FES 08-32

Proposed Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Final Programmatic Environmental Impact Statement

Volume 4: Comments & Responses

September 2008

BLM

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

FES 08-32

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U.S. Department of the Interior
Bureau of Land Management

September 2008

MISSION STATEMENT

It is the mission of the Bureau of Land Management (BLM), an agency of the Department of the Interior, to manage BLM-administered lands and resources in a manner that best serves the needs of the American people. Management is based upon the principles of multiple use and sustained yield taking into account the long-term needs of future generations for renewable and nonrenewable resources.

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NOTATION

The following is a list of acronyms and abbreviations and units of measure used in this document.

ACRONYMS AND ABBREVIATIONS

ACEC	Area of Critical Environmental Concern
AGR	aboveground retort
API	American Petroleum Institute
AQRV	air quality related value
ATP	Alberta Taciuk Process
BLM	Bureau of Land Management
BMP	best management practice
BOR	U.S. Bureau of Reclamation
CAA	Clean Air Act
CDPHE	Colorado Department of Public Health and Environment
CDW	Colorado Division of Wildlife
CEQ	Council on Environmental Quality
CFR	*Code of Federal Regulations*
CHL	combined hydrocarbon lease
CRS	Colorado Revised Statutes
CWA	Clean Water Act
CWCB	Colorado Water Conservation Board
DOE	U.S. Department of Energy
DOI	U.S. Department of the Interior
EA	environmental assessment
EIA	Energy Information Administration
EIS	environmental impact statement
E.O.	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act of 1973
FLPMA	Federal Land Policy and Management Act of 1976
FONSI	Finding of No Significant Impact
FR	*Federal Register*
FY	fiscal year
GHG	greenhouse gas
GIS	geographic information system

I-70	Interstate 70
ICP	in situ conversion process
IPCC	Intergovernmental Panel on Climate Change
LPG	liquefied petroleum gas
MFP	management framework plan
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NOI	Notice of Intent
NOSR	Naval Oil Shale Reserves
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRA	National Recreation Area
NRHP	*National Register of Historic Places*
OHV	off-highway vehicle
OSEC	Oil Shale Exploration Company
OSTS	oil shale and tar sands
PEIS	programmatic environmental impact statement
P.L.	Public Law
PRLA	preference right lease area
PSD	Prevention of Significant Deterioration
RCRA	Resource Conservation and Recovery Act of 1976
RD&D	research, development, and demonstration
RFDS	reasonably foreseeable development scenario
RMP	resource management plan
ROD	Record of Decision
ROI	region of influence
SHPO	State Historic Preservation Office(r)
STSA	Special Tar Sand Area
TDS	total dissolved solids
UIC	underground injection control
USC	*United States Code*
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VRM	Visual Resource Management

WRFO	White River Field Office
WSA	Wilderness Study Area
WSR	Wild and Scenic River

UNITS OF MEASURE

ac-ft	acre foot (feet)	m	meter(s)
		m^3	cubic meter(s)
bbl	barrel(s)	mi	mile(s)
d	day(s)	t	metric ton(s)
ft	foot (feet)	yr	year(s)
gal	gallon(s)	µg	microgram(s)
		µm	micrometer(s)
h	hour(s)		

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INTRODUCTION

This volume of the *Proposed Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Final Programmatic Environmental Impact Statement* (PEIS) presents the public comments on the Draft PEIS and the Bureau of Land Management's (BLM's) responses to those comments.

The Notice of Availability (NOA) of the Draft PEIS was published in the *Federal Register* on December 21, 2007 (Volume 92, No. 245, p. 72707). The 90-day comment period began when the NOA was published. The comment period was later extended by 30 days, officially ending on April 21, 2008. Comment documents were submitted electronically or by postal mail.

Open house–style public meetings on the Draft PEIS were held during February 2008 in Salt Lake City, Price, and Vernal, Utah; Rock Springs and Cheyenne, Wyoming; and Rifle, Meeker, and Denver, Colorado. Oral comments were not collected at the public meetings, although attendees were given the opportunity to submit written comments or enter their comments electronically.

Document identification (ID) numbers were assigned to each comment submittal. Comment documents submitted via the project Web site were assigned sequential ID numbers beginning with 50000. Those received via postal mail were assigned ID numbers starting with 00001. Individual comments were identified within each document and numbered sequentially from 1 upward to the last comment in the submission (e.g., 50000-001, 50000-002). The comment documents are presented in numerical order by document ID number. Gaps in the numbering sequence are the result of the omission of project-initiated submittals used to test the Web-based comment form, duplicate submittals, and submittals that were not comments on the PEIS.

Each comment document is immediately followed by the response(s) to its comment(s). To view a specific comment document and its associated responses, the reader should consult the index to determine its document number. Two indices are provided: one by the last name of the person who submitted the document, and the other by the agency or organization that provided the document.

With the exception of the commentors who requested anonymity, everyone who submitted a comment letter is included in the index, which includes last name, first name, organization (if applicable), and document ID. A separate alphabetical list is provided for comment letters submitted by organizations. Individuals who participated in a campaign will be pointed to a representative letter. For campaigns submitted via the project Web site, both the Web document ID and the campaign ID will be provided. People who requested that their names not be made public are listed as "name withheld." Such commentors who submitted their comments via the Web site can find their comment letters by the document ID assigned when they submitted their comments.

Campaigns

Several organizations prepared campaign letters that individuals could submit as is or modify. Nearly 30 different form/campaign letters were identified during the comment period; more than 100,000 individuals participated in these campaigns. A representative letter from each of the campaigns (with name and address information redacted) was assigned an ID number and divided into individual comments, for which responses were prepared. Each potential campaign letter was compared to the representative letter. If it had been modified enough to make the campaign letter response incomplete or inappropriate, the letter was considered unique and handled individually.

Campaign letters were received from all 50 states and the District of Columbia, U.S. military bases, and several foreign countries. In decreasing order, California, New York, Florida, Texas, Colorado, Pennsylvania, Illinois, Washington, and Ohio accounted for slightly more than 50% of the letters. Of the comment letters, 16% were from California and 6% were from New York. The three study-area states (Colorado [4%], Utah [1.2%], and Wyoming [0.2%]) accounted for less than 6% of the campaign letters.

The largest campaign (nearly 45,700) was from individuals who submitted a letter provided by the National Resources Defense Council. This campaign addressed policy issues and expressed opposition to oil shale and tar sands development. Fewer than 50 letters from this campaign were determined to be unique.

Nearly 34,300 individuals submitted one of several form letters provided by Consumer Energy Alliance. These form letters expressed a general preference for oil shale and tar sands development (about 17,300) or specifically mentioned a preference for Alternative B (about 17,000). They were submitted electronically and by postal mail.

The Wilderness Society campaign letter (about 18,300) provided comments on policy, cumulative impacts, and land use issues. These letters were submitted electronically. Fewer than 100 letters associated with this campaign were considered unique.

More than 1,300 people sent letters that originated with the Center for Biodiversity. Nearly 98% of them were submitted via the project Web site; the remaining letters were submitted by postal mail. The letters stated a preference for Alternative A and expressed concerns about air quality, cumulative impacts, and the range of alternatives considered in the Draft PEIS.

Both the National Wildlife Federation and the Colorado Environmental Coalition were associated with the same comment letter; 140 such letters were received by postal mail. Individual comments dealt with policy and cumulative impacts issues.

The remaining form letters were not obviously linked to an organization. The comment categories they covered include: policy; a preference for Alternative A; support for oil shale and tar sands development; and cumulative impacts.

Unique Comment Documents

Nearly 2,000 unique comment documents were received from individuals, state and local governments, federal agencies, private industry and other organizations, resulting in about 4,050 individual comments. Comments from Cooperating Agencies are presented in this document and in Chapter 7.

Letters that were not part of a campaign were received from all 50 states and the District of Columbia and a few foreign countries. Colorado (18%), Utah (16%), California (12%), and Texas (4%) accounted for 50% of these comment letters. Less than 2% were from Wyoming. About 90% of the unique letters were received electronically.

Comment categories relating to the alternatives, policy, and scope accounted for nearly 60% of the unique comments. The largest percentage of comments (about 39%) expressed preferences regarding development of oil shale and tar sands and the alternatives: 11% for oil shale and tar sands development; 19% against oil shale and tar sands development; 7% for Alternative A; 2% for Alternative B; and 0.1% for Alternative C. Policy and scope of the PEIS received 11% and 9%, respectively. About 40% of the comments dealt with technical issues. Technical areas of greatest concern were water (6.1%), air (5.6%), ecology (4.8%), technology (4.4%), cumulative impacts (4.0%), and socioeconomics (3.8%).

The remaining comments were concerned with land use; cultural resources; waste; paleontology; safety and health; regulating issues; geology; visual impact; noise; environmental justice; irreversible and irretrievable commitment of resources; and transportation.

Cooperating Agencies

The following cooperating agencies (except Duchesne County, Utah, and Town of Rangely, Colorado) provided written comments on the Draft PEIS.

National Park Service
Bureau of Reclamation
U.S. Forest Service
U.S. Fish & Wildlife Service
State of Colorado, Department of Natural Resources and Department of Public Health and Environment
State of Utah
State of Wyoming
Garfield County, Colorado
Mesa County, Colorado
Rio Blanco County, Colorado
Duchesne County, Utah
Uintah County, Utah
City of Rifle, Colorado
Town of Rangely, Colorado

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Index 1: Individuals (Web ID indicates that submittal was part of a campaign)

Name	Document ID	Web ID
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a gutierrez, javier	00165	
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A, R.	00189	
A. Camp, Elizabeth	00183	
A., Keith	00189	
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Aaron, Donald	00189	
Aaron, Fiamma	00183	
Aaron, Frank	00269	51018
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Aaron, Frank	00183	
Aaron, Jacquinetta	00196	
Aaron, Tacheisha	00210	
Aaron, Victor	00189	
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Aarsvold, Matthew	00189	
Aaserude, Sarah	00189	
Aasgaard, Sunny	00189	
A-Atkins, Kathryn	00189	
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Abarca, Maira	00160	
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American Farm Bureau Federation	Maslyn, Mark	52853
American Highway Users Alliance	Cohen, Gregory	52861
American Petroleum Institute	Radford, Andy	52759
American Petroleum Institute (API)	Morris, Doug	00131
American Trucking Associations	Moskowitz, Richard	52817
Anadarko Petroleum Corporation	Bell, Brooke	52763
Aspen Skiing Company	Schendler, Auden	00079
ATP Services, LLC	Vawter, R. Glenn	00095
ATP Services, LLC	Vawter, Roy	52692
ATV America	Rowland, Dwayne	52657
Biodiversity Conservation Alliance	Molvar, Erik	00079
Biodiversity Conservation Alliance	Molvar, Eric	00192
Black Canyon Audubon Chapter	Day, Bill	52859
Black Sands Energy	Pucciarelli, Edward	52987
Bledrock, LLC	Brault, Barry	52886
Blue Ensign Technologies Limited	Ryan, Christopher	53005
California Attorney Generals Office	Goldberg, Sandra	53003
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Californians for Western Wilderness	Painter, Mike	00079
Carbon County, Utah	Sacco, Rex	52532
Center for Biological Diversity	Thrailkill, Melissa	52766
Center for Native Ecosystems	Robertson, Erin	00079
Center for Unconventional Fuels	Corcoran, Thomas	52771
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Colorado Environmental Coalition	Jones, Elise	00079
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Colorado Mining Association	Sanderson, Stuart	52846
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Colorado Oil & Gas Assoc, Western Slope Chapter	Hall, Kathy	00073
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Colorado Plateau Archaelological Alliance	Spangler, Jerry	00053
Colorado River District	Birch, Daniel	52566
Colorado Solar Inc.	Wahl, Eric	52167
Colorado Trout Unlimited	Neubecker, Ken	52822
ConocoPhillips Company	Walker, Deanna	52785
Consumer Energy Alliance	Holt, David	52791
Consumer Energy Alliance of Florida	Batt, David	00072

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Defenders of Wildlife	Matson, Noah	00079
DeLong Associates Petroleum Consultants	DeLong, Dale	52656
Denver Water on behalf of Front Range Water Users Council	Little, Dave	52869
E.G.L. Oil Shale, LLC	Day, Roger	52699
Eagle County, Colorado	Montag, Keith	52971
Earth Search Sciences	Vance, Larry	00001
Earthlight Magazine	Burks, Paul	52731
EcoFlight	Gordon, Bruce	00079
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Environment Colorado	Hay, Keith	00079
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Excalibur Industries Inc.	Ridge, Raymond	52698
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First National Bank of the Rockies	Waller, Peter	00075
Foret Plasma Labs	Foret, Todd	52936
Friends of Northwest Colorado	Hammel, Rick	52976
Garfield County Board of County Commissioners *	Martin, John	00157
GeoX Consulting Inc	Schamel, Steven	52828
Glen Canyon Institute	Ingebretsen, Richard	00079
Grand Canyon Trust	Kamala, Laura	00079
Grand Junction Area Chamber of Commerce	Schwenke, Diane	00059
Grand Junction Economic Partnership	Driggers, Ann	00121
Great Old Broads for Wilderness	Egan, Veronica	00079
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Howard County Bird Club	Schwarz, Kurt	52668
Int Centre Heavy Hydrocarbons	Olsen, David	52805
Irving A. Backman & Associates	Backman, Irving	52944
JWBA, Inc	Bunger, James	52998
Kerogen Resources, Inc.	Harris, Thomas	00074
Living Rivers/Colorado Riverkeeper	Weisheit, John	52834
Mesa County, Colorado *	Dechant, Maurice	52870
Mountain West Energy	Cowley, Stewart	52686
National Oil Shale Association	No Name Provided	00225
National Oil Shale Association	Vawter, Glenn	52696
National Park Service, U.S. DOI *	Snyder, Michael	00267
National Wildlife Federation	Zimmerman, Kate	00079
National Wildlife Federation	Zimmerman, Kathleen	52851
Natural Resources Defense Council	Mall, Amy	00079
Natural Resources Defense Council	Mall, Amy	00192
Nine Mile Canyon Coalition	Miller, Pam	52874
North Carolina Farm Bureau Federation	Wooten, Larry	52857
Northern Colorado Renewable Energy Society	Coen, Richard	52981
OCTA	Linton, Frederick	52653
Oil and Gas Accountability Project / Earthworks	Baizel, Bruce	00079
Oil Shale Exploration Company, LLC	Jackson, Jerry	52843

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Parsons & Whittemore Inc	Matheson, James	00239
Petroleum Association of Wyoming	Sorensen, Cheryl	52856
Pitkin County Board of Commissioners	Hatfield, Jack	00208
Public Citizen	Slocum, Tyson	00079
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Public Lands Advocacy	Moseley, Claire	52856
Public Lands Council & National Cattlemen's Beef Association	Eisenberg, Jeff	52847
Public Lands Foundation	Lea, George	00036
Pulp & Paperworkers Resouce Council	Dixon, Melvin	00240
Rangely Area Chamber of Commerce	Hahn, Rebecca	00070
Red Leaf Resources	Nelson, Laura	52772
Red Leaf Resources	Nelson, Laura	52984
Red Rock Forests	Shepherd, Terry	00079
Red Rock Forests	Shepherd, Harold	00192
Red Rock Forests	Shepherd, Terry	52860
Resolution Fund, LLC	Cunningham, Storm	50199
Rifle Area Chamber of Commerce	Fegen, Mark	00114
Rio Blanco County Planning Department	Madison, Jeff	00184
Rio Blanco County, Colorado *	Parsons, Kenneth	52770
Rio Blanco Water Conservancy District	Eddy, Dan	00051
Rock Springs Grazing Association	Schramm, Donald	52678
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Shell Exploration and Production Company	O'Connor, Terry	52863
Sierra Club	O'Brien, Keren	00079
Sierra Club, Rocky Mountain Chapter	Hughes, Kirby	53002
Society for Mining, Metallurgy and Exploration	Kanagy, David	00088
Soft Energy Associates	Coyte, David	52666
South Caroline Chamber of Commerce	Rawl, Jr, Otis	00058
Southeast Energy Alliance	Whatley, Micahel	00111
Southern Utah Wilderness Alliance	Bloch, Shephen	00079
Southern Utah Wilderness Alliance, Grand Canyon Trust	Garbett, David	52734
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State of Colorado *	Ritter, Jr., Governor Bill	52837
Temple Mountain Energy Inc	Clynch, Larry	52968
The 60 Plus Association	Martin, James	00080
The Center for Unconventional Fuels	Corcoran, Thomas	00085
The Nature Conservancy	Tuhy, Joel	52755
The Nature Conservancy	Powelson, Michael	52999
The Navajo Nation, Historic Preservation Dept	Joe, Jr., Tony	00029
The Sentient Group - Natural Soda Inc	Cassidy, Peter	52815
The Wilderness Society	Jones, Suzanne	00079
The WIlderness Society	Huntley, Chase	00192
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U.S. DOI, Bureau of Reclamation *	Coulam, Nancy	00156
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U.S. DOI, U.S. Geological Survey	Devine, James	00082

Organizations and Cooperating Agencies[a]	Name	Document ID
Uintah County, Utah *	McKee, Michael	00094
Uintah Mountain Club	Ackerman, Diane	00092
US Congress Task Force on Strategic Unconventional Fuels	Johnson, Bill	52829
USEPA	Svoboda, Larry	52964
Utah Petroleum Association	Peacock, Lee	00113
Utah Public Lands Policy Coordination Office *	Harja, John	53001
Utah Rock Art Research Association	Scotter, Troy	52748
Valley Watch, Inc.	Blair, John	51907
Watershed Environmental	Atkins, David	52786
Western Business Roundtable	Sims, Jim	52826
Western Colorado Congress	Cox, Duke	00079
Western Colorado Congress	Tischbein, Heather	00246
Western Energy Partners, LLC	Chivers, Jeffrey	52539
Western Organization of Resource Councils	Utesch, Peggy	00079
Western Resource Advocates	Chiropolos, Mike	00079
Western Wildlife Conservancy	Robinson, Kirk	52695
Wild Utah Project	Catlin, James	52655
Wilderness Workshop	Hart, Peter	00079
Wilderness Workshop	Hart, Peter	00192
Wyoming Game and Fish Department	Emmerich, John	52852
Wyoming Office of the Governor *	Freudenthal, Dave	00126
Wyoming Wildlife Federation	No Name Provided	52851
Young Ideas	Young PE, Gordon	52898

[a] An asterisk indicates a cooperating agency.

OSTS_00001

EARTH SEARCH SCIENCES, INC.

To: Sherri Thompson
Bureau of Land Management
Colorado State Office
2850 Youngfield Street
Lakewood, CO 80215
Phone: (303) 239-3758

From: Larry Vance, CEO, Earth Search Sciences

Re: Oil Shale and Tar Sands Resources Leasing Programmatic EIS

Ms. Thompson,

I am very pleased to see the BLM undertaking this PEIS and pursuing additional fact finding in its wake. I firmly believe there is an opportunity to add significantly to our domestic oil reserves by tapping into our vast oil shale resources. What's more, Earth Search Sciences is on the cusp of offering a means of extracting those resources with the least possible impact on the environment.

During the past decade, we have seen and experienced stark challenges to energy policy and development. Foreign demand for oil has increased exponentially, placing unprecedented strain on the supply chain. At the same time, the U.S. has been forced to reevaluate long-standing relationships with its oil trading partners as a means of ensuring our national security.

Simultaneously, the emergence of an environmental consciousness in this country has gained traction beyond the "cause du jour" to become a well-established impetus behind America's pursuit of alternative energy sources.

1-001

However, one thing has not changed: America's need for a steady flow of oil resources. While alternative fuels present us with interesting options, further review of many new technologies renders them non-viable over time. More viable alternative sources are still years from becoming mainstream, both economically and technologically. In the short term, our dependence on traditional petroleum resources shows no signs of abating. As such, it will be necessary to strengthen America's domestic oil reserves until new technologies evolve and allow us to steadily transition into a more diverse and sustainable energy economy.

In my view, exploitation of domestic oil reserves will soon become an imperative. However, I also believe any identified domestic resource – no matter how vast or accessible – must be responsibly extracted with minimal environmental impact. Oil shale extraction has, in the past, produced dire environmental consequences. Those past forays into oil shale extraction have not been forgotten and continue influencing the reticence for pursuing this resource.

OSTS_00001

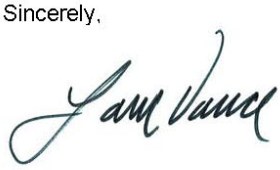
Petro Probe, Inc. – a subsidiary of Earth Search Sciences, Inc. – is an emerging technology petroleum company that focuses on the use of cost-effective and environmentally-responsible technology to search for and produce hydrocarbon products. Our processes produce the least possible environmental impact, use no water and release virtually no gas byproducts as a result of its extraction process. In short, we strive for a "zero footprint" standard, while being both efficient and cost-effective.

All extraction is performed in-situ, using super-heated air to bring hydrocarbons to the surface. Most importantly, this is a self-sustaining system: effluent gas is transferred into a condenser where it is allowed to expand and cool; gaseous fraction is separated from liquid fraction and scrubbed to provide an upgraded synthesis gas; a portion of this upgraded gas is recycled and combined with other recycled feed stocks to create continuous fueling within the combustor. In addition, four value-added products result from the process: hydrogen; 45 gravity condensate; 1000 BTU methane gas, and water. Finally, we ensure the process is environmentally sensitive: CO_2 produced during the process is compressed, then pumped back into the body of oil shale where it remains and all physical facilities necessary for extraction and collection are portable with post-extraction land reclamation factored into the entire process. 1-001 (cont.)

There are several other components of this process which set it apart from others on the market claiming an environmentally friendly point of difference, including our zero-impact method of identifying target extraction locations. For the purpose of this letter, however, I feel it is more important to highlight how Petro Probe can be invaluable in making oil shale extraction a reality without the traditional environmental side effects.

Again, let me congratulate the BLM on taking this step towards creating energy independence for America by engaging in this PEIS and for allowing us the opportunity to express our sincere interest in ensuring this resource contributes towards an energy-independent America, without sacrificing the natural splendor of our public lands.

Sincerely,



Larry Vance
CEO and Founder
Earth Search Sciences

Contact: Larry Vance: (406) 751-5200; lvance@earthsearch.com

Response for Document 00001

00001-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00002

A personal note...

80 Huntington Way
Lafayette, IN 47905

February 12, 2008

Sherry Thompson,
BLM Project Manager
Oil Shale + Tar Sands EIS
Argonne Nat'l Laboratory
9700 S. Cass Ave.
Argonne, IL 60439

Dear Ms. Thompson,

I strongly support the "No Action" alternative. Mining + processing of oil shale + tar sands are low value, destructive uses of these beautiful, biologically-diverse western lands. Conservation is the approach our government should be advocating, not the abuse of our environment. Thank you!

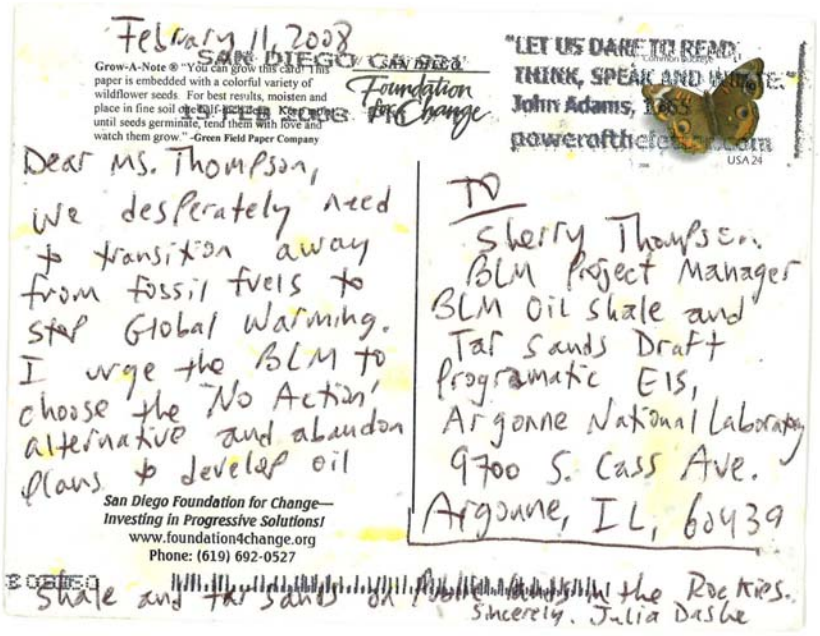
Sincerely,
Theodore J. Harris, Jr.

2-001

Response for Document 00002

00002-001: The BLM acknowledges the commentor's preference for Alternative A.

OSTS_00003



February 11, 2008

SAN DIEGO CAN DEA

Grow-A-Note ® "You can grow this card! This paper is embedded with a colorful variety of wildflower seeds. For best results, moisten and place in fine soil one half-inch deep. Keep moist until seeds germinate, tend them with love and watch them grow." -Green Field Paper Company

Foundation for Change

"LET US DARE TO READ, THINK, SPEAK AND WRITE."
John Adams, 1783

powerofthelet...com

USA 24

Dear Ms. Thompson,

We desperately need to transition away from fossil fuels to stop Global Warming. I urge the BLM to choose the 'No Action' alternative and abandon plans to develop oil shale and tar sands in Colorado, Utah and Wyoming. Protect the Rockies.

Sincerely, Julia Dasche

San Diego Foundation for Change—
Investing in Progressive Solutions!
www.foundation4change.org
Phone: (619) 692-0527

TO
Sherry Thompson
BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS,
Argonne National Laboratory
9700 S. Cass Ave.
Argonne, IL, 60439

3-001

Response for Document 00003

00003-001: The BLM acknowledges the commentor's preference for Alternative A.

OSTS_00004

Paul M. Brown
105 Marlboro Rd.
Pittsburgh, PA 15238
pmbrown2001@yahoo.com
2/13/08

Sherry Thompson, BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne, IL 60439

Dear Ms. Thompson:

I strongly support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shales and Tar Sands. The extraction of oil shale rock would cause large-scale degradation of our public lands. The very energy intensive process of extracting oil from shale requires that the shale be heated to about 900 degrees F. This would necessitate the mining, combustion, and transportation of huge quantities of coal that would very significantly add to our nation's emissions of greenhouse gasses and other pollutants including mercury and acid rain precursors. These pollutants will further degrade air and water quality here in the eastern states. It would also require tremendous quantities of water in a region where existing water resources are in short supply and in very high demand. Oil shale development would have a poor energy return on energy-invested ratio. Its development would negatively effect surface and ground water quality in the Colorado River watershed. It would result in vast quantities of waste rock with elevated concentrations of arsenic and selenium to be disposed of. I don't think this is a legacy that any of us want to have. 4-001

Oil shale development has not been economically or environmentally viable in the past and it should be rejected now. Furthermore, with increased concerns about global climate change, federal agencies including the BLM should be focusing their resources on policies that reduce instead of increasing greenhouse gas emissions.

Sincerely,
Paul M. Brown
Paul M. Brown

Response for Document 00004

00004-001: The BLM acknowledges the commentor's preference for Alternative A.

OSTS_00005

I am opposed to the development of oil shale and tar sands on public land. We don't need to continue to use fossil fuels. We need to concentrate on reducing greenhouse gas emissions. BLM should develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 5-001 5-002

Consider also the impact on the plants and animals that will be affected. There will be a cumulative effect. 5-003

Deborah Brown

Responses for Document 00005

00005-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

00005-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

00005-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to

facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

OSTS_00006

Feb. 12, 08

As concerning the BLM Oil Shale
+ Tar Sands Draft (PEIS):

We whole heartly Agree with the concerns Attached About Oil Shale Develop ment:

SOS slow on oil Shale

Nita Benham

Nita Benham
Kim Benham
1217 M Rd
Loma, CO
81524

OSTS_00006

- **No commercial leasing or development of oil shale should occur unless/until current Research, Demonstration & Development efforts are completed and the social, cultural, and environmental impacts of development are proven to be acceptable to local communities.** 6-001

- The BLM acknowledges that the need for "long-term water supplies to support oil shale development could lead to the conversion of existing water rights from current uses" resulting in "a noticeable reduction in local agricultural production and land use."(PEIS 4-18) **The BLM should not proceed with commercial leasing until it has a fuller understanding of the water requirements and contamination potential of various oil shale extraction technologies.** 6-002

- An oil shale industry producing one million barrels of shale oil a day (as has been proposed) would require massive amounts of energy equal to ten new coal-fired power plants. **The BLM must know where this energy would come from and what impacts its generation would have on the landscape, communities, and air quality before it goes forward with commercial leasing.** 6-003

- The BLM acknowledges that "the number of new residents from outside the producing regions and the pace of population growth associated with the commercial development of oil shale resources…are likely to lead to substantial demographic and social change in small rural communities."(PEIS 4-144) The desired quality of life and the needs of rural western Colorado communities must be taken into account. **Commercial oil shale leasing and development should not happen at a pace or scale that will cause significant social upheavals in these communities.** 6-004

Responses for Document 00006

00006-001: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

The BLM believes that the RD&D program will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. The scope of the PEIS, in consultation with cooperating agencies, was changed from a leasing decision to an allocation decision. Consequently, new NEPA analysis will be required prior to offering parcels of land for lease for commercial oil shale exploration and development. This NEPA analysis will evaluate environmental impacts of the operation(s) and develop specific measures to mitigate or eliminate those impacts. This analysis will also contain any new information or circumstances relevant to the RD&D technology, which may be a consequence of research or lessons learned on the RD&D leases or as a result of studies on nonfederal lands.

00006-002: The BLM is conducting phased decision making—proceeding from land use planning to leasing to operational permitting. The land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases. Water depletion due to oil shale development depends on many factors, including project sites, technologies to be used, and various activities involved in the development. Impacts of water depletion and other surface and groundwater impacts would be addressed in subsequent project-specific NEPA documents when these factors can be better defined. Depending on the type and level of development, regional water impacts may limit oil shale and tar sands development (Section 6.1.5.3.4). The BLM also initiated the RD&D leasing process to provide important information that can be used as the BLM works with communities, states, and other federal agencies to develop strategies for managing any environmental effects.

00006-003: Power generation requirements are unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support meaningful assumptions and analysis. As explained in response to Comment 00006-002, the type and level of development will define the nature of the proposed action and electrical power requirements. For example, existing sources of electrical power may be sufficient to power the operation, or electrical

power may need to be generated on lease using either conventional energy sources like natural gas or renewable energy sources like wind or solar. Other options may include the expansion of existing power plants or the construction of additional power plants (coal, natural gas, and nuclear).

00006-004: A description of the social environment of each ROI, including population, housing, local government fiscal conditions and public service provisions, and crime rates is provided in Section 3.10 of the PEIS. Potential impacts of oil shale and tar sands leasing and development on social change and the potential for social disruption are assessed in Sections 4.11 and 5.11. As is suggested in the review of the literature on social disruption presented in Section 3.10.2.2.5, because of the absence of longitudinal studies of the social impacts of energy development projects in communities of varying population size, sociocultural background, and economic and social history, there is little evidence that can be used to conclusively predict the extent to which social disruption would occur in any given community, and precisely how social disruption would manifest itself.

OSTS_00007

February 11, 2008

Sherry Thompson, BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Avenue
Argonne, IL 60439

Dear Ms. Thompson:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

On December 21, 2007, the BLM released a draft programmatic environmental impact statement proposing to open up almost 2 million acres of public lands in Wyoming, Colorado, and Utah to commercial leasing of oil shale and tar sands, a non-conventional type of fossil-fuel energy production that requires an incredible amount of energy and emits tremendous amounts of greenhouse gases. 7-001

The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions.

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. Oil shale rock must be heated up to about 900 degrees F to release the oil, and at least 40 percent of the energy value of the shale is consumed in production. Producing 1 million barrels of shale oil a day, as some have proposed, would require ten new (and likely coal-fired) power plants and five new coal mines just to serve them, costing taxpayers billions, consuming millions of tons of coal and acre-feet of water each year, and producing an astronomical amount of greenhouse pollution. 7-002

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. Development of oil shale and tar sands in the Rocky Mountains would hurt species that depend on our public lands and waters for survival, including migratory birds, endangered plants, and federally protected fish species like the humpback chub, Colorado pikeminnow, razorback sucker, and others. 7-003

The Bureau of Land Management's controversial proposal would fuel an outdated, fossil-fuel-intensive energy infrastructure and comes at a time when we need to be rapidly transitioning away from fossil fuels-based energy production. If "business as usual" greenhouse gas emissions continue, over one third of our world's plants and animals will be committed to extinction by the middle of this century or before. 7-001 (cont.)

The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 7-004

I urgently ask the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 7-001 (cont.)

Thank you on behalf of America's treasured and irreplaceable lands and wildlife.

Respectfully,
J. Capozzelli 315 West 90th Street New York, NY 10024

Responses for Document 00007

00007-001: The BLM acknowledges the commentor's preference for Alternative A.

00007-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00007-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which

lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

00007-004: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

OSTS_00008

February 13, 2008

Sherry Thompson, BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

In his 2006 State of the Union speech, President Bush stated that "the US is addicted to oil". His solution: get more oil. That's like saying the solution to a drug addiction is to get more drugs.

The Bush prescription is utterly senseless. It would become utterly destructive if more land is opened up to oil drilling, and even worse if it is opened to tar sands development, which is even more environmentally destructive.

Do not open up the most magnificent portions of the US—Utah, Wyoming, Colorado, or any other location—to tar sands development. Opening up land for such destruction would be nothing less than criminal. 8-001

What is the problem with the BLM that it would even consider such outlandish developments? Developing tar sands into usable oil will destroy whole ecosystems. It will contribute to global warming. It will mar the landscape. It will help keep our dependency on oil.

Sincerely,

Bruce Barnbaum
31417 Mountain Loop Highway
Granite Falls, WA 98252
(360) 691-4105

Response for Document 00008

00008-001: The BLM acknowledges the commentor's preference against tar sands development.

OSTS_00009

From the desk of:

Lynn Ledgerwood, 2605 Otis St. SE, Olympia, WA 98501 lynnledgerwood@qwest.net

February 19, 2008

Sherry Thompson, BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Ms. Thompson,

OPPOSITION TO ALL DEVELOPMENT OF OIL SHALE AND TAR SANDS ON PUBLIC LANDS

I was very distressed to learn that the Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. It has been scientifically proven that the production of these fossil fuels would destroy the landscape and produce unacceptable quantities of greenhouse gases and other pollutants, at a time when we need to transition to non-polluting, renewable energy sources.

I am writing today, probably in vain, to let you know that I, as a taxpayer and OWNER of these public lands, support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development in these beautiful places (and important ecosystems) comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 9-001 9-002 9-003

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 9-004

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 9-001 (cont.)

Sincerely,

Lynn Ledgerwood

Lynn Ledgerwood

Responses for Document 00009

00009-001: The BLM acknowledges the commentor's preference for Alternative A.

00009-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00009-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

00009-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

OSTS_00010

From: Courtney Crawford [mailto:petshopjunkie@comcast.net]
Sent: Tuesday, February 12, 2008 7:48 AM
To: ostseiswebmaster@anl.gov
Subject: Oil Shale and Tar Sands Question about Web Commenting

Please don't waste our fossil fuels. In the future we might need them more than ever in the future!!!!! Think about it!!!
Your friend, Courtney Crawford

10-001

Response for Document 00010

00010-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00011

From: Dan Mcgraw [mailto:dmcgraw48557@roadrunner.com]
Sent: Tuesday, February 12, 2008 8:09 AM
To: ostseiswebmaster@anl.gov
Subject: Oil Shale and Tar Sands Question about Web Commenting

We need oil. Please drill. 11-001

Dan Mcgraw
Hemet, Ca.

Response for Document 00011

00011-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00012

Stacey Gavrell
6105 County Road 214 *New Castle, CO* *81647*

February 14, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 South Cass Ave.
Argonne, IL 60439

To Whom It May Concern:

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. As a local resident in western Garfield County in Colorado, I am concerned by the significant community and environmental impacts of this extensive, reactionary plan.

The development envisioned by the study would come at a time when our land is already in the midst of an energy and population boom. The stress and pressure on our natural resource - from water to sensitive wildlife areas - is not sufficiently considered. This plan proposes development in some of the best hunting, fishing and recreation areas in Colorado, Wyoming and Utah. These activities are critical economic drivers in our local community. We can and should protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. It is inappropriate to grant priority to oil shale development and preclude other uses for our public lands. 12-001

The massive scope of the project also does not consider critical community impacts. Our community is already in the throws of significant change and pressures due to the strain of the natural gas boom. Clearly, the BLM not sufficiently considered the immediate and long-term community impacts of this proposal. 12-002

Overall, this plan is reactionary in scope. It is an inappropriate investment in unproven new technology to fuel our dependence on fossil fuels. I question why the BLM is rushing toward a commercial leasing program without even knowing if oil shale development is feasible economically. *This community cannot afford another Black Sunday.*

We must ensure the oil shale RD&D process has allowed us to assess the impacts of experimental extraction technologies on energy consumption and water use before proceeding with the PEIS. It will be years before companies developing oil shale technology will know if it is technologically or economically feasible. 12-003

I urge you to slow down and carefully consider the gigantic effect commercial oil shale development would have before committing the west slope to a future of industrial development and environmental degradation.

Sincerely,

Stacey Gavrell
6105 County Road 214
New Castle, CO 81674

Responses for Document 00012

00012-001: The PEIS is a programmatic-level document, analyzing allocation decisions. The level of analysis is appropriate to the decisions being made. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis may include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to sensitive resources or issues such as air quality or habitat fragmentation.

00012-002: A description of the social environment of each ROI, including population, housing, local government fiscal conditions and public service provisions, and crime rates is provided in Section 3.10 of the PEIS. Potential impacts of oil shale and tar sands leasing and development on social change and the potential for social disruption are assessed in Sections 4.11 and 5.11. As is suggested in the review of the literature on social disruption presented in Section 3.10.2.2.5, because of the absence of longitudinal studies of the social impacts of energy development projects in communities of varying population size, sociocultural background, and economic and social history, there is little evidence that can be used to conclusively predict the extent to which social disruption would occur in any given community, and precisely how social disruption would manifest itself.

The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. On the basis of the analysis in the PEIS, the BLM has determined that there is no environmental impact associated with amending land use plans to make lands available for application for commercial leasing in the three-state study area, but there may be impacts to land values.

00012-003: Oil shale has a tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable environmentally sound manner.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before

completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands. This analysis will balance any conflicting uses, as required by FLPMA.

OSTS_00013

From: Coper1658@aol.com [mailto:Coper1658@aol.com]
Sent: Tuesday, February 12, 2008 12:30 PM
To: ostseiswebmaster@anl.gov
Subject: Oil Shale and Tar Sands Question about Web Commenting

I oppose all development of oil shale and tar sands on public lands.
Cal Lash
A conservative Arizona Republican

13-001

Response for Document 00013

00013-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00014

February 19th, 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments 9700 South Cass Avenue Argonne, IL 60439

RE: Responsible Development of National Oil Shale and Tar Sands Resources

Dear Sherri Thompson:

I would like to express my strong support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed for leasing have enough oil to meet America's gasoline demand for more than 18 years.

With today's technology, this enhanced development can be conducted in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community. 14-001

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example:

- In spite of significant conservation efforts, world energy demand is projected to increase by 50% during the next 20 years and could double in 50 years.
- Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
- The United States military currently uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

OSTS_00014

Finally, development of unconventional fuels will produce a strong workforce and will support the local and regional economies of Utah, Colorado and Wyoming.

The utilization of oil shale and tar sands from these leasing areas will offer significant benefits to the local communities and will strengthen our national energy security while bringing the necessary supplies of oil into the markets to offset increased global demand. I encourage developing these areas while protecting the environment, local communities and other economic interests.

14-001 (cont.)

Sincerely,

Craig Maners
1783 Quinn Creek Dr.
Brownsburg, IN 46112

Response for Document 00014

00014-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00015

12 FEBRUARY 2008

to SHERRY THOMPSON,

I AM WRITING to PLEAD WITH you to SUPPORT THE NO ACTION ALTERNATIVE IN THE DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT FOR OIL SHALE AND TAR SANDS. THE FACT THAT OUR PUBLIC LANDS ~~[illegible]~~ ARE ALREADY UNDER SUCH ECOLOGICAL STRESS FROM THE CURRENT ENERGY BOOM AND FROM RAPID DEVELOPMENT ACROSS THE WEST, IS REASON ENOUGH to SCRAP THIS ENORMOUSLY INVASIVE AND DESTRUCTIVE POTENTIAL PROPOSAL. COUPLED WITH THE TERRIBLE AND AS YET UNKNOWN effects of GLOBAL CLIMATE CHANGE, IT IS CLEAR THAT ~~[illegible]~~ THE VERY LAST PLACE we SHOULD BE EXPENDING BOTH OUR FINANCIAL AND PUBLIC INFRASTRUCTURE efforts IS IN EXTRACTING yet MORE fossil fuels. THIS PROPOSAL IS NOT FEASIBLE ENVIRONMENTALLY OR ECONOMICALLY, AND IN THIS CURRENT ADMINISTRATION, WHOSE TROUBLING ECOLOGICAL AND ENERGY SECURITY POLICIES HAVE BEEN CONTINUALLY SHORT-TERM FOCUSED AND SKEWED to BUSINESS INTERESTS RATHER THAN SCIENCE, WE ARE RELYING ON VOICES SUCH AS YOURS to SPEAK OUT AND DO THE RIGHT THING - THE THING THAT MAKES SENSE. BLM SHOULD SCRAP THE PROPOSED DEVELOPMENT COMPLETELY BY CHOOSING THE NO Action ALTERNATIVE. THANK YOU FOR YOUR HARD WORK - PLEASE CONTINUE YOUR efforts to ADVOCATE RESPONSIBLE LAND ~~[illegible]~~ AND RESOURCE STEWARDSHIP.

15-001

SINCERELY,

LAURA PAVLISCAK
lulupav@gmail.com

Response for Document 00015

00015-001: The BLM acknowledges the commentor's preference for Alternative A.

OSTS_00016

February 14, 2008

BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic
EIS Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development in Wyoming, Colorado, and Utah seems completely ill-advised. As a nation, and as a world, we need to be looking not at the use of more fossil fuels but to alternative energies; finding ways of reducing global warming, which threatens all life as we know it, would be a better use of our resources. I am then urging you and the Bureau of Land Management to completely toss out this proposed development and choose the No Action alternative—or, at the very, very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 16-001 16-002

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 16-003

Again, I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 16-001 (cont.)

Sincerely yours,

Matthew H. Hall

P.O. Box 22273
Flagstaff, AZ 86002

Responses for Document for 00016

00016-001: The BLM acknowledges the commentor's preference for Alternative A.

00016-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

00016-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and

3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

OSTS_00017

Diane M. Long
6338 Gateway Dr
Joplin, Mo. 64804
February 19, 2008

Sherry Thompson, BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 17-001 17-002

Oil shale rock must be heated up to about 900 degrees F to release the oil, and at least 40 percent of the energy value of the shale is consumed in production. Producing 1 million barrels of shale oil a day, as some have proposed, would require 10 new (and likely coal-fired) power plants and five new coal mines just to serve them, costing taxpayers billions, consuming millions of tons of coal and acre-feet of water each year, and producing an astronomical amount of greenhouse pollution. Development of oil shale and tar sands in the Rocky Mountains would also hurt species that depend on our public lands and waters for survival, including migratory birds, endangered plants, and federally protected fish species like the humpback chub, Colorado pike minnow, razorback sucker, and others. And what of the larger animals that try to live on these lands?? 17-003

The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 17-004

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. We are already aware that oil puddles are killing wildlife as well as domestic animals. 17-005

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

The Bureau of Land Management's controversial proposal would fuel an outdated, fossil-fuel-intensive energy infrastructure and comes at a time when we need to be rapidly transitioning away from fossil fuels-based energy production. If "business as usual" greenhouse gas emissions continue, over one third of the world's plants and animals will be committed to extinction by the middle of this century or before. 17-001 (cont.)

Why are we not spending more to develop solar power???

Sincerely,

Diane M Long

Responses for Document 00017

00017-001: The BLM acknowledges the commentor's preference for Alternative A. The funding of solar power initiatives is outside the scope of this PEIS.

00017-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00017-003: In the PEIS, the BLM analyzes, to the extent possible, impacts on a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result,

additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

00017-004: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

00017-005: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and

gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

OSTS_00018

February 13, 2008

To Whom It May Concern:

My wife and I are completely and vigorously opposed to the commercial leasing of any public land for oil shale development until such time as there is a proven and tried method of extraction that will not use excessive water and energy. We are fifth generation residents of Mesa County and will not stand by and see our beautiful area and economy sacrificed for the possible viability of oil shale. 18-001

Max and Vicki Stites

2559 Kelby Ct.

Grand Junction, Co. 81503

Response for Document 00018

00018-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

OSTS_00019

February 13, 2008

Sherry Thompson, BLM Project Mgr
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave
Argonne, IL 60439

RE: Oil Shale and Tar Sands

Dear Ms/ Thompson:

I am writing to you to support the "**No Action**" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 19-001

If this is going to be a bonded project, what surety will give you the Reclamation Bond? 19-002

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and many other pollutants. 19-003

The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative. A better idea would be to develop and evaluate a full range of reasonable alternatives, not limiting alternatives based on energy conservation and efficiency. 19-004

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 19-005

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 19-001 (cont.)

I thank you for considering my request.

Sincerely,

Brenda Turiello

Brenda Turiello
211 Mountain Way
Lyndhurst, NJ 07071

Responses for Document 00019

00019-001: The BLM acknowledges the commentor's preference for Alternative A.

00019-002: It appears this comment relates to the regulatory process; however, the promulgation of regulations addressing bonding is outside the scope of the PEIS.

00019-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00019-004: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best

addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

00019-005: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is

presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

OSTS_00020

P.O. Box 2040
Ridgway, CO 81432
February 13, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 South Cass Ave.
Argonne, IL 60439

I wish t o comment on the proposed leasing of BLM lands for oil shale development.

This is, probably, the most destructive action contemplated in the history of the West. The immense amount of land involved would destroy prime areas of ranching, As I am sure are aware, ranchland land will become an increasingly scarce commodity as a result of global warming and to suggest a use such as oil shale development is totally illogical. 20-001

The amount of water needed for this process is prodigious. Water is the commodity in shortest supply worldwide and especially in the Intermountain West. To consider using water needed for life in the communities and farming activities for energy development is callous and dangerous to citizens' health. Also, downstream users of Colorado River water in Arizona, Nevada and California would be severely impacted. This will, undoubtedly, result in a massive lawsuit by these states costing the Federal Government huge funds-money which could be more wisely spent advancing alternative sources of energy. 20-002

The amount of energy needed to develop this project is massive, probably from coal-fired plants resulting in further air pollution. Also, the energy required is many times more than that produced resulting in a net energy loss. The entire scheme is impractical. 20-003

One has only to look at the tremendous irreparable destruction that has occurred in Canada to realize that the area proposed will be useless for centuries to come. This country cannot afford to lose productive land for an unproven process which results in a net loss of energy.

To propose leasing at this time is playing into the hands of speculators at the expense of the American public. 20-001 (cont.)

Please consider the well being of the millions of people in the Intermountain West and the Southwest. Do not allow commercial leasing or development of oil shale until present research and development plans are completed and the social, water and other environmental effects have been fully evaluated.

Sincerely
Robert F. Green

Responses for Document 00020

00020-001: The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00020-002: Existing and future needs of water for communities as well as for other sectors would be evaluated prior to leasing and development of oil shale and tar sands resources. Extensive negotiation with different stakeholders, including state and federal agencies and water right owners, would be required. The development eventually would be restricted by physical and legal water availability.

The distribution of the Colorado River water among the river basin states is dictated by the various compacts for the river water. Water allocations in Arizona, Nevada, and California are not likely to be affected by the potential development of oil shale and tar sands resources in Wyoming, Colorado, and Utah.

00020-003: Power generation requirements are unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support meaningful assumptions and analysis. The type and level of development will define the nature of the proposed action and electrical power requirements. For example, existing sources of electrical power may be sufficient to power the operation, or electrical power may need to be generated on lease using either conventional energy sources like natural gas or renewable energy sources like wind or solar. Other options may include the expansion of existing power plants or the construction of additional power plants (coal, natural gas, and nuclear).

OSTS_00021

February 20, 2008

Michael R. George
372 Seneca Place
Lancaster, NY 14086

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Responsible Development of National Oil Shale and Tar Sands Resources

Dear Sherri Thompson:

I would like to express my strong support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed for leasing have enough oil to meet America's gasoline demand for more than 18 years.

With today's technology, this enhanced development can be conducted in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example: 21-001

- In spite of significant conservation efforts, world energy demand is projected to increase by 50% during the next 20 years and could double in 50 years.
- Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
- The United States military currently uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will produce a strong workforce and will support the local and regional economies of Utah, Colorado and Wyoming.

The utilization of oil shale and tar sands from these leasing areas will offer significant benefits to the local communities and will strengthen our national energy security while bringing the necessary supplies of oil into the markets to offset increased global demand. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Michael R. George

Michael R. George

Response for Document 00021

00021-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00022

18 February 2008

Sherry Thompson, BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Ms. Thompson:

Please support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. 22-001

Now, more than ever, our country needs to be reducing our greenhouse gas emissions and lessening our dependence on fossil fuels. The proposed development of oil shale and tar sands on public lands in the Rockies is not feasible either environmentally or economically. 22-002

The Bureau of Land Management should scrap the proposed development completely and choose the No Action alternative. 22-001 (cont.)

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans that would injure public lands for recreation and wildlife as well as generate unacceptable GHG levels.

Sincerely,

Arlene Gemmill

Arlene Gemmill
861 Clayton Street
San Francisco, CA 94117

Responses for Document 00022

00022-001: The BLM acknowledges the commentor's preference for Alternative A.

00022-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

OSTS_00023

20 Feb '08

Greetings:

There are no dry holes in pursuit of kerogen in the Piance creek oil shale beds. The kerogen content in every ton of the marlstone can be measured. Some of these beds are 2000 feet thick and can yield up to 90 gallons per ton.

Neither The Bureau of Land Management nor the Forest service own these associated minerals. They are owned by the citizens of the United States who charge these respective agencies to protect our assets. Should extraction be deemed appropriate, the best price should be returned to the U.S Treasury for the minerals and property used. 23-001

Already, 20% of these mineral rich lands of the Green River Formation are owned by energy companies and interested investors. Their holdings have been computed in excess of 2,000,000 acres.

There is no need to lease, sell or trade public lands for oil shale research and development at this time. It is papular knowledge that many energy companies are making handsome (some would say Obscene) profits and research and development can well be accomplished on their own properties.

Further, additional rich mineral deposits are associated with oil shale and the sought after kerogen. 23-002

(MORE)

OSTS_00023

2

Dawsonite (sodium aluminum ~~dihydroxy~~ carbonate), is present in great quantities and estimated at some 27 billion tons which equals 2 1/2 times the free worlds known supply of bauxite.
Nacholite, which is almost pure bicarbonate of soda, lies in 150,000 acres of the Piceance Creek basin and is estimated at 30 billion tons.
Trona (soda ash) and Halite (sodium chloride or salt) lies just north of the Colorado-Wyoming boarder and is already being mined. It lies in some 40 beds and amounts to some 100 billion tons. Trona is used in making glass.

23-002 (cont.)

Forty years ago, in 1968, researchers valued these minerals and oil shale at 70 ~~T~~trillion dollars. This valuation was made when spot prices for Kansas Oil was $3.20 per barrel.

I favor the use of natural resources. However, the process must be orderly, regulated and fair to all stakeholders. Until all facets of oil shale development and the respective costs and benefits are known, the Department of Interior, BLM and related agencies must not surrender our public assests to private industry, speculators or exploiters.

23-003

Respectfully,
Dale N Reed

Dale Reed
2048A Winston Way
Montrose, CO 81401

Responses for Document 00023

00023-001: With the passage of the Energy Policy Act of 2005, Congress declared the policy of the United States to include that "oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed …." Congress also required the Secretary of the Interior to prepare a PEIS for oil shale and tar sands. The FLPMA, the Mineral Leasing Act, and the Energy Policy Act of 2005 authorize use of some BLM land for commercial oil shale leasing and development.

00023-002: Thank you for your comment.

00023-003: As stated in the Energy Policy Act, the development of oil shale, tar sands, and other strategic unconventional fuels, for research and commercial development, should be conducted in an environmentally sound manner, using practices that minimize impacts. The BLM believes that analyzing an allocation decision provides the opportunity to build on scientific, governmental, or industry research in order to analyze, in a general way, the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale exploration and development, further analysis will be carried out and documented in accordance with NEPA, to support any decisions in this regard. That NEPA analysis will evaluate the environmental impacts of the oil shale exploration and development, and develop specific mitigation measures to mitigate or eliminate the identified impacts. The BLM believes that such an approach ensures that commercial oil shale development programs meet the intent of Congress, take advantage of the best available practices to minimize impacts, and offer opportunities for the state, local communities, and the public to have the opportunity to participate in the process. While uncertainty is an inherent part of planning in accordance with FLPMA's multiple-use mandate, and delays are possible in bringing any new resource into commercial development, the BLM is committed to managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

OSTS_00024

Dear Bureau of Land Management:

I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This development envisioned by the study would come at a time when our land is already experiencing sever pressure from the current energy boom and significant population growth across the West. It is difficult to understand why the BLM is rushing toward a commercial leasing program without even knowing if oil shale development is feasible economically. In light of that, it's even more difficult to understand why the BLM seems so anxious to give oil shale development priority over other uses on our public lands as shale development would likely preclude all other activity, including natural gas development in priority areas. 24-001

We must ensure the oil shale RD&D process has allowed us to asses the impacts of experimental extraction technologies on energy consumption and water use before proceeding with the PEIS. It will be years before companies developing oil shale technology will know if it is technologically or economically feasible.

I urge the BLM to consider the cumulative effects of this industry on wildlife habitat and protected areas across the West. This plan proposes development in some of the best hunting, fishing and recreation areas in Colorado, Wyoming and Utah and it is my opinion we can and should protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 24-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits oil shale development will displace every other public use of public land to benefit private companies. The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming and Utah. I urge you to slow down and carefully consider the gigantic effect commercial oil shale development would have before committing the west slope to a future of industrial development and environmental degradation. 24-003, 24-002 (cont.)

Sincerely,

Mrs. Shirley Willis

P.S. Oil shale takes a lot more water. We can live without oil shale, but we cannot live without good clean water!! 24-001 (cont.)

Responses for Document 00024

00024-001: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

The BLM believes that the RD&D program will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. The scope of the PEIS, in consultation with cooperating agencies, was changed from a leasing decision to an allocation decision. Consequently, new NEPA analysis will be required prior to offering parcels of land for lease for commercial oil shale exploration and development. This NEPA analysis will evaluate environmental impacts of the operation(s) and develop specific measures to mitigate or eliminate those impacts. This analysis will also contain any new information or circumstances relevant to the RD&D technology, which may be a consequence of research or lessons learned on the RD&D leases or as a result of studies on nonfederal lands.

00024-002: Since the alternatives in the PEIS do not authorize the immediate leasing of the lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document and all subsequent NEPA documents will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. The reasonably foreseeable actions can include reasonably foreseeable development scenarios and pertinent federal or nonfederal actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably foreseeable actions. That analysis will also help to form

the basis for the development of mitigation measures, such as BMPs to mitigate short-term and long-term adverse impacts.

00024-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

February 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439
RE: Develop National Oil Shale and Tar Sands Resources

OSTS_00025

Dear PEIS Project Manager:

I strongly support the development of our national oil shale and tar sands resources ? including the leasing in Utah, Colorado and Wyoming, as proposed by BLM in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation?s natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed offering for lease have enough oil to meet America?s gasoline demand for more than 18 years.

With today?s technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels such as oil shale and tar sands in a ways that reduce environmental impacts and increases socio-economic benefits for the community.

25-001

Further, production of domestic unconventional fuels will have a positive impact on America?s energy security. For example:

? In spite of significant conservation efforts, world energy demand is projected to increase by 50% over the next 20 years and could double in 50 years.
? Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
? The United States currently military uses approximately 500,000 barrels of oil daily ? over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will create a vibrant workforce and will strengthen the local and regional economies of Utah, Colorado and Wyoming.

Response for Document 00025

00025-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00026

Dr. Mha Atma S. Khalsa
1536 Crest Dr.
Los Angeles, CA 90035

February 21, 2008

Sherry Thompson, BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Ms. Thompson,

As a concerned American I strongly support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

The proposal to open up almost 2 million acres of public lands in Wyoming, Colorado, and Utah to commercial leasing of oil shale and tar sands would require an incredible amount of energy and emit tremendous amounts of greenhouse gases. It comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 26-001

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The BLM should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 26-002 26-003

The BLM proposal would fuel an outdated, fossil-fuel-intensive energy infrastructure. If "business as usual" greenhouse gas emissions continue, over one third of the world's plants and animals will be committed to extinction by the middle of this century or before. Oil shale and tar sands development is an environmental catastrophe that we cannot afford now or ever. 26-001 (cont.)

I very strongly urge the BLM to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

Most sincerely,

Dr. Mha Atma S. Khalsa

Responses for Document 00026

00026-001: The BLM acknowledges the commentor's preference for Alternative A.

00026-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00026-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

February 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439
RE: Develop National Oil Shale and Tar Sands Resources

Dear PEIS Project Manager:

I strongly support the development of our national oil shale and tar sands resources – including the leasing in Utah, Colorado and Wyoming, as proposed by BLM in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed offering for lease have enough oil to meet America's gasoline demand for more than 18 years.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels such as oil shale and tar sands in a ways that reduce environmental impacts and increases socio-economic benefits for the community. 27-001

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example:

• In spite of significant conservation efforts, world energy demand is projected to increase by 50% over the next 20 years and could double in 50 years.
• Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
• The United States currently military uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will create a vibrant workforce and will strengthen the local and regional economies of Utah, Colorado and

Wyoming.

Development of oil shale and tar sands in Utah, Colorado and Wyoming provide tremendous benefits to the local communities will strengthen our national energy security and bring much-needed supplies of oil into the markets to offset increased demand in China and India. I support developing these areas while protecting the environment, local communities and other economic interests.

27-001 (cont.)

Sincerely, Ramon Garcia

Name: RAMON GARCIA
Address: 670 WINONA CT. #B-27
DENVER, CO. 80204

Response for Document 00027

00027-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00028

From: sandy paredi [mailto:sandymack33@bellsouth.net]
Sent: Tuesday, February 12, 2008 10:09 AM
To: OSTseiswebmaster@anl.gov
Subject: Emailing: index

If production of energy/fuel costs more in other polluting fuels, devastation of public lands, global warming, pollution, negative quality of life for human and wild life, is tax dollar subsidized, then it is NO energy/fuel alternative. Like corn derived energy it costs more to produce than it sells for, is HEAVILY subsidized by our tax dollars, and beside driving up the cost and availability of corn as a food for the hungry, we the public pay twice for it at the pump. I DO NOT SUPPORT THIS Shale and Tar sand OIL PRODUCTION.

28-001

Response for Document 00028

00028-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00029

THE NAVAJO NATION

JOE SHIRLEY, JR.
PRESIDENT

BEN SHELLY
VICE-PRESIDENT

March 3, 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

To Whom It May Concern:

The Historic Preservation Department-Traditional Culture Program (HPD-TCP) is in receipt of the United States Department of the Interior-Bureau of Land Management proposed Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement.

After cross-referencing the HPD-TCP Sacred Sites Database, there are two Cultural Sacred Sites within the proposed project area: 1) LaPlata Mountains, 2) Abajo Mountains, 3) Bear's Ears, 4) Elk Ridge, 5) Henry Mountains, and 6) Dunton Pass. The HPD-TCP recommends mitigation to avoid the area of concern that threatens Traditional Cultural Properties (TCP's).

In addition, HPD-TCP requests documents and plans on how to avoid the two Cultural Sacred Sites. The HPD-TCP and the Cibola National Forest need to come to an agreement on how these Cultural Sacred Sites will not be affected. Therefore, a field visit by an HPD-TCP representative may be appropriate for additional comments, recommendations, and/or concerns regarding the proposed project location. 29-001

However, if the proposed project inadvertently discovers Navajo habitation sites, plant gathering areas, human remains and objects of cultural patrimony the HPD-TCP request that we be notified respectively in accordance with the Native America Graves Protection and Repatriation Act (NAGPRA).

The Navajo Nation recommends that you consult with other tribes within the vicinity of the proposed project area.

In conclusion, the HPD-TCP appreciates the Bureau of Land Management for consulting the Navajo Nation pursuant to 36 CFR 800.1 (c)(2)(iii). If you have questions, do not hesitate to contact me electronically at tonyjoe@navajo.org or telephone at 928-871-7750.

Sincerely,

HISTORIC PRESERVATION DEPARTMENT P.O. BOX 4950 WINDOW ROCK, ARIZONA 86515 928.871.7198 (v) 928.871.7886 (fax)

OSTS_00029

Tony H. Joe, Jr.
Traditional Culture Program
Historic Preservation Department

Cc TCP 08-395
Bureau of Land Management

Response for Document 00029

00029-001: The BLM thanks you for the information regarding TCPs in the vicinity of some of the STSAs. As is stated in the PEIS, government-to-government consultation is being conducted for this PEIS. Receipt of this comment has been added to the existing record of consultation presented in Section 7.3.

On the basis of input from the cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM analyzes the environmental consequence of land use allocation decisions that do not commit any resources or grant any lease rights. In addition, prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with and appropriate consultation as required by the National Historic Preservation Act and other authorities specific to Native American concerns. Subsequent NEPA analyses will be conducted to assess the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. If TCPs or significant cultural resources are present or found to be present during requisite surveys and consultations, this specific analysis may include mitigation such as use of best management practices, specific protections, or avoidance to mitigate or eliminate adverse effects to historic properties, including TCPs.

At the subsequent leasing phase, the BLM will consult further with the Tribe regarding mitigation measures to avoid the area of concern that threatens the identified TCPs and the consideration of inadvertent discoveries under the Native American Graves Protection and Repatriation Act.

OSTS_00030

550 Plains Church Road

Mars, PA 16046

Sherry Thompson, BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Ms. Thompson:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 30-001 30-002 30-003

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 30-004

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 30-001 (cont.)

Sincerely,

Kathleen Boudreau

Responses for Document 00030

00030-001: The BLM acknowledges the commentor's preference for Alternative A.

00030-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00030-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

00030-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

OSTS_00031

February 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439
RE: Develop National Oil Shale and Tar Sands Resources

Dear PEIS Project Manager:

I strongly support the development of our national oil shale and tar sands resources – including the leasing in Utah, Colorado and Wyoming, as proposed by BLM in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed offering for lease have enough oil to meet America's gasoline demand for more than 18 years.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels such as oil shale and tar sands in a ways that reduce environmental impacts and increases socio-economic benefits for the community. 31-001

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example:

• In spite of significant conservation efforts, world energy demand is projected to increase by 50% over the next 20 years and could double in 50 years.
• Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
• The United States currently military uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will create a vibrant workforce and will strengthen the local and regional economies of Utah, Colorado and Wyoming.

Development of oil shale and tar sands in Utah, Colorado and Wyoming provide

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tremendous benefits to the local communities will strengthen our national energy security and bring much-needed supplies of oil into the markets to offset increased demand in China and India. I support developing these areas while protecting the environment, local communities and other economic interests. 31-001 (cont.)

Sincerely,

Betty Coulthard
PO Box 151
Shawnee, CO 80475

Response for Document 00031

00031-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00032

FORT LEWIS COLLEGE

February 27, 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Dear BLM:

In the American West we now have the perfect storm of energy and minerals development with major exploration and planning for oil and gas wells, uranium mines, coal mines, gold mines, and oil shale development.

I have deep concerns about cumulative mining impacts in the West, but I am particularly concerned about oil shale and the inability of the BLM to adequately respond to massive oil shale development. They simply do not have adequate staff in local offices. 32-001

The December 2007 Oil Shale and Tar Sands Resources: Programmatic Environmental Impact Statement, at 1,464 pages, is a frightening document that lists potential oil shale development on hundreds of thousands of acres across Utah, Colorado, and Wyoming. Major federal laws related to cultural resources, environmental standards, clean air, clean water, etc. will need to be considered, yet this seems to be a rush to judgment to permit oil shale leases on land that will no longer be multi-use but solely dedicated to oil shale extraction at a time when the industry has yet to develop a successful technology to extract oil from shale with minimal environmental impacts. 32-002

Energy companies, especially large multi-national oil companies, are flush with cash. In 2007, Exxon-Mobile posted the highest fourth quarter earnings in its history, yet it has only recently revived an interest in oil shale. Shell is also experimenting with an oil shale process. Rural northwest Colorado could become as industrialized as parts of Texas.

Alternative B in the PEIS recommends leasing 2 million acres for oil shale development. Providing the archaeological clearances for such a huge amount of 32-003

OSTS_00032

land would take dozens of staff and produce a mountain of site forms. I fear that we're about to run the stagecoach off the cliff, as we did in the early 1980s when oil shale went bust as I chronicled in my book *Boomtown Blues: Colorado Oil Shale.*

32-003 (cont.)

I feel we're poised to do too much too fast with serious environmental, social, and cultural consequences.

Development of a massive oil shale industry could impact the West's water and natural resources permanently. If oil shale development takes three barrels of water for one barrel of oil, there may not be enough water on the entire Western Slope to support such an industry. Then there are the power needs: Shell's scenario at full commercial build out may take three additional coal-fired power plants. How much water would they use? Clearly, this is 1980s voodoo economics all over again.

32-004

Air quality issues already exist with gas wells which use diesel engines to pump pollutants into air that will impact the Flat Tops Wilderness Area and Colorado's important tourism industry. New power plants would also impact Dinosaur National Monument and the Mount Zirkel Wilderness Area. Then there's the issue of extremely rare and undocumented Ute Indian wickiups scattered across the Piceance Basin in very good condition.

32-005

32-006

This is a rare cultural resource not found in abundance on other public lands in Colorado. How will those fragile wickiups stand up to ground disturbing haul trucks, well digging, etc.?

For all these reasons, I suggest:

1. Front end money immediately be made available to BLM to hire additional staff where they will be needed in district offices.

2. The establishment of an Oil Shale Advisory Council, in conjunction with the BLM, and identical to the Resource Advisory Councils and the Recreation Councils already established in Colorado. Such a group should have representatives from local communities, energy companies, environmental groups, etc. This is sorely needed because of the huge potential impact on three states. All too often environmental impact studies do not clearly evaluate cumulative effects.

32-007

Thank you so much for your consideration. Quality of life for thousands of rural western citizens, and the future for numerous small towns, are at stake.

OSTS_00032

Yes, I understand that the Oil Shale PEIS is an allocation decision plan not a leasing decision, but the implications here are enormous. And then there's the issue of our continued dependence upon fossil fuels, which kerogen is.

Slow on shale is the only rational response. If the major oil companies can utilize an in-situ microwave heating process that utilizes solar panels—now that may have some utility. But burning coal to make electricity to heat rock to liquefy oil shale to create gasoline seems like a very expensive and energy in-efficient exercise. 32-008

The BLM is to be commended for all of the work that went into this report. Now it's time to seriously assess the social, environmental, and cultural impacts on the two million acre planning area—and the costs. For BLM to state that "The BLM has determined that the amendment of land use plans to designate lands as available for application for commercial leasing would have no impact on the environment" is certainly an odd conclusion. Perhaps amendments do not commit the BLM to a specific course of action, but that's all the more reason to establish an Advisory Council. 32-009

The socioeconomic and flora and fauna aspects of this PEIS are excellent, though there needs to be far greater attention paid to the largest migratory mule deer herd in the nation in the Piceance Basin and what will happen to it with oil shale development. 32-010

The BLM has produced a benchmark document of great detail with excellent attention to threatened and endangered species. Water issues and potential water allocation, however, need further clarification. 32-011

Sincerely yours,

Andrew Gulliford, Ph.D.
Professor of Southwest Studies and history
Department of Southwest and American Indian Studies
Fort Lewis College
Durango, CO 81301
Gulliford_a@fortlewis.edu

Cc: Sherri Thompson, Colorado State Office

Responses for Document 00032

00032-001: The potential cumulative impacts of oil shale and tar sands development, in particular the cumulative impacts of these developments, alongside projected growth in oil and gas exploration and development and coal mining in the three states, is assessed in Sections 6.1.5 and 6.2.5 of the PEIS.

The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner. Budgetary and staffing issues at the BLM field office level in support of leasing applications are beyond the scope of the PEIS.

00032-002: The purpose of the PEIS is to analyze the environmental and socioeconomic impacts of amending land use plans to facilitate oil shale and tar sands development in the future, not to permit the construction and operation of individual facilities, as is suggested by the commentor. Although it may be the case that the proposed land use amendments in support of oil shale and tar sands developments may require restrictions on some existing land uses in the areas in which oil shale and tar sands resources are located, additional NEPA analyses will be undertaken at the project-specific level before any public land is dedicated to oil shale and tar sands development.

While it may be the case that commercial interest in oil shale and tar sands development has been growing in the last decade, individual projects on public lands will require additional NEPA approval and will not be able to proceed without the necessary state and federal permits. Given these restrictions, and the impact of the experience in each of the three states with large-scale energy development on public land with multiple uses, it is unlikely that substantial

changes in the natural and socioeconomic environment suggested by the commentor would occur.

00032-003: Processing lease applications and associated requirements (such as archaeological clearances) for individual oil shale and tar sands projects may be a complex and lengthy process, however, the purpose of the PEIS is to analyze the environmental and socioeconomic impacts of amending land use plans to facilitate oil shale and tar sands development in the future, not to permit the construction and operation of individual facilities. Additional NEPA analyses will be undertaken before any leasing occurs. BLM staffing issues in support of leasing application are speculative and outside the scope of this PEIS.

The experiences in each of the three states with large-scale energy development on public land, in particular the social and economic impacts associated with "boom and bust" developments, notably with respect to oil shale projects in northwest Colorado, were a large part of the analysis covered in the PEIS. The economic and political circumstances leading up to the events surrounding the Colony Project are described in detail in Section 3.10.1 of the PEIS, with a broader discussion of the potential social and cultural impacts of large-scale energy projects on small rural western communities presented in Section 3.10.2 of the document. While the likely extent of many of the social and cultural changes in any given community as a result of large-scale energy developments is by no means clear, various mitigation measures, including employer-provided housing, proactive community economic development planning, and vocational educational programs, are suggested in Section 4.11 of the PEIS as a means of reducing the potential impacts of large-scale developments, in particular those that may result in "boom and bust" type impacts.

00032-004: The BLM recognizes potential impacts of oil shale and tar sands development on the environment. However, the PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. As explained in the introductions to Chapters 4 and 5 of the PEIS, these chapters contain a summary of preliminary information available about impacts of oil shale and tar sands development. The evaluation of the impacts to specific resources and the environmental and socioeconomic consequences of oil shale or tar sands development will be included in subsequent NEPA documents rather than in this PEIS. The amount of water that will be needed for oil shale development, if it occurs, would depend on the scale of the development, the technologies to be used, the environmental impacts, and many other factors.

00032-005: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally,

the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00032-006: The BLM thanks you for the information regarding Ute wickiup sites scattered across the Piceance Basin. On the basis of input from the cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the scope of the PEIS was changed from a leasing decision to an allocation decision. In the PEIS, the BLM analyzes the environmental consequence of land use allocation decisions that do not commit any resources or grant any lease rights. In addition, prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with, and appropriate consultation as required by the National Historic Preservation Act and other authorities specific to Native American concerns. Subsequent NEPA analyses will be conducted to assess the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. If wickiups or significant cultural resources are present or found to be present during requisite surveys and consultations, this specific analysis may include mitigation such as use of best

management practices, specific protections, or avoidance to mitigate or eliminate adverse effects to historic properties.

At the subsequent leasing and development phases, the BLM will conduct further identification and evaluation of wickiup sites and consultation under the National Historic Preservation Act. Consultation will include consideration of mitigation measures to avoid the area of concern that threatens wickiup sites.

00032-007: Please see response to Comment 32-001. In addition, requirements for the establishment of an Oil Shale Advisory Council, or other locally representative bodies, are beyond the scope of the PEIS.

00032-008: Thank you for your comment.

00032-009: With the exception of impacts to property values, the BLM concludes that land use plan amendments would have no impacts on the environment. Before any leasing occurs, additional NEPA analyses for individual projects will be undertaken, which would provide additional assessments of the social, environmental, and cultural impacts and costs of oil shale and tar sands developments, and allow the development of mitigation measures.

00032-010: The information presented in the PEIS for mule deer is of sufficient detail to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing. The PEIS identifies basic life history and population information, existing threats, and the potential for the species to be affected by commercial oil shale and tar sands development. Additionally, the PEIS presents graphic overlays of the oil shale basins and STSAs that would be made available for leasing under each alternative with the summer and winter ranges of mule deer.

Subsequent NEPA documents will be prepared to evaluate specific occurrences of mule deer, analyze the environmental consequences to them from leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. Site-specific NEPA analysis would include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to mule deer and its habitat (including migratory corridors).

00032-011: The water issues and water allocation are described in Section 3.4. Potential water use for oil shale development and water availability information are provided in Section 4.5. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing. Further clarification of water issues would be appropriate at the next stages of NEPA analysis when

additional information regarding specific leases and development projects is known.

OSTS__00033

February 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439
RE: Develop National Oil Shale and Tar Sands Resources

Dear PEIS Project Manager:

I strongly support the development of our national oil shale and tar sands resources – including the leasing in Utah, Colorado and Wyoming, as proposed by BLM in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed offering for lease have enough oil to meet America's gasoline demand for more than 18 years.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels such as oil shale and tar sands in a ways that reduce environmental impacts and increases socio-economic benefits for the community.

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example: 33-001

• In spite of significant conservation efforts, world energy demand is projected to increase by 50% over the next 20 years and could double in 50 years.
• Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
• The United States currently military uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will create a vibrant workforce and will strengthen the local and regional economies of Utah, Colorado and Wyoming.

Development of oil shale and tar sands in Utah, Colorado and Wyoming provide tremendous benefits to the local communities will strengthen our national energy security and bring much-needed supplies of oil into the markets to offset increased demand in China and India. I support developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Name James H. Bagwell
Address #743 So Palmas Brownsville, Tx 78526

Response for Document 00033

00033-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00034

Thursday, February 28, 2008

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I strongly support the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS). A robust and active oil shale program conducted in an environmentally sensitive manner as proposed by BLM will strengthen communities, add to our nation's energy portfolio and help reduce energy prices for consumers.

With rising energy costs and increasingly volatile supplies, it is more important now than ever that the United States pursue balanced energy solutions and alternative energy sources like oil shale and tar sands. Consumers, industries and businesses throughout the nation face rising energy prices, ever-tighter supplies and increased dependence on imports, often from politically unstable areas. Oil shale can help address the nation's energy challenges.

Further, production of domestic oil shale and oil shale technology will have a positive impact on America's energy security. For example:

? In spite of significant conservation efforts, world energy demand is projected to increase by 50% over the next 20 years and could double in 50 years.

? Oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil. No nation has more oil shale than the United States.

? The lands that BLM is proposing to develop would yield enough gasoline to keep America driving for at least 18 years.

34-001

With today's technology, this enhanced development can be conducted in an environmentally responsible manner.

Finally, development of unconventional fuels will create a vibrant workforce and will strengthen the local and regional economies of Utah, Colorado and Wyoming. Development of oil shale and tar sands in these communities would provide tremendous local and national benefits that will help to strengthen our national energy security and bring much-needed supplies of oil into the markets to offset increased demand in China and India.

For these reasons, we urge BLM to adopt Alternative B of the PEIS. BLM should also investigate and analyze the positive impacts to the American public that would result in developing this valuable resource.

Sincerely,

Mr. Michael G. Murry
Shell Retail Academy - Instructor
Shell Oil Products US
16454 Concord Falls
Sugar Land TX 77478
Email: Mike.Murry@Shell.com

Response for Document 00034

00034-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00036

March 10, 2008

BLM Oil Shale and Tar Sands Resources
Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Sirs:

The Public Lands Foundation (PLF) has studied the Draft Programmatic Environmental Impact Statement (PEIS) for Oil Shale and Tar Sands Resource Management Plan Amendments in Colorado, Utah and Wyoming, dated December 20, 2007. We have the following comments:

PLF is a national non-profit conservation organization founded in 1987. Our membership is primarily retired former employees of the Bureau of Land Management (BLM). PLF's mission is to keep America's Public Lands in public hands, sustainably managed for the public's common use and enjoyment through professional, science-based education and advocacy.

We support the implementation of Alternative C. We find that this alternative is the more prudent course for BLM to take given some serious issues and unknowns that the draft PEIS discusses with respect to the technologies of Oil Shale and Tar Sand extraction. For example the PEIS states frequently that the amount of water that may be required for future commercial development, and the potential mix between surface water, groundwater, and treated process water is unknown. We would like to see the Oil Shale Research, Development, and Demonstration work plans of the five tract operators put priority emphasis on these water information gaps. In addition, the PLF recommends that the PEIS contractor define thresholds for Oil Shale and Tar Sand development for water and related environmental effects as a part of the final PEIS revisions. To defer the determination of thresholds will create a patchwork of analysis within individual Resource Management Plan Amendments, thus compromising the intent of NEPA for realistic disclosure of cumulative impacts.

36-001

36-002

36-003

The preparation of the draft PEIS has been a very complex effort, and the PLF commends the BLM and Argonne National Laboratory for a comprehensive and professional draft.

Sincerely;

George Lea, President

Attachment- PLF Comments, 5 pp.

OSTS_00036

DRAFT OIL SHALE AND TAR SANDS RESOURCE MANAGEMENT PLAN AMENDMENTS TO ADDRESS LAND USE ALLOCATIONS IN COLORADO, UTAH AND WYOMING AND PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

COMMENTS OF THE PUBLIC LANDS FOUNDATION
March 10, 2008

Sec. ES-1, first paragraph: principle is misspelled. 36-004

The Executive Summary should have an explicit discussion of Purpose and Need for the PEIS. 36-005

Vol. 1, Ch. 2, Sec. 2.1, Pg. 2-1, para. 2: This paragraph needs to do a better job of explaining how the BLM's current approach to the oil shale and tar sands industry and their recovery technologies differs from the management approaches proposed in Alternatives B and C of the draft PEIS. 36-006

Ch. 2, Sec. 2.2.1, page 2-2: This paragraph on the requirements of E.O. 12088 (Federal Compliance with Pollution Control Standards) should make it clear that 12088 was amended January 23, 1987. It is inaccurate to cite it as only a 1978 E.O. It was amended by E.O. 12580. It was also amended April 22, 2000 by E.O. 13148 to delete Section 4. 36-007

Ch. 2, Sec. 2.2.1, Pg. 2-5: This bullet on water quality, while accurate, does not address the full range of water quality standards and regulations with which a potential oil shale or tar sands lease must comply. Salinity is but one special case of a water quality constituent, which is managed on a basin scale (seven Basin States) through the federal salinity control program, in which the USDI-BLM participates. This water quality bullet is incomplete unless it further states that the BLM in its proposed leasing of oil shale and tar sands must ensure that all leases, stipulations, and plans of operations comply with federal and state water quality standards and regulation, including tribal standards and regulation, where applicable. This is a requirement of the Clean Water Act. 36-008

Ch. 2, Sec. 2.3.1, Pg. 2-16: PLF agrees with the BLM's cooperating agencies that BLM's analysis would be too speculative to support a decision to issue any oil shale or tar sands leases on the basis of the 15 Project Scenario. PLF further concurs with the BLM's decision to not attempt to issues leases for commercial development on the basis of this PEIS. 36-009

Ch. 2, Sec. 2.5.7, Pg. 2-53: The White River Resource Management Plan (1997) was considered to be a state-of-the-art planning document at the time it was completed, particularly in its establishment of carrying capacity thresholds (also known as Limits of Acceptable Change) specific to oil shale development, for air and water quality, big 36-010

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game habitat, and socioeconomic impacts. In terms of the vintage of all 12 RMPs that the BLM proposes to amend, the White River RMP is one of the newer RMPs, with only the Roan Plateau Plan Amendments (2006, 2007) and the Jack Morrow Hills Coordinated Activity Plan (WY) (2006) being more recent. Thus we are disappointed with the position taken in this PEIS that instead of using the White River RMP as the minimum standard for analysis of impacts of oil shale, the approach will be to dumb down the level of impact analysis for the PEIS to accommodate and reward those Field Offices and States who did not face up to development thresholds and hard work of establishing threshold capacities years ago. The PEIS instead, proposes to defer the issue of defining thresholds for oil shale development into the future, as part of site-specific NEPA analyses to be conducted prior to the issuance of commercial leases. Unfortunately, to defer will simply create a piecemeal patchwork of analysis by individual BLM Field Offices, lacking any real cumulative impact analysis, which flies in the face of the spirit and intent of NEPA. If the contactor-preparer of this PEIS were to objectively look at the most compelling resource question in oil shale and tar sand development, that of the large quantities of water required, the water question alone is one that should convince BLM and its contractor to define thresholds for oil shale/tar sand development for water and all related environmental impacts in this PEIS. The Public Lands Foundation is opposed to defining these thresholds as they relate to water at some point in the future as part of site-specific NEPA analyses. 36-010 (cont.)

Ch. 3, Sec. 3.2.1.3, Pg. 3-45: Soils of the Piceance Basin are described in two paragraphs, which is an inadequate discussion. What soil surveys are completed that cover this area, and to what mapping order are these surveys; please provide the literature citations to these surveys. The same deficiency occurs in Sec. 3.2.2.3, for Soils of the Uinta Basin, and in Sec. 3.2.3.3 for Soils of the Green River-Washakie Basins. The soils discussion for the 11 Special Tar Sand Areas (Ch. 3, Sec. 3.2.4.3) is also incomplete and inadequate. Soil properties as documented in soil mapping and soil survey publications of the USDA and others will be very important in determining the magnitudes and types of off-site, downstream erosion impacts that can be expected, as well as the reclamation potential for disturbed surfaces. 36-011

Ch. 3, Sec. 3.4.2.1, Pg. 3-76: Third to last paragraph of this Section: This paragraph makes the point that groundwater is possibly being mined (over-drawn) in the Piceance Basin, resulting in depletion of the aquifer system. We believe that the word adequate should be changed to inadequate in the last sentence of the last full paragraph. Thus it would read, "Because of inadequate surface water supplies, however, demand is unlikely to change (Hatton, 2000)." 36-012

Ch. 3, Sec. 3.5.3, Pg. 3-101: Although elemental mercury is not a National Ambient Air Quality Standard, we believe that the PEIS should address Hg, since Hg is a known toxic released to the atmosphere from coal fired power plants, occurring naturally in coal deposits. It could also be associated with oil shale deposits and overburden. There is a national mercury monitoring network which Mesa Verde National Park participates in on a year round basis, and in northern Colorado there is a seasonal Hg monitoring station. Fish consumption advisories for mercury are known to the Colorado Game and Fish Department for McPhee Reservoir, Vallecito Lake, Sanchez Reservoir, and other 36-013

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mountain locations in Colorado. There also may be mercury in reservoir and lake issues in Utah and Wyoming in oil shale and tar sand areas. 36-013 (cont.)

Ch. 3, Section 3.7.2, Pg. 3-121 on Plant Communities and Habitats: There is no mention of wildland fire, lightning caused fires, frequency or severity of burning…..this is an important factor in the plant communities of the Oil Shale and Tar Sand areas that affects the public, erosion, air quality, and water supplies and it needs to be addressed. 36-014

Vol. 2, Sec. 4.2.1.1, Pg. 4-17, Other Mineral Development Activities: It is discussed in Section 2.3.3, that the BLM has determined that it will carry forward decisions in the White River RMP (BLM 1997) establishing the Multimineral Zone within which mineral development would be allowed only if recovery technologies are implemented to ensure that the development of one mineral does not prevent recovery of other minerals (see Section 3.1.1.3 and Figure 3.1.1-3). As a result, impacts on nahcolite and dawsonite development are expected to be negligible within the Multimineral Zone. 36-015

The BLM also has determined that it will not carry forward decisions in the White River RMP to restrict oil shale leasing from the Piceance Creek Dome area. By making lands within the Piceance Creek Dome area available for application for commercial leasing, potential conflict between oil shale and oil and gas development could occur, according to the draft PEIS. Our question is, what is the rationale of BLM in their decision to not carry forward decisions in the White River RMP to restrict oil shale leasing in the Piceance Creek Dome area? 36-016

Vol. 2, Sec. 4.3.1.1, Soil Resources, Pg. 4-23: The PEIS identifies a key concern for impacts on soil as the associated impact on water quality. As discussed in Section 4.5, soil erosion increases both the sediment load to streams and the salinity of runoff reaching these streams. Infiltration of precipitation through stockpiled oil shale or through waste piles of spent material has the potential of impacting surface water quality or shallow aquifers water quality with leached hydrocarbons and salts. We believe that the preparers of this PEIS need to locate and analyze soil and water studies that were performed in the late 1970s to early 1980s in western Colorado in which water was leached through representative spent shale rock in order to get an idea of the water chemistry of this leachate. These data are very pertinent and should be made available and discussed in this PEIS in order to make some qualitative or semi-quantitative estimates of these surface and ground water quality impacts. These data should also be discussed in Vol. 2, pages 5-19 and 5-20 with regards to development of Tar Sands and soil resource impacts, and water quality. We do not believe that the draft document provides enough data on the chemical and physical characteristics of spent shale, which would be important to the resuming of traditional land management activities, such as grazing or wildlife habitat following reclamation. 36-017

Vo. 2, Sec. 4.6.1, Pg. 4-46, Common Impacts, Air Quality and Climate: Elemental Mercury should be mentioned as a very likely emission category that is associated with the burning of coal from the up to 2,400 MW of new coal-fired power plant(s) that would be needed to support the electric power needs of In-Situ commercial extraction of oil shale. This Sec. 4.6.1 also fails to address Mercury as a potential released toxic to the 36-018

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atmosphere when extracted shale rock is processed for oil extraction at surface retort facilities. Mercury is a cross-media toxic that has been appearing in water bodies of the intermountain states from air deposition, and then converting to methyl mercury in bottom sediments of these water bodies (e.g. McPhee, Narraguinnep and Vallecito Reservoirs, CO; and Navajo Reservoir, NM). These reservoirs and others in western CO and Utah are then posted with fish consumption advisories which recommend the avoidance or careful limiting of humans eating specific fish species and size classes because of the bioaccumulation of this mercury in fish tissue. This is a major water quality issue in the intermountain west that large scale industrial initiatives such as Oil Shale and Tar Sand development must address.

36-018 (cont.)

Another deficiency of this section is there is no mention of the Class I and Class II areas (as protected under the Clean Air Act of 1970, as amended 1977 and 1990) that are included in the 17 Counties and 3 States itemized in Table 4.6.1-1. It is particularly important to know the location of the Class I areas with respect to the potential Oil Shale and Tar Sand development areas, and their vulnerability to the drifting over and deposition of emissions into these areas, which require the highest level of air quality protection that the EPA is required to enforce. Similarly, in Vol. 2, Chapter 5, Pg. 5-39 also needs to be modified to show the Class I and Class II areas that are included in the 10 Utah Counties displayed in this Table 5.6.1-1.

36-019

Vol. 2, Sec. 4.6.2, Pg. 4-50, Mitigating Measures: The PLF is pleased to see the statement here that
".....to ensure that BLM-authorized activities comply with applicable ambient air quality standards, as well as potential impacts on AQRVs (such as visibility, atmospheric deposition, noise, etc.), specific monitoring programs may be established." However, the PLF cautions the BLM and the air quality regulatory agencies of the three involved States, that monitoring costs for AQRV's are almost never included in the budgets of the BLM, or in the very modest air quality monitoring budgets of States such as CO, UT and WY. Therefore PLF recommends that the PEIS be revised to provide here (and on Pg. 5-42 for STSA's), a strong "heads up" to industry, that industry, (i.e. those who expect to be lease holders on Oil Shale or Tar Sand development) must bear the largest share of such AQRV monitoring costs, as a condition of leasing.

36-020

Vol. 2, Sec. 4.8.1.4, Pg. 4-82, Threatened and Endangered Species: This section indicates that with the significant water depletions anticipated from drainages of the Upper Colorado River basin, adverse effects on endangered Colorado River fish species could represent a significant impact. The discussion of mitigating measures in Vol. 2, Section 4.8.2.4 that are supposed to address this impact are too general to be of any value, and need a complete rewrite. A complete rewrite is also needed in the Sec. 5.8.1.4 on Tar Sands and water depletions (Vol. 2, Pg. 5-77) because the mitigating measures there are again, too general to be of any value.

36-021

Vol. 2, Section 4.11.1.4, Pg. 4-144, Impacts on Agriculture: This section is not complete because it does not acknowledge the indirect impacts on wildlife caused by the changes in water use from agriculture (primarily ranching) to industrial. The draft PEIS indicates that to facilitate new oil shale and tar sand development, historic water rights will likely

36-022

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be purchased from agricultural landowners, primarily ranchers. This means that usually that irrigated agriculture is no longer possible and it will likely lead to conversion of irrigated agriculture to dry land farming/ranching activities. Many species of terrestrial and aquatic wildlife benefit from irrigated agriculture, and the preparers have not addressed this here; thus this Section needs rewrite. Another deficiency of this section is that it does not address the possibility that some agricultural fee lands, because they will be moving to dry land non-irrigated status, no longer will support their owners, and thus may be sold and developed for second homes, condos, and other real estate types, which will further fragment wildlife habitat, and create another set of impacts to wildlife, and particularly to the behavior of migratory big game species such as elk and mule deer. 36-022 (cont.)

Vol. 2, Pg. 4-163, Table 4.14-1 Potential Health Impacts Associated With Oil Shale Development: This table does not display any impacts associated with the construction and operation of up to 2,400 MW of new coal-fired electricity generation to support in-situ oil shale development. There are many health impacts documented in the Four Corners region and elsewhere such as asthma and mercury toxicity in breast milk that you need to disclose here. Similarly, the narrative on Page 4-70, Sec. 4.14.1.4 on health impacts associated with in-situ processing is incomplete because it does not address those health impacts associated with new coal-fired electricity generation. 36-023

Vol. 2, Sec. 6.1.2.4, Impacts on Water Resources (under the Proposed Alternative B): The Public Lands Foundation notes the statement seen here and in many other places in the PEIS that the
amount of water that may be required for future commercial development and the potential mix
between surface water, groundwater, and treated process water is unknown. This then results in 1.) an inability to predict specific locations for potential future commercial development
and 2.) the impossibility of predicting the specific impacts on water resources that could occur with commercial development of Oil Shale and Tar Sands. We view this as very serious technology restriction to full public disclosure in the NEPA process of how the development of these energy resources will affect water supplies, uses, and water quality. In the arid states of this PEIS project area, water resources are limited, and are nearly all committed to other important water uses, such as agriculture, municipal, other industrial, and in-stream flow/aquatic habitat purposes. Water in western Colorado, eastern Utah and southwest Wyoming is no less important than is the development of energy resources, and in fact, many would argue that water is more important than the extraction of these energy resources. Industry, academia, and the federal government simply must do better homework so as to be able to better estimate the water needs of commercial development. We suggest that obtaining answers to these questions about water, if not already being pursued through Oil Shale Research, Development, and Demonstration (R, D and D) that these questions be given high priority in the work plans of the five R, D and D Tract Operators. Without more complete information on water requirements, commercial development of Oil Shale and Tar Sands may be premature, and future emphasis should remain in the R, D and D stage until these answers are forthcoming. Finite water resources and our public lands deserve better than trial and error development of Oil Shale and Tar Sands. 36-024

Responses for Document 00036

00036-001: The BLM acknowledges the commentor's preference for Alternative C.

00036-002: As discussed in Section 2.3.2, activities on the 160-acre RD&D leases are considered as part of the baseline under Alternative A, the no action alternative. Any decisions or modification of the operations on the RD&D leases are outside of the scope of this PEIS. Details regarding water requirements will be addressed at the appropriate stage of future NEPA analyses.

00036-003: Identification of thresholds requires site-specific information relevant to the resource within a particular location or area. Any decisions concerning the application of thresholds would need to be made at the site-specific level where detailed information relevant to that determination can be made, and where interagency consultation can be accomplished, thus bringing an important local perspective and expertise to any subsequent NEPA analysis.

00036-004: The text in the Executive Summary has been corrected.

00036-005: The purpose and need is discussed in the Executive Summary. The purpose of the PEIS is to amend 12 land use plans in the three states to describe the most geologically prospective areas administered by the BLM where oil shale and tar sands resources are present, and to decide which of those areas will be open for application for commercial leasing, exploration, and development, in compliance with the congressional mandates of the Energy Policy Act of 2005, Public Law (P.L.) 109-58.

00036-006: It is unclear what the phrase "BLM's current approach" references. It is assumed that the commentor is referring to the existing RD&D leases, which are separate and apart from the decisions in the PEIS. Under this program, lessees would be required to successfully prove their oil shale technology prior to obtaining a noncompetitive preference right lease for a tract large enough for commercial operation. The RD&D program is explained in Section 1.4.1. Alternatives A, B, and C in the PEIS do not affect the valid existing rights of the RD&D leases.

00036-007: The text in Section 2.2.1 has been modified to address the E.O. 13148 amendment.

00036-008: The bullet on water quality in Section 2.2.1 has been modified to address applicable federal, state and Tribal water quality standards.

00036-009: Thank you for your comment.

00036-010: The BLM agrees that a piecemeal approach to analysis of the environmental effects resulting from several projects without consideration of other past, present, or reasonable foreseeable future projects that may cumulatively affect the quality

of the human environment should be avoided to the extent possible. At the leasing or development stage, however, the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects. As a result, the BLM believes that "piecemealing" is unlikely to occur. Any decisions concerning the application of thresholds within the PEIS study area will be made at the site-specific level where detailed information relevant to that determination can be made, and where interagency consultation can be accomplished. This will bring an important local perspective and expertise to the subsequent NEPA process, and address specifically local issues.

00036-011: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of public lands for commercial development. Therefore, this document addresses soil conditions in the oil shale basins in a general way. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. Detailed, local analyses of soil conditions would be required during these subsequent phases.

00036-012: The text in Section 3.4.2.1 has been modified.

00036-013: The potential emissions of any air pollutant (including mercury) would not result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM

would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00036-014: The effects of fires are included in Sections 3.5.2 (existing emissions), 3.7.2 (plant communities), 4.8.1.3 (wildlife), 6.1.1.7.2 (plant communities), 6.1.2.7.3 (wildlife), 6.1.3.7.3 (wildlife), 6.1.5 (cumulative), and 6.2.5 (cumulative). Additional text has been added to Section 4.8.1.2.

00036-015: Thank you for your comment.

00036-016: It is the BLM's policy to optimize the recovery of both resources in an endeavor to secure the maximum return to the public in revenue and energy production; prevent avoidable waste of the public's resources utilizing authority under existing statutes, regulations, and lease terms; honor the rights of each lessee, subject to the terms of the lease and sound principles of resource conservation; and protect public health and safety, and mitigate environmental impacts.

Conflicts associated with potential oil shale leasing and existing oil and gas leases would be analyzed and stipulations could be developed to mitigate the conflict between oil and gas and oil shale consistent with BLM policy. Additionally, if an application is received or if there is a proposal to lease and the NEPA analysis associated with the potential leasing identifies conflicts that cannot be mitigated and are unacceptable, then the application can be rejected and/or the area can be closed to leasing. The BLM has the discretion to deal with potential conflicts and, therefore, it was determined that it was unnecessary to retain the closure of the Piceance Creek Dome area for consideration for future oil shale leasing.

00036-017: The text of Section 4.3.1.1 identifies the potential impact of operations on water quality as a key concern that includes the issue of leaching from stockpiled material or spent shale. The PEIS does not attempt to determine the degree of impact. Because site-specific factors (e.g., soil characteristics) and management practices would heavily influence the impact of this issue on water quality, this issue is one that would be addressed in a site-specific NEPA analysis.

00036-018: See response to Comment 00036-013.

00036-019: Table 3.5.3-3 in Section 3.5.3 of the Draft PEIS lists the Prevention of Significant Deterioration (PSD) Class I areas, describes the significance for their designation, and identifies the four Class I areas closest to the oil shale and tar sands resources. The Draft PEIS also indicates that most of the study area is designated PSD Class II, which would allow for moderate emission growth. A map of all mandatory federal PSD Class I areas is available online at: http://www.nature.nps.gov/air/Maps/images/ClassIAreas.jpg

00036-020: Speculation regarding how potential AQRV monitoring activities would be funded is beyond the scope of this programmatic analysis.

See also response to Comment 00036-013.

00036-021: The potential mitigation measures presented in Sections 4.8.2.4 and 5.8.2.4 are those measures considered generally applicable to all listed species. Those mitigation measures applicable to specific species, including the Colorado River fish mentioned in the comment, are presented in Appendix F of the PEIS. Included are measures related to water depletion effects on these species.

00036-022: Text has been added to Sections 3.10 and 4.11.1.4 of the PEIS to more specifically address issues discussed in the comment. Although it is recognized that substantial water use impacts in some or all of the ROIs may be associated with oil shale or tar sands development (e.g., potential restrictions on water use by existing users, including agriculture; transfer of water rights to developers), the locations, technologies used, and magnitude of development cannot be determined at this time. Consequently, the extent to which existing regional surface and groundwater sources would be affected, the interregional transfer of water into each oil shale or tar sands resource area, and the associated legal costs cannot be determined at this time. Therefore, the PEIS assesses potential impacts of future development qualitatively, to provide a general assessment of the magnitude of potential impacts of reductions in agriculture on the economy of each ROI.

On the basis of the analysis in the PEIS, the BLM has determined that there is no environmental impact associated with amending land use plans to make lands available for application for commercial leasing in the three-state study area, but there may be impacts to land values. Additional, more detailed NEPA analysis of water use impacts will be conducted at subsequent stages of leasing and development.

00036-023: Impacts from power generation for oil shale/tar sands development are not assessed as part of the proposed action in the PEIS because such impacts are too speculative for analysis at this time. The amount of power required varies with technology to be implemented, and the source of the power (and, therefore, the impacts) is unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. Therefore, it would also be

speculative to discuss asthma or mercury-related health effects associated with exposure to contaminants in coal-fired power plant exhaust gases. Impacts associated with provisions of additional electrical power required to operate future oil shale or tar sand facilities will be part of subsequent NEPA analysis when the specifics regarding additional power needs can be identified.

00036-024: As you are aware, the BLM initiated the RD&D leasing process to provide important information that can be used as the BLM works with communities, states, and other federal agencies to develop strategies for managing any environmental effects, including those of water requirements. The PEIS was modified to analyze the impacts of an allocation decision, creating a “staged” or “phased” approach that provides an opportunity for building on scientific, governmental, or industry research, including findings from the existing RD&D leases. Any new information and/or circumstances will be taken into consideration when preparing future NEPA analysis.

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March 3, 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Americans are facing an energy crisis of historical proportions. Consider:

- Analysts are predicting that gasoline will be over $4.00 per gallon this summer – due largely to the failure of international oil production to keep pace with increased international consumption of oil.
- Americans now import over 60% of the oil that we use to make gasoline and diesel – and send over $1 billion a day to countries like Saudi Arabia, Venezuela and Iran

In order to help lower gasoline and diesel prices – and in order to strengthen our nation's energy security, the United States needs to expand access to its domestic energy resources.
Domestic reserves of oil shale and tar sands are vital sources of domestic energy – in fact, the federal government estimates that oil shale deposits on public lands hold the equivalent of at least 1.23 trillion barrels of oil. These resources should be responsibly developed in order to lower gas and diesel prices, increase American energy security and reduce our dependence on imported oil.
Because a robust and active oil shale program can be done in a balanced manner that simultaneously promotes energy production and provides comprehensive environmental protections, I strongly support Alternative B in the PEIS. If BLM adopts Alternative A, the United States will be turning its back on an important domestic energy source, continue to increase our dependence on imported oil and driving up gasoline and diesel prices,

Please ensure that these important national energy resources can be developed in an environmentally sound manner in order to help reduce gasoline and diesel prices, as well as our dependence on foreign oil by adopting Alternative B in the PEIS.

Electro-Petroleum, Inc. has developed a Direct Current cold cracking process for the extraction of petroleum from tar sands. The lack of leases and a proactive policy toward the use of new technology has forced us to go outside the United States for funding and oil fields which was not our initial intent.

37-001

Sincerely,

J. Kenneth Wittle, Ph.D.
Vice President

Environmental Problems, Electrical Solutions.

Response for Document 00037

00037-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00038

USDA United States Department of Agriculture | Forest Service | Intermountain Region | 324 25th Street Ogden, UT 84401 801-625-5605

File Code: 2820
Date: MAR 0 4 2008

BLM Oil Shale and Tar sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Dear Ms. Thompson:

We have completed our review of the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement. Due to the programmatic nature of the analysis and decision we only have a few comments or suggestions.

The description of Alternative C (section 2.4.3.2) states that lands are excluded from leasing where surface disturbance and seasonal limitations are in place to protect known sensitive resources. Excluding those lands at the programmatic level would limit or preclude the ability to address the effects of those exclusions during the leasing analysis. Table 2.4.3-3 identifies things such as slopes, raptor nests or habitat, wildlife habitat, and other as resource areas that would not be available for lease application. If literally applied, there probably are extremely few public lands available for lease application. We therefore continue to support Alternative B as the preferred or more appropriate alternative to select. 38-001

Section 3.1 refers to "Areas Recognized as Having Wilderness Characteristics", i.e., Table 3.1.1-4, Table 3.1.1-9 but it is unclear what such a status implies or means. It states these areas might be addressed in Resource Management Plan revisions, but isn't any resource issue a potential item to be addressed in such a revision? Also, note that WCA is used in Table 3.1.1-11 and WCA is not included in the list of acronyms. 38-002

On page 3-43 is a table listing Federal and State Recreation Areas. Range Creek is another one to consider which is administered by the Utah Division of Wildlife. It is an area of very rich cultural resources, similar to the Nine Mile area and open to the public via a permit process. Following is a web site for more information. It should be fairly close to the Sunnyside Special Tar Sand Area. http://wildlife.utah.gov/range_creek/index.php 38-003

In the first paragraph under 3.10.3 on page 3-231 the second sentence states, "Federal land in these areas includes land administered by the BLM, USFWS, NPS, DOI, and BOR…" Since all of those agencies are within the 'DOI', the use of DOI is redundant. Also should the FS be included in that listing? 38-004

In conclusion, based on the programmatic nature of this analysis we believe the documents are thorough and provide sufficient information for the decision being made. It will also provide an

excellent document to tier to or reference during subsequent analyses should lease applications be received.

If you have questions, please contact Barry Burkhardt, Assistant Director for Minerals of our Bio-Physical Resources Staff, at 801-625-5157.

Sincerely,

HARV FORSGREN
Regional Forester

cc: Barry Burkhardt

Responses for Document 00038

00038-001: The BLM acknowledges the commentor's preference for Alternative B.

00038-002: The text in Section 3.1 of the PEIS has been revised to define the meaning of wilderness characteristics. Also, the term Wilderness Characteristic Areas has been added to the notation list and glossary.

"Areas Recognized as Having Wilderness Characteristics" (WCAs) are areas that are not officially identified as "wilderness" under the Wilderness Act of 1964, nor are they "wilderness study areas" (WSAs) that were identified by BLM inventories in the 1970s and 1980s under the authority of FLPMA. Generally, they are areas that were identified by various groups, and then inventoried by the BLM to determine if they possessed the characteristics of wilderness as described in the Wilderness Act. The BLM may manage the lands to protect and/or preserve some or all of those characteristics through the land use planning process. In addition, under the land use planning process, the BLM must consider a range of alternatives for the lands identified with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness characteristics on these non-WSA lands.

00038-003: Thank you for the comment. Range Creek is an appropriate addition and has been added to Table 3.1.1-11 in Chapter 3.

00038-004: The text in Section 3.10.3 of the PEIS has been changed to address information provided in the comment.

OSTS_00039

EXCALIBUR
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March 5, 2008

BLM Oil Shale and Tar Sands Resources PEIS
Argonne National Laboratory
EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Re: **EIS Comments**

Gentlepersons:

This letter of comment is prompted by our attendance at the hearing in Salt Lake City on February 25, 2008, where BLM staff clarified that the purpose of the Programmatic EIS has been altered to merely identify prospective sites for commercial leasing given the large variation in processes and the impossibility of addressing a given technology on any particular site.

Naval Oil Shale Reserves 1 & 3

We would like the EIS to make the lands earlier encompassed within Naval Oil Shale Reserves 1 & 3 at Rifle, Colorado possible sites for commercial leasing.

We understand the environmental nightmare earlier created at that location by the Bureau of Mines, commencing in 1948 and continuing to the present, but we intend to demonstrate at that location the environmental cleanliness of our process, which eliminates harmful effluents and renders the spent shale environmentally inert.

Please see (i) the attached "Introduction", (ii) the enclosed photo of the shale, both before and after processing, and (iii) the samples of spent shale enclosed herewith.

39-001

The Rifle, Colorado location greatly reduces the costs associated with other sites, because of the immediate availability and access to transportation (interstate & rail), electricity and pipelines. The only issue to date with that location has been the failure of earlier processes to solve the environmental conundrum.

We can demonstrate to all concerned that we have solved the environmental conundrum, and that we can produce at that location cleanly and responsibly. Further, we intend to relocate the vitrified spent shale to a distant location where it can be processed into the ancillary products which can be derived from spent oil shale. Such an example should make it easier to develop elsewhere as it will demonstrate in full view of the public the cleanliness with which the extraction can be accomplished.

OSTS_00039

Best Available Technology

We also suggest that you attempt to identify the "best available technology" ("BAT") and gear the EIS to that level of cleanliness. With that approach, only those processes which do not meet the BAT will have to complete a separate EIS for each location sought to be developed with inferior environmental technology and compliance, while those compliant with BAT will not be hampered with the burden of an EIS on each property.

39-002

Obviously, we think that our technology forms the basis of BAT; so we challenge others to render their projects as clean as we envisage ours will be! In this regard, see our "Introduction" attached and the manner in which we view the technologies segregated therein.

Should you have any questions, please call.

Sincerely yours,

Raymond L. Ridge

Raymond L. Ridge,
President

OSTS_00039

Excalibur Industries Inc.

(The 'Keystone' to Commercial Production of Oil Shale)
An Introduction

1. **Commercial Production of Oil Shale:**

Country	Metric Tons/Day	Retort Process
Estonia	60,274	Kiviter[1]; Galoter[1]
China	8,219	Fushun[1]
Brazil	6,600	Paraho/Petrosix[2] (18') (36')
USA	**-0-**	
Excalibur	18,144 (projected), 15,000 Bbls./Day	Paraho/Petrosix[2] (14' in modules)

All existing processes generate carbon dioxide and fail to leave the spent shale environmentally inert.

The only reason the U.S. has no commercial operations is that existing retort technology can't comply with environmental regulations in the U.S. without further remediation.

2. **Proven Commercial Technologies in a Hybrid Configuration with Patent Pending; No mixing of gases:**

No "scale-up" risk; No effluents; Spent shale environmentally inert; No water for planting.

(a) Underground mining mandated by the State of Colorado, e.g.Continuous Mining Machines in 20' seams or Block Caving:
Possible mining partners: The Washington Group or Peregrine Systems (formerly Phelps Dodge)

(b) Plasma Gasification: Heat, Electricity & Cleanliness
The 'Keystone' to Commercial Production: Elimination of effluents and rendering spent shale environmentally inert

"Using the syngas is more efficient than direct combustion of the original fuel."

(c) Paraho/Petrosix retorts:
95% efficient; scaled-down to 14' diameter from a maximum of 36'

(d) Refining (vapor capture & upgrade)

(e) Electricity co-generation
Syngas turbine
Steam turbine

OSTS_00039

3. <u>The Oil Shale Business vs. The Oil Business:</u>

Whenever the term "oil" is used one tends to think only of oil & gas exploration, production, refining and petrochemicals.

The oil shale business is involved with more than "oil" and its ancillary products.

The by-products of oil shale give rise to many more products than does the traditional oil business, but few companies have understood the opportunity to pursue oil shale for more than the "kerogen oil" trapped within, i.e. Petrobras (Brazil) and Viru Keemia Grupp AS (Estonia) . **The ancillary products from oil shale serve to reduce its dependence on oil prices, with a reduction in Cost/Bbl. from $34.00 to $22.00 using only road base and carbon dioxide to reduce costs/bbl. Further allocated cost reductions are highly probable!**

The following is a list of products which can be derived from the processing of oil shale in connection with the extraction of the kerogen oil (only the first 7 are synonymous with the oil industry):

1. Distillate gases: Naptha
2. Distillate liquids: Kerosene/Gasoline
   Diesel/Jet Fuel
   Fuel Oil
3. Petrochemicals: (feasible once production of 50,000 Bbls./day is achieved)
4. Sulfur
5. Ammonia sulfate: Solid & Liquid Fertilizers
6. Solvents
7. Asphalt, asphalt stabilizers and cold patch repair
8. Cement & cement extender
9. Soil conditioner (pH conditioner)
10. Ceramic feed stock & tiles
11. Glaze
12. Dust control agents
13. Road & roof sealant
14. Road base
15. Self-burned brick & building block
16. Tiles & ceramic counter-top materials
17. Wall Board
18. Paper filler & Paint filler
19. Cosmetic & medicinal delivery systems
20. Rock Wool

OSTS_00039

4. Comparable Costs:

Matthew Simons, author of *Twilight in the Desert: The Coming Saudi Oil Shock and the World Economy,* indicates in that work that the oil & gas industry is spending $20,000 - $40,000 to identify and produce one (1) sustainable barrel of oil/day. Thus, an expenditure of $450 Million should produce 15,000 Bbls. of oil/day. This happens to be comparable to the projected cost of a plant utilizing the combined technologies of Petrosix retorts and plasma gasification for heat. And, this Energy Return on Investment analysis is virtually identical to that of EGL Resources, Inc. which can be accessed on-line at "http://dels.nas.edu/besr/docs/LerwickDay.pdf" The EGL analysis is as follows:

Energy Comparison
Preliminary Energy Efficiencies
for
Various Unconventional Resource Recovery Processes

Process	1st Law Efficiency	Energy Self-sufficiency	Energy Return on Investment
Conventional Petroleum Exploration & Production	0.92	0.92	10.5
US Oil Shale - Surface	0.82	0.98	10.0
Alberta Oil Sands - Surface	0.82	0.89	7.2
Alberta Oil Sands - In-situ	0.86	0.86	5.0
US Oil Shale - In-situ non-electric heat	0.88	0.88	6.2
US Oil Shale - In-situ electric heat (Shell Oil)	0.78	0.78	2.5
IGCC with Fisher-Tropsch	0.61	0.87	6.0

5. Competition:

Excalibur's current competition is described in a publication from the Department of Energy entitled "Secure Fuels from Domestic Resources/Profiles of Companies Engaged in Domestic Oil Shale and Tar Sands Resource and Technology Development (June 2007) ["The Profiles"]. However, management is of the opinion that the competition really should be classified by the approach to environmental issues as follows:

1. In-Situ/"Out-of-sight/Out-of-Mind"
2. Above-Ground/Sequestration
3. Above-Ground/Compaction & Planting
4. Above-Ground/Air Quality Only
5. Above-Ground/Comprehensive Remediation

The companies listed in The Profiles can be classified by these categories as follows:

In-Situ/"Out-of-sight/Out-of-Mind"

Chevron USA
E.G.L. Resources
Electro-Petroleum
Earth Search Sciences/
Petro-Probe, Inc.
Exxon Mobile Corporation
Global Resource Corporation
Independent Energy Partners
James A. Maguire, Inc.
Mountain West Energy Company
Phoenix-Wyoming, Inc.
Raytheon Corporation
Shell Frontier Oil and Gas Inc.

(In-Situ processes remain environmentally challenged because (I) they still produce carbon dioxide which escapes into the atmosphere, (ii) they still release mercury and other toxins into the water table, (iii) they will still be required to remediate these underground effects, (iv) given the well spacing requirements, they will denude the landscape to drill all the holes needed, and (v) the energy requirements to heat the kerogen in place will create a "carbon footprint" that is

unacceptable. **Finally, all in-situ processes fail to capitalize on the value of the ancillary products which can be produced from spent shale using above-ground processes)**

Above-Ground/Sequestration
Red Leaf Resources a/k/a EcoShale

(The surface sequestration [leaving the spent shale encapsulated in earthen chambers] remains environmentally challenged because of the possibility of collapse and resulting escape of the residue from earthquake or other natural processes. It is also challenged by the surface area required to build such a large number of earthen vessels and the need to build a new resource delivery system to each new chamber. **Finally, surface sequestration fails to capitalize on the value of the ancillary products which can be produced from spent shale using other above-ground processes; and also incurs the costs of mining and above-ground preparation of the feedstock.)**

Above-Ground/Compaction & Planting

Millenium Synthetic Fuels, Inc.	Petrobras ("Petrosix")
Nevtah Capital Management, Inc.	Syntec, Inc.
Oil Shale Exploration Corporation	Temple Mountain Energy, Inc.
Shale Tech International ("Paraho")	Western Energy Partners

(The compaction/planting proposals remain environmentally challenged because of the amount of water required [at least 75% of historical estimates for water usage], and because of the danger to ground water systems from toxins and poisons.)

Above-Ground/Air Quality Only
Chattanooga Corporation

(The Chattanooga Corporation method remains environmentally challenged because it only reduces water usage and carbon dioxide, contemplating the sequestration of carbon dioxide in deep wells. It does not address the treatment of the spent shale except for the virtual absence of sulfur. And, its need for natural gas to provide the necessary hydrogen requires the use of a more expensive source of fuel for its process.)

Above-Ground/Comprehensive Remediation
Excalibur Industries Inc.

(All greenhouse gases are prevented from escaping to the atmosphere, and the spent shale is rendered environmentally inert and shipped to another location for use in fabricating anciallary products.)

6. Reasons to Believe:

The Paraho/Petrosix Processes. The Paraho/Petrosix processes have been successfully operated in Brazil on a commercial scale since at least 1982, but without regard to eliminating the effluents or remediating the spent shale, which causes so much consternation in the U.S. This success of extracting 4,200 Bbls./day from shale having a quality of only 7.6% by weight is a testament to its 95% efficiency and the value of ancillary products. Oil shale in the Anvil Points sector of Colorado, for example, averages 13% by weight.

Plasma Gasification. Plasma gasification has been demonstrated by a number of firms to be capable of generating hot syngas from any type of material which is carbon based. Those firms have focused primarily on the gasification of municipal waste, and just a few firms have demonstrated the use of coal as a feed stock in a plasma gasifier. Coal has 4x the BTU's contained in municipal waste.

OSTS_00039

The syngas from a plasma gasifier is generated at atmospheric pressure without the need of the introduction of pure oxygen into the process. The syngas exits the plasma gasifier at a temperature of approximately 3,200 degrees Fahrenheit, and is capable after cooling of being introduced to a gas turbine to generate electricity to sustain its own operations and those of the plant. The gas at these temperatures is non-fouling, and does not allow fly ash to gum-up the heat exchanger.

These demonstrated technologies, when combined, are capable of extracting the kerogen oil from the oil shale and leaving the spent shale in an environmentally inert state ready for further processing for use in the production of the additional products noted above.

We have not reinvented the wheel, we have just rearranged the spokes

7. **Summary:**

The technology is ready, and the subject of our **pending Patent Application. Market risk is negligible. The conditions are prime. The opportunity has never been better.**

(1) **The Kiviter, Galoter and Fushun retorts all create carbon dioxide with combustion within the retort itself.**

(2) **The Paraho/Petrosix retorts create heat outside of the retort itself, and heat recycling gases via a heat exchanger. However, they still combust carbon fuels to create the heat and thereby create carbon dioxide, which is ultimately release into the atmosphere.**

(3) **Management is of the view that BLM leases, being dependent on royalty payments, should not be extended to any firm unable to conduct "commercial" operations, and then only to those firms with the "best available technology". Accordingly, other firms should have to be as environmentally friendly as Excalibur's Technology to even secure leases on other tracts.**

Contact Information:

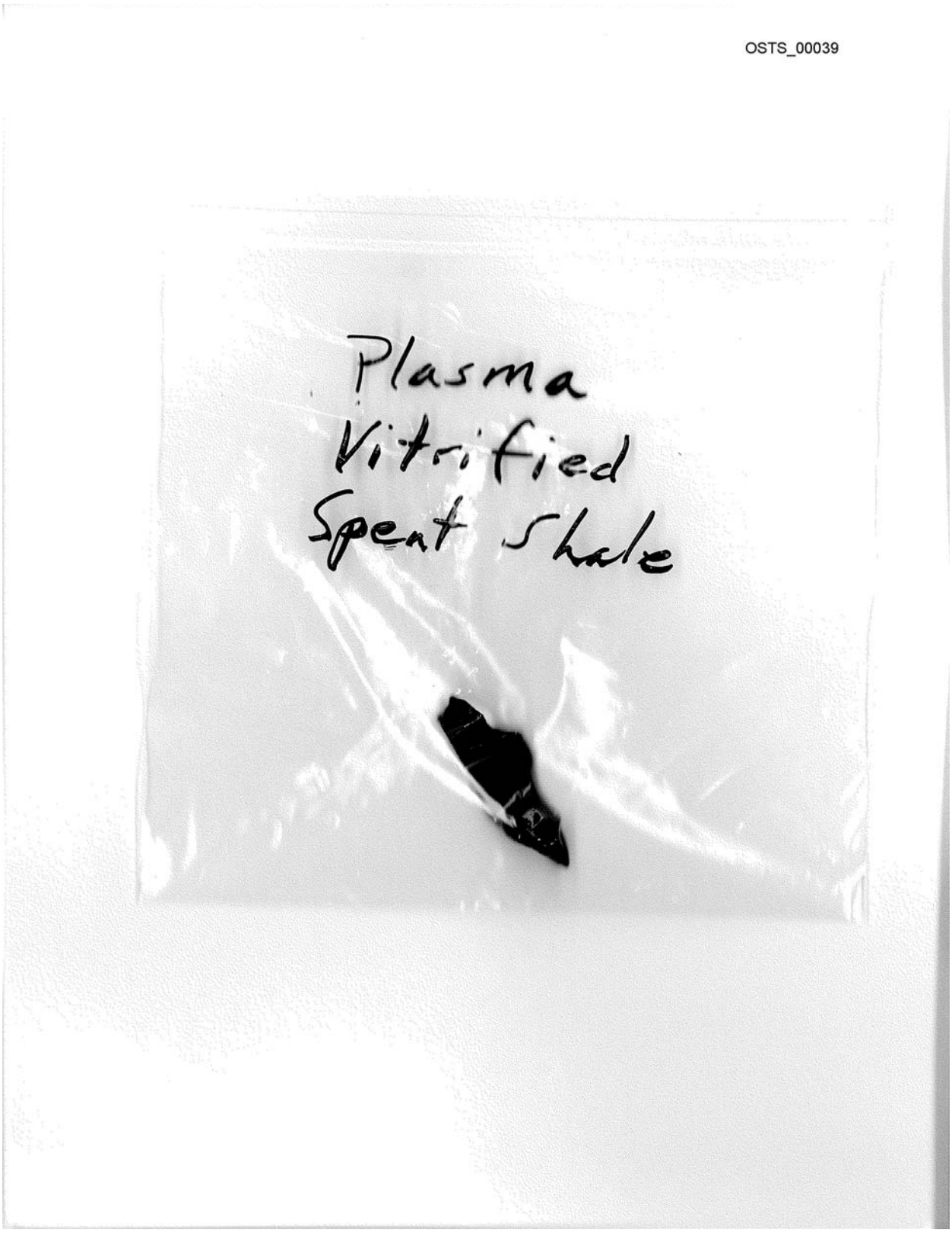
Raymond L. Ridge, President
Excalibur Industries Inc.
1366 Spring Lane E
Salt Lake City, UT 84117

(801) 274-1353
(801) 647-3241 (cell)

RayRidge@comcast.net

OSTS_00039
Vitrified
Spent Oil Shale
Spent Oil Shale
Virgin Oil Shale

OSTS_00039
Spent shale
Paraho
process


OSTS_00039
Plasma
Vitrified
Spent Shale

Responses for Document 00039

00039-001: Portions of NOSR 1 are within the most geologically prospective area identified in the PEIS. This area is proposed to be available for application for leasing in the Proposed RMP Amendments.

Thank you for your comments regarding your oil shale technology; however, the scientific and technical evaluation of new technologies is outside the scope of the PEIS.

00039-002: The BLM generally does not determine what technologies may be applied for a particular use. The general approaches used are to either define the specific desired condition or outcome and to allow operators to choose how to achieve the desired condition, or to provide prescriptive requirements that dictate performance. Even if specifying particular technologies was the accepted approach, at this time the industry is so new that not enough information exists on available technologies to make an informed choice.

OSTS_00040

Mark W. Belles
9318 Willard Street
Rowlett, TX 75088

BLM Oil Shale and Tar Sands Resources
Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

26 December 2007

Dear Planning Team,

Thank you for the notice of availability of the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocation in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement. Please retain my name on the mailing list for this project.

I am particularly concerned that the Draft documents do not address the impacts to Travel and Recreation issues. These documents should be amended and re-submitted for public comment after addressing these issues. 40-001

I am also concerned that the plans do not exclude area under consideration by Congress for designation as wilderness. Much of these areas were found to have wilderness qualities by the BLM in the 1999 Wilderness inventory. Additionally a recent ruling by the Central Division of the US District Court (SOUTHERN UTAH WILDERNESS ALLIANCE v. GALE NORTON) has found that planning processes must take into consideration all data made available to it. As such I furnish the following descriptions of areas that possess wilderness qualities and should be excluded from the program area.

Lower Bitter Creek (approximately 14,000 acres) 40-002
Desbrough Canyon (Vernal FO Portion) (approximately 13,000 acres)
Dirty Devil (approximately 242,000 acres)
Fiddler Butte (approximately 92,000 acres)
Hideout Canyon (approximately 12,000 acres)
Hondu Country (approximately 20,000 acres)
Mexican Mountain (approximately 100,000 acres)
San Rafael Creek (approximately 114,000 acres)
Seep Canyon (approximately 21,000 acres)
Sid's Mountain (approximately 107,000 acres)
Sunday School Canyon (approximately 18,000 acres)

OSTS_00040

Winter Ridge (approximately 38,000 acres)
White River (approximately 29,000 acres)
Wolf Point (approximately 15,000 acres)

Each of these areas are shown in the maps accompanying H.R. 1919 (154 House co-sponsors) and S. 1170 (20 Senate co-sponsors). While much the areas noted above are not in the proposed programmatic area, those areas that overlap should be excluded.

40-002 (cont.)

Thank you for the opportunity to comment,

Responses for Document 00040

00040-001: The PEIS discusses the potential impacts to recreation and associated travel management activities in Sections 4.2.1.4 and 5.2.1.3 and the potential impacts on the economics of recreational activities in Sections 4.11.1.5 and 5.11.1.3. In addition, potential impact to recreation and associated travel (access) by alternative is included in the socioeconomic and land use sections in Sections 6.1 and 6.2.

In the PEIS, the BLM analyzes the environmental consequences of an allocation decision and, therefore, no changes to the travel management plan of the land use plans is made. However, the BLM's analysis concludes that areas that will undergo oil shale or tar sands development would displace recreational uses. Areas currently opened to OHV use may be unavailable if leased and development plans are approved. Closure of these areas would be to protect the health and safety of the public. Sections 4.11.1.5 and 5.11.1.5 also contain scenarios that describe the potential economic effect of hypothetical declines in recreation-related employment and its implications to the overall economy of the areas. Additional NEPA analyses would be conducted prior to the issuance of commercial leases, which will evaluate site-specific impacts to recreation and associated travel management activities.

00040-002: As described in Chapter 2 of the PEIS, only designated wilderness areas and WSAs are excluded from application for leasing. In the PEIS, areas identified by BLM with wilderness characteristics (WCAs) that overlap with the alternatives are disclosed. For example in Utah, these lands were reviewed as part of BLM's wilderness characteristics inventory maintenance, where a combination of data and on-site reviews were done. This included specific field inspections, interdisciplinary team review of data such as range files, county and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM's findings are described in the 1999–2003 wilderness reinventory documentation, as well as in the 2007 wilderness characteristics review process.

Decisions regarding management of the WCAs are being made in the local RMPs and not in this PEIS. Nevertheless, the management and level of protection of the wilderness characteristics on non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). The BLM may manage the lands to protect and/or preserve some or all of those characteristics through the local land use planning process.

The Utah v. Norton Settlement Agreement distinguished between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLPMA §202 land management process.

The BLM does not manage public land based on pending draft or proposed legislation.

OSTS_00041

Utah Reiner
2749 ½ Cheyenne Drive
Grand Junction CO 82501

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To Whom It May Concern:

I support oil shale and tar sands development as a means to improving our domestic energy supply.

The BLM has done a first-rate job in creating the PEIS. It clearly outlines how the process should move forward. It uses sound judgment and I support amending the 12 land use plans.

Congress set forth a clear policy to see that unconventional fuels, such as oil shale and tar sands, are developed. While I favor seeing renewable energy more in the future, technologies need to mature before these resources can be relied on to contribute significantly to our domestic energy needs. Until then, unconventional energy resources like oil shale and tar sands should be developed to help bridge the gap between our energy needs of today and the future. 41-001

Please keep up the good work. I appreciate you including this letter in the PEIS record.

Sincerely,

U. Reiner

Response for Document 00041

00041-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00042

Dennis Portnoy
1537 Franklin Street # 310
San Francisco, CA 94109

Sherry Thompson, Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave
Argonne, IL 60439

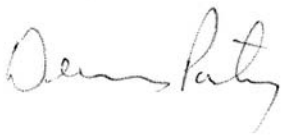
March 5, 2008

Dear Sherry:

I am very troubled that the government is not promoting sustainable sources of energy, but instead more fossil fuels that increase negative climate change. The BLM'S Alternative "B" is completely unacceptable.
I strongly believe that the Alternative A plan of no action is much wiser for the wellbeing of future generations.

42-001

Sincerely,



Response for Document 00042

00042-001: The BLM acknowledges the commentor's preference for Alternative A.

OSTS_00043

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To Whom It May Concern:

I would like to thank the Bureau of Land Management for their tireless effort in creating a well-founded document which will hopefully be used to create a stable national tar sands and oil shale commercial program. I strongly support the direction of the Oil Shale and Tar Sands PEIS. Having said that, I do not feel Alternative C is a viable option for an economically stable unconventional energy program.

First and foremost, a commercial leasing program for oil shale and tar sands should protect the economic well-being of the affected communities. In its current form Programmatic Alternative C is not big enough to help economies in the West. Whereas Alternative B would make 1.9 million acres available, Alternative C would make just over 830,000 acres available, excluding more than 1.1 million acres. The exclusion of more than fifty percent of the acreage will mean communities in oil-shale rich areas will not receive the appropriate amount of tax and royalty revenues that a more robust program would garner.

The reserves of oil shale located among Colorado, Utah and Wyoming are estimated at 800 billion to 1 trillion barrels of recoverable resource with the majority of the resource located in Western Colorado. Alternative C would limit the acreage in Colorado to less than 43,000 acres; this will deter new businesses from making capital investments in oil shale resources in northwest Colorado because of the inability to see substantial return on their investments. 43-001

In Western Colorado, we rely on the energy industry to help keep our economies flourishing. The Grand Junction, Colo. newspaper *The Business Journal*, reported in its February 07, 2008 issue that despite the economic national downturn, "the situation is far different in the Grand Valley [Mesa County] and surrounding areas, where the growing energy industry has created jobs and bolstered the economy." A vigorous oil shale program will add to the economy. Whereas the program as outlined in Alternative C will hinder the growth of new jobs and stagnate the economy.

In closing, I ask you to please disregard Alternative C because it is not large enough to create a long-standing viable commercial oil shale program.

Sincerely,

Harvey Childers

Harvey Childers
Western Colorado Resident

Response for Document 00043

00043-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands, and the preference for BLM to not select Alternative C.

OSTS_00044

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

February 20, 2008

To Whom It May Concern:

I am writing in reference to the public comment period for the Programmatic Environmental Impact Statement (PEIS) for oil shale and tar sands resources in Colorado, Utah and Wyoming.

I live and work in one of the most energy-producing regions of northwest Colorado. I understand that the strength and sustainability of my local economy comes, in part, from energy development and the proud men and women, just like me, who work in the industry. It is my understanding that the bulk of what is considered the largest known oil shale deposit in the world is right in my backyard. It is because of this that I support the BLM's efforts to conduct this PEIS in the hopes of creating a viable commercial oil shale and tar sands program. 44-001

The development of Western Colorado's unconventional resources will have a positive and significant impact on my local economies through increased tax revenues, payrolls and the creation of quality jobs. While I recognize and appreciate the need for responsible development of oil shale resources, I humbly request you consider the positive impacts the unconventional energy industry could have on this wonderful economy. A no-action decision on the PEIS could have undesirable repercussions on the Western Colorado economies.

Thank you for the opportunity to weigh in on this very important issue.

Sincerely,

Preston Driver
590 Starlight Dr.
Grand Junction CO 81501

Response for Document 00044

00044-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00045

Jane Augustine
6512 County Road 140
Westcliffe, Colorado 81252
phone/fax: 719-783-2512
AugustineJane@cs.com

winter address: 346 East 18th St, #3C
New York, NY 10003
3 March 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne, IL 60439

To the BLM:

It is an outrage that the U.S. Bureau of Land Management plans to lease out 1.9. million acres of public lands it's supposed to protect in order that private companies can make huge profits out of oil shale processing. This giveaway is especially outrageous because those lands are destroyed in the process, there being no efficient way of getting the oil of the shale. Since a ton of rock must be processed to get a mere 25 gallons of oil and the industry wants to produce a million gallons a day, the American people end up owning a giant landscape of rubble. The processing machinery requires very large amounts of energy and water that will deplete the already threatened Colorado river system, so the end result massively increases our overall national energy problems.

I live on the eastern slope of the Sangré de Cristos in Custer County where there is also much BLM land. If the BLM is permitted to mishandle public lands on the western slope, it can do the same here and ruin the local economy.. There are energy replacements for oil being developed, but there are no replacements for the mountains, forests, grass- and grazing fields, and the plants and animals who lose their habitats. Above all, there is no replacement for the water, which is already being used up worldwide far faster than it is naturally replenished.

45-001

This oil shale plan is bad environmental policy and bad economics, but above all scandalously bad government. It must not go forward.

Sincerely yours,
Jane Augustine
Jane Augustine
cc: Senators Allard and Salazar

Response for Document 00045

00045-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00046

STUART DeWOLF KING
690 N. Riverside Dr.
Crownsville, MD 21032
Phone/Fax: 410.923.3738 Cell: 410.903.6626 E-mail: stuartking@verizon.net

March 5, 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Adopt PEIS "Alternative B" to Unlock America's Oil Shale and Tar Sands Resources

Dear BLM:

This letter is to urge BLM to adopt Alternative "B" for the pending Oil Shale and Tar Sands PEIS. I believe that any other course would be grossly irresponsible, essentially "shooting the country's foot" as we face an uncertain energy future.

America's abundant oil shale and tar sands resources could, and should, be developed using advanced in-situ technologies that minimize impact on the environment.

It is clear that "unconventional" sources of fuels have already become a staple in the U.S. Consider that our imports from Canada and Venezuela—our two largest foreign suppliers—are almost entirely derived from tar sands and heavy oil.

It is also clear that the country will rely largely on fossil sources for its liquid fuels for many years to come, even if the development of alternatives and renewables moves at the most rapid possible pace. 46-001

And it is ABUNDANTLY clear that any serious disruption in the delivery of foreign supplies—say, a simple confrontation in the Strait of Hormuz—would create economic chaos because of our great and growing dependence on imports.

For America to restrict (environmentally aware) development of our own unconventional resources purposely courts disaster. These resources cannot be developed at the flip of a switch—and a crash program in the midst of a crisis will surely be more expensive, and dirtier, than an orderly program begun now, with foresight and prudence.

I believe it is your clear patriotic duty to adopt Alternative B.

Sincerely,

Stuart King

Response for Document 00046

00046-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00047

BLM Argonne National Laboratory
Oil Shale & Tar Sands PEIS
9700 South Cass Avenue
Argonne, Illinois 60439

Dear BLM Officials,

I'm a big supporter of domestic utilization of renewable energy and unconventional energy. However, I also believe that we cannot entirely count on renewable energy at this time to meet all of our future energy needs. The technologies for these resources still need time to mature until they can significantly contribute to our domestic energy supply. That said, unconventional energy resources, such as oil shale and tar sands, can help bridge the gap between existing conventional energy resources and renewable energy resources.

As you know, the BLM has already devoted a great deal of time and effort to identifying the most geologically prospective areas where oil shale and tar sands are present. In general, many of these lands are capable of supporting an active oil shale and tar sands program.

Please keep up the good work to see that these areas will be open for application for commercial leasing, exploration and development.

47-001

Sincerely,

Jason Kuzov
463 Seckel
Clifton CO 81520

Response for Document 00047

00047-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00048

Mayrita Varna
626 S Alvarado #444
Los Angeles, CA 90057-3300

Sherry Thompson, BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

RE: My comments—No commercial leasing for oil shale and tar sands!

Dear Ms. Thompson,

As a concerned American I strongly support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

The proposal to open up almost 2 million acres of public lands in Wyoming, Colorado, and Utah to commercial leasing of oil shale and tar sands would require an incredible amount of energy and emit tremendous amounts of greenhouse gases. It comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 48-001

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The BLM should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 48-002 48-003

The BLM proposal would fuel an outdated, fossil-fuel-intensive energy infrastructure. If "business as usual" greenhouse gas emissions continue, over one third of the world's plants and animals will be committed to extinction by the middle of this century or before. Oil shale and tar sands development is an environmental catastrophe that we cannot afford now or ever. 48-001 (cont.)

I very strongly urge the BLM to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

Most sincerely,

Mayrita Varna

Responses for Document 00048

00048-001: The BLM acknowledges the commentor's preference for Alternative A.

00048-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00048-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

OSTS_00049

Untitled

February 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Responsible Development of National Oil Shale and Tar Sands Resources

Dear Sherri Thompson:

I would like to express my strong support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed for leasing have enough oil to meet America's gasoline demand for more than 18 years.

With today's technology, this enhanced development can be conducted in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example: 49-001

In spite of significant conservation efforts, world energy demand is projected to increase by 50% during the next 20 years and could double in 50 years.
Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
The United States military currently uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.
Finally, development of unconventional fuels will produce a strong workforce and will support the local and regional economies of Utah, Colorado and Wyoming.

The utilization of oil shale and tar sands from these leasing areas will offer significant benefits to the local communities and will strengthen our national energy security while bringing the necessary supplies of oil into the markets to offset increased global demand. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Name: Norman & Freda Lipps

Address: 8445 Lurline Ave

E-mail: Normli@juno.com

Response for Document 00049

00049-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00050

Thursday, February 28, 2008

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I strongly support the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS). A robust and active oil shale program conducted in an environmentally sensitive manner as proposed by BLM will strengthen communities, add to our nation's energy portfolio and help reduce energy prices for consumers.

With rising energy costs and increasingly volatile supplies, it is more important now than ever that the United States pursue balanced energy solutions and alternative energy sources like oil shale and tar sands. Consumers, industries and businesses throughout the nation face rising energy prices, ever-tighter supplies and increased dependence on imports, often from politically unstable areas. Oil shale can help address the nation's energy challenges.

Further, production of domestic oil shale and oil shale technology will have a positive impact on America's energy security. For example:

50-001

? In spite of significant conservation efforts, world energy demand is projected to increase by 50% over the next 20 years and could double in 50 years.

? Oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil. No nation has more oil shale than the United States.

? The lands that BLM is proposing to develop would yield enough gasoline to keep America driving for at least 18 years.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner.

Finally, development of unconventional fuels will create a vibrant workforce and will strengthen the local and regional economies of Utah, Colorado and Wyoming. Development of oil shale and tar sands in these communities would provide tremendous local and national benefits that will help to strengthen our national energy security and

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bring much-needed supplies of oil into the markets to offset increased demand in China and India.

For these reasons, we urge BLM to adopt Alternative B of the PEIS. BLM should also investigate and analyze the positive impacts to the American public that would result in developing this valuable resource.

50-001 (cont.)

Sincerely,

Ms. Sara Glenn
4944 Quebec Street NW
Washington DC 20016

Response for Document 00050

00050-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00051

Rio Blanco Water Conservancy District

March 10, 2008

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

RE: A Sensible Oil Shale Program Will Benefit Western Colorado Communities

To Whom It May Concern:

This letter is in reference to the three-state Programmatic Environmental Impact Statement (PEIS) for oil shale and tar sands. The ability to extract oil shale will help maintain the vibrant, flourishing economies of Rio Blanco County.

The majority of the United States' massive oil shale resource is found in close proximity to Rio Blanco County and the ability to develop the resource will certainly help to keep our economy strong. Oil shale development will bring in additional dollars for the County in the form of severance taxes and increased salaries. Municipal infrastructure will also benefit from increased budgetary dollars as a result of development. 51-001

Not only do we need to develop oil shale to help our economy, but we need to develop oil shale to increase energy self-sufficiency and energy independence. Developing unconventional oil shale resources, in addition to other energy sources, will help ensure we have a strong, diverse energy portfolio.

The PEIS will help set the foundation for a sensible, national oil shale and tar sands commercial leasing program to become economically viable and socially sustainable. And I look forward to an oil shale program moving forward to help Rio Blanco County and the Nation.

Sincerely,

Dan Eddy
Rio Blanco Water Conservancy District
2252 East Main Street
Rangely, CO 81648

2252 East Main Street-Rangely, Colorado 81648 Phone (970) 675-5055 Fax (970) 675-5531

RECYCLED PAPER

Response for Document 00051

00051-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00052

February 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Americans are facing an energy crisis of historical proportions. Consider:

- Analysts are predicting that gasoline will be over $4.00 per gallon this summer – due largely to the failure of international oil production to keep pace with increased international consumption of oil.
- Americans now import over 60% of the oil that we use to make gasoline and diesel – and send over $1 billion a day to countries like Saudi Arabia, Venezuela and Iran

In order to help lower gasoline and diesel prices – and in order to strengthen our nation's energy security, the United States needs to expand access to its domestic energy resources.

Domestic reserves of oil shale and tar sands are vital sources of domestic energy – in fact, the federal government estimates that oil shale deposits on public lands hold the equivalent of at least 1.23 trillion barrels of oil. These resources should be responsibly developed in order to lower gas and diesel prices, increase American energy security and reduce our dependence on imported oil. 52-001

Because a robust and active oil shale program can be done in a balanced manner that simultaneously promotes energy production and provides comprehensive environmental protections, I strongly support Alternative B in the PEIS.

If BLM adopts Alternative A, the United States will be turning its back on an important domestic energy source, continue to increase our dependence on imported oil and driving up gasoline and diesel prices, and Alternative C does not allow for full recovery of oil shale and tar sands resources and does not provide for sound or efficient management of the program.

Please ensure that these important national energy resources can be developed in an environmentally sound manner in order to help reduce gasoline and diesel prices, as well as our dependence on foreign oil by adopting Alternative B in the PEIS.

Sincerely,

Name: Mary Linda Nicholson

Address: 18 Gamble Dr, Glenwood Springs CO 81601

E-mail: MARYHNDAY@comcast.net

Response for Document 00052

00052-001: The BLM acknowledges the commentor's preference for Alternative B.

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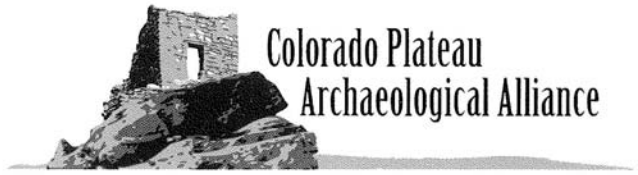

15 March 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
Argonne, Ill. 60439

Comments: Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement (DOI No. DES 07-60.)

Introduction

Please accept and fully consider these comments on behalf of Jerry D. Spangler, a registered professional archaeologist and executive director of the Colorado Plateau Archaeological Alliance (CPAA). Founded in 2005, CPAA works to protect archaeological and historical properties on public lands throughout the West through sound scientific research into the causes of adverse effects, through public outreach and education, and through collaborative projects with conservation and governmental entities. Our goal is to ensure that cultural resources are protected for future generations, for their scientific as well as aesthetic qualities. We appreciate this opportunity to comment on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement (hereafter PEIS). We believe the federal actions articulated in Alternatives B and C will adversely impact the integrity of cultural resources on more than 2 million acres of BLM-administered lands in the West, and that a more thoughtful consideration of potential adverse impacts to cultural resources is warranted.

53-001

FLPMA obligates the Bureau of Land Management (BLM) to protect cultural, geologic and paleontological resource values (43 U.S.C. §§ 1701(a)(8) 1702(c)), whereas the National Historic Preservation Act of 1966 ("NHPA") (16 U.S.C. § 470 et seq.) provides for enhanced consideration of potential impacts to these resources through a cooperative federal-state program for the protection of historic and cultural resources. In particular, Section 106 (16 U.S.C. § 470f) obligates the BLM to consider the effects of management actions on historic and cultural resources listed or eligible for listing to the National Register of Historic Places, as provided under NHPA. Section 110 of the NHPA requires the BLM to assume responsibility for the preservation of historic properties it owns or controls (16 U.S.C. § 470h-2(a)(1)), and to manage and maintain those resources

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jerry_cpaa@att.net • CPArch.org

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in a way that gives "special consideration" to preserving their historic, archaeological and cultural values. Section 110 also requires the BLM to ensure that all historic properties under the jurisdiction or control of the agency are identified, evaluated, and nominated to the National Register of Historic Places. Id. § 470h-2(a)(2)(A).

As discussed throughout the PEIS, many other federal laws, regulations and executive orders have articulated the BLM's responsibility to protect properties of cultural and religious significance. This responsibility was reaffirmed by President Bush's "Preserve America" initiative (See Exec. Order 13287, March 3, 2003) that requires the BLM to advance the protection, enhancement, and contemporary use of its historic properties. It states the BLM must ensure that "the management of historic properties in its ownership is conducted in a manner that promotes the long-term preservation and use of those properties as Federal assets." It is within that context that the BLM must carefully consider federal management actions designed to facilitate oil shale and tar sands leasing and the consequent effects of such decisions on archaeological and historic resources of significance to all Americans. 53-002

As a professional archaeologist, I am intimately familiar with the cultural resources of northeastern Utah and northwestern Colorado. My research in this region over most of the past 20 years, much of it conducted on behalf of the BLM, has been widely published in peer-reviewed monographs, journal articles and books (cf. Spangler 1993a; 1993b; 1995; 2000a; 2000b; 2001; 2002; 2003; 2004; 2006, 2007; Spangler, Barlow and Metcalfe 2004; see also attached vitae). Ongoing research in the Desolation Canyon, Range Creek Canyon and Nine Mile Canyon regions has been specifically focused on the direct, indirect and cumulative impacts of large-scale industrial development, road access and unmanaged recreation on cultural resources in a region renowned for its archaeological and historic sites (cf. Spangler, Arnold and Boomgarden 2006; Spangler, Aton and Spangler 2007; Spangler et al.2007a, 2007b, 2008). Consequently, the following comments are directly applicable to management decisions that could adversely impact the cultural resources found in three specific areas considered by the PEIS: the Piceance Basin area, including contiguous areas of Rio Blanco County to the west; the White River and Hill-Willow Creek Extension of the Uintah and Ouray Ute Indian Reservation on the northern escarpment of the East Tavaputs Plateau; and the West Tavaputs Plateau, including Nine Mile Canyon and Desolation Canyon.

General Concerns

As stated throughout the PEIS, the BLM has already made a determination that any amendments to land-use plans to "designate lands as available for application for commercial leasing would have no impact on the environment," and that such amendments "do not commit the BLM to a particular course of action since they merely allow the BLM to consider granting leases for oil shale or tar sands development in the future" (PEIS ES-5). The PEIS further maintains that "additional environmental analysis will be required to analyze the impacts of the proposed technology and of any reasonable known alternative technologies for development of the oil shale or tar sands resources. Another review under NEPA would be undertaken before approval of a plan of

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development, which would include approval of particular activities at the specific locations where such development would take place" (PEIS 1-1).

CPAA disagrees with the basic premise that "cultural resources on federal and nonfederal lands would not be impacted by land use plan amendments" (PEIS 2-66). Amending BLM land-use plans to accommodate a particular use of public lands not anticipated at the time the plan was drafted is commonly a process initiated when the proposed activity is considered imminent and viable. Hence, the amendments to these specific land-use plans to allow for the leasing of selected and identified parcels/areas with oil shale or tar sands constitutes a *de facto* acknowledgement that these areas will be leased, even though the BLM readily admits that "uncertainty associated with the preliminary analyses indicated that BLM should defer approving the issuance of commercial leases until adequate information is available to define what the development will entail" (PEIS 2-51).

In effect, BLM admits there is "uncertainty" as to the nature and scope of the development, and that current information about that development is inadequate to make informed decisions at the current time. However, these inadequacies have not precluded the BLM from offering Alternative B (preferred) and Alternative C, each with the stated intent to *facilitate* commercial leasing. Both alternatives also come with the acknowledgment that leasing could lead to "construction and operation of commercial projects within the lease areas. Potential impacts [to cultural resources] may include damage or destruction, and increased potential for vandalism or theft due to increased human access" (PEIS 2-66).

53-003

If the actual commercial leasing of public lands for oil shale and tar sands development constitutes a federal undertaking requiring thorough Section 106 review, as is acknowledged in the PEIS, then by logical extension any management decisions to amend the land-use plans (e.g., Alternatives B and C) to allow such leasing to occur is also an undertaking that requires full consideration of direct, indirect and cumulative impacts to cultural resources. No such consideration is offered in the PEIS. Rather, the PEIS states the "potential for future impacts on the environment have been analyzed at the programmatic level with the understanding that future leasing and development will require site-specific NEPA evaluation" (PEIS ES-5) and compliance with agency-specific processes for complying with Section 106 (PEIS 2-3).

CPAA contends that identifying lands for potential oil shale and tar sands leasing without critical analysis of the environmental suitability of those lands for leasing puts the cart before the horse. BLM has made very similar arguments in the past that the *sale* of oil and gas leases would have "no potential to affect" cultural resources, and that site-specific NEPA analysis at the time of the lease development is sufficient to comply with NEPA and NHPA. The Interior Board of Land Appeals has repeatedly rejected this assumption, emphasizing that appropriate NHPA compliance must be completed at each phase of a federal undertaking (cf. IBLA 2004-124, in SUWA v. UT 055, et al.). Furthermore, state protocol agreements specify the BLM will make reasonable efforts to

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identify all historic properties and sacred sites on BLM-administered lands where federal undertakings will occur.

We believe the modification of land-use plans to facilitate leasing is a federal undertaking as defined in 36CFR200.16(y) in that it is "a project, activity or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including … those requiring a Federal permit, license or approval." As such, we believe the BLM has not demonstrated "reasonable and good faith effort to identify all historic properties within the area potentially affected by the proposed undertaking, evaluate and determine whether identified properties are eligible for inclusion in the National Register, assess the adverse effects upon the identified properties deemed eligible, and develop and evaluate the means to mitigate or avoid such effects" (Save Medicine Lake Coalition, 156 IBLA 219,260 [2002]). 53-003 (cont.)

Also disconcerting is that Alternative B, with potential lease areas totaling about 2 million acres, is identified as the preferred alternative based on the rationale that "it would make the largest amount of potential oil resources available for leasing while still providing for an environmentally sound program and would provide the greatest flexibility in locating future development" (PEIS 2-1). This contrasts to Alternative C (830,000 acres of potential lease areas), which excludes those areas where there are already prohibitions on surface disturbance and/or seasonal limitations that have already been implemented by the BLM to protect known sensitive resources (PEIS 2-28).

In effect, the agency preference for Alternative B is based on maximum size of potential lease areas, not "an environmentally sound program." Consequently, at-risk areas already analyzed in detail by the BLM and found worthy of enhanced environmental protection would not receive continued enhanced protection under Alternative B. Hence, Alternative B places at direct and imminent risk 1.17 million acres of public lands where at-risk resources have already been identified and where they are currently being managed by the BLM to protect those values. Alternative B appears to be in direct contrast to the stated intent of Congress that commercial development of oil shale and tar sands should "be conducted in an environmentally sound manner using management practices that will minimize potential impacts" (PEIS 1-1). 53-004

In light of these concerns, CPAA recommends:

- Any amendments to the relevant BLM land-use plans should be accompanied by full Section 106 compliance that includes, at a minimum, a more thorough Class I cultural resources analysis of all sites on lands identified for oil shale and tar sands leasing under Alternatives B and C. This should include the identification of highly sensitive areas where the densities of archaeological sites of National Register eligibility may make those areas unsuitable for leasing (see discussion and recommendations hereafter related to East Tavaputs and West Tavaputs Plateaus). 53-005
- Given that some areas in northwestern Colorado and northeastern Utah considered for oil shale and tar sands leasing also occur in zones with 53-006

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substantial ongoing oil and gas development, the PEIS should more carefully consider the cumulative effects of additional impacts to cultural resources in those areas already experiencing adverse effects. The consideration of cumulative effects should be considered at the earliest stages of a federal undertaking and continue through each phase. 53-006 (cont.)

- The PEIS proposes to amend land-use plans that are woefully out of date, and many of these plans are currently undergoing revision. The issue of oil shale and tar sands leasing should have been addressed within a more synergistic and holistic context of the new draft resource management plans, rather than amendments to outdated plans. It is recommended that oil shale and tar sands leasing be incorporated into the broader context of draft RMPs currently undergoing revisions, and that ongoing RMP revisions be delayed as necessary to accommodate proper planning for oil shale and tars sands leasing development. 53-007
- CPAA concurs that leasing should be excluded from all wilderness areas, wilderness study areas, national landscape conservation system areas, Wild and Scenic river sections (and eligible river segments), National Historic and Scenic Trails, and areas of critical environmental concern (ACECs) currently closed to mineral development (PEIS 1-7, PEIS 2-19). As discussed later, this list of excluded areas should be augmented to exclude leasing in National Register districts or districts deemed eligible for listing on the National Register of Historic Places, as well as proposed ACECs. 53-008

Piceance Basin

The PEIS acknowledges that five 160-acre parcels have been leased in the Piceance Basin for oil shale RD&D activities, one each from Chevron Shale Oil Company and EGL Resources Inc., and three from Shell Frontier Oil and Gas. The leases were issued for 10-year terms with a 5-year extension option. As part of the RD&D leases, each applicant has identified a contiguous 4,960 acres of "preference right lease" areas (PEIS 1-9). These preference lease areas constitute a small portion of the Piceance Basin under consideration for leasing.

It should be noted that the PEIS would appear to modify certain provisions in the current White River RMP that were implemented to protect certain environmental values. These modifications would eliminate surface occupancy restrictions, prohibitions on leasing in the Piceance Creek Dome area due to potential conflicts with oil and gas development; and lease stipulations subject specified carrying-capacity thresholds (PEIS 2-21), in particular the potential impacts on air quality, water quality, socioeconomic impacts and big game habitat (PEIS 2-53). 53-009

The PEIS indicates that about 18 percent public lands in the Piceance Basin have been surveyed for cultural resources, an exceptionally high percentage. These surveys have identified 1,161 sites as of 2006, of which only 51 have been determined eligible for listing on the National Register of Historic Places. This is an unusually small percentage of eligible sites, and it likely is not indicative of the actual number of significant sites. 53-010

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This low total may be reflective of traditional (but incorrect) assumptions that significance corresponds to visual architecture, rock art and rockshelters with deep cultural deposits. It is emphasized that visual appeal is not a definitive standard whereby National Register sites or districts are deemed appropriate for listing (see *National Register Bulletin 16A*). Many known archaeological sites are clearly eligible under Criterion A in that they are associated with broad patterns of human prehistory on the northern Colorado Plateau and northwestern Plains, and they are probably eligible under Criterion D in that they have yielded or are likely to yield important information about the prehistory of the region. Euroamerican historic sites in the Piceance lease area (86 sites) could also be eligible under Criterion B if they are associated with individuals of local, regional or national significance.

The PEIS bases its statistical data regarding eligible sites on GIS data provided by the Colorado SHPO (PEIS 3-193). CPAA did not reexamine these data, but we find the low percentage of sites deemed eligible (less than 5 percent) to be extremely suspect. A cursory review of previous research in the Piceance Basin reveals numerous surveys with a very high percentage of significant sites ranging from Paleoindian campsites to ancestral and historic Ute encampments. For example, Colorado State University initiated surveys of oil shale lands in 1976, documenting 86 archaeological sites (Weber et al. 1977). These surveys included study tracts along Piceance Creek, between Hunter and Willow Creeks, Yellow Creek drainage, Black Sulphur Creek and Ryan Creek. These surveys identified a Paleoindian encampment at 5Rb385, numerous encampments with temporally and spatially diagnostic Archaic artifacts, at least eight sites with Fremont and Ancestral Puebloan potsherds that implied socioeconomic intercourse with the Colorado Plateau, and at least eight complex sites with ancestral Ute ceramics and architecture. The exceptionally high percentage of sites appear to be significant under one or more National Register criteria (ca. 15 to 20 percent) stands in decided contrast to the eligibility data listed in the PEIS (3-194).

53-010 (cont.)

Although admitted not visually spectacular, the cultural resources of the Piceance Basin are nonetheless of tremendous significance with a potential to contribute important understandings into the basin's role in the cultural interface between prehistoric groups living in the eastern Great Basin, northern Colorado Plateau and northwestern Plains. As such, prehistoric groups who utilized this region reflect adaptive and technological characteristics common to all three areas, with regional influences ebbing and flowing over thousands of years of prehistory. Of particular interest is the role of the Piceance Basin in the florescence of farmer-foragers in northwestern Colorado, commonly called the Fremont culture, and the ultimate demise of prehistoric agriculture in the region.

Although researchers had initially rejected the idea that Fremont-like horticulturalists had exploited the Piceance Basin, archaeologists now generally agree the region was subsumed within the Fremont Complex. Grady (1980) first argued the distinctions between "Fremont farmers" and "Archaic-like foragers" in the Piceance Basin was "in reality nothing more than differing sets of economic activities employed by the same people but at different times of the year." He argued that deer hunting in the Piceance Basin was critical to understanding Fremont adaptive diversity in which spring

planting of corn in lowland areas was followed by the highland/summer deer harvest, followed by harvesting pinyon nuts and later harvesting of corn in the valleys (1980:247).

This distinction was more thoroughly articulated by Reed and Metcalf (1999), who defined the nonagricultural Aspen Tradition of hunters and gatherers residing in northwestern Colorado during Formative times, and the coexistent Fremont culture with its distinctive horticultural lifeways, ceramics technology, residential architecture and rock art. The PEIS accurately notes that "it is not expected that the prehistoric populations practiced horticulture in the Piceance Basin per se, because of the relatively short growing season and inadequate soil conditions. However, horticultural sites are found very near to the basin to the west and northwest" (PEIS 3-191). As discussed in greater detail by Spangler (2002), these labels are artificial constructs created by archaeologists to describe separate and distinct lifeways, but which may be applicable to Formative groups that were ethnically and linguistically identical or closely related. In effect, Formative groups in the Piceance Basin were Fremont who foraged, whereas those to the west and northwest were Fremont who farmed (most Fremont scholars now refer to Fremont people as "farmer-foragers").

Although Grady's research was focused on the contention that aboriginal exploitation of both regions was focused on migratory mule deer herds (1980:241), he clearly demonstrated that important archaeological insights can be derived from careful analyses of the environmental contexts and spatial distribution of seemingly insignificant sites. Randomly distributed sites, most located in the lowlands, were interpreted as representative of plant exploitation and the need for human groups to be widely dispersed over the landscape to more effectively exploit plant resources. The highly clustered sites, located primarily at higher elevations, were interpreted as faunal resource exploitation sites, perhaps reflecting a desire to minimize disturbance of the mule deer herd (1980:30). These data serve as a cautionary reminder that entire areas with seemingly insignificant lithic scatters and dispersed campsites cannot and should not be dismissed as culturally insignificant, but must be examined within broader macroregional contexts.

Grady's hypothesis of a Fremont foraging presence in the region (see also Spangler 2002 for a synthesis of the relevant regional data) also presents an important issue regarding consultation. There is no clear indication in the PEIS that Puebloan tribes were explicitly informed that the Piceance Basin was probably an ancestral home of Fremont groups. Modern Puebloan groups, in particular the Hopi Tribe, have a significant interest in cultural resources related to the Fremont culture (*Motisinom*) that is considered ancestral to modern Puebloan groups (cf. Kuwanwisiwma 2008). Furthermore, the statement in the PEIS that the Hopi Tribe "has indicated it would be interested in the portion of the study area located in eastern Utah as far north as Price" (PEIS 7-3) is at odds with previous communications between the Hopi Tribe and the BLM indicating the Hopi have a direct interest in *all* Fremont cultural resources, including those located a considerable distance farther to the north and east (Kuwanwisiwma 2007, 2008).

CPAA acknowledges that an understanding of the cultural significance of the Piceance Basin has benefited greatly from past archaeological surveys, some of which were directly associated with earlier economic interests in developing oil shale deposits.

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It is likely that Section 106 compliance in connection with future development of oil shale leases will identify additional cultural resources, and will contribute to a more complete understanding of prehistoric adaptations in the region. We concur with the PEIS that cultural resources in the Piceance Basin could be adversely impacted if leasing and future commercial development occur, that cultural resources could be damaged or destroyed, that there is an enhanced potential of loss due to looting or vandalism and that special lease stipulations may be necessary to protect cultural values (PEIS 6-61).

In light of these concerns, CPAA recommends:

- The surprisingly low numbers of National Register-eligible sites in the Piceance Basin (5 percent) warrants a more thorough re-examination of relevant site data on file with the Colorado SHPO to ascertain the accuracy of site eligibility data. 53-011
- The PEIS acknowledges the *intent* of the BLM to conduct more thorough NEPA and NHPA analyses at subsequent phases of the project, including leasing and development. This language should be modified to indicate that the BLM "shall" and "will" conduct more thorough analyses at each subsequent phase of the project. 53-012
- Compliance with Section 106 is only one component of the BLM's responsibility under NHPA. The PEIS should clearly articulate the agency's commitment to its Section 110 responsibilities, including its mandate to identify, evaluate *and* nominate appropriate properties in the Piceance Basin lease area to the National Register. 53-013
- The PEIS should more clearly state the nature and scope of consultation with Native American tribes, and this should clearly articulate the nature of information provided to the tribes (e.g., Puebloan groups were informed of possible Fremont affiliation of cultural resources in the Piceance Basin). 53-014

East Tavaputs Plateau

As articulated in the PEIS, the Uinta Basin area east of the Green River and north of the southern flank of the East Tavaputs Plateau are included as potential lease areas for both oil shale and tar sands. Oil Shale Exploration Company (OSEC) currently has one RD&D lease in the Evacuation Creek area just south of the White River in an area that has experienced previous NEPA and NHPA analysis related to oil shale. Most of this area is managed under the Book Cliffs RMP, although a small portion extends west of the Green River into the jurisdiction of the Diamond Mountain RMP. This area involves some split-estate with the Uintah and Ouray Utes.

CPAA is concerned that the PEIS does not adequately consider the potential impacts of leasing on unknown resources in areas with a potential for exceptionally high densities of significant sites. In particular, these areas include the White River corridor, the Hill-Willow Creek drainage, and the Green River, as well as tributaries with permanent water. In water-stressed environments, such as those found in the Uinta Basin lease area, human populations were tethered to a greater or lesser degree to permanent 53-015

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water sources, in particular perennial and ephemeral streams, springs and rivers (Spangler 2001, 2002). Consequently, stream and river segments considered in the Uinta Basin lease area would also have been the focus of significant human adaptations throughout prehistory, although the nature of these resources here remains largely unknown due to the absence of baseline data. 53-015 (cont.)

It is unclear from the data represented and PEIS graphics made available to the public if the actual stream and river corridors under Alternative B (preferred) are excluded from potential leasing due to Wild and Scenic River eligibility or some other classification (PEIS 2-24). Alternative C maps clearly demarcate broad non-lease areas along stream and river corridors (PEIS 2-30) that are not clearly evident under Alternative B. It is emphasized these areas are expected to contain substantial evidence of human occupations throughout prehistory. However, very few systematic surveys have ever been conducted of the river corridors themselves (limited Class III surveys have been done only near the mouth of the White River, with a few isolated, narrowly focused surveys that overlapped river corridors elsewhere). 53-016

The PEIS is quite confusing on the issue of site location. The document indicates that 1,087 sites have been recorded in the Uinta Basin lease area, of which 266 were deemed eligible for the National Register (ca. 25 percent). The document further states the White River corridor is a zone of high sensitivity for cultural resources, whereas higher elevations to the south on the margins of the East Tavaputs Plateau are of moderate sensitivity (PEIS 3-196). CPAA concurs with this assessment. However, the document also states in Table 3.9.4-1 related to Hill Creek STSA that only 26 sites are known in the Hill Creek STSA area (PEIS 3-205), despite the fact that Hill Creek and its sister drainage Willow Creek are renowned for their exceptionally high density of Fremont architectural sites and Fremont and Ute rock art sites. In fact, this area may have the second or third highest concentration of Fremont sites anywhere in northeastern Utah, behind only Nine Mile Canyon and perhaps Range Creek Canyon. 53-017

This discrepancy suggests one of three possibilities: (1) areas of high cultural site density or sensitivity have been excluded from Hill Creek STSA lease areas, but these exclusions are not clearly evident on the maps provided to the public. (2) Because many of the archaeological sites in this area were recorded four decades ago or longer, these older site data were not available to planners who relied exclusively on GIS data provided by the Utah SHPO. Or (3) the data and predictive modeling (O'Rourke et al. 2007) misrepresents actual site density and significance.

Also relevant to this discussion, the PEIS indicates the Uintah and Ouray Utes desire additional consultation before leasing of split-estate parcels on tribal lands in the Hill Creek Extension (PEIS 7-4). As discussed above related to the Piceance Basin, the Hopi Tribe "has indicated it would be interested in the portion of the study area located in eastern Utah as far north as Price" (PEIS 7-4). However, previous communications between the Hopi Tribe and the BLM have indicated the Hopi have a direct interest in *all* Fremont cultural resources, including those located a considerable distance farther to the 53-018

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north and east (Kuwanwisiwma 2007, 2008). This would be particularly relevant to Fremont cultural resources in the Hill Creek region. 53-018 (cont.)

In light of concerns related to the Uinta Basin lease area, CPAA recommends:

- The PEIS be modified to clearly articulate those areas that have been excluded from leasing and the rationale for the exclusions, including more detailed maps whereby the public can make informed comments. This should clearly state that the Green River, White River, Hill-Willow Creek and other perennial water sources are excluded from lease applications and the criteria by which they were excluded. 53-019
- The PEIS should more clearly state the nature and scope of consultation with Native American tribes, and this should clearly articulate the nature of information provided to the tribes (e.g., Puebloan groups were informed of the Fremont affiliation of cultural resources in the Hill and Willow Creek drainage). 53-020
- The PEIS should clearly acknowledge the exceptionally high density and high quality of known archaeological resources that could be impacted by federal management decisions resulting from amendments to the Book Cliffs RMP. The failure of the current document to even acknowledge these resources would appear to be a deliberate attempt to obfuscate the significance of cultural resources in the Hill and Willow Creek areas specifically, and in the White River and Green River areas generally. 53-021

West Tavaputs Plateau

Perhaps the PEIS is most confusing when it comes to cultural resources on the West Tavaputs Plateau, a region that encompasses Nine Mile Canyon, Range Creek Canyon and Desolation Canyon, all areas of international renown for the abundance and the quality of their archaeological and historic sites. The PEIS only occasionally makes direct references to the rich archaeological resources of the region, such as "Within Nine Mile Canyon is the greatest concentration of rock art sites in the United States" (PEIS 3-187). More often, the PEIS appears to dismiss impacts to cultural resources through the apparent misrepresentation of data that is clearly inconsistent with data on file with the Utah SHPO. For example, Table 3.9.4-1 (PEIS 3-205) indicates there are only 244 historic and prehistoric sites in the Argyle Canyon STSA and Sunnyside STSA where Nine Mile Canyon is located. Data on file with the SHPO indicate at least 830 prehistoric sites within 1 kilometer of either side of Nine Mile Creek, and at least 100 documented historic sites. Some of these sites (ca. 5 to 10 percent) are located in lower Nine Mile Canyon within the Nine Mile Canyon ACEC and are excluded from potential leasing. Even with that consideration, the data represented in the PEIS still understate the actual number of sites by 65 to 70 percent. 53-022

This discrepancy may be attributed to any one of three factors (or perhaps combinations of all three). First, a very large portion of the archaeological site data for Nine Mile Canyon is not digitally available through the Utah SHPO and site forms and maps with plotted sites must be examined manually. This would include most of the sites

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documented prior to about 1995, which constitute the majority of sites documented in the canyon corridor. If PEIS planners relied exclusively on GIS data, sites recorded prior to about 1995 would have been excluded from the data set and could explain the low number of sites in the area. However, the failure of planners to personally examine site records at the Utah SHPO would constitute a remarkable failure that stands in contrast to the PEIS statement that the document is "based on available and credible scientific data" (PEIS 1-7). Non-GIS data is both available and credible.

Second, the discrepancy could also be attributed to the fact that Nine Mile Creek has been determined eligible as a Wild and Scenic River segment (PEIS 3-187). As such, all areas within a quarter mile of the creek would be excluded from leasing. The determination that there are only 244 sites in the Argyle Canyon STSA and Sunnyside STSA could reflect a careful calculation of only those sites outside of the WSR corridor. Given the paucity of GIS data on archaeological site location, such a calculation is considered unlikely. It should be noted that all of the 830 documented prehistoric sites in the Nine Mile Canyon corridor are located within 1 kilometer of the creek (or 0.8 miles). A WSR exclusion of 0.25 miles would not protect the vast majority of prehistoric sites in the canyon (CPAA has not yet examined the distribution of historic resources in the canyon to offer informed comments related to their site location).

53-022 (cont.)

A third possibility is that planners could have excluded most of Nine Mile Canyon from lease consideration because the lower third is a designated ACEC and the upper two thirds of the canyon is identified as a *potential* ACEC. Indeed, FLPMA directs the BLM to give priority to the designation of ACECs where "special management attention and direction are needed to protect and prevent irreparable damage to important historic, cultural and scenic values, fish or wildlife resources or other natural systems of processes" (PEIS 2-7). Figure 3.1.1-8 indicates that all identified STSAs in the Nine Mile Canyon corridor are within *potential* ACECs (PEIS 3-23). However, if *potential* ACEC areas were excluded, this would seem to be in conflict with statements in the PEIS that indicate only "existing Areas of Critical Environmental Concern (ACECs) that are currently closed to mineral development" are excluded from leasing (PEIS 1-7).

A major source of confusion in this regard is the failure of the PEIS to clearly articulate whether Nine Mile Canyon is located in the Argyle Canyon STSA or the Sunnyside STSA. Poor resolution aside, the maps seem to indicate that the canyon is in the Argyle Canyon STSA (as indicated in Figure 1.2-2 and Figure 2.4-1, the Argyle Canyon label is placed directly over Nine Mile Canyon). Furthermore, Table 3.1.1-10 states that the Nine Mile Canyon ACEC, which is located only in lower Nine Mile Canyon, overlaps with the Argyle Canyon STSA (PEIS 3-34). Only after repeated readings of the document could it be ascertained with any confidence that most if not all of Nine Mile Canyon is actually in the Sunnyside STSA (PEIS 3-187).

53-023

The identification of "Argyle Canyon" and "Sunnyside" as a Special Tar Sands Areas (cf. Figure 2.4-1) is problematic in that PEIS discussion rarely mentions Nine Mile Canyon or its cultural resources, or that the area constitutes one of the richest archaeological districts on the northern Colorado Plateau. Even the nomenclature of

"Argyle Canyon" and "Sunnyside" appears to be an intentional effort on the part of the BLM to disassociate the STSAs from the area's reputation as a remarkable and internationally renowned archaeological region that includes not only Nine Mile Canyon, but portions of Range Creek Canyon and Desolation Canyon.

53-023 (cont.)

Based on the PEIS maps, both Alternative B and Alternative C appear to designate portions of Nine Mile Canyon as available for application for leasing. Under Alternative B (preferred), those parcels in upper Argyle Canyon would be available, as would all parcels in Nine Mile Canyon located in Carbon County (PEIS 2-44). Under Alternative C, the upper Argyle Canyon parcels are excluded from consideration, but the Nine Mile Canyon parcels in Carbon County would remain available for lease applications (PEIS 2-47).

The location of lease areas only in Carbon County is troubling in that appears that NEPA planning decisions are being made on the basis of political boundaries that have nothing whatsoever to do with environmental or cultural values. Nine Mile Canyon is a west-to-east flowing perennial stream that undulates back and forth along the boundary between Duchesne County on the north and Carbon County on the south. Yet the STSA blocks deemed suitable for lease applications are all located in Carbon County. Carbon County is noted for accommodating industrial development in Nine Mile Canyon, while at the same time it has been hostile to the protection of cultural resources there. Given the location of suitable blocks only in the Carbon County portion of the canyon, it would appear that special considerations were afforded to local officials from one county but not the neighboring county.

53-024

The PEIS also presents other issues that should be more fully considered. In particular, the PEIS does not recognize or consider that the nomination of the entire Nine Mile Canyon drainage to a distance of 1 kilometer on both sides of centerline of the creek to the National Register of Historic Places as an archaeological district of national significance was submitted to the Utah SHPO in late 2007. This nomination was prepared over a two-year period by CPAA in cooperation with the BLM, the National Trust for Historic Preservation and Nine Mile Canyon Coalition. In effect, the BLM was fully aware of the nomination, and these data should have been a factor in considerations of STSA boundaries (see nomination form on file with the Utah SHPO and Utah BLM State Office).

In summary, the proposed Nine Mile Canyon Archaeological District (NMCAD) reflects centuries of human experience, much of it indicative of Fremont farmer-foragers uniquely adapted to the harsh desert environment of the Tavaputs Plateau. This adaptation appears to have reached a florescence in late Formative times (A.D. 900 to 1300), as evidenced by population aggregation, the emergence of defensive responses and the development of extremely complex strategies for food storage. Although only a small portion of the canyon has been systematically surveyed, at least 830 prehistoric sites have been formally recorded within the district. It is estimated that these 830 sites represent *about 10 percent* of the prehistoric sites located within the canyon bottom. A large number of sites known to the public and archaeologists remain unrecorded.

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The aboriginal cultural resources of Nine Mile Canyon include an unusually dense concentration of rock art sites containing thousands of images that have been painted on or pecked into the friable sandstone cliff faces. The copious rock art resources of the NMCAD are undeniably impressive, both in quality and quantity. These sites, largely accessible by road, attract thousands of recreational visitors to the canyon each year, earning the canyon the moniker "Worlds Longest Art Gallery." Indeed, the sheer number of rock art sites tends to statistically overwhelm other archaeological manifestations in the canyon. Of the 830 documented sites, at least 583, or 70 percent, have rock art components. As discussed in the actual nomination, these sites are eligible for National Register listing under three of four criteria defined by the National Park Service (*Bulletin 16A*). The Nine Mile Canyon drainage is also a Traditional Cultural Property as identified by the Hope Tribe (Kuwanwisiwma 2007, 2008), something not mentioned in the PEIS.

53-025

It should also be noted that Nine Mile Canyon contains large numbers of historic ranch houses, telegraph poles, line shacks, fences, water control devices, trails, mining remnants, small hamlets, a saloon, historic signatures, and a 19th Century freight road that collectively are historic resources of tremendous significance to local and regional residents. Remnants of historic and modern Euroamerican activities are ubiquitous throughout the NMCAD, and these resources will be the subject of a future, overlapping National Register nomination. Neither the historic nor prehistoric resources were properly considered within the context of the PEIS. Instead, cultural resource concerns were generally dismissed with various statements to the effect that "If and when applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect and cumulative effects, reasonable alternatives and possible mitigation measures, as well as what level of development may be anticipated" (PEIS 2-16).

Another concern is that the PEIS does not recognize or acknowledge the existence of a second major draft environmental impact statement that encompasses much of the same project area. The implementation of both projects at the same time would result in massive cumulative impacts not adequately considered under either EIS. The *West Tavaputs Plateau Natural Gas Full Field Development Plan West Tavaputs Plateau* would expand natural gas development in the area from about 100 wells currently to as many as 807 new natural gas wells on 538 locations over a period of approximately eight years. CPAA believes strongly that the PEIS considered here for potential tar sands leases should not be considered separately from the West Tavaputs Draft EIS, and that the cumulative impacts from two major and simultaneous developments must be considered within the context of potential leasing of the Argyle Canyon STSA and Sunnyside STSA.

53-026

It should also be noted that previous archaeological investigations in Argyle Canyon have focused only on the area around the mouth of the canyon. There remains a high potential that this major drainage contains significant cultural resources as do other major tributary canyons to Nine Mile Creek (e.g., Cottonwood Canyon, Dry Canyon). It should also be noted that Alternative B (preferred) calls for lease applications on 11,226

53-027

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acres, of which the BLM administers only 1,022 acres of surface estate (PEIS 2-45). This suggests that the preferred alternative is to allow lease applications in an area where 91 percent of the surface estate is non-federal (e.g. private). 53-027 (cont.)

In light of these concerns, CPAA recommends:

- The PEIS should be modified throughout to clearly articulate that Nine Mile Canyon is located in the Sunnyside STSA, and to clarify exactly what portions of the canyon are available for lease applications in light of WSR eligibility, potential ACEC designation and other environmental factors that could limit or preclude leasing. 53-028
- The list of areas excluded from lease applications should be augmented to exclude from lease applications those areas within National Register districts or districts deemed eligible for listing on the National Register of Historic Places. In Nine Mile Canyon, this would exclude leasing within 1 kilometer of each side of the creek. 53-029
- The PEIS should clearly articulate those areas or portions of areas within designated STSAs (e.g., Nine Mile Canyon) are Traditional Cultural Properties as identified by Native American tribes. 53-030
- The PEIS should be modified to clearly state that leasing will be excluded in those areas of STSA overlap with the Range Creek ACEC and Desolation Canyon ACEC, both of which are noted for remarkable cultural values. 53-031
- Substantial inaccuracies in the archaeological database used to prepare the PEIS should be corrected through more thorough examination of SHPO records. The under-representation of site data by 65 to 70 percent is not acceptable in a planning document of such magnitude. 53-032
- The PEIS should be modified to more accurately reflect that (1) Nine Mile Canyon and the Green River corridor have the highest density of sites anywhere in the Diamond Mountain Resource Area, and (2) that only 1 percent of the Diamond Mountain Resource Area has been surveyed, with a potential of 150,000 sites (cf. IBLA 2004-124, in *SUWA v. UT 055 et al.*). 53-033

Conclusion

It appears from language in the PEIS the BLM fully intends to "facilitate" leasing of oil shale and tar sands resources, and that only Alternatives B and C are being seriously considered. The PEIS clearly states that the BLM is mandated by Section 369 of the Energy Policy Act of 2005 to evaluate commercial leasing programs for oil shale and tar sands, and that any alternative that does not make such evaluations would be inconsistent with Section 369 (PEIS 2-51). 53-034

CPAA concurs with the PEIS assessment that the BLM "does not have at this time adequate information on the (1) magnitude of commercial development and pace of that development (2) potential locations for commercial leases, (3) technologies that will be employed, (4) size of production level of individual commercial projects, and (5) development time lines for individual projects to support decisions about lease issuance"

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(PEIS 2-50). Given those caveats, CPAA believes the only logical alternative is Alternative A (no action), which remands the issue to local field offices pending the BLM's acquisition of "adequate information." It is further recommended that planning for oil shale and tar sands development should be incorporated into the ongoing RMP revision process whereby planning can be considered synergistically and within the context of other environmental values.

Given the BLM is likely to choose an action alternative (or some combination of Alternative B and Alternative C), CPAA finds Alternative C much more palatable than the preferred Alternative B in that Alternative C clearly places "a priority on protecting known sensitive resources within each field office by excluding certain lands from application for leasing" (PEIS 2-46). Risks to these values have been identified by various field offices and have been managed accordingly for their protection. To strip these areas of protections already implemented cannot and should not be considered sound environmental policy.

53-034 (cont.)

CPAA appreciates the opportunity to comment on the issues articulated above, and we look forward to working cooperatively with the BLM to ameliorate these concerns at each stage of the planning process. The cultural resources of northeastern Utah and northwestern Colorado are indeed among the most remarkable anywhere in the American West. The preservation of cultural values during the course of expanding energy development will mandate creative and aggressive planning. This should include more detailed planning at the RMP amendment stage, as well as each subsequent stage of planning as oil shale and tar sands leasing moves closer to actual development.

Please feel free to contact me directly if you have questions or seek additional clarification.

Best Regards,

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Executive Director

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Responses for Document 00053

00053-001: The PEIS analyzes the environmental consequences of land use allocation decisions that do not commit any resources or grant any lease rights. The integrity of cultural resources on more than 2 million acres of BLM-administered land will not be adversely affected by a land use allocation decision under Alternatives B or C. In addition, prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with and appropriate consultation as required by the NHPA and other authorities specific to Native American concerns. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. If significant cultural resources are present or found to be present during requisite surveys and consultations, this specific analysis may include mitigation such as use of BMPs, specific protections, or avoidance to mitigate or eliminate adverse effects to historic properties.

The analysis presented in the PEIS is an appropriate level of analysis for a land use allocation decision. The PEIS does address the potential impacts of oil shale and tar sands leasing and development in Chapters 4 and 5 to disclose the possible types of impacts that would have to be evaluated in future site-specific NEPA analyses, if leases are applied for and plans of development are submitted. Sections 4.10 and 5.10 specifically address the potential impacts that could occur on cultural resources, but impacts would be site-specific and depend on a number of factors, as discussed above. The level of survey and analysis that would need to be undertaken if a lease or project were proposed would be determined according to BLM policy, in compliance with the numerous federal regulations regarding the protection of cultural resources, and in consultation with the appropriate SHPOs and affected Native American Tribes.

00053-002: The BLM is meeting its responsibility to protect properties of cultural and religious significance and will continue to do so. As stated in the above response (Comment 00053-001), the BLM is evaluating a land use allocation decision and is not committing any resources or granting any lease rights in this PEIS.

E.O. 13287 is included in Appendix D of the PEIS as one of the cultural protection requirements that the BLM is responsible to implement. As pointed out in the PEIS, the BLM will be completing additional NEPA analysis before commercial leases would be issued and prior to approval of plans of development. At this site-specific level, the BLM will be reviewing information regarding cultural and historic resources and will be seeking input from interested and knowledgeable sources including the Tribes, cultural resource professionals, and the public. It is at that level that decisions regarding the protection and management of these resources will be made and applied.

00053-003: On the basis of input from the cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM analyzes the environmental consequences of land use allocation decisions that do not commit any resources or grant any lease rights. It does not analyze a leasing or development decision that requires compliance with Section 106 prior to issuing the ROD for this PEIS. Prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with and appropriate consultation as required by the NHPA and other authorities specific to Native American concerns. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. If significant cultural resources are present or found to be present during requisite surveys and consultations, this specific analysis may include mitigation such as use of BMPs, specific protections, or avoidance to mitigate or eliminate adverse effects to historic properties.

There is no guarantee within this PEIS that lands within the areas identified under the alternatives as open to application will be leased or developed if significant cultural resources are present. Similarly, it is premature at this stage to completely deny access to particular lands without sufficient knowledge of the technologies to be applied or the specific physical area of potential effect. The data provided in Section 3.9 are a general overview of regional cultural resources to indicate that there are many types of sites present in the areas under consideration and likewise that there are many areas requiring survey and sites needing evaluation. It is recognized that these data will be continuously updated as surveys and evaluations are completed in the various areas. By the time a lease is applied for or a development project proposed, a complete and thorough investigation beyond what is presented generally in the PEIS will be necessary to collect and evaluate the best available information, including the possibility of conducting field surveys and site evaluations, as appropriate.

See also the response to Comment 00053-001 regarding the disclosure of potential impacts of oil shale and tar sands leasing and development in Section 4.10 and 5.10 of the PEIS.

00053-004: The BLM's preference for Alternative B offers the greatest flexibility to allow applications to be submitted but does not commit any resources or grant any lease rights. Therefore, if it is determined in project-specific NEPA analyses that specific lands within the areas identified under Alternative B or Alternative C cannot be leased or developed in an environmentally sound manner, the lease or project may not be approved by the BLM. The BLM is committed to managing the public lands in compliance with the FLPMA principles of sustained yield and

multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

00053-005: Please see the response to Comment 00053-003 addressing Section 106 compliance.

A more thorough Class I overview for such a multitude of lands that are not committed for leasing or development within the PEIS is unnecessary at this time. A Class I overview at a higher level of detail than was completed for this PEIS likely would be outdated and ineffective for a project-specific analysis by the time a lease is applied for. The Class I that was conducted was a snapshot in time, providing a general illustration of the wide range of resources present in large regions. As indicated in the cumulative analysis in Sections 6.1.5 and 6.2.5, many activities are now occurring in these same regions, particularly energy projects and oil and gas activities. As a result, the data regarding cultural resources in the areas identified in the various alternatives in this PEIS are being updated regularly within the SHPO's office. A project-specific Class I overview would likely be required at the lease stage, depending on several factors, including the extent of previous surveys in the lease area, site density, significance of known resources, the level of sensitivity of the area to contain significant resources, and results of consultations with SHPOs and Native American Tribes, as required by Section 106 of the National Historic Preservation Act. An appropriate level of field survey could also be required at the leasing stage. It is possible that following intensive survey, some lands identified within the areas under Alternatives B or C could be determined unsuitable; however, at this time, without speculating as to the magnitude of impact of certain technologies, the BLM has sufficient information to make a land use allocation decision that would be followed by further NEPA analysis to address project-specific direct, indirect, and cumulative effects.

00053-006: As the commentor noted and as is summarized in Tables 6.1.5.4 to 6.1.5.6 and 6.2.5.4 to 6.2.5-6, extensive oil and gas development is ongoing in the study area. Additionally, large areas of the Piceance, Green River, and Washakie Basins have been identified as having a medium or high sensitivity for containing cultural resources (see Section 6.1.2.9). Although the cumulative impact evaluations for cultural resources given in Sections 6.1.5.3.9 and 6.2.5.3.9 are general, this is an appropriate level of analysis for a land use allocation decision. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

00053-007: In the Energy Policy Act of 2005, Congress mandated that the BLM expeditiously prepare this PEIS within 18 months after the date of the enactment of the Act. Congress specially requested that a PEIS be prepared that emphasized the most geologically prospective lands within each of the states of Colorado, Utah, and Wyoming. Early in the process, the BLM recognized that there were several ongoing land use planning efforts, as well as planned planning efforts, that would begin while BLM was preparing the PEIS. The BLM determined that it would be more administratively efficient to prepare the PEIS and provide a more focused analysis of the environmental consequences of a commercial oil shale and tar sands program rather than disrupting the ongoing planning efforts.

00053-008: As described in the PEIS, there are some areas that have been designated ACECs for the cultural resources they contain. These areas are not available for application for leasing for oil shale under Alternative C, nor are they available under Alternative B for those ACECs that are closed to other mineral development. There are many areas of known significant cultural resources that have not formally been reviewed for ACEC status, as there are many areas containing significant cultural resources that have not yet been identified or recorded. For that reason, other than the reviewed ACECs and some designated historic trails, no lands have been excluded in this PEIS strictly on the basis of the presence of cultural resources. The BLM has policies in place for protecting significant cultural resources, such as those listed on the National Register as sites or districts or deemed eligible for listing, and the agency is subject to compliance with the National Historic Preservation Act, among other pertinent regulations, as described in Appendix D. During subsequent NEPA analysis, full consideration will be given to the protection of cultural resources in full compliance with existing BLM policies and pertinent laws and regulations.

00053-009: The affected environment of the PEIS covers portions of three states and nine separate land use plans. It is important to note that the carrying-capacity thresholds included in the WRFO RMP are unique to that plan. There are no comparable management prescriptions in the other eight land use plans. These thresholds are based on existing statutory requirements or site-specific analysis and are only applicable to oil shale. Prior to changing the proposed action to an allocation decision, the intent was to review and subsequently revise or remove the thresholds based on information obtained since 1989 when the thresholds were first established. However, after the purpose of the PEIS was changed from providing opportunities for commercial leasing to making only land use allocations, the revision or removal of the thresholds were no longer applicable. The PEIS does not modify or eliminate the carrying capacity thresholds for the protection of communities, the environment, and wildlife resources contained in the WRFO RMP. Any decisions concerning the application of thresholds will be made at the site-specific level where detailed information relevant to that determination can be made, and where interagency consultation can be accomplished.

00053-010: The data presented in Section 3.9 are a general overview of data available electronically from the State Historic Preservation Offices in Colorado, Utah, and Wyoming in 2006. They represent a snapshot in time of data available electronically so that a general synopsis of cultural resources in the large study regions could be provided. It is recognized in the text of the PEIS that the data may be incomplete as they do not include an analysis of nonelectronic files at the SHPO, including backlog and new information, or site files from the BLM. A footnote has been added to further clarify this point to each subsection that presents these data. The eligibility information is what is available, and where data were available electronically they were used. There is nothing in the PEIS that insinuates that few sites meet eligibility criteria—in fact, it is clear from the data that it is a low percentage of sites that have been evaluated for eligibility. During subsequent NEPA analysis, full consideration will be given to the identification, evaluation, and protection of cultural resources in full compliance with existing BLM policies and pertinent laws and regulations.

00053-011: See response to Comment 00053-010 regarding the data presented in Section 3.9. Additional detail is not relevant at this programmatic level whereby land use allocations are being decided. No lands are being eliminated from consideration on the basis of the presence of cultural resources, with the exception of some designated ACECs that may contain cultural resources and designated National Historic and Scenic Trails. During subsequent NEPA analysis, full consideration will be given to the protection cultural resources in full compliance with existing BLM policies and pertinent laws and regulations.

00053-012: Thank you for your comment, but the current wording has been retained. The BLM does not find the suggested changes necessary or appropriate.

00053-013: Yes, Section 106 is only one component of BLM's responsibility under the NHPA. Although the main text of the PEIS in Sections 3.9, 4.10, and 5.10 primarily discusses the Section 106 process, as stated in Section 3.9, Appendix D provides more information about the BLM's obligations for addressing other cultural resource regulations, including Section 110 responsibilities. The BLM has policies in place to inventory, evaluate, and protect cultural resources within BLM-administered public lands.

00053-014: Government-to-Government consultation is described in Section 7.3 of the PEIS. Letters were submitted to each of the Tribes listed in Table 7.3-1. The letters included maps of the geologically prospective areas to be analyzed in the PEIS. Each Tribe listed was also contacted during the preparation of an ethnographic overview in support of the PEIS analysis.

See also the response to Comment 00053-018 below that discusses the scope of the PEIS and the consultation process for future actions.

00053-015: The PEIS analyzes the environmental consequences of an allocation decision, not a leasing decision. As a result, the Record of Decision will not commit any resources or grant any lease rights. This process provides an opportunity for a subsequent level of land use planning, if necessary, and NEPA analysis of specific parcels that may be offered for lease and to develop specific mitigation measures to protect the resources and resource values present. Potential impacts of oil shale and tar sands leasing and development on cultural resources are described in Sections 4.10 and 5.10, and these sections include a discussion of mitigation measures that may be applied and application of the Section 106 process to future leasing and development decisions. During subsequent NEPA analysis, full consideration will be given to the inventory, evaluation, and protection of cultural resources in full compliance with existing BLM policies and pertinent laws and regulations. The collection of sufficient baseline data from areas such as those specified in the comment would be conducted in order to adequately evaluate the impacts of future decisions.

00053-016: Stream and river corridors are not closed to consideration for application for leasing in Alternative B; however, existing regulations and policy will have an effect on any decision to include these areas within lease boundaries. Conceptually, it would be possible to include these areas in a lease that would be developed using underground methods where there would be no surface disturbance, but that will be decided at the site-specific level considering the technologies proposed to be applied.

00053-017: See responses to Comments 00053-010 and -011.

00053-018: Consultation will be ongoing concerning any oil shale- or tar sands-related issues, including the land allocation decision, any leasing applications, and any proposals for commercial development. Thank you for providing the recent citation from Kuwanwisiwma; this information post-dates the data collected for preparation of the PEIS, and will be available for all future analyses. However, in the context of this programmatic-level document, the addition of this information in the PEIS is not relevant to the BLM's ability to make a reasoned choice among the alternatives.

See also response to Comment 00053-001. If TCPs or significant cultural resources are present or found to be present during requisite surveys and consultations, subsequent NEPA analysis may include mitigation such as use of BMPs, specific protections, or avoidance to mitigate subsequent NEPA analysis or eliminate adverse effects to historic properties, including TCPs.

00053-019: Areas that are excluded from the alternatives along with the rationale for that exclusion are described in Chapter 2 of the PEIS.

00053-020: See response to Comment 00053-014.

00053-021: See response to Comment 00053-011.

00053-022: As stated previously, the data in Section 3.9 represent a general overview of data available electronically from the State Historic Preservation Offices in Colorado, Utah, and Wyoming in 2006. They represent a snapshot in time of data available electronically so that a general synopsis of cultural resources in the large study regions could be provided. It is recognized in the text of the PEIS that the data may be incomplete as they do not include an analysis of nonelectronic files at the SHPO, including backlog and new information, or site files from the BLM. A footnote has been added to further clarify this point to each subsection that presents these data. It is clear from the data that a low percentage of sites have been evaluated for eligibility, but that the area within Nine Mile Canyon is certainly archaeologically rich. In addition, all sites within areas excluded from consideration under each alternative are not included in the data counts presented in Section 3.9 (i.e., any sites located within 0.25 mi of a WSR corridor would not be included in the table).

As described in the PEIS, there are some areas that have been designated ACECs for the cultural resources they contain. These areas are not available for application for leasing for tar sands under Alternatives B and C and for oil shale under Alternative C, nor are they available under Alternative B for oil shale for those ACECs that are closed to other mineral development. There are many areas of known significant cultural resources that have not formally been reviewed for ACEC status, as there are many areas containing significant cultural resources that have not yet been identified or recorded. For that reason, other than the reviewed ACECs and some designated historic trails, no lands have been excluded in this PEIS strictly on the basis of the presence of cultural resources. Should the potential ACECs become designated ACECs under ongoing RMP amendments, these lands will be subject to the RMP designation.

The BLM has policies in place for protecting significant cultural resources, and the agency is subject to compliance with the National Historic Preservation Act, among other pertinent regulations, as described in Appendix D. During subsequent NEPA analysis, full consideration will be given to the protection of cultural resources in full compliance with existing BLM policies and pertinent laws and regulations.

00053-023: Nine Mile Canyon is located predominantly within the Sunnyside STSA. Regardless, the names of the STSAs are used because they are the focus of the PEIS analysis and designate the boundaries of the proposed action—the amendment of land use plans to allocate lands available for application for leasing and potential development following additional NEPA analysis. There is no intentional effort to disassociate the STSAs from the cultural richness of the area. There are many areas of known significant cultural resources that have not formally been reviewed for ACEC status, as there are many areas containing significant cultural resources that have not yet been identified or recorded. For

that reason, other than the reviewed ACECs and some designated historic trails, no lands have been excluded in this PEIS strictly on the basis of the presence of cultural resources.

The BLM has policies in place for protecting significant cultural resources, and the agency is subject to compliance with the National Historic Preservation Act, among other pertinent regulations, as described in Appendix D. During subsequent NEPA analysis, full consideration will be given to the protection of cultural resources in full compliance with existing BLM policies and pertinent laws and regulations.

00053-024: The PEIS analyzes the environmental consequences of land use allocation decisions that do not commit any resources or grant any lease rights. In addition, prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with and appropriate consultation as required by the National Historic Preservation Act and other authorities specific to Native American concerns. The location of the areas available under Alternatives B and C are related to the designation of ACECs only. Political boundary issues are outside the scope of this PEIS.

00053-025: See response to Comment 00053-021.

It is acknowledged that additional data will become available on a regular basis and that future NEPA analysis and compliance with and appropriate consultation as required by the National Historic Preservation Act and other authorities specific to Native American concerns will need to take place. Cultural resource concerns are not dismissed in the PEIS, and potential impacts to cultural resources are discussed in Sections 4.10 and 5.10. However, cultural resource issues are site-specific and, if and when leases are applied for, these issues would need to be evaluated at later stages of analysis.

The BLM appreciates your inclusion of specific references that have been added to the archaeological data record since 2006 when the data were accessed and analyzed for preparation of the draft PEIS.

00053-026: The PEIS cumulative impacts analyses for both oil shale and tar sands do consider natural gas production from the West Tavuputs Plateau (Tables 6.1.5-5 and 6.2.5-4 indicate up to about 2,000 wells to be installed in the San Rafael planning area over the next 20 years, including those on the West Tavuputs Plateau). The newer data from the recently released Draft EIS have been added to these tables.

00053-027: Please see the response to Comment 00053-023. In addition, BLM-managed mineral resources under nonfederal surface are included for consideration in the PEIS. As stated in Section 1.2 of the PEIS, "…BLM-administered lands where the federal government owns the subsurface mineral rights but the surface estate is owned by Tribes, states, or private parties…are included in the scope of the

analysis." Should applications be received for these "split estate" lands, the NEPA analysis will consider the impacts associated with developing the mineral resources and will explore possible mitigating measures. Because cultural resources found on the private surface might be affected, full compliance with applicable federal cultural and historic protection statutes as described in the referenced comment will be required just as if they were located on the surface of public lands. The United States, however, does not own or control artifacts on private surface.

00053-028: See response to Comment 00053-023.

00053-029: There are many areas of known significant cultural resources that have not yet been identified, recorded, or formally evaluated for National Register eligibility. The only areas with cultural and historic values that are excluded from both Alternatives B and C for tar sands are designated ACECs and National Historic and Scenic Trails. These areas are excluded for multiple resource values, not strictly cultural resources. For oil shale, only ACECs withdrawn from mineral entry are excluded from Alternative B, while all ACECs are excluded from Alternative C. National Historic and Scenic Trails are excluded from consideration for leasing in both Alternatives B and C for oil shale and tar sands. The differences in the alternatives are included to allow analysis of the differing impacts of the alternatives on various resources. Under all alternatives, the BLM would comply with all applicable requirements for cultural and historical preservation, whether affected areas are included in areas available for application for leasing. The BLM has policies in place for protecting significant cultural resources, such as those listed on the National Register as sites or districts or deemed eligible for listing, and the agency is subject to compliance with the National Historic Preservation Act, among other pertinent regulations, as described in Appendix D. During subsequent NEPA analysis, full consideration will be given to the protection of cultural resources in full compliance with existing BLM policies and pertinent laws and regulations.

00053-030: See responses to 00053-021 and -023. Nine Mile Canyon is acknowledged by the BLM as an important area containing a rich collection of cultural resources. Section 3.9 provides a general overview of cultural resources in large regions of Colorado, Utah, and Wyoming. The section does not go into any detail about any specific locations within the study area, such as Nine Mile Canyon, or specific TCPs. The PEIS is a programmatic-level document that analyzes allocation decisions; it provides an adequate description of the environmental resources in areas that would be made available for lease application to enable a decision among alternatives. Detailed site-specific surveys for sensitive and protected resources in project areas would be required prior to any leasing or development decisions.

It is also acknowledged that additional data will become available on a regular basis and that future NEPA analysis and compliance with and consultation, as

required by the NHPA and other authorities specific to Native American concerns, will need to take place. Potential impacts to cultural resources that could result from leasing and development of oil shale and tar sands resources and possible mitigation measures that the BLM could require in lease stipulations are discussed in Sections 4.10 and 5.10. However, cultural resource issues are site-specific and would need to be evaluated at later stages of analysis if and when leases are applied for. The level of detail suggested in the comment is not warranted for this programmatic document.

00053-031: The text of the PEIS describing the alternatives in Chapter 2 states that designated ACECs and National Historic and Scenic Trails are excluded from the area proposed as available for future application for commercial tar sands leasing under both Alternatives B and C. This would apply to ACECs that are designated in the ongoing RMP regions in Utah.

00053-032: Please see response to Comment 00053-022

00053-033: See the response to Comment 00053-030. Although Nine Mile Canyon is specified in that response, the same level of description would apply for the Diamond Mountain Resource Area. The land use allocations proposed in the PEIS do not commit any resources or grant any lease rights; therefore, further detail is not necessary at this stage of analysis.

The BLM has policies in place for protecting significant cultural resources, and the agency is subject to compliance with the National Historic Preservation Act, among other pertinent regulations, as described in Appendix D. During subsequent NEPA analysis, full consideration will be given to the protection of cultural resources in full compliance with existing BLM policies and pertinent laws and regulations.

00053-034: Thank you for your comments and rationale describing your preference among the alternatives. The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures that any commercial leasing program both meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offers opportunities for states, Tribes, local communities, and the public to be involved at each decision point. At future stages of environmental evaluation (i.e., leasing and/or plan of development), site-specific NEPA reviews will be completed prior to issuance of any leases, and in that NEPA analysis full consideration of cultural and historic resource values will be assessed.

OSTS_00054

Ellen Comeau comeaufamily1@yahoo.com>
To woinfo@blm.gov 03/13/2008 10:11 PM
cc
Subject: Protect the West from hasty oil shale development

To Whom it May Concern,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 54-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 54-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming.

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 54-003

Sincerely,
Ellen Comeau

Responses for Document 00054

00054-001 The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00054-002 The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00054-003 In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA

also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

OSTS_00055

"Kent McDonald"<kmcdonal@infowest.com>
To <woinfo@blm.gov> 03/14/2008 12:39 PM
cc
Subject Development of S. Utah Tar Sands and oil shale

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments March 14, 2008

Dear BLM,

As a 28 year resident of St George and Southern Utah, I appreciate being able to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 55-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 55-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming.

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 55-003

Sincerely,
Kent B McDonald, MD
797 S 1740 W
St George, UT 84770

Responses for Document 00055

00055-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00055-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00055-003: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA

also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

OSTS_00056

Charlie DeTar <chazen@gmail.com
To woinfo@blm.gov 03/13/2008 04:54 PM
cc

Subject Help protect the West from hasty oil shale development

I'm writing to comment on the draft PEIS for commercial oil share development in the Roan Plateau in Colorado and the San Rafael Swell in Utah. I grew up in Utah, and have spent a good part of my life exploring the wilderness of the south. I recognize its uniqueness, its cultural and ecological importance, and its fragility.

I'm concerned that the BLM might sacrifice large tracts of public lands without being able to provide adequate information to determine the true environmental and social risks. Excavation of tar sand in Canada has been known to be environmentally devastating, and the industry research is in its early stages at best. It is imperative that you follow agency regulations which require the BLM to manage the land for multiple use, and not allow this single use to displace every other. The public will not benefit from the mistake of letting foreign interests destroy our treasures. These lands will be far more valuable intact than they can ever be after their destruction by short-sighted extractive interests.
http://action.wilderness.org/campaign/oilshale?rk=cpdb1od1uv-eW

56-001

Response for Document 00056

00056-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

OSTS_00057

markdroof@aol.com 3/13/2008 05:59 PM
woinfo@blm.gov
Subject Oil shale and tar sands

Dear sir:

Recently I received an email urging me to oppose your development of the energy resources in oil shale and tar sands in the West and Midwest. I want to let you know that I strongly support the development of these resources. We need this energy development because no amount of energy conservation will meet our needs. I am confident in our ability to develop these resources cleanly and safely and to clean up any mess that is made.
God bless you in your work for us.
Furthermore, I believe that environmental activist groups like the one that contacted me are intentionally dishonest and misleading. I blame them for many of our inflation and economic problems which have made us suffer recently. I believe that they are actively and intentionally trying to lower our standard of living and take away our freedoms, and that environmentalism is the excuse, not the reason.

57-001

Sincerely,
Mark Roof

Response for Document 00057

00057-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00058

SOUTH CAROLINA CHAMBER OF COMMERCE

February 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Americans are facing an energy crisis of historical proportions. Consider:

- Analysts are predicting that gasoline will be over $4.00 per gallon this summer – due largely to the failure of international oil production to keep pace with increased international consumption of oil.
- Americans now import over 60% of the oil that we use to make gasoline and diesel – and send over $1 billion a day to countries like Saudi Arabia, Venezuela and Iran

In order to help lower gasoline and diesel prices – and in order to strengthen our nation's energy security, the United States needs to expand access to its domestic energy resources.

Domestic reserves of oil shale and tar sands are vital sources of domestic energy – in fact, the federal government estimates that oil shale deposits on public lands hold the equivalent of at least 1.23 trillion barrels of oil. These resources should be responsibly developed in order to lower gas and diesel prices, increase American energy security and reduce our dependence on imported oil. 58-001

Because a robust and active oil shale program can be done in a balanced manner that simultaneously promotes energy production and provides comprehensive environmental protections, I strongly support Alternative B in the PEIS.

If BLM adopts Alternative A, the United States will be turning its back on an important domestic energy source, continue to increase our dependence on imported oil and driving up gasoline and diesel prices, and Alternative C does not allow for full recovery of oil shale and tar sands resources and does not provide for sound or efficient management of the program.

Please ensure that these important national energy resources can be developed in an environmentally sound manner in order to help reduce gasoline and diesel prices, as well as our dependence on foreign oil by adopting Alternative B in the PEIS.

Sincerely,

Otis B. Rawl, Jr.

V.P. Public Policy & COO

1201 Main Street
Suite 1700
Columbia
South Carolina
29201-3229

803/799-4601

Fax
803/779-6043

www.scchamber.net

Response for Document 00058

00058-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00059

Grand Junction Area Chamber "Your Business Connection"

March 12, 2008

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

RE: Energy Sector Increases Quality of Life

To Whom It May Concern:

This letter is in reference to the Bureau of Land Management's ("BLM") Programmatic Environmental Impact Statement ("PEIS") for oil shale and tar sands resources in Colorado, Utah and Wyoming. The Grand Junction Area Chamber of Commerce ("Chamber") supports the work of the BLM to implement a national oil shale leasing program, as a means to enhance our already strong economy spurred by diverse energy development.

59-001

The estimated oil shale reserves in Wyoming, Colorado and Utah is more than 50 times the of United States' conventional oil reserves. The majority of Green River Formation's oil shale resource is located in Northwest Colorado. The benefits from developing oil shale in Western Colorado will help to ensure a high quality of life we here on the Western Slope have come to expect.

Regional employers have continued to add to their payrolls here in Grand Junction, Colo. Mesa County's employment numbers topped 79,100 this January adding over 5,000 jobs in the last year. This increase is due to the energy industry. Our top employer was the mining and construction sector which added 1,500 jobs this year.

Grand Junction's medium family income has increased drastically. The U.S. Census reports the medium family income in 1999 was $33,152. In less than 10 years, the medium family income increased to $49,800 in 2007 according to a Housing and Urban Development report.

59-002

Weekly wages have also increased: According to the Colorado Department of Labor, the average wage in Mesa County was $454 per week in 1997. Today's wages average $651 per week.

Because of increases to wages and family income, Grand Junction tax revenues have steadily increased. In the last year, tax revenue increased 8 percent, the Grand Junction Financial Operations Department reported. Sales tax receipts topped $5.29 million, up from $4.91 million

OSTS_00059

in January 2007. And the City Financial Operations Department expects sales tax revenue to advance 10 percent this year to about $50 million.

Other service-based sectors are seeing increases due to energy development in the West. Passenger traffic at Grand Junction Regional Airport was up nearly 10 percent early in 2008. And lodging daily room rates increased to $73.52 from $65.14.

59-002 (cont.)

As you can see, our economy is dependent upon the energy industry and it is in our best interest to continue to expand new energy ventures. For that reason, the Grand Junction Chamber of Commerce supports a strong, robust, environmentally sound commercial oil shale leasing program in Colorado that will help ensure our economic vitality.

59-001 (cont.)

Sincerely,

Diane Schwenke, President and CEO
Grand Junction Area Chamber of Commerce

cc: Bill Ritter, Colorado Governor

Responses for Document 00059

00059-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

00059-002: Estimates of the economic impacts of oil shale and tar sands power plant and coal mine facility development on direct and indirect employment and income in each ROI indicate that oil shale, tar sands, and ancillary facility development would provide substantial employment and income in each ROI, together with higher wages for some occupations. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities.

OSTS_00060

March 12, 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Americans are facing an energy crisis of historical proportions. Consider:

- Analysts are predicting that gasoline will be over $4.00 per gallon this summer – due largely to the failure of international oil production to keep pace with increased international consumption of oil.
- Americans now import over 60% of the oil that we use to make gasoline and diesel – and send over $1 billion a day to countries like Saudi Arabia, Venezuela and Iran

In order to help lower gasoline and diesel prices – and in order to strengthen our nation's energy security, the United States needs to expand access to its domestic energy resources.

Domestic reserves of oil shale and tar sands are vital sources of domestic energy – in fact, the federal government estimates that oil shale deposits on public lands hold the equivalent of at least 1.23 trillion barrels of oil. These resources should be responsibly developed in order to lower gas and diesel prices, increase American energy security and reduce our dependence on imported oil.

Because a robust and active oil shale program can be done in a balanced manner that simultaneously promotes energy production and provides comprehensive environmental protections, Chattanooga Corp and I strongly support Alternative B in the PEIS. The Chattanooga process is comprised of common commercial sub-processes and has been successfully demonstrated to extract and convert domestic materials such as oil sand, heavy oil, oil shale and liquid bitumen into petroleum fuel vapors. Our controlled internal gases are cleaned of particulates, cooled and separated. Recovery of waste heat, power co-generation and the utilization of the fuel gases produced in the reactor make the Chattanooga process virtually self sufficient with lower capital and production costs per bbl, and reduced energy requirements. 60-001

If BLM adopts Alternative A, the United States will be missing a critical strategic opportunity to exploit these important domestic energy sources while continuing to increase our dependence on imported oil and driving up gasoline and diesel prices, and Alternative C does not allow for full recovery of oil shale and tar sands resources and does not provide for sound or efficient management of the program.

It is important to have a Programmatic EIS in place to protect the environment while these resources are developed

Please ensure that these important national energy resources can be developed in an environmentally sound manner in order to help reduce gasoline and diesel prices, as well as our dependence on foreign oil by adopting Alternative B in the PEIS.

Sincerely,

Name: Chalmer Fiskebeck Jr.

Address: 1455 N. Treasure DR. North Bay Village, Florida 33141

E-mail: Chalmer@The-beach.net

Response for Document 00060

00060-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00061

Bureau of Land Management
Attn: Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Re: Oil Shale and Tar Sands Draft Programmatic EIS

Dear BLM Officials:

I am writing this letter to voice my distates for Alternative C in the Bureau of Land Management's draft Oil Shale and Tar Sands programmatic environmental impact statement.

Alternative C doesn't open enough lands to make the program commercially viable. A commercial oil shale and tar sands development is important for bolstering our domestic energy resources. Our country already relies too heavily on foreign oil. In 2005, Congress made it clear that unconventional fuel sources, such as oil shale and tar sands, should be developed to address our country's energy needs. The development of the oil shale and tar sands will also be really good for western communities and economies. Development of these resources will create new business opportunities and in turn create new jobs. 61-001

Thank you for listening to my concerns and for supporting a reasonable and sensible oil shale and tar sands development program.

Sincerely,

Shelly Johnson

Response for Document 00061

00061-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00062

U.S. BLM Oil Shale & Tar Sands PEIS Draft
Argonne National Laboratory
9700 S. Cass Ave.
Argonne, IL 60439

To Whom It May Concern:

I would like to humbly submit my opinion regarding the PEIS. I fully support the BLM's efforts to make these lands available for a leasing program.

Commercial oil shale and tar sands development is important for bolstering our domestic energy resources. Our country already relies too heavily on foreign oil. In 2005, Congress made it clear that unconventional fuel sources, such as oil shale and tar sands, should be developed to address our country's energy needs. I support development and believe the PEIS is a step in the right direction. 62-001

Development of these resources is good for western communities and economies. Not only does development create jobs in the energy industry, it also creates new business opportunities. The potential economic development is important to people living out here in the West.

Sincerely,

David Brinkley

David Brinkley

Response for Document 00062

00062-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00063

Bureau of Land Management
Attn: Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Re: Oil Shale and Tar Sands Draft Programmatic EIS

Dear BLM Officials:

With the rising costs of energy and the United States' reliance on foreign oil, we should be doing all that we can to support domestic energy production. That's why I support an oil shale and tar sands development program. Such development is critical for diversifying our country's energy portfolio.

Conventional fuels and renewable energy sources are important, but more can and needs to be done! The 2005 Energy Policy Act clearly contains a section that directs the BLM to identify areas where unconventional fuels are present and to undertake steps to develop a commercial leasing program for oil shale and tar sands. I support the resulting document – the Oil Shale and Tar Sands Draft Programmatic EIS. 63-001

Oil shale and tar sands, along with renewable energy sources like solar and wind, are essential for creating a stable energy supply. This stability translates into more predictable and affordable prices to U.S. consumers. This is really important to me and my neighbors. Further, development also benefits our local communities by creating economic development.

Thanks for your time and hard work!

Sincerely,

Steve Mitchell

Response for Document 00063

00063-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00064

BLM Oil Shale and Tar Sand Draft Programmatic E.I.S.
Argonne National Lab.
9700 S. Cass Av.
Argonne, IL 60439

To Whom It May Concern:

Oil shale resources are CRITICAL for America's safety and security. I am writing to express my support for the BLM's Draft PEIS for commercial oil shale and tar sands development. These resources are ESSENTIAL to developing our domestic energy supply.

I am deeply concerned with our country's reliance on foreign energy sources, particularly when energy resources are available in this country. A STRONG, active shale program should be supported so as to diversify our country's energy portfolio. In addition to conventional and renewable sources of energy, oil shale and tar sands will help create a stable domestic energy supply. 64-001

We, here in the West, need to keep our economies VIBRANT. Allow an oil shale and tar sands program to move forward.

Thanks for listening to my concerns on this subject.

Sincerely,

Scott A. Siegel
Garfield County Colo.

Response for Document 00064

00064-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00065

Bureau of Land Management
Attn: Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Re: Oil Shale and Tar Sands Draft Programmatic EIS

Dear BLM Officials:

Oil shale resources need to be developed. We have massive amounts of viable resource in our country and if we want to remain a world power we need to put oil shale development on the fast track. I support the Oil Shale and Tar Sands Draft PEIS.

All over Colorado there are bleeding heart liberals who are trying to say that the PEIS shouldn't move forward. Well, to them I say, enjoy being a slave to unstable countries and their unstable energy supply. Just recently Venezuela threatened to cut the United States off from their energy supply. We need to develop unconventional resources so threats like these never materialize. 65-001

These resources will be developed in an environmentally sensitive manner. I hope you will continue to move forward through environmental planning processes to see that exploration of these resources happens. These resources are too important not to develop. Our policy makers have made it clear that we should stay focused on diversifying our energy portfolio.

Thank you,

Larry R. Bradley

Response for Document 00065

00065-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00066

U.S. Bureau of Land Management
Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To Whom It May Concern:

At no time in our history has it been more critical to develop unconventional resources like oil shale and tar sands. Please support the Oil Shale and Tar Sands Draft PEIS. As you know, this document deals with potential commercial oil shale and tar sands development. These resources are necessary to bolstering our nation's domestic energy supply.

These resources can be developed in an environmentally sensitive manner. I hope you will continue to move forward through environmental planning processes to see that exploration of these resources happens. These resources are too important not to develop. The United States, as directed by Congress as a matter of public policy, should stay focused on diversifying our energy portfolio. 66-001

I greatly appreciate your consideration of my views and ask that you include this letter in the public comment record.

Sincerely,

Dave Johnson
Rifle Colorado

Response for Document 00066

00066-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00067

Bureau of Land Management
Attn: Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Re: Oil Shale and Tar Sands Draft Programmatic EIS

Dear BLM Officials:

The costs of energy have been steadily rising and it seems that our reliance on foreign sources of oil has also been increasing.

It is therefore prudent to develop our unconventional energy resources to help maintain our energy and economic security. In addition to pursuing natural gas and oil resources, I support alternative energy resources and unconventional sources such as oil shale and tar sands. It is the last of the energy resources that I would like to discuss. Oil shale and tar sands development is critical for diversifying our country's energy portfolio. Conventional fuels and renewable energy sources are important, but more can and needs to be done. And need to be done today! The 2005 Energy Policy Act clearly contains a section that directs the BLM to identify areas where unconventional fuels are present and to undertake steps to develop a commercial leasing program for oil shale and tar sands. I support the resulting document - the Oil Shale and Tar Sands Draft Programmatic EIS. Oil shale and tar sands, along with renewable energy sources like solar and wind, are essential for creating a stable energy supply. This stability translates into more predictable and affordable prices to U.S. consumers. This is really important to me and my neighbors. Further, development also benefits our local communities by creating economic development. 67-001

Sincerely,

Mike Albright

Response for Document 00067

00067-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00068

Bureau of Land Management
Attn: Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Re: Oil Shale and Tar Sands Draft Programmatic EIS

To Whom It May Concern:

I would like to thank the Bureau of Land Management for all its hard work on the PEIS. A 14,000 page document that looks at the affects of a national oil shale and tar sands program is no small task! I think the BLM has done an amazing, in-depth review and because of this should be allowed to move forward with a national unconventional fuels program.

The one problem I had with the document was Alternative C: it was just too small to do any good for people like me who will certainly get the impacts associated with new energy development. Scrap Alternative C and just stick with Alternative B. And do it quickly: Now more than ever we need to reduce our over-reliance on foreign sources of energy. And we have that resource, right here in our back yard! A strong, active shale program should be supported so as to diversify our country's energy portfolio. In addition to conventional and renewable sources of energy, oil shale and tar sands will help create a stable domestic energy supply. 68-001

The oil shale and tar sands development will benefit local economies in Colorado, Wyoming and Utah. These areas already provide our country with important energy resources. These areas should be explored for oil shale and tar sands, which will balance all of the resources in affected areas.

Please keep moving forward and keep me informed on the process.

Sincerely,

Jeff T. Nunn

Response for Document 00068

00068-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00069

March 12, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To Whom It May Concern:

I write this letter to express my support for commercial development of oil shale and tar sands throughout the Colorado-Utah-Wyoming region. The Oil Shale and Tar Sands Draft Programmatic EIS, developed by the BLM, is an important plan to allow for that development. 69-001

Western Colorado economies will see a significant growth by allowing oil shale development. Not only will jobs be created in the industry, but other economic opportunities will follow for existing and new businesses. Further, this region's socioeconomic infrastructure will benefit from the tax and royalty revenues generated by oil shale and tar sands development. These benefits are important to consider, as they impact thousands of people living in our area. 69-002

In addition to the economic benefits, I will also add that development is good for bolstering our nation's domestic energy supply and can be done in an environmentally sensitive manner. 69-001 (cont.)

Please do not ignore the positive impacts that development would have for numerous western communities. These impacts are very important to me, my family and my community.

Thank you,

Gary Haas
Garfield County Resident

Responses for Document 00069

00069-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

00069-002: Estimates of the economic impacts of oil shale and tar sands power plant and coal mine facility development on direct and indirect employment and income in each ROI indicate that oil shale, tar sands, and ancillary facility development would provide substantial employment and income in each ROI, together with higher wages for some occupations. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities.

OSTS-00070

Rangely Area Chamber of Commerce
209 E. Main St
Rangely CO, 81648
Ph: (970) 675-5290
Email: rangelycoc@rangelygovt.com

March 12, 2008

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To Whom It May Concern:

Recently at the end of 2007, the Bureau of Land Management published the Draft Programmatic Environmental Impact Statement for oil shale and tar sands in Colorado, Wyoming and Utah. We have come to understand that the largest occurrence of the oil shale resources are located in Northwestern Colorado. The Rangely area is located close to the center of this on going research and development.

The Rangely Chamber of Commerce supports a commercial oil shale leasing program that is to be on going and able to expand to keep the viability of the oil shale projects committed for years to come. The nation's economy as well as our local economy depends on the potential the oil shale projects propose for independence from foreign oil. In addition, this research with the eventual payoff in oil and gas can help to sustain our businesses and communities in Northwest Colorado. 70-001

We would like to see continued oil leasing where expansion and prudence go hand in hand. As the Bureau of Land Management moves forward to the provisioning of a national commercial oil shale leasing program, we feel consideration should be given to the ultimate possibility of freeing our nation from the economic tyranny of foreign oil.

Please consider that the Programmatic Environmental Statement for oil shale and tar sands will have far reaching consequences for our economic health in Rangely as well as the rest of the nation. We know you have a mighty task to perform and have hope that you will be able to create an effective policy.

Respectfully,

Rebecca Hahn

Rebecca Hahn
Rangely Chamber President

Response for Document 00070

00070-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS-00071

March 11, 2008

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Please Protect the West from Oil Shale Development

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

I am writing because I am deeply concerned that BLM is prepared to sacrifice large tracts of public lands without being able to provide adequate information to determine the true environmental and social risks of this program.

Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. 71-001

Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS.

A PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development.

The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts.

The preferred alternative forecasts production of one million barrels of oil shale per day; that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. 71-002

We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation.

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best fishing and recreation areas in Colorado, Utah, and Wyoming.

Many of these areas are treasured wilderness-quality landscapes, such as western Colorado's spectacular Roan Plateau and the San Rafael Swell in southeastern Utah, renowned for its spiraling sandstone cliffs and rugged solitude. 71-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health.

I urgently ask the agency to delay completing its PEIS process until the agency can provide less speculative information. Thank you for your help on behalf of America's irreplaceable lands and wildlife. 71-004

Respectfully,
J. Capozzelli New York, NY

Responses for Document 00071

00071-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00071-002: In the PEIS, cumulative impacts analysis at a programmatic level has been conducted to the extent possible. The analysis summarizes the extensive current and planned other activities (e.g., oil and gas development, coal mining, minerals development) for the study area and offers a preliminary qualitative assessment of the impacts of those activities, combined with possible future oil shale and tar sands development, including but not limited to air, water, wildlife, and communities in the study area. Because of the limited character of the decision to be made on the basis of this PEIS (planning/allocation of lands where nominations to lease can be considered), because the locations and magnitude of future oil shale and tar sands development are highly speculative, and because there will be additional NEPA analysis prior to leasing, in this PEIS it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. This point has been clarified in the introduction to the cumulative impacts sections (Sections 6.1.5 and 6.2.5).

None of the alternatives in this PEIS, including the preferred alternative, projects a specific future level of production (e.g., production of one million barrels of oil shale per day is not forecasted). For the purposes of illustrating potential impacts, the PEIS does provide estimated impacts for individual oil shale and tar sands projects producing from 50,000 bbl/d to 200,000 bbl/d (see Chapters 4 and 5 of the PEIS).

The NEPA analysis at the leasing and development stages will consider effects from RFFA (40 CFR 1508.7). If the proposed action would affect a particular

resource that one or more RFFAs would also affect, the impacts of those RFFAs would be included in the cumulative effects analysis for the proposed action. At the leasing or development stage, the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects.

00071-003: It is correct that the FLPMA directs BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00071-004: Congress articulated in the Energy Policy Act of 2005 that oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed to reduce the reliance of the United States on foreign sources of oil; that these resources should be developed in an environmentally sound manner; and that these resources should be developed with an emphasis on sustainability to benefit the United States while taking into account affected states and communities. The Secretary of the Interior was given the charge to implement this direction from Congress and initiated this PEIS along with other actions to implement that direction.

OSTS_00072

Consumer Energy Alliance of FLORIDA

March 12, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Support Responsible Development of National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

On behalf of the many Florida businesses which make up the Consumer Energy Alliance of Florida, I would like to express our strong support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, this enhanced development can be conducted in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

72-001

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example:

- In spite of significant conservation efforts, world energy demand is projected to increase by 50% during the next 20 years and could double in 50 years.
- Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
- The United States military currently uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will produce a strong workforce and will support the local and regional economies of Utah, Colorado and Wyoming.

OSTS_00072

The utilization of oil shale and tar sands from these leasing areas will offer significant benefits to the local communities and will strengthen our national energy security while bringing the necessary supplies of oil into the markets to offset increased global demand. This has far reaching benefits, particularly important to consumers in Florida. We encourage developing these areas while protecting the environment, local communities and other economic interests.

72-001 (cont.)

Sincerely,

David L. Batt, Director
Consumer Energy Alliance of Florida

4631 Highgrove Rd.
Tallahassee, Fl. 32309

Response for Document 00072

00072-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00073

Western Slope Chapter
COGA
Colorado Oil & Gas Association

March 10, 2008

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

RE: Support for a prudently-paced commercial scale leasing program

To Whom It May Concern:

To begin with, I would like to commend the Bureau of Land Management (BLM) on their thoughtful work on the Programmatic Environmental Impact Statement (PEIS) for oil shale and tar sands resources in Colorado, Utah and Wyoming. Colorado Oil and Gas Association West Slope Chapter strongly supports the efforts of the Department of Energy (DOE), Interior, and Defense to develop and implement a national oil shale strategy.

As you well know, the bulk of the largest known oil shale deposit in the world, according to the DOE, lies in northwest Colorado. The DOE estimates that 800 billion to 1 trillion barrels of recoverable oil exists within the deposits of the Green River Formation stretching across the three states. The potential oil shale resources within the Green River Formation are more than 50 times the United States' current proven conventional oil reserves and about three times the proven reserves of Saudi Arabia. The ability to extract this resource will help maintain our vibrant, flourishing Western Colorado economies. 73-001

At no time in our history has energy independence been more critical. The Federal government, in cooperation with State and local governments, should work to create an energy portfolio that includes conventional, alternative and unconventional energy resources. The PEIS will help set the foundation for a sensible, national oil shale and tar sands commercial leasing program to become economically viable and socially sustainable.

Western Slope Chapter
Colorado Oil & Gas Association
PO Box 89
Grand Junction, CO 81502
970-241-1200
970-241-4321 (Fax)

OSTS_00073

Western Slope Chapter
COGA
Colorado Oil & Gas Association

We ask that you consider the magnitude of the resource at hand and the positive benefits that will be gleaned by Western Colorado communities. Once again, we commend your work on the PEIS and we look forward to seeing a commercial oil shale and tar sands program move forward at a prudent pace and in an environmentally sound manner.

Sincerely,

Kathy Hall

Kathy Hall, Executive Director
Colorado Oil and Gas Association West Slope Chapter

cc: Bill Ritter, Colorado Governor

Western Slope Chapter
Colorado Oil & Gas Association
PO Box 89
Grand Junction, CO 81502
970-241-1200
970-241-4321 (Fax)

Response for Document 00073

00073-001: Thank you for your comment.

OSTS_00074

KEROGEN
RESOURCES, INC.

March 11, 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

It has been brought to my attention that the Bureau has before it three options to consider for responsibly developing oil shale and tar sand resources within the United States. In my opinion, the PEIS lays out an environmentally sound way to exploit these important domestic energy resources in Alternative B.

The oil and gas community, in order to compete globally, needs access to government lands across our nation. As you may have learned from the recent EOG press release 2 weeks ago (attached), there are tremendous oil and gas opportunities still remaining within the onshore continental US and Canada. Environmentally responsible extraction of these resources can be accomplished for all of us, with your help. In my opinion, this is best accomplished through Alternative B in the PEIS. 74-001

Thank you for your time and consideration.

Respectfully submitted,

Thomas G. Harris

President

Kerogen Resources, Inc.

Turning Resources into Reserves™
Ashford Crossing II • 1880 South Dairy Ashford • Suite 545 • Houston, Texas 77077 • USA
Phone: (281) 588-5500 • Fax: (281) 588-5501

OSTS_00074

EOG RESOURCES ANNOUNCES 2008 ANALYST CONFERENCE HIGHLIGHTS

Feb 28, 2008

- **Increases Total Company Production Growth Targets for 2009 and 2010**
- **Announces Significant Crude Oil Discoveries in Fort Worth Barnett Shale and Colorado North Park Basins**
- **Identifies Substantial Natural Gas Potential in British Columbia Horn River Basin**
- **Increases Estimated Natural Gas Recoveries from Fort Worth Barnett Shale**
- **Raises Natural Gas Reserve Estimates in Uinta Basin**

FOR IMMEDIATE RELEASE: Thursday, February 28, 2008

HOUSTON - EOG Resources, Inc. (EOG) today announced it has increased its organic production growth estimates for 2009 and 2010 to 13 to 15 percent from the previously stated annual average of 10 percent, with total crude oil and natural gas liquids volumes expected to increase at a disproportionately higher rate than its natural gas production. EOG also disclosed information about four promising new crude oil and natural gas plays that could contribute to future reserve and production growth. Additionally, the company increased the potential reserve recovery from its Fort Worth Barnett Shale and Uinta Basin natural gas plays.

"By applying our expertise in horizontal drilling and completion techniques, EOG is positioned to replicate its success in the Fort Worth Basin Barnett Shale and North Dakota Bakken with several newly identified onshore North American plays that show substantial promise," said Mark G. Papa, Chairman and Chief Executive Officer. "Although some of these discoveries are in the very early stages of delineation, they are expected to impact EOG's reserves and production in the coming years."

Crude Oil Discoveries

In the Fort Worth Basin Barnett Shale where EOG has been producing natural gas since 2004, it has drilled and tested eight horizontal crude oil wells. Using the same techniques that gave EOG an early mover advantage in prolific Johnson County, the company has extended the play further north unlocking economic crude oil reserves by applying its growing expertise in horizontal drilling and enhanced completion technology. Based on initial results from EOG's drilling activity, as well as technical and core analysis of previously drilled industry wells, the estimated reserve potential on EOG's 250,000 net acres in Montague, Clay and Archer Counties is approximately 225 to 460 million barrels of oil equivalent (MMboe), net. Development of EOG's Fort Worth Basin Barnett Shale crude oil play is underway with the first significant production impact projected for 2009.

In northwest Colorado's North Park Basin where the company has accumulated 100,000 net acres, EOG plans to drill seven additional wells during 2008. Based on production history from EOG's first horizontal well and two prior industry wells, the preliminary net reserve potential for the play is estimated to be 10 to 80 MMboe. The Buffalo Ditch 1-32H, in which EOG has a 100 percent working interest, had an initial production rate of 550 barrels of oil per day. The company's first significant production from the play is expected to begin in 2009.

Natural Gas Discoveries

EOG has drilled three vertical and three horizontal wells in northeastern British Columbia's Horn River Basin where it has accumulated approximately 140,000 net acres. Drilled during 2007, the Trail a-26-G horizontal well tested at 5 million cubic feet per day (MMcfd). Two other recent EOG wells tested at 3.5 and 4.2 MMcfd, each from only partially completed laterals. A fourth horizontal well is currently being drilled. Although the play is still in the very early stages of delineation, based on core data, technical analysis and flow tests to date, EOG's acreage may have potential net reserves of approximately 6 trillion cubic feet of natural gas. EOG is planning additional development wells in 2008 to further refine the drilling and completion processes in this resource play. First production is expected to start in June 2008 with more significant volumes coming online in 2010 and beyond. Due to the preliminary nature of the play, this potential production increase has not been considered in EOG's production growth targets for 2009 and 2010.

Also in the early stages of horizontal development is the Mississippi Chalk Play in Jefferson Davis County where EOG has tested three horizontal wells. The preliminary net reserve potential of the play, in which EOG has accumulated 14,000 net acres, is estimated to be approximately 200 billion cubic feet of natural gas. The first significant production from the horizontal development of the field is expected to begin in 2009.

"With the addition of these outstanding horizontal prospects to our excellent existing drilling portfolio, EOG is positioned to meet its goals for years to come," Papa said. "Our strategy remains consistent; we will focus on organic growth through the drillbit to continue to deliver high rates of return while maintaining a very low debt level."

Natural Gas Reserves

Based on improvements in its horizontal drilling and recovery techniques, EOG expects to achieve higher per well reserve recoveries in certain areas of Johnson County in the Fort Worth Basin Barnett Shale and has increased its estimated reserve potential by 500 billion cubic feet equivalents (Bcfe). The total net reserve potential for EOG's 650,000 net acres in the Fort Worth Basin Barnett Shale natural gas play is in the range of 5.0 to 7.2 trillion cubic feet equivalents (Tcfe), net. EOG's proved reserves in the play at December 31, 2007 were 1.4 Tcfe.

Based on results from a detailed technical study of data from three Mesaverde wells that were drilled on 10 acre spacing and the extension of the field's boundaries, EOG has increased its potential unbooked natural gas reserves in northeastern Utah's Uinta Basin by 800 Bcfe from earlier estimates. At December 31, 2007, EOG had 915 Bcfe of proved reserves in the Uinta with additional net reserve potential of 1,750 Bcfe remaining.

Webcast Scheduled for February 28, 2008

EOG's 2008 analyst conference webcast will be available via live audio webcast at 8 a.m. Central Standard Time (9 a.m. Eastern Standard Time) on Thursday, February 28, 2008. To listen, log on to http://www.eogresources.com/. The webcast will be archived on EOG's website through Thursday, March 27, 2008. The slides that will accompany the conference presentations will be posted to the EOG website http://www.eogresources.com/ by 6:30 a.m. Central Standard Time (7:30 a.m. Eastern Standard Time) on Thursday, February 28, 2008.

EOG Resources, Inc. is one of the largest independent (non-integrated) oil and natural gas companies in the United States with proved reserves in the United States, Canada, offshore Trinidad and the United Kingdom North Sea. EOG Resources, Inc. is listed on the New York Stock Exchange and is traded under the ticker symbol "EOG."

This press release includes forward-looking statements within the meaning of Section 27A of the Securities Act of 1933, as amended and Section 21E of the Securities Exchange Act of 1934, as amended. All statements other than statements of historical facts, including, among others, statements regarding EOG's future financial position, business strategy, budgets, reserve information, projected levels of production, projected costs and plans and objectives of management for future operations, are forward-looking statements. EOG typically uses words such as "expect," "anticipate," "estimate," "strategy," "intend," "plan," "target" and "believe" or the negative of those terms or other variations or comparable terminology to identify its forward-looking statements. In particular, statements, express or implied, concerning future operating results, the ability to replace or increase reserves or to increase production, or the ability to generate income or cash flows are forward-looking statements. Forward-looking statements are not guarantees of performance. Although EOG believes the expectations reflected in its forward-looking statements are based on reasonable assumptions, no assurance can be given that these expectations will be achieved. Important factors that could cause actual results to differ materially from the expectations reflected in EOG's forward-looking statements include, among others:

- the timing and extent of changes in commodity prices for crude oil, natural gas and related products, foreign currency exchange rates, interest rates and financial market conditions;
- the extent and effect of any hedging activities engaged in by EOG;
- the timing and impact of liquefied natural gas imports;
- changes in demand or prices for ammonia or methanol;

OSTS_00074

- the extent of EOG's success in discovering, developing, marketing and producing reserves and in acquiring oil and gas properties;
- the accuracy of reserve estimates, which by their nature involve the exercise of professional judgment and may therefore be imprecise;
- the ability to achieve production levels from existing and future oil and gas development projects due to operating hazards, drilling risks and the inherent uncertainties in predicting oil and gas reservoir performance;
- the availability and cost of drilling rigs, experienced drilling crews, tubular steel and other materials, equipment and services used in drilling and well completions;
- the availability, terms and timing of mineral licenses and leases and governmental and other permits and rights of way;
- access to surface locations for drilling and production facilities;
- the availability and capacity of gathering, processing and pipeline transportation facilities;
- the availability of compression uplift capacity;
- the extent to which EOG can economically develop its Barnett Shale acreage outside of Johnson County, Texas;
- whether EOG is successful in its efforts to more densely develop its acreage in the Barnett Shale and other production areas;
- political developments around the world and the enactment of new government policies, legislation and regulations, including environmental regulations;
- acts of war and terrorism and responses to these acts; and
- weather, including weather-related delays in the installation of gathering and production facilities.

In light of these risks, uncertainties and assumptions, the events anticipated by EOG's forward-looking statements may not occur. EOG's forward-looking statements speak only as of the date made and EOG undertakes no obligation to update or revise its forward-looking statements, whether as a result of new information, future events or otherwise.

The United States Securities and Exchange Commission (SEC) permits oil and gas companies, in their filings with the SEC, to disclose only proved reserves that a company has demonstrated by actual production or conclusive formation tests to be economically and legally producible under existing economic and operating conditions. As noted above, statements of proved reserves are only estimates and may be imprecise. Any reserve estimates provided in this press release that are not specifically designated as being estimates of proved reserves may include not only proved reserves, but also other categories of reserves that the SEC's guidelines strictly prohibit EOG from including in filings with the SEC. Investors are urged to consider closely the disclosure in EOG's Annual Report on Form 10-K for fiscal year ended December 31, 2006, available from EOG at P.O. Box 4362, Houston, Texas 77210-4362 (Attn: Investor Relations). You can also obtain this report from the SEC by calling 1-800-SEC-0330 or from the SEC's website at http://www.sec.gov/.

Response for Document 00074

00074-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00075

FIRST NATIONAL BANK OF THE ROCKIES®
fnbrockies.com
2452 HIGHWAY 6 AND 50
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970-242-2255
FAX 970-242-7722

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

March 14, 2008

Re: Programmatic Environmental Impact Statement (PEIS)

To Whom It May Concern:

As you are well aware, the majority of the Green River Formation's oil shale resource, which is 50 times the proven reserves of the United States' conventional oil reserves, is located primarily in northwest Colorado. The area of the richest concentration is surrounded by the small rural towns of Meeker, Rangely, and Rifle, Colorado together with the only SMSA in western Colorado, the city of Grand Junction. These communities have endured difficult economic times since the recession of the early 1980's but have recently experienced healthier economies largely due to recent energy activity primarily centered on natural gas exploration and pipeline installation. The advent of large scale oil shale development would have a significant positive impact to the region and would be beneficial to the majority of the affected citizens.

75-001

I am fully supportive of a national oil shale leasing program and urge the Bureau of Land Management to ensure that the scope of oil shale development in this region is of sufficient magnitude to have a positive impact to the local economies referenced above.

Furthermore, the OPEC nations are taking advantage of the dearth of oil exploration domestically. With crude oil prices at $110.00 per barrel, a move to develop domestic reserves of the magnitude found in our region should have positive effects on the international price of oil and the price of gasoline at the pumps given the threat of increased production of the magnitude found in this region's oil shale reserves. The consequent increase in supply and subsequent reduction in prices would benefit the citizens of the United States as a whole.

OSTS_00075

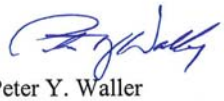
I believe the development of the oil shale in our region is consistent with the Administration's passage of the Energy Policy Act of 2005 and is a very good fit with its proposed development of alternative energy sources.

Thank you for taking the time to hear my concerns regarding the recently released PEIS for the oil shale and tar sands resources in Colorado, Utah, and Wyoming. I am fully supportive of a robust oil shale commercial leasing program.

75-001 (cont.)

Should you have questions or wish to discuss by phone, please feel free to contact me.

Sincerely,



Peter Y. Waller
Chairman, President & CEO

Response for Document 00075

00075-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00076

Sherry Thompson, BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

RE: My comments—No commercial leasing for oil shale and tar sands!

Dear Ms. Thompson,

As a concerned American I strongly support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

The proposal to open up almost 2 million acres of public lands in Wyoming, Colorado, and Utah to commercial leasing of oil shale and tar sands would require an incredible amount of energy and emit tremendous amounts of greenhouse gases. It comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 76-001

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The BLM should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 76-002 76-003

The BLM proposal would fuel an outdated, fossil-fuel-intensive energy infrastructure. If "business as usual" greenhouse gas emissions continue, over one third of the world's plants and animals will be committed to extinction by the middle of this century or before. Oil shale and tar sands development is an environmental catastrophe that we cannot afford now or ever.

I very strongly urge the BLM to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 76-001 (cont.)

Most sincerely,

Responses for Document 00076

00076-001: The BLM acknowledges the commentor's preference for Alternative A.

00076-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00076-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

OSTS_00077

CHARLES CRAMER

· FINE PHOTOGRAPHIC WORKS ·

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 77-001

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming.

77-002

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information.

Thank you,

Charles Cramer

· 1234 CARMEL WAY SANTA CLARA CA 95050 · (408) 243-0390 ·

Responses for Document 00077

00077-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00077-002: See response to Comment 00077-001.

OSTS_00078

TAR SAND PROCESSING

Then years ago, I owned a large tar sand lease in the Book Cliffs of Eastern Utah. I built and tested a small centrifugal separator which was a continuous loading - unloading unit. With proper feed-stock preparation, I got excellent sand and petroleum separation.

My patent pending process includes a remote underground miner, belt system to bring feedstock to processing unit, crusher and mixer to cutback all asphalt with heavy naphtha, continuous loading - unloading, centrifuge to strip petroleum from sand granules and float cutback above sand with a water layer where cutback is skimmed off and sand centrifugally dried and removed, spent sand is deposited in previously mined tunnel, cutback is processed in a mini-fractioning tower where naphtha (200 IBP - 350 dry end) is returned to processing unit and hot asphalt is shipped.

Process uses no chemicals other than petroleum, leaves no dirty water and no stock piles of feed stock or spent materials. Personnel will never be allowed underground (if the miner or spent sand thrower dies, it will be winched out and repaired).

Suggested size processing unit:

78-001

1. Mine and process 500 tons per hour
2. Yield - nearly 500 barrels crude per hour
3. Cost - $1,000.00 per hour

Projected hourly cost:

65 gallons diesel fuel	$200.00
5 operators and laborers	$350.00
5,000 gallons water delivered	$200.00
Diamond minor teeth	$100.00
Maintenance and Misc.	$100.00
Plant amortization	$50.00
Total	$1,000.00

I also have a patent pending shale oil extraction process.

Jim Maxwell 801-318-4551 cell 801-375-0540 home
722 East 2730 North
Provo, Utah 84604

Response for Document 00078

00078-001: Thank you for sending information on your process.

OSTS_00079

March 20, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Avenue
Argonne, IL 60439

Re: Oil Shale and Tar Sands Resources Programmatic EIS

Dear Reviewers:

On behalf of the undersigned organizations and business, we are submitting the following comments on the Bureau of Land Management's (BLM) *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (DPEIS).* We represent individuals who live in close proximity to the areas identified for oil shale and tar sands leasing, and many others who are concerned about the fate of their public lands. Based on the BLM's analysis, commercial development of oil shale or tar sands would irreparably harm local lives and livelihoods. Development would also compromise a wide range of environmental values, including clean air, clean water, climate, recreation, water supply, and wildlife habitat. 79-001

Despite beliefs in some quarters that oil shale might finally be ready for large scale commercial development, industry's research and development are moving at a snail's pace. At the current pace of research, design and demonstration (RD&D) programs, we are years away from being informed of the social, economic and environmental impacts of commercial development. Prematurely amending Resource Management Plans (RMPs) is certain to lead to considerable unknown consequences at the expense of the affected region and its citizens. 79-002

Congress' directive that the BLM develop an oil shale and tar sands leasing program with arbitrary deadlines, while simultaneously working with industry on a RD&D leasing program, raises serious concerns. As Colorado Governor Bill Ritter stated in 2007, "the movement towards commercial leasing regulations and ultimately commercial leasing prior to the evaluation of the RD&D projects will not be in the best interest of our state and ultimately our nation."[1] Other western governors are raising similar concerns.

In June 2007, the Western Governors Association, led by South Dakota Governor Michael Rounds and Wyoming Governor Dave Freudenthal, argued the potential development of a large scale program "demands a thoughtful discussion."[2] According to the governors, the schedule for developing a commercial oil shale program set forth in Section 369 of the Energy Policy Act of 2005 "hampers the ability of the states to constructively participate." These "concerns are heightened by the lack of detailed information about the technologies that would be involved; the potential effects on our lands, water, air

[1] Appendix 1.
[2] Appendix 2.

quality, and wildlife; the conflicts with other uses of scarce resources; and the potentially serious adverse impacts on local communities."[3]

Leading members of the region's congressional delegation have stated that federal agencies must pursue a reasoned and measured approach. According to a March 13, 2008, statement by Senator Ken Salazar,

> BLM is rushing towards a commercial lease sale when the technology is not ready and the potential environmental impacts are unknown. The communities of Colorado's West Slope are wary of unchecked oil shale development in their backyard. We must take a judicious approach that will help, not hurt, West Slope communities and avoid any economic bust that could follow an unchecked boom on commercial leasing. [4]

As the DPEIS clearly identifies, production of oil from shale and tar sands would irrevocably and permanently alter the three-state region for the worse. Commercial oil shale and tar sands development could render national policy objectives on climate change unattainable because of the magnitude of the increased demand for new coal-fired power capacity. From a regional perspective, oil shale and tar sands are incompatible with Colorado and Wyoming's efforts to be leaders in the New Energy Economy. From a local perspective, the water demands could permanently alter the rural agricultural and amenity-based economy of affected regions. The proposed development unacceptably threatens drinking water, air quality, and the outdoor recreational economy powered by hunters, anglers and others who value the region's unmatched wildlife, scenery and open spaces. Western communities are unwilling to abandon efforts to build sustainable, diversified economies and to again stake their future on unproven oil shale technologies. 79-003

No one can say whether the economics of oil shale will one day support full-scale production. Even today, however, with oil prices at an all-time high, industry fully acknowledges the uncertainty. As reported in *The Denver Post*,

> The front-runner energy company in the effort to unlock oil shale in northwest Colorado has slowed down its research by withdrawing an application for a state mining permit. Shell spokeswoman Jill Davis said the withdrawal of a permit on one of its three oil-shale research and demonstration leases was done for economic reasons.[5]

Shell, a leader in developing new oil shale technologies, started its research in the 1970s. Shell's experience demonstrates that industry is unlikely to develop viable oil shale technology for years to come.

What we do know is that the environmental impacts identified by the BLM are broad, deep and are only just a start. Western landscapes – and uses of those lands from hunting and fishing to agriculture and water rights – would be altered for generations as the proposed industrial development threatens clean air, clean water, human health, and local communities. 79-003 (cont.)

Commercial leasing and development also threatens our water. Development would subject Colorado River water – currently used by both western communities and Colorado's Front Range – to 79-004

[3] *Id.*
[4] Appendix 3.
[5] Nancy Lofholm, *Shell Shelves Oil Shale Application to Refine Its Research*, June 16, 2007, Section B.

OSTS_00079

call, thereby straining or destroying rural economies and communities throughout Colorado, Wyoming and Utah. The region is still largely rural, and is thus dependent on the health of the agricultural sector. Yet, as the BLM concludes, development will likely transfer water from traditional agricultural uses to industrial uses. This change will result in the loss of traditional irrigated agriculture and a shift towards dryland agriculture. Depending on the scale, water impacts could transform the character of traditional agriculture-based communities across the region.[6]

79-004 (cont.)

Also troubling are the potential impacts resulting from increased carbon-dioxide emissions. Climate change is already significantly affecting this region. The DPEIS either ignores the impacts on global climate change from commercial development, or wrongly dismisses them as inconsequential.

79-005

Tar sands development in Alberta has been promoted by some boosters as exemplary of an environmentally-protective development program. Tar sands production in Canada, however, has destroyed vast expanses of forests and wildlands, displaced wildlife, created enormous toxic waste sites, produced more greenhouse gasses than conventional fuel, and used an enormous amount of clean water – a priceless resource in the arid West. The environmental degradation experienced in Alberta might only scratch the surface of the types of potential impacts where the resource is technologically more difficult to develop in western Colorado, eastern Utah, and southwestern Wyoming.

Despite the inadequacies of the DPEIS, two things are clear. First, there is sufficient information to warrant Congress and the Administration proceeding more slowly and insufficient data to support the BLM's preferred alternative. The DPEIS is anathema to the intent and purpose of the National Environmental Policy Act (NEPA).[7] NEPA's primary intent is to protect and enhance the environment. As the Supreme Court has stated, NEPA represents a "broad national commitment to protecting and promoting environmental quality."[8] Using analyses such as this DPEIS to approve massive but uncertain environmental impacts violates Congressional intent. As stated in NEPA's preamble:

> The purposes of this chapter are: To declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; [and] to enrich the understanding of the ecological systems and natural resources important to the Nation[.][9]

79-006

Second, the Preferred Alternative would violate the letter and spirit of NEPA. As the Supreme Court established in a landmark case involving the Department of the Interior, "NEPA announced a national policy of environmental protection and placed a responsibility upon the Federal Government to further specific environmental goals by 'all practicable means, consistent with other essential considerations of national policy.'"[10] Premature commercial leasing and development of oil shale and tar sands would violate each and every criteria specified by Congress in our national environmental charter.

The BLM fails to substantiate or support the assertion that the DPEIS is legally sufficient to amend existing resource management plans, or that existing technologies indicate that oil shale and tar sands development would not unduly affect communities and the environment. The only approach

79-007

[6] DPEIS at 4-144 to -145.
[7] 42 U.S.C. §§ 4321-4370f.
[8] *See* Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 348 (1989) (citing 42 U.S.C. § 4331).
[9] 42 U.S.C. § 4321.
[10] Kleppe v. Sierra Club, 427 U.S. 390, 409 (1976) (quoting 42 U.S.C. § 4331(b)).

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consistent with NEPA at this time is Alternative A – the no commercial oil shale or tar sands leasing alternative. 79-007 (cont.)

Both the BLM and the public will be best served if – before amending RMPs, offering commercial lease sales, or adopting leasing regulations – the BLM conducts a thorough analysis of completed research, development and demonstration projects; a full assessment of environmental risks; and an exhaustive exploration of an appropriate range of alternatives. Only after conducting such an analysis can the BLM assure Congress and the public that the facts can be construed to support RMP amendments that would allow commercial leasing programs. Knowledge must precede action. 79-008

Building a new energy economy is central to the long-term economic, social and environmental health of our nation. We need to focus our resources on supporting energy efficiency and renewable energy sources that are known to protect the environment and are economically sound.

Respectfully submitted,

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Detailed Comments on Oil Shale and Tar Sands DPEIS

Overview – Putting the Cart Before the Horse

New oil shale and tar sands research and development in the U.S. remains in its infancy, leaving the BLM with little information to assess the impacts of a full scale leasing program using new technologies. The approach advanced through this DPEIS is, by the BLM's own admission and omissions, unsupported on both legal and public policy grounds. We formally request that the BLM respond to each issue raised in the cover letter, in these detailed comments, and in the opinions and papers attached to this document and included by reference. We also formally request Congress adopt legislation prohibiting the BLM from pursuing a leasing program (including adopting leasing regulations) until such time that the results on the current congressionally mandated RD&D program are known and independently assessed. Until that time it will be impossible to assess the environmental impacts of developing a full scale production plan or the potential for mitigation measures to protect our communities, western water, and the environment. For these and other reasons **we support Alternative A**.

79-009

79-010

Research and Design Must Precede Development

The BLM's initiative to develop a commercial-scale oil shale and tar sands leasing and development program based on this DPEIS, while simultaneously working with industry on the RD&D leasing program, is inconsistent with basic principles regarding research and development. A necessary precursor to considering an oil shale program is first completing the required research and development, and then fully assessing the likely impacts of full scale development based on an accurate assessment of the information gained from the research and development experience. Pursuing commercial-scale leasing without first understanding the impacts of the technology is putting the cart before the horse.

79-011

This concern has been even raised by proponents of oil shale development. In April 2007, Dr. James Bartis of the RAND Corporation provided the following testimony to Congress:

> While the prospects of major economic and national security benefits motivate the development of oil shale, federal actions need to be tempered by the need to address the adverse environmental impacts and risks that accompany such development.[11]

Dr. Bartis argued that Congress' requirement that the BLM establish final regulations for a commercial leasing program within six months of completing the DPEIS should be rescinded. It is unlikely, Dr. Bartis stated, that within the next few years

> adequate technical, economic, and environmental information will be available to formulate fair and equitable leasing regulations . . . . [The] fundamental approach the Department of the Interior is currently taking may be counterproductive if the goal is to keep open the option for a sustainable domestic oil shale industry.[12]

79-012

[11] James T. Bartis, The RAND Corporation , "Policy Issues for Oil Shale Development", Before the Committee on Natural Resources, Subcommittee on Energy and Mineral Resources, United States House of Representatives, April 17, 2007.
[12] *Id.*

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Dr. Bartis is a leading expert on oil shale development. As a senior policy researcher at the RAND Corporation, Dr. Bartis was hired by the Department of Energy to report on the prospects and policy issues of oil shale development in the United States. The BLM's DPEIS confirms Dr. Bartis's conclusion – commercial oil shale and tar sands development, even if possible some day, is premature. Decisions about development should never precede research. 79-011 (cont.)

Congress' Directive – Identify the Impacts from Oil Shale and Tar Sands Development

Section 369 of the Energy Policy Act of 2005 directed the BLM to "develop the information necessary to complete a programmatic environmental impact statement for a commercial leasing program for oil shale and tar sands resources on public lands, with an emphasis on the most geologically prospective lands within each of the States of Colorado, Utah, and Wyoming."[13] While the BLM has identified significant impacts from commercial development, it lacks the information necessary to meet Congress' mandate. According to the BLM,

> The BLM initially intended the final PEIS to provide the NEPA analysis not only for the amendment of land use plans but also for the issuance of leases for the commercial development of both oil shale and tar sands resources. The BLM developed and circulated among cooperating agencies an internal draft PEIS. Based on their review of the document, many of the cooperating agencies commented that the lack of information about specific technologies and their impacts caused BLM's analysis to be too speculative at this time to support a decision to issue any leases. As a result, the BLM has elected not to issue leases for commercial development of oil shale on the basis of this PEIS. (*Emphasis added*).[14]

79-013

We agree with the BLM's determination that it would be too speculative at this time to decide to lease lands for oil shale and/or tar sands development. It is also clear as both a matter of law and public policy that BLM does not have in this DPEIS the information it needs to amend existing Resource Management Plans (RMPs), much less to tier subsequent leasing analyses. Without further detail regarding the environmental impacts from oil shale and tar sands development, the BLM cannot identify impacts to specific areas identified in each RMP, cannot identify cumulative impacts resulting from oil shale and tar sands development, cannot identify steps the agency and lessee will need to mitigate such undefined impacts, and cannot ensure compliance with federal laws.

The root problem the BLM faces when developing the DPEIS is that, since none of the companies that have applied for oil shale research plots in Colorado have a proven and demonstrated extraction technology, adequate and appropriate analysis of the environmental and socio-economic impacts of oil shale development is problematic at best. The mistake the BLM makes is taking one theoretical oil sands project and one theoretical tar sands project and projecting the anticipated results over two million acres.

Legal Deficiencies

As discussed in depth below, the BLM's decision to amend the RMPs contravenes existing law.

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[13] Public Law 109-58

[14] DPEIS at ES-2 to -3 (emphasis added).

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The National Environmental Policy Act

The National Environmental Policy Act[15] requires federal agencies to prepare a detailed statement on the environmental impacts of a proposed "major federal action" and all of the reasonable alternatives thereto before authorizing any such action.[16] An agency proposal for major federal action exists for NEPA purposes "at that the stage . . . when an agency subject to [NEPA] has a goal and is actively preparing to make a decision on one or more alternative means of accomplishing that goal and the effects can be meaningfully evaluated."[17] NEPA's purpose is to promote efforts "which will prevent or eliminate damage to the environment",[18] to inform the public of environmental consequences,[19] and to "help public officials . . . take actions that protect, restore, and enhance the environment."[20]

Under NEPA, the DPEIS must analyze "connected", "cumulative", and "similar" actions and three types of impacts.[21] Connected actions are those which are "closely related," including those that "[c]annot or will not proceed unless other actions are taken", or those that "[a]re interdependent parts of a larger action and depend on the larger action for their justification."[22] Cumulative actions are those that "have cumulatively significant impacts and should therefore be discussed in the same impact statement."[23] Similar actions include those that have "common timing or geography."[24] In order to assess "significance," NEPA requires consideration of "[w]hether the action is related to other actions with individually insignificant but cumulatively significant impacts."[25]

The three types of impacts to be studied in an environmental impact statement are those that are "direct," "indirect," and "cumulative."[26] Direct effects are those that "are caused by the action and occur at the same time and place."[27] Indirect effects are those "which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable."[28] A project's "cumulative impact," is

> the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions . . . . Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.[29]

As discussed in more detail below (*See infra* pp. 9-12), while the DPEIS uses the term "cumulative impacts" it does not identify such impacts. Instead, the DPEIS defers its analysis of the 79-014

[15] 42 U.S.C. §§ 4321-4370f.
[16] *Id.* at § 4332(2)(C).
[17] 40 C.F.R. § 1508.23.
[18] 42 U.S.C. § 4321.
[19] 40 C.F.R. § 1500.1(b).
[20] *Id.* at § 1500.1(c).
[21] *Id.* at §§ 1508.25, 1508.7, 1508.8.
[22] *Id.* at § 1508.25(a)(1).
[23] *Id.* at § 1508.25(a)(2).
[24] *Id.* at § 1508.25(a)(3).
[25] *Id.* at § 1508.27(b)(7).
[26] *Id.* at 1508.25(c); *see also id.* at §§ 1508.7, 1508.8.
[27] *Id.* at § 1508.8(a).
[28] *Id.* at § 1508.8(b).
[29] *Id.* at § 1508.7. *See also* Neighbors of Cuddy Mountain v. U.S. Forest Serv., 137 F.3d 1372, 1379 (9th Cir. 1998) (stating that with respect to a cumulative impacts analysis, an agency must provide "some quantified or detailed information" because "[w]ithout such information, neither courts nor the public . . . can be assured that the [agency] provided the hard look that it is required to provide.").

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cumulative impacts of developing oil shale and tar sands over two million acres to future analyses to be conducted on a lease-by-lease basis. This approach is not only inconsistent with NEPA but it contravenes Congress' intent in directing the BLM to issue this DPEIS.

79-014 (cont.)

Cumulative and Connected Impacts

One of the most glaring gaps in the DPEIS concerns identification of connected actions; a second is the BLM's thin analysis of cumulative impacts. As discussed above, identifying and evaluating the cumulative and connected impacts arising from a federal action is a central component of NEPA. The BLM is required to consider not only the single proposed action – amending RMPs to designate lands available for leasing – but also connected actions (actions which are closely related) and cumulative actions (actions, which when viewed with other proposed actions, have cumulatively significant impacts).[30] Closely related actions include any reasonably foreseeable oil shale and tar sands project that would not occur "but for" authorization provided in the RMP.

Cumulative and connected impacts assessments help assure that Federal Land Policy and Management Act's (FLPMA)[31] requirements regarding no degradation to the environment are met. As the BLM notes in section 6 of the DPEIS,

> The purpose of this cumulative impacts assessment is to discuss how the environmental and socioeconomic conditions within the study area might be incrementally affected over the next 20 years (the study period) by oil shale development that would be made possible by land use plan amendments under either Alternative B or Alternative C. . . . [D]irect, indirect, and incremental cumulative impacts could occur due to future commercial oil shale development that would be facilitated by such land use plan amendments.[32]

Courts have held that there are situations where an agency must consider several related actions in a single NEPA document. The U.S. Court of Appeals for the Fifth Circuit held that in a cumulative impact analysis, an agency should consider "(1) past and present actions without regard to whether they themselves triggered NEPA responsibilities and (2) future actions that are 'reasonably foreseeable,' even if they are not yet proposals and may never trigger NEPA-review requirements.[33] The court noted that the applicable law "does not limit the inquiry to the cumulative impacts that can be expected from proposed projects; rather, the inquiry also extends to the effects that can be anticipated from "reasonably foreseeable future actions."[34] Similarly, the U.S. Court of Appeals for the Ninth Circuit has specifically required analysis of activities on both public and private land, since both may impact federal resources; the court also found cumulative impacts analysis insufficient where it did not include foreseeable projects in the same geographical region.[35]

Identifying these impacts is vital to the decision-making process as the "primary purpose" of the DPEIS is to "insure that the policies and goals defined in [NEPA] are infused into the ongoing programs and actions of the Federal Government."[36] NEPA policies and goals include:

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[30] 40 C.F.R. § 1508.25
[31] 43 U.S.C. §§ 1701 – 1785.
[32] DPEIS at 6-106 to -107
[33] *See*, Fritiofson v. Alexander, 772 F.2d 1225, 1245 (5th Cir. 1985).
[34] *Id.* at 1243
[35] *See*, Natural Resources Defense Council v. U.S. Forest Service, 421 F.3d 797, 815-16 (9th Cir. 2005); Muckleshoot Indian Tribe v. U.S. Forest Service, 177 F.3d 800 (9th Cir. 1999).
[36] 40 C.F.R. § 1502.1

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- Encouraging a "productive and enjoyable harmony between man and his environment;"[37]
- Promoting "efforts which will prevent or eliminate damage to the environment and biosphere";[38]
- Using "all practicable means and measures . . .to create and maintain conditions under which man and nature can exist in productive harmony . . .;"[39]
- Fulfilling "the responsibilities of each generation as trustee of the environment for succeeding generations;"[40]
- Assuring "all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings;"[41]
- Allowing beneficial use of the environment "without degradation . . . or other undesirable and unintended consequences;"[42]
- Preserving "important historic, cultural, and natural aspects of our national heritage . . .";[43]
- Achieving a "balance between population and resource use . . .";[44] and
- Enhancing "the quality of renewable resources" and maximizing recycling of depletable resources.[45]

Importantly, the scope of this analysis must be appropriate to the scope of the proposed action.[46] The Council on Environmental Quality's (CEQ) guidelines on cumulative and connected effects analyses provide the following steps for determining the appropriate geographic boundary of cumulative impact analysis:[47]

- Determine the geographic area that will potentially be directly affected by an action, known as the "project impact zone";
- Identify resources in the project impact zone that could be affected by the action;
- Determine the geographic areas occupied by the resources outside the project impact zone; and
- Identify the appropriate area for analysis of cumulative effects based on the largest of the geographic areas outside the project impact zone.

Once commercial development projects are planned, it is reasonably foreseeable that additional energy infrastructure and refining projects will be developed. The increased infrastructure and the clustering of projects to access and service the oil shale and tar sands leasing areas is likely to have a cumulatively significant effect on the resources in the area. Since the additional energy infrastructure development projects will be tied, at least to some extent, to the location of these leasing areas, these projects are certainly similar in terms of geography. Or, even if such support facilities (e.g., coal-fired electric power plants) are located at some distance from the immediate area of oil shale and tar sands development, the impacts upon the lands, communities, and resources impacted by such facilities need to be analyzed in this document. 79-015

[37] 42 U.S.C. § 4321.
[38] *Id.*
[39] *Id.*
[40] *Id.* at § 4331(b)(1).
[41] *Id.* at § 4331(b)(2).
[42] *Id.* at § 4331(b)(3).
[43] *Id.* at § 4331(b)(4).
[44] *Id.* at § 4331(b)(5).
[45] *Id.* at § 4331(b)(6); *see also* BLM Handbook H-1790-1.V. B.2.a.(3).
[46] Kern v. United States Bureau of Land Management, 284 F.3d 1062, 1072 (9th Cir. 2002).
[47] Council on Environmental Quality, 1997, Considering Cumulative Effect Under the National Environmental Policy Act.

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A landscape level analysis is a critical component of any NEPA analysis, even if site-specific analyses are deferred until authorization of specific projects. The U.S. Court of Appeals for the Second Circuit has held that analyzing the overall environmental risks involved in transporting oil from off-shore leases was appropriate and necessary in a PEIS, although specific analysis of individual pipeline locations could be deferred.[48]

In the context of this DPEIS, the BLM must examine the cumulative effects on the landscape of oil shale and tar sands development. Examples of actions/projects that would not occur but for authorization in the RMP include leasing, exploration projects, and full-field development projects. Thus, given that the DPEIS amends RMPs, the DPEIS should address each of these types of connected actions/projects in detail so as to foster informed public participation in the RMP revision and informed decision-making by BLM.

79-015 (cont.)

A landscape level analysis of proposed commercial oil shale and tar sands development must likewise evaluate the distribution of resources and supporting facilities across the affected states. Doing so complies with the BLM's legal obligations to truly assess potential impacts and to, as necessary, yield management decisions in order to balance and protect the multiple resources of these public lands. For oil shale and tar sands development, the geographic area of impact will include the resources, such as wildlife, within areas of proposed development and their habitat extending outside such areas.

As a case in point, the document acknowledges that ten new large coal-fired power plants will be required to supply energy to these projects, and mainline and branch power lines will be needed to run the required energy into the oil shale facilities.[49] However, likely corridors and their impacts are not identified in the DPEIS, but are instead deferred to project-level NEPA analyses. Nor are the likely emissions of greenhouse gases from these power plants or their contributions to global warming. Similarly, oil shale and tar sands development will require substantial new construction of regional and feeder pipelines and expansion of existing refineries to transport and process the crude oil.[50] However, likely routes and impacts resulting from these are not identified in the DPEIS.

79-016

Similarly, given that cumulative actions are actions that, incrementally, have significant impacts, even if the individual impacts are minor, the BLM should broaden the scope of the DPEIS to include analysis of the cumulative effects of other actions/projects already approved under each RMP. Impacts and actions that should be addressed in a cumulative fashion include, but are not limited to:

- road construction,
- activities leading to soil and vegetation disturbance,
- activities leading to changed habitat structure,
- activities leading to habitat fragmentation, and
- activities causing air or water pollution.

79-017

Yet, instead of identifying the cumulative and connected impacts at a landscape level, the BLM relies on one theoretical data point and projects the impacts over a given area:

> For the purposes of analysis, this cumulative impacts assessment looks at the incremental impacts of a single oil shale facility (as described in Section 4.1) and a single tar sands facility (as described in Section 5.1),

[48] County of Suffolk v. Secretary of Interior, 562 F.2d 1368, 1376-1377 (2nd Cir. 1977) (It was "essential to consider and weigh the environmental aspects of transportation, as well as of exploration and production.").
[49] *See* DPEIS 4-12 to -13.
[50] *Id.* at 4-13 to -16.

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> recognizing that there may be more than one of each type of these facilities brought into operation during the study period.[51]

79-017 (cont.)

Not surprisingly, due to the paucity of information regarding the technologies to be used, the cumulative impacts are nearly impossible to define. The BLM cedes this point in the DPEIS:

> Because of the magnitude of actions on public land, the lack of information about how many projects might be undertaken under either alternative, and the lack of information regarding the likely locations for future development, the cumulative effects discussed in this section are general in nature. The magnitude of the differences between the cumulative effects of Alternatives B and C cannot be identified. The cumulative effects discussion by resource area presented in Section 6.1.5.3 is intended to place the potential development of oil shale resources into the context of impacts from known ongoing and planned activities, and highlight issues that will be considered in future, site-specific NEPA actions.[52]

79-018

This approach is unacceptable. We appreciate the enormous challenge Congress created when it directed the BLM to undertake a programmatic assessment of oil shale and tar sands development. As BLM notes numerous times throughout the DPEIS, it is virtually impossible to identify with any certainty the scope of environmental, social and economic impacts that will result from oil shale development. Clearly, what the agency has not done is comply with applicable rules for dealing with situations in which necessary information is incomplete or unavailable.[53]

Instead, the BLM's opt-out is to note that there will be subsequent project-specific NEPA analyses. While that may be the agency's intent, the DPEIS amends existing RMPs and the subsequent NEPA analyses the BLM identifies above will be driven by lease applications and thus will not address landscape level actions and associated impacts. Instead, there is ample precedent that the agency's subsequent NEPA analysis for individual projects will be limited and will rely on this PEIS to justify placement of projects in proximity to designated leasing areas. This approach contravenes NEPA and thus raises critical questions regarding BLM's legal basis for amending the RMPs. As the courts have found, an insufficient cumulative or connected impact analysis of actions within a larger region will render NEPA analysis insufficient.[54]

Mitigating Environmental Impacts

At the most fundamental level, NEPA is intended to help public officials make decisions that are based on an understanding of environmental consequences, and to take actions that protect, restore, and enhance the environment.[55] Federal agencies are required, to the fullest extent possible, use all practicable means consistent with the requirements of NEPA to "restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment."[56] CEQ regulations further define mitigation as:

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[51] *Id.* at 6-108.
[52] *Id.*
[53] *See* 40 CFR § 1502.22.
[54] *See, e.g., Kern*, 284 F.3d at 1078.
[55] *See* 40 CFR § 1500.1(b).
[56] *Id.* at 1500.2(f).

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- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.[57]

Effective mitigation therefore starts at the beginning of the NEPA process, not at the end, and must be included as an integral part of the alternatives development and analysis process.

There are two fundamental problems with the mitigation measures identified in the DPEIS. First, the measures identified are generic, speculative, and lack any assurance that if implemented will avoid, minimize, rectify, reduce, eliminate or compensate for impacts associated with oil shale or tar sands development. Instead the DPEIS states what the lessees might be required to do but does not link mitigation measures with specific steps that should be taken in specific resource areas or over a larger landscape. To make matters worse, many of the measures identified are accompanied by a caveat such as "if possible" and "to the fullest extent practicable." 79-019

Second, the DPEIS does not link cumulative impacts with mitigation measures. As discussed above, one of the fundamental shortcomings of the DPEIS is that is does not adequately identify cumulative impacts resulting from full scale production, Congress' goal in developing oil shale and tar sands. Mitigation measures, in turn, will be tailored to individual leases, whose impacts will be a small percentage of the overall project impacts. 79-020

The DPEIS amends 12 RMPs to allow for full scale development of oil from shale and tar sands. Accordingly, mitigation measures must track full-scale oil shale development and not be reduced to a lowest common denominator.

Lease Sales and Tiering

Under FLPMA, RMPs guide and regulate the configuration and timing of lease offerings when parcels are offered for lease. Currently, industry nominates parcels, followed by a pre-leasing environmental analysis which is not based on common airsheds, river drainages, or other ecological units. While RMPs should ensure that these problems of focusing narrowly on the environmental impacts are not perpetuated, the fact that the BLM has not identified cumulative impacts in the DPEIS nor identified in any detail impacts to specific RMPs leaves a huge gap in its analysis.

The DPEIS does not examine the pace and intensity of development but instead leaves it to industry to set. Coupled with no identification of cumulative impacts or measures the BLM and industry will take to mitigate such impacts, the BLM is unable to identify the impacts resulting from development. The impacts are thus conceptual and so too is the mitigation. 79-021

Agencies often deal with proposals and alternatives for which necessary information on environmental impacts is incomplete, and NEPA regulations elaborate upon the responsibilities of an agency in such a situation.[58] Agencies must obtain that information if it is relevant to a reasonably

[57] 40 C.F.R. § 1508.20.
[58] *See* 40 C.F.R. § 1502.22.

foreseeable significant impact, is essential to a reasoned choice among alternatives, and the overall cost to obtain it is not exorbitant.[59] The DPEIS does not meet this standard.

It appears instead that the BLM will tier subsequent NEPA analyses to the incomplete analysis contained in this DPEIS. "Tiering" is an established method of avoiding the unnecessary duplication of analysis and is valid so long as the underlying analysis is thorough and defensible. CEQ regulations explicitly provide for this:

> Whenever a broad environmental impact statement has been prepared (such as a program or policy statement) and a subsequent statement or environmental assessment is then prepared on an action included within the entire program or policy (such as a site specific action) the subsequent statement or environmental assessment need only summarize the issues discussed in the broader statement and incorporate discussions from the broader statement by reference and shall concentrate on the issues specific to the subsequent action. The subsequent document shall state where the earlier document is available. Tiering may also be appropriate for different stages of actions.[60]

79-021 (cont.)

Applying this approach to oil shale and tar sands development would be flawed. The DPEIS does not consider the cumulative impacts, so tiering subsequent individual lease analyses will result in the BLM never evaluating the cumulative impacts of lease sales. Unless the BLM adopts a policy of conducting full scale environmental impacts statements for each RMP prior to offering lease sales, the BLM will have not met its mandate under NEPA and FLPMA to evaluate the cumulative impacts and thus prevent undue degradation of public lands.

Federal Land Policy Management Act

Any policies toward the leasing and development of oil shale on federal public lands managed by the BLM must also comply with relevant aspects of the Federal Land Policy and Management Act (FLPMA).[61] Congress enacted FLPMA "to provide guidance and a comprehensive statement of congressional policies concerning the management of the public lands . . . ."[62] FLPMA establishes a policy of "multiple use" management pursuant to which BLM must "recognize competing values," which is to be done by "using the Act's procedures in a dynamic, evolving manner to accommodate these competing demands."[63]

79-022

FLPMA directs BLM to manage public lands for multiple uses and sustained yield.[64] The Secretary is required to "use and observe the principles of multiple use and sustained yield" in developing

[59] *Id.* at 1502.22(a); Colo. Envtl. Coal. v. Dombeck, 185 F.3d 1162, 1172 (10th Cir. 1999); *see also*, Davis v. Mineta, 302 F.3d 1104, 1114 n.5 (10th Cir. 2002) (NEPA is intended to focus the agency's attention to environmental consequences and to provide relevant information needed for forming and implementing an agency decision.); Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1216 (9th Cir. 1998) (An impacts analysis under NEPA should be done up front so that an agency "will not act on incomplete information only to regret its decision after it is too late to correct." (quoting Marsh v. Or. Natural Res. Council, 490 U.S. 360, 378 (1989))).
[60] 40 C.F.R. §1502.20.
[61] 43 U.S.C. §§ 1701-1785.
[62] Rocky Mtn. Oil & Gas Ass'n v. Watt, 696 F.2d 734, 737 (10th Cir. 1982).
[63] *Id.* at 738; *see also* 43 U.S.C. §§ 1701 - 1702(c).
[64] 43 U.S.C. § 1732(a).

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and revising land use plans.[65] "Multiple use" is defined as managing the lands so that the various resources ("recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values") "are utilized in the combination that will best meet the present and future needs" of the public[66]; "sustained yield" is defined as managing to maintain regular renewable resource outputs in perpetuity.[67]

Congress also directed BLM to conduct inventories of the public lands and to incorporate those inventories into management decisions.[68] BLM is thus required to "take any action necessary to prevent unnecessary or undue degradation of the lands."[69] RMPs, in turn, must "provide for compliance with applicable State and Federal air, water noise, or other pollution standards or implementation plans . . . ."[70] Implementing regulations specifically require that BLM ensure compliance with federal and state air quality standards.[71]

79-022 (cont.)

These provisions are applicable to all resource uses and decisions affecting BLM lands.[72] It serves as a bedrock for all analyses in the DPEIS and activities undertaken pursuant to the RMP.

Amending Resource Management Plans

One of the fundamental principles governing the development of and amendments to RMPs is to "identify the actions needed to achieve desired outcomes, including actions to restore or protect land health."[73] Those actions are not identified in the PEIS and, as discussed above, mitigation measures are largely undefined and speculative. Without this information, it is impossible to determine whether the other management goals set forth in each RMP can be met.

In amending the RMPs through the DPEIS, the BLM is circumventing agency policy. BLM policy provides that in order to amend RMPs to allow for oil shale development, the agency must identify the following:

1. Areas open to leasing, subject to existing laws, regulations, and formal orders, and the terms and conditions of the standard lease form.
2. Areas open to leasing, subject to moderate constraints such as seasonal and controlled surface use restrictions. (These are areas where it has been determined that moderately restrictive lease stipulations may be required to mitigate impacts to other land uses or resource values.)
3. Areas open to leasing, subject to major constraints such as no-surface-occupancy stipulations on an area more than 40 acres in size or more than 0.25 mile in width. (These are areas where it has been determined that highly restrictive lease stipulations are required to mitigate impacts to other lands or resource values. This category also includes areas where overlapping moderate constraints would severely limit development of fluid mineral resources.)
4. Areas closed to leasing. (These are areas where it has been determined that other land uses or resource values cannot be adequately protected with even the most restrictive lease stipulations; appropriate protection can be ensured only by closing the lands to leasing.) Identify whether such closures are discretionary or nondiscretionary; and if discretionary, the rationale.

79-023

[65] *Id.* at 1712(c)(1).
[66] *Id.* at 1702(c).
[67] *Id.* at 1702(h); *see also* Pub. Lands Council v. Babbitt, 529 U.S. 728, 738 (2000) (discussing standards); Pennaco Energy, Inc. v. U.S. Dept. of Interior, 377 F.3d 1147, 1151 (10th Cir. 2004) (discussing standards).
[68] 43 U.S.C. §§ 1711(a) (inventories), 1712 (resource management planning).
[69] *Id.* at § 1732(b).
[70] *Id.* at § 1712(c).
[71] *See* 43 C.F.R. §§ 2920.7(b), 3162.5-1.
[72] 43 U.S.C. § 1732(b).
[73] BLM Handbook H-1601-1 at II-4.

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5. Resource condition objectives that have been established and specific lease stipulations and general/typical conditions of approval and best management practices that will be employed to accomplish these objectives in areas open to leasing.
6. For each lease stipulation, the circumstances for granting an exception, waiver, or modification. Identify the general documentation requirements and any public notification associated with granting exceptions, waivers, or modifications.
7. Whether the leasing and development decisions also apply to geophysical exploration.
8. Whether constraints identified in the land use plan for new leases also apply to areas currently under lease.
9. Long-term resource condition objectives for areas currently under development to guide reclamation activities prior to abandonment.[74]

79-023 (cont.)

In addition to these requirements, FLPMA also requires that BLM land use plans be consistent with state, local and tribal government resource-related plans.[75] For example, it is the Wyoming Game and Fish Commission's policy that crucial habitat for wildlife species within the State should be managed to prevent "any loss of habitat function."[76] Some modification of crucial habitat is permitted but only if "habitat function is maintained (i.e., the location, essential features, and species supported are unchanged)."[77] Pursuant to the RMP amendments proposed in Wyoming, 362,792 acres of mule deer crucial winter habitat and 262,273 acres of elk crucial winter habitat will be opened to oil shale development. Despite this requirement, there is no discussion in the DPEIS as to whether the proposed RMP amendments are consistent with the resource management goals of the impacted states, local governments or tribes.

Analysis of Impacts to Human Health and the Environment

As noted above, the DPEIS identifies – but dismisses – significant impacts. A summation of the impacts and corresponding legal deficiencies follows.

Water Impacts

Water resources in the West are scarce and are under increased pressure from many forms of development. The DPEIS makes clear that water requirements for commercial development could be substantial. Yet the DPEIS greatly underestimates oil shale's likely water demands and fails to take into account numerous factors that limit water availability, especially when considered in the context of other current and anticipated activities that compete for the same resource.

Among other impacts the DPEIS fails to adequately analyze is the potential magnitude of converting water from agricultural uses to industrial uses. Large-scale oil shale and tar sands production likely will shift hundreds of thousands of acre-feet from agricultural use, resulting in the dry-up of hundreds of thousands of acres of agricultural lands. The DPEIS fails to adequately analyze this issue and the related issues of potential impacts including soil erosion, sediment loading in streams, and other environmental resource issues. As is the case in other sections of the DPEIS, the BLM's determination that oil shale development will not result in significant impacts to water is completely unfounded. The DPEIS does not adequately address cumulative impacts or provide reasonable mitigation measures.

79-024

There are many reasons why the BLM underestimates the impacts to water resulting from oil

79-025

[74] *Id.* at H-1601-1, Appendix C at 23-24.
[75] 43 U.S.C. § 1712(c)(9); *see also* 43 C.F.R. § 1610.3-2; BLM Handbook H-1601-1 at II-1 ("Land use plans must be consistent with State and local plans to the maximum extent consistent with Federal law.").
[76] Wyo. Game & Fish Comm'n Policy No. VII H (April 28, 1998) at 138.
[77] *Id.*

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shale technology. These issues are discussed below.

One of the fundamental flaws in the DPEIS is that it overestimates the amount of water available to Upper Basin states under the 1922 Colorado River Compact. As David Atkins, a water expert specializing on water quality and quantity impacts from resource extraction, notes in his expert comments:

> In section 3.4.1, the Draft PEIS provides a broad legal framework of the Upper Colorado River Basin's water resources, but this section dramatically overestimates the states' potential water surpluses listed in tables 3.4.1-2, 3.4.1-3, and 3.1.4-4. To realistically evaluate how much additional Colorado River Basin water could be developed in Colorado, Utah, and Wyoming, the Draft PEIS must analyze both the Upper and the Lower basins' outstanding legal issues, the implications of the most recent legal agreements, the scientific assumptions behind estimates, any authorized and/or proposed municipal or industrial water projects, flows to recover federally endangered fish in the Yampa and Green Rivers, and the predicted effects of climate change on Colorado River flows.

As water rights expert Bruce Lytle notes in his expert comments, projections of decreased water availability in the Colorado River basin could result in Colorado's allocation being much less than the 3 million acre-feet/year that the draft DPEIS assumes. Lytle notes that Utah, at least, does not believe that there is excess water available under its Compact entitlement. 79-025 (cont.)

The State of Colorado is in the early stages of a water availability study to answer how much water is available for the state to develop from the Colorado River. The results of this study will be critical in determining the broad-reaching effects of water availability on potential oil shale and tar sands development. Accordingly, the BLM should first review the outcome of Colorado's study before concluding there is sufficient water available for commercial oil shale development. This information, which will help identify impacts in western Colorado, Utah and Wyoming, as well as Colorado's Front Range, is also critical information in developing appropriate mitigation measures.

Should the water available from the Colorado River be less than the BLM anticipates, it increases the likelihood that water use by oil shale would result in an over-development of Colorado's Compact allocation. This situation, in turn, increases the likelihood of a "call" being placed on the river by Lower Basin states. Such an outcome would affect many cities, including millions of people who live *outside* the Colorado River basin (e.g., Colorado's Front Range). Such broad-reaching impacts were not considered in the DPEIS and thus draw into question the BLM's conclusion that oil shale and tar sands development will comply with the fundamental goals of NEPA and FLPMA.

The BLM compounds problems with their analysis by basing water availability on a daily production level that is roughly one order of magnitude less than government projections. The DPEIS estimates a daily production capacity of 350,000 bbl/day (50,000 bbl/day for surface retort; 200,000 bbl/day for *in situ* retort; and one 100,000 bbl/day for tar sands facility). This scenario of just three commercial plants (one for each general technology considered) operating at a production level far below current projections skews the BLM's analysis. The discrepancy between the production capacity of these facilities – 350,000 bbl/day – compared to the government's projections of 2.5 million bbl/day demonstrates that the DPEIS failed to analyze whether the requisite amount of water is available and the cumulative impacts to water resulting from development. 79-026

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The potential water demands from oil shale development of this magnitude are enormous. As Lytle notes, large-scale oil shale and tar sands production could require as much as 740,000 acre-feet of water annually. There are insufficient flows in most of the basins to provide water to the oil shale and tar sands industry and the DPEIS fails to include adequate evaluation of site-specific and basin-wide data. 79-026 (cont.)

Another flaw in determining water availability and impacts from development is that the DPEIS does not forecast realistic municipal and other water demands. Future municipal development, power production, in-stream flows for federally endangered fish, and other types of energy development are expected to rely on water from the Colorado River, yet these impacts are not sufficiently included in the DPEIS. When coupled with anticipated changes in climate, population, and land use both within and outside the Colorado River Basin, the DPEIS's widespread omissions render its water availability analysis incomplete and inaccurate. 79-027

Similarly, as Atkins notes, the BLM's assumptions about water demands connected with electricity generation are based on incorrect numbers. The DPEIS grossly underestimates water requirements for power generation required for *in situ* oil shale production, as well as for retort processes. These deficiencies are compounded when coupled with basic energy requirements for a growing population. 79-028

The DPEIS also fails to adequately analyze the potential impact of oil shale and tar sands development on groundwater rights and resources. As Lytle notes, oil shale development will impact the hydraulic interconnection of aquifers and cause permanent impacts to ground and surface water systems. These impacts, in turn, will affect water quality, existing groundwater rights, surface water flows, and the development of other surface and groundwater supplies. 79-029

Atkins further notes that because technology and conditions in the Colorado River Basin have change markedly since the last time large-scale oil shale development was proposed, the DPEIS should address the following additional concerns as well:

- The development of new, untested in-situ retort technology and its effects on water resources;
- An evolving understanding of water supply and demand, particularly in the Colorado River Basin;
- An emerging appreciation for the interdependence of energy and water resources; and
- A growing awareness of the scope of impacts that elevated levels of greenhouse gases – especially carbon dioxide – can have on everything from global climate to regional water supplies, and the feedback that could occur from carbon dioxide releases due to large-scale oil shale development. 79-030

Similarly, Lytle notes that the DPEIS's analysis is deficient in other areas related to water resources and water rights, including:

- The draft PEIS fails to evaluate site-specific water supplies in river basins where oil development many occur;
- The draft PEIS fails to assess impacts from oil shale development forcing the retirement of agricultural water rights and the dry-up of agricultural lands; and
- The draft PEIS fails to adequately address water rights issues related to hydraulic interconnection of aquifers, permanent changes to ground and surface water systems, water quality, and mitigation of impacts related to either surface or groundwater supply development. 79-029 (cont.)

The water availability and water rights analysis in the DPEIS is inadequate to determine the potential programmatic-level environmental impacts. This incomplete information and analysis of potential adverse impacts on water resources does not support the BLM's decision to amend 12 RMPs. 79-030 (cont.)

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In addition to these comments, our comments also incorporate directly, and by reference, those offered by David Atkins[78] and Bruce Lytle.[79] 79-030 (cont.)

Wildlife Impacts

Federal law directs the BLM to protect and enhance the diversity of all native wildlife on public lands. FLPMA requires management plans protect ecological and other values.[80] NEPA, in turn, requires the BLM to fulfill its trustee obligation for future generations, assure productive surroundings, avoid environmental degradation, preserve important natural aspects of our national heritage, and enhance the quality of renewable resources.[81]

As discussed above, one of the primary drivers for undertaking this programmatic assessment is to understand the impacts over a broad landscape. A landscape level analysis is a critical component of any NEPA analysis, even if the agency later conducts site-specific analyses. Protecting the biological diversity of wildlife can only be addressed appropriately at the planning level as habitat fragmentation, connectivity, and other factors affecting biological diversity are inherently landscape-level considerations. Relegating such analyses to future decisions on individual 5000-acre leases contravenes BLM's mandates under both NEPA and FLPMA and is thus inadequate. 79-031

The DPEIS presumes most oil shale and tar sands projects will disturb 100 percent of the leased surface. Given that the DPEIS amends 12 RMPs, 10 of which contain no oil shale provisions, the DPEIS should describe existing environmental conditions and impacts so that the public and decision makers can evaluate the potential ecological costs from development as a result of the leasing program.

As William Alldredge notes in his comments on the DPEIS,

> Since the ROD was signed for each of the 12 RMPs affected by this PEIS analysis, landscapes influenced by those RMPs have experienced considerable change from a variety of anthropogenic actions, chief among which is gas and oil development (see USDI, BLM 2004, 2006, 2007a, 2007b, 2007c). My experience in these areas is that crucial wildlife habitats are even more crucial today and thus in need of greater protection if impacts are to be minimized or mitigated. This is especially true for big game winter ranges, transition ranges and migration corridors that overlap areas designated for potential leasing.[82] 79-032

Alldredge, a professional wildlife ecologist, believes the BLM "must explain why protected areas and protective measures set forth in previous NEPA processes would be overridden by the deficient analysis in the Oil Shale Tar Sands PEIS."[83]

While there are great uncertainties about the potential impacts, some of what is known is stunning: at least 735,000 acres of mule deer winter habitat, 649,700 acres of elk winter habitat and 501,503 acres of identified sage-grouse habitat is at risk.[84] Sage-grouse populations, which are on the

[78] Appendix 20.
[79] Appendix 21.
[80] 43 U.S.C. § 1701(a)(7)-(8)
[81] 42 U.S.C. § 4331(b)(1)-(6)
[82] A. William Alldredge, DPEIS Comments, pages 2-3. (Appendix 16).
[83] *Id.*
[84] DPEIS, Table 6.1.2-6 at 6-52.

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verge of requiring listing under the Endangered Species Act, have declined precipitously over their entire range. Declines have been estimated at over 50% in occupied area and up to 80% decline in bird abundance, with complete extirpation in several states.

Other species which would be impacted include:

1. Midget Faded Rattlesnake
   The midget faded rattlesnake is believed to be rare throughout its range, which includes northwest Colorado, northeast Utah, and southwest Wyoming and along the lower Green River and Bitter Creek valleys.

2. Pygmy Rabbit
   The pygmy rabbit has been petitioned for listing under the Endangered Species Act, and the USFWS has issued a positive 90-day finding on this petition, indicating that there is substantial scientific information that listing may be warranted.[85]

3. Wyoming Pocket Gopher
   The Wyoming pocket gopher has recently been petitioned for listing under the Endangered Species Act.

4. White-Tailed Prairie Dog
   White-tailed prairie dogs have declined to 8% of their native range in North America, and the survival of remaining populations is threatened.

5. Mountain Plover
   Mountain plovers are often found closely associated with prairie dog colonies of all species.

6. Swift Fox
   The swift fox was determined to be "warranted but precluded" for listing under the Endangered Species Act by the U.S. Fish and Wildlife Service in 1995.[86] The swift fox is listed as a Species of Special Concern by the Wyoming Game and Fish Department.

7. Burrowing Owl
   Nationwide, the burrowing owl is a species on the decline. As of 1997, over half of the agencies across North America tracking burrowing owl population trends reported declining populations, while none reported increasing populations.

A more in depth discussion of these and other species is found in Appendix 14.

The mitigation measures identified in the DPEIS are inadequate. The steps identified are not sufficient either in their detail or to match the broad impacts that will likely result from oil shale and tar sands development. Future analyses that focus narrowly will not support valid cumulative impact analyses and thus will not provide a reasonable basis for identifying and implementing mitigation measures that address landscape levels impacts.

79-032 (cont.)

[85] 73 Fed. Reg. 1312.
[86] 60 Fed. Reg. 31663.

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In addition to these comments, our comments also incorporate directly and by reference those offered by William Alldredge[87] and Erik Molvar.[88] 79-032 (cont.)

Aquatic Species

Like wildlife, federal law requires the BLM to protect aquatic species and their habitats. These requirements extend to migration, breeding, foraging and other activities. Instruction Memorandum (IM) 97-118, which governs BLM Special Status Species management, requires that actions authorized, funded, or carried out by the BLM do not contribute to species becoming listed as a candidate species, or for candidate species becoming listed as threatened or endangered. Accordingly, it is vital that the agency identify BLM sensitive species early in the process in order to prevent species from becoming endangered.

The IM also encourages state directors to collect information on species of concern to determine if BLM sensitive species designation and special management are needed. For special status species, the BLM must

> Identify strategies and decisions to conserve and recover special status species. Given the legal mandate to conserve threatened or endangered species and BLM's policy to conserve all Special Status Species, land use planning strategies and decisions should result in a reasonable conservation strategy for these species. Land use plan decisions should be clear and sufficiently detailed to enhance habitat or prevent avoidable loss of habitat pending the development and implementation of implementation-level plans. This may include identifying stipulations or criteria that would be applied to implementation actions. Land use plan decisions should be consistent with BLM's mandate to recover listed species and should be consistent with objectives and recommended actions in approved recovery plans, conservation agreements and strategies, MOUs, and applicable biological opinions for threatened and endangered species.[89]

Roundtail chubs, flannelmouth suckers, and bluehead suckers are found in watersheds that will be affected by oil shale development. These species, which reside in large, slow-moving rivers as well as smaller tributary streams, "have experienced dramatic reductions in their range in western Wyoming since 1965, and may need immediate conservation attention."[90] In the Upper Colorado Basin, the roundtail chub has been extirpated from 45% of its historical range, bluehead suckers occupy about 45% of their historical range, and the flannelmouth sucker occupies about 50% of its historic range.[91] All three of these species are on the BLM Sensitive Species list, and merit special conservation attention.

The DPEIS identifies three primary ways aquatic species would be impacted: (1) direct disturbance, (2) sedimentation, and (3) changes in water quantity and water quality. These impacts, the DPEIS makes clear, could occur during both construction and throughout oil shale and tar sands operations. Despite the aforementioned mandate that the BLM develop strategies to protect sensitive 79-033

[87] Appendix 16.
[88] Appendix 14.
[89] BLM Land Use Planning Handbook H-1601-1, Appendix C at 5.
[90] Wheeler, p. 54.
[91] Bezzerides and Bestgen 2002.

species, the description of aquatic resources is vague and BLM presents little information about species distribution. Cumulative impacts are not sufficiently discussed, and without such information, the mitigation measures are perfunctory. 79-033 (cont.)

Reduced water volume in the Colorado River system will have direct and indirect impacts on the water quality and ecological health of aquatic and riparian systems. Contaminants that are washed into the rivers from oil and tar sands development will flow downstream. Depleted water volumes will reduce the amount of water available for diluting pollutants and carrying them downstream. Higher levels of pollutants will directly impact the ability of aquatic and riparian organisms to sustain themselves and increase the level of stress on the system dynamics. 79-034

Reduced water flows will also impact the ability of streams and rivers to remove excess nitrogen caused by human activities. Recent studies completed at Oregon State University identified the role that rivers play in filtering and denitrifying stream systems. Timing, distribution and volumes of water in a watershed directly impact the ability and level of de-nitrification and nutrient cycling that defines the overall health of the aquatic ecosystems.

In his expert comments,[92] John Woodling identifies numerous deficiencies in the DPEIS, including:

1. The DPEIS' description of ambient aquatic resources in proposed oil shale and tar sands areas is lacking. It omits fish distribution data on the flannelmouth sucker and the mountain sucker, two BLM species of concern and Colorado species of concern in the White River and Piceance Creek.
2. The DPEIS does not adequately describe ambient aquatic resources in rivers downstream of oil shale areas in Colorado. It omits fish distribution data on demonstrating the presence of federally and state listed fish species, BLM species of concern and Colorado species of concern in the White River, Colorado River and Yampa River. These species include the four federally listed species, three species of concern to the BLM and one Colorado species of concern.
3. The DPEIS did not adequately describe impacts of water depletion on aquatic species, including whether depletions might trigger Section 7 consultations.[93]
4. The DPEIS does not identify monitoring that could be used to develop mitigation measures necessary to lessen impacts to water quality and aquatic species. 79-035
5. The DPEIS does not identify mitigation measures that could reduce water quality and related impacts to aquatic species.
6. The DPEIS presumes native fish in river reaches downstream of land that may be developed are adapted to high sediment loads. This assumption is unsupported. The DPEIS further presumes these fishes are adapted to additional sediment loads.
7. The DPEIS does not include cumulative impacts to water quality. Water depletions may increase total dissolved salt loads, raise water temperature, and increase selenium levels. Together, these impacts may be far reaching, and could extend to downstream environments.
8. The DPEIS does not identify cumulative impacts resulting from the combination of oil shale and other development activities. For example, gas development is throughout the Piceance basin, but no mention is made concerning aquatic resources in the Piceance Creek basin.

[92] *See* Appendix 22.

[93] 16 U.S.C. §§ 1531 et seq. Section 7 of the Endangered Species Act directs all Federal agencies to use their existing authorities to conserve threatened and endangered species and, in consultation with the US Fish and Wildlife Service, to ensure that their actions do not jeopardize listed species or destroy or adversely modify critical habitat. Section 7 applies to management of Federal lands as well as other Federal actions that may affect listed species, such as Federal approval of private activities through the issuance of Federal permits, licenses, or other actions.

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9. The DPEIS does not consider impacts from increased human populations, including increased nutrient loads resulting from increased domestic wastewater treatment plant effluent.
10. The DPEIS ignores key regulations and agreements that will influence oil shale and tar sands development. For example, the DPEIS does not mention the seven-state agreement limiting salt loading to the Colorado River by upstream states. The DPEIS likewise does not consider other water quality standards that will likely be impacted (e.g., selenium standard; temperature standards).

79-035 (cont.)

Overall, Woodling concludes, the DPEIS "does not accurately describe the aquatic resources found in waters that would be impacted by oil shale development and does not address regulations and processes that protect these resources."[94]

In addition to these comments, our comments also incorporate directly and by reference those offered by John Woodling and Erik Molvar.

Endemic Wildflowers

Several wildflowers have been protected under the Endangered Species Act specifically because of the threat of commercial development of oil shale. The BLM must analyze the impacts of oil shale and tar sands development on endemic wildflowers. A thorough analysis of direct, indirect, and cumulative effects of potential oil shale and tar sands development is essential before determining which areas should be available for leasing. The BLM must take a "hard look" at how each alternative would impact each of the special status species in Appendix E, and ensure that the agency is not contributing to the need to list any species, not undermining any existing recovery plans or Conservation Agreements, not sanctioning the adverse modification of designated critical habitat, or permitting leasing in areas where oil shale or tar sands development could jeopardize the future existence of any species.

79-036

The lack of analysis in the PEIS contravenes federal law. Rather than simply listing which oil shale or tar sands areas each special status species may occur within, the BLM should work with the Natural Heritage Programs to identify what proportion of the known occurrences of each species would be made available for leasing under each alternative, and should also disclose what proportion of the high-quality occurrences could be offered for lease. The areas that the BLM is considering opening to development are centers of endemism, and it is highly likely that the current alternatives would open to leasing every known occurrence of multiple species. The DPEIS, as noted throughout these comments, may be the sole decision point where the BLM evaluates the cumulative effects of full-scale development. This type of landscape analysis is precisely why a programmatic EIS must fully consider impacts from a new program before it is authorized. Deferring analysis until leases are issued or projects are approved results in a piecemeal approach where the BLM may not understand until it is too late that the best recovery habitat for an imperiled species has already been sacrificed. This situation is occurring right now with conventional oil and gas leasing in the West.

79-037

The DPEIS provides conflicting information about whether the BLM intends to undergo Section 7 consultation with the USFWS. Page 7-6 states that consultation on portions of the DPEIS will occur; page 4-99 suggests that BLM is making a "may affect" finding for a whole list of species; and pages 6-291 to -292 indicate that the BLM has made a no effect finding, will not prepare a Biological Assessment, and will not enter into Section 7 consultation at this time. The BLM essentially claims that opening an area to leasing has no effect on the environment and therefore consultation is not required.

79-038

[94] Appendix 22 at 6.

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However, in a 2007 ruling federal court found that consultation should have taken place before the BLM made South Shale Ridge available for oil and gas leasing:[95]

> The Court draws some guidance from the ESA's regulations regarding the conferral process. Of particular note is 50 C.F.R. § 402.14(a), which directs that "[e]ach federal agency shall review its actions at the earliest possible time" to determine whether an action may affect protected species, and, if so, to engage in the appropriate level of conferral. This, in turn, suggests that the conference should occur as early as all of the necessary information is available; there is little logic in requiring an agency to make an early determination that conferral is required, only to allow the agency to postpone actually conferring until some indeterminate later date. Thus, the Court finds that the BLM's duty to confer with the FWS arises as of the time that it was possible for the two agencies to engage in meaningful conference regarding the decision to be made.[96]

Accordingly, due to the likely impacts oil shale and tar sands development will have on listed species, the BLM must consult with the USFWS on the decision to amend these RMPs.

The specifics of how oil shale and tar sands development may proceed are not necessary for the two agencies to consult about potential impacts, for the USFWS has valuable information about steps the BLM should take to protect and recover imperiled species. Importantly, consultation is already stale on many if not all of these plans already. We are aware that the BLM has been working on programmatic BAs for years to remedy this, but that process has been stalled for some time now. Since the agency is already vulnerable to being brought up on Endangered Species Act violations, it makes little sense to further exclude input from the Service now. 79-038 (cont.)

For some special status species, the DPEIS omits or gets wrong basic life history needs. For example, Appendix E simply lists "not available" for the habitat description for *Astragalus coltonii* var. *moabensis*. However, a quick search on NatureServe (the Natural Heritage Program's national database) gives the following habitat description for this subspecies: "Pinyon/juniper and mountain brush communities 4400-6900 ft.".[97] For *Cirsium ownbeyi*, the only county listed is Sweetwater, when both NatureServe and the USDA's PLANTS database indicate that it is also found in Uintah County, Utah. The DPEIS description of *Penstemon debilis* habitat – "Rocky clay loam soils of sagebrush hills and flats at elevations between 7,000 and 8,500 ft." – is incorrect.[98] This mistake is important, because this species is endemic to the areas under consideration for oil shale development. 79-039

Throughout the DPEIS the BLM refers only to *Sclerocactus glaucus*, when this taxon has now been split into three different species, including *Sclerocactus wetlandicus* and *Sclerocactus brevispinus*. Most if not all of the occurrences of these latter two species are within areas that the BLM proposes to open to oil shale and tar sands leasing, and this decision could constitute jeopardy. In September 2007, the USFWS ruled *Sclerocactus brevispinus* warrants uplisting to "Endangered" status. The finding made no mention of the additional threat of tar sands or oil shale, yet based on conventional oil and gas drilling 79-040

[95] The Wilderness Soc'y v. Wisely, 524 F.Supp.2d 1285 (D. Colo. 2007).
[96] *Id.* at 1301.
[97] NatureServe Explorer: An Online Encyclopedia of Life, http://www.natureserve.org/explorer/ (last visited Mar. 19, 2008).
[98] DPEIS at E-15.

alone the USFWS stated, "The species cannot tolerate the cumulative effects from existing and proposed energy projects, especially due to the extent of roads within *S. brevispinus* habitat."[99] Yet in the DPEIS the BLM once again fails to recognize that *Sclerocactus brevispinus* even exists. These examples are representative of the DPEIS's inadequate analysis of current conditions and potential impacts of commercial oil shale and tar sands leasing. 79-040 (cont.)

The DPEIS also fails to provide protections to oil shale endemics like *Penstemon grahamii*, despite the BLM's past assurances that this would occur. On May 10, 2006, Kathleen Clarke submitted to the USFWS official comments on the proposal to protect *Penstemon grahamii* under the Endangered Species Act. In her letter, Clarke committed that the PEIS would incorporate conservation measures for *penstemon*, including making the proposed critical habitat areas for *Penstemon grahamii* off-limits to oil shale and tar sands leasing:

> The BLM will develop the necessary conservation measures to protect this and other species from the future potential impacts of oil shale and tar sands development. This will be accomplished through the recently initiated Programmatic Environmental Impact Statement (PEIS) for the Oil Shale/Tar Sands Commercial Leasing Program and concurrent development of the associated regulatory program. Required conservation measures for *P. grahamii* and other species will be generated through the PEIS process and will be applied to oil shale and tar sands development projects. While we cannot describe what the specific conservation measures will be, because they are yet to be developed, they will incorporate effective conservation measures for *P. grahamii* and other species.[100]

79-041

Despite Clarke's commitment and the need to protect this species, the DPEIS opens most of the former critical habitat proposal for the *penstemon* to leasing. Contrary to NEPA's mandate, the DPEIS does not take the hard look required by law. The DPEIS does not evaluate conflicts between leasing and habitat critical to the recovery of *Penstemon grahamii* or other species, or seriously consider what changes in land use allocation or stipulations may be necessary to conserve this or any of the other oil shale endemic species. Taking these actions for *Penstemon grahamii* is especially critical because this species currently has no special status.

The BLM must take a close look at indirect and cumulative effects to these oil shale endemic species as well. For example, the Dudley Bluffs plants are already under considerable pressure from conventional oil and gas drilling, especially the Piceance Development Project. Like *Sclerocactus brevispinus*, currently authorized roads and wells may have already disturbed the Dudley Bluffs plants too much; adding a new industry to their habitat may be more than they or their pollinators can tolerate. 79-042

The DPEIS acknowledges that rare species are inherently more vulnerable to the effects of disturbance like that which would accompany oil shale or tar sands development. But the BLM must also consider how this program will contribute to climate change and therefore further imperil rare species in the region. Many of the rare plants that will be affected by oil shale and tar sands development are edaphic endemics - species tied to very specific substrates, many of them only found growing on oil shale. These species may be particularly hard-pressed to respond to climate change because the soils they rely on may be restricted to very narrow elevational and/or latitudinal bands that do not allow for refugia 79-043

[99] 72 Fed. Reg. 53217 (Sept. 18, 2007).
[100] *Id.* at 5-6.

from warmer, drier conditions. These plants are literally tied down to oil shale soils, and cannot march up a mountain or move north in response to climate change without leaving behind the soils they require. In facilitating the oil shale and tar sands industry, the BLM is dealing these endemics a double blow – fragmenting and degrading their habitat, and contributing even more greenhouse gases (both through oil shale and tar sands mining, and through meeting the tremendous energy needs that would have to power oil shale and tar sands extraction) which may speed species decline due to drought stress. 79-043 (cont.)

The Intergovernmental Panel on Climate Change has come to consensus on several factors relevant to the potential threat of climate change to endemic species, including:

- "With global average temperature changes of 2°C above pre-industrial levels, many terrestrial, freshwater and marine species (particularly endemics across the globe) are at a far greater risk of extinction than in the recent geological past (medium confidence)"[101]
- "Warming and drying trends are likely to induce substantial species-range shifts, and imply a need for migration rates that will exceed the capacity of many endemic species."[102] 79-044
- "The likely synergistic impacts of climate change and land-use change on endemic species have been widely confirmed."[103]

The DPEIS is exactly where the BLM should be taking a hard look at the indirect and cumulative impacts that oil shale and tar sands development would have on at-risk species like these.

Climate Change

Climate change is a subject that has been intensely studied by the world's scientists, and broad consensus exists around its causes, magnitude and effects. The planetary warming that scientists predict will result from human emissions of heat-trapping gases is already underway. In February 2007, the Intergovernmental Panel on Climate Change (IPCC) declared, "[w]arming of the climate system is unequivocal," and it is "very likely" that most of the warming since the middle of the 20th century is the result of human pollutants. Climate change is a global phenomenon with well-documented and serious local impacts. Those impacts affect the both ecosystems and the welfare of citizens not only around the world, but in the United States and the nation's Western states in particular.

In addition to its other disruptive direct effects, oil shale and tar sands leasing, development and use poses serious climate threats: first, production of oil from shale and tar sands will likely result in the generation of huge quantities of greenhouse gas emissions and second, transportation fuels derived from oil shale and tar sands are highly energy intensive and have a carbon footprint that is known and calculated to be higher than conventional fuels, and significantly higher than other cleaner fuel alternatives.

Many of the public resources managed by the Department of the Interior are being harmed by climate change resulting from increased greenhouse gas emissions[104]. The West in particular is being affected more by a changed climate than any other part of the United States outside of Alaska: compared

[101] Fischlin et al., 213 (2007).
[102] *Id.* at 226.
[103] *Id.* at 241 (citing Hannah et al., 2002a; Hughes, 2003; Leemans and Eickhout, 2004; Thomas et al., 2004a; Lovejoy and Hannah, 2005; Hare, 2006; Malcolm et al., 2006; Warren, 2006).
[104] See generally, GAO, Climate Change: Agencies Should Develop Guidance for Addressing the Effects on Federal Land and Water Resources (Aug. 2007).

to the 20th century average, the West has experienced an increase in average temperature during the last five years that is 70 percent greater than the world as a whole.

The attached discussion of global climate change and impacts from oil shale and tar sands development prepared by the Natural Resources Defense Council identifies five ways in which public land resources are already being adversely affected by climate change. [105]

1. The West is getting hotter
   The American West has heated up even more than the world as a whole. The West has also experienced more frequent and severe heat waves, with the number of extremely hot days increasing by up to four days per decade since 1950. These heat waves, particularly those with excessive nighttime heat, can be deadly. Climate change has eroded the severe winter cold of the West's mountains. This has resulted in declining springtime western snowpacks.[106]

2. The West is getting drier
   In the arid and semi-arid West, global warming is already having serious consequences for the region's scarce water supplies, particularly the snow that makes up most of the region's precipitation and, when melted, provides 70 percent of its water. Already, decreases in snowpack, less snowfall, earlier snow melt, more winter rain events, increased peak winter flows, and reduced summer flows have been documented.

3. Climate change is disrupting ecosystems
   The IPCC also concluded that "recent warming is already strongly affecting" ecosystems and wildlife. Forests across the West have suffered as warming has extended the range of some damaging insects, such as bark beetles. Glaciers are melting across the West. The warming of the West is also disrupting the natural timing of seasons and leading to loss of wildlife.

4. Climate change is affecting wildlife
   Greenhouse gas emissions are also having direct and indirect impacts on wildlife species, including numerous listed species. The IPCC has reported that 30 percent of animal and plant species could be at an increased risk of extinction if global warming continues unabated.[107]

5. Warmer temperatures affect business, recreation, and tourism
   In the first few years of the 21st century, western farmers and ranchers have suffered significantly from the combination of above-normal heat and drought. Across the country, four of the five top years for crop loss claims due to drought have been since 2000. Warming temperatures and other manifestations of a changing climate are already diminishing fishing and hunting opportunities in the

[105] Appendix 15.
[106] Mote P. W., Hamlet A. F., Clark M. P., and Lettenmaier D. P. 2005. Declining Mountain Snowpack in Western North America. Bulletin of the American Meteorological Society. 86: 39-49. See also Intergovernmental Panel on Climate Change (IPCC), "North America," in *Climate Change 2007: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*, M.L. Parry and others, eds., Cambridge University Press, Cambridge, UK (2007), 621-22.
[107] IPCC, 2007: Summary for Policymakers. In: Climate Change 2007: Fourth Assessment Report, Synthesis Report, available at http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr_spm.pdf

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> West. Sea-run salmon stocks are in steep decline throughout much of North America.

BLM is required to analyze the impacts of climate change and take action to reduce it.[108] In 2007 the Supreme Court issued a decision that recognized the severity of the climate change crisis, and the U.S. Environmental Protection Agency's obligation to confront the problem. The Court noted "the enormity of the potential consequences associated with man-made climate change,"[109] and the contribution of carbon dioxide emissions to global warming.[110] The Supreme Court's concluded, "[t]he harms associated with climate change are serious and well recognized,"[111] and that the federal government has a responsibility to take action to reduce it, even if such action may not completely reverse global warming.[112] BLM is not exempt from that responsibility.

In enacting FLPMA, Congress enacted a policy that "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource , and archeological values…."[113] Further, FLPMA directs BLM to manage the lands under its jurisdiction in such a manner that will "best meet the present and future needs of the American people;" "provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions;" and "take[] into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish…."[114] In addition, the statute requires BLM to "minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) of the public lands involved."[115]

As documented above, climate change is already threatening many of these very resources in the West including undoubtedly resources on BLM-administered lands. Accordingly, FLPMA imposes an obligation on BLM to take the effects of climate change into account in managing and in making decisions about various uses of the public lands under its stewardship.

In fact, an order issued by the Secretary of the Interior requires that:

> Each bureau and office of the Department will consider and analyze potential climate change impacts when undertaking long-range planning exercises, when setting priorities for scientific research and investigations, when developing multi-year management plans, and/or when making major decisions regarding the potential utilization of resources under the Department's purview.[116]

79-045

Obviously, the proposed decisions that the DPEIS purports to address are covered by this order. Thus, the BLM's failure to address climate change impacts in this impact statement is not only inexplicable, it directly contravenes an explicit Secretarial order.

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[108] Massachusetts v. EPA, 127 S. Ct. 1438 (2007),
[109] *Id.* at 1458.
[110] *Id.* at 1457-58.
[111] *Id.* at 1455.
[112] Id. at 1458.
[113] 43 U.S.C. at § 1701(a)(8).
[114] *Id.* § 1702(c).
[115] *Id.* § 1732(d)(2)(a).
[116] U.S. Dept. of the Int., Sec. Order No. 3226 (Jan. 19, 2001), Section 3.

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BLM is also required under NEPA to analyze climate change impacts that result from its actions. CEQ regulations require federal agencies to get information "essential to a reasoned choice among alternatives" when the overall costs of obtaining the information are "not exorbitant."[117] Modeling to predict effects of climate change on specific landscapes and wildlife populations is absolutely essential when planning whether to allow thousands of new wells, mining and the construction of associated large scale infrastructure. Programmatic NEPA analyses clearly provide the Interior Department the ability to address climate change in the most efficient and effective way.

Clearly, oil shale and tar sands leasing and development will result in increased greenhouse gas emissions and exacerbate climate change. The lifecycle emissions of oil shale- and tar sands-oil are well above those of conventional fuels or cleaner alternatives.[118] The DPEIS acknowledges that climate change exists and will have environmental consequences.[119] It also acknowledges that development of these resources is certain to require coal fired power and that construction of more such plants will be needed.[120] It also purports to predict the impacts of such use, albeit selectively – i.e., excluding greenhouse gas and climate change impacts.[121]

79-046

The DPEIS fails dismally to consider climate change on many fronts. Despite the legal mandates that require BLM to address climate change, the DPEIS does not discuss the potential direct, indirect and cumulative impacts on climate change from oil shale and tar sands development and use, let alone make any attempt to quantify them. It fails to quantify the carbon emissions from leasing, development and use and compare them to a baseline. It fails to analyze the direct, indirect and cumulative impacts that climate change and increased carbon emissions will have on the welfare of ecosystems and humans – both qualitatively and quantitatively. It also fails to analyze alternatives to oil shale and tar sands development in meeting energy needs.

Federal agencies generally and the BLM in particular are required to incorporate climate change and its impacts in their decision calculus under a number of mandates, including NEPA, FLPMA and Secretarial Order 3226. Thus, the current DPEIS is fatally flawed, violates NEPA and must be supplemented to integrate climate change in its analysis.

In addition to these comments, our comments also incorporate directly and by reference the Natural Resource Defense Council's discussion of climate change impacts.[122]

Air Resources

79-047

Despite the fact that, as the BLM recognizes, oil shale and tar sands development would negatively impact air quality, the DPEIS does not analyze impacts that would result from the actions authorized under the RMP amendments. The BLM instead defers all air quality analyses until specific oil shale and tar sands development projects are proposed – and in doing so fails to comply with both NEPA and FLPMA. Without such an analysis in the DPEIS, the BLM cannot determine how the activities authorized in the DPEIS affect air quality nor ensure development will prevent significant deterioration of air quality, as required by the Clean Air Act (CAA).[123]

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[117] 40 C.F.R. § 1502.22(a).
[118] *See* Brandt, A. R. and Farrell, A. E. Scraping the bottom of the barrel: CO2 emission consequences of a transition to low-quality and synthetic petroleum resources. Climatic Change (2007) 84:241–263.
[119] *See* DPEIS at 3-95 to -98; 5-40 to -41.
[120] DPEIS at 6-112.
[121] *See* DPEIS at 6-113.
[122] Appendix 15.
[123] 42 U.S.C. § 85

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This approach is unacceptable. Protecting air quality should be a priority, not just an afterthought. FLPMA requires the BLM to consider the relative value of the various resources, and clean air is increasingly becoming (along with undeveloped landscapes) a most valued, yet dwindling, resource. Oil shale and tar sands development activities directly contribute to air pollution in several ways, all of which should be addressed in the DPEIS. 79-047 (cont.)

Under NEPA, the BLM must conduct a comprehensive quantitative analysis of air quality impacts and evaluate the potential impacts of air pollution from commercial-scale oil shale and tar sands development on human health and the environment. Yet, as Megan Williams, an air quality expert, notes in her expert comments, "The BLM does not provide specific analyses of near-field, far-field or cumulative air quality impacts as required by NEPA for resource management plan amendments and environmental impact statements." 79-048

NEPA mandates that environmental impact statements be done with "scientific integrity" and requires information be collected unless the costs would be exorbitant or the means to do so are unknown.[124] This standard can and should be met. The BLM is also required to assess and report on the cumulative impacts of expected emissions on the National Ambient Air Quality Standards (NAAQS), prevention of significant deterioration (PSD) increments, and air quality related values (AQRVs). The DPEIS bypasses this important analysis and reporting requirement, and also sidesteps requirements to identify alternatives or other mitigation measures sufficient to prevent expected impacts, including air quality violations.

Likewise, under the CAA, RMPs must manage actions on public lands to meet the air quality standards prescribed by Federal, State, and local laws, which includes improving air quality in non-attainment areas. FLPMA further mandates "[i]n the development and revision of land use plans, the Secretary shall . . . (8) provide for compliance with applicable pollution control laws, including State and Federal air, water, noise, or other pollution standards or implementation plans . . . ."[125] Taken together, under this regulatory framework, the BLM must conduct a full-scale quantitative analysis of the air quality impacts in both the study area and all affected areas. Otherwise, it is impossible to quantitatively show that production contemplated under the DPEIS and as provided in the RMP amendments will ensure attainment with all applicable standards. 79-049

BLM should proactively manage air quality. That means, among other things, gathering baseline air quality data; setting aggressive standards; requiring any actions on public lands to meet those standards; analyzing the cumulative impact of any proposed action with other past, present, and reasonably foreseeable actions; and establishing an effective monitoring program. It also could entail halting any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded.

Because of oil and gas drilling and other activities in the study area, the BLM and industry are not starting with a clean slate. There are ongoing air quality concerns. As Williams notes in her comments, particulate matter concentrations are high as are ozone concentrations. Visibility in several Class I Areas in each state is already impacted. The final EAs for the five oil shale RD&D test sites in Colorado concluded there will be significant adverse effects on visibility at the Flat Tops Wilderness Area Class I area. Several RMPs in Utah have identified visibility impacts from oil and gas development in several Class I areas, including Canyonlands National Park and Capitol Reef National Park. In Wyoming, there

[124] *See* 40 CFR §1502.24.
[125] 43 U.S.C. § 1712(c)(8); *see also* 43 CFR § 2920.7(b)(3) (requiring the same for land use authorizations).

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are serious concerns that visibility in the Bridger Wilderness Area and other nearby Class I areas as a result of oil and gas development in the Pinedale Anticline and Jonah Fields. 79-049 (cont.)

Part of the challenge industry faces in trying to develop oil shale and tar sands is that the increments are already consumed. As Williams notes, "the near-field modeling performed for the draft EGL oil shale RD&D EA showed that the EGL project alone would directly cause violations of the 24-hour average Class II PM_{10} and SO_2 increments." These impacts, which are potentially widespread, are missing from the DPEIS. 79-050

Williams further notes there are a number of other steps the BLM must take to comply with all applicable laws and regulations:

1. The BLM must acknowledge and address the potential enormous impacts that would result from the electricity requirements of commercial scale in-situ oil shale development;
2. The BLM must determine whether commercial-scale oil shale and tar sands development, along with all other ongoing development in the study area, will cause significant deterioration of air quality or impact visibility;
3. The BLM must disclose the magnitude of emissions authorized under the three alternatives of the DPEIS and perform a full-scale dispersion modeling analysis of the alternatives to evaluate the potential air quality impacts from a commercial-scale oil shale and tar sands leasing program; and
4. The BLM must include adequate plans to protect air quality in the affected areas as part of the RMP amendments and DPEIS.

79-051

In summary, the BLM's charge under the NEPA, FLPMA and CAA is to demonstrate that every decision or action it takes will comply with applicable air quality requirements. Without further detail in the DPEIS, the BLM cannot meet this critical charge.

In addition to these comments, our comments also incorporate directly and by reference those offered by Megan Williams.[126]

Socio-Economic Impacts

Over the past 30 years, western economies have shifted from largely extractive industries to more diversified economies based on recreation, tourism, knowledge-based industries and the professional and service sector (Bennett and McBeth 1998, Johnson 2001). A recent study examining the impact of public lands on economic well-being in 11 western states found that only 3% of western counties could be classified as resource-extraction dependent.[127] There is a vast and growing body of research that indicates that the environmental amenities provided by public lands are an important economic driver in the rural West (Rudzitis and Johansen 1989; Johnson and Rasker 1993, 1995; Rasker 1994; Power 1995, 1996; Duffy-Deno 1998; Rudzitis 1999; Rasker et al. 2004; Holmes and Hecox 2004). Given the changing nature of these economies, prioritizing oil shale and tar sands development at the expense of non-extractive economic drivers may harm the economy of the region in the long run by depleting the natural amenities currently responsible for the economic growth of western communities. 79-052

The western region of the United States is growing at a rate faster than any other region (U.S. Census Bureau 2001), and, counter to the norm, population growth has preceded employment growth in

[126] Appendix 19.
[127] R. Rasker, B. Alexander, J. van den Noort and R. Carter..2004. The Sonoran Institute, Public Lands Conservation and Economic Well-Being. Tucson AZ: The Sonoran Institute. Available at http://sonoran.org/index.php?option=com_docman&task=cat_view&gid=152&Itemid=74.

the rural West (Vias 1999), indicating that people migrate to the region for its amenity resources. Furthermore, counties with high levels of natural amenities (such as varied topography, access to water bodies, and a pleasant climate) are more likely to experience higher growth than those counties with fewer such amenities (McGranahan 1999). Along with this growth comes demographic change. As Shumway and Otterstrom (2001) point out, "Population change represents more than a simple redistribution of people; it is an indicator and, in many instances an instigator, of a wide range of economic, social, cultural, political/policy, and environmental changes." As more people move from urban areas to rural communities they bring with them expectations about how local public lands ought to be managed. Changing community values must be accounted for in land management planning.

It is especially important to consider these demographic and economic shifts given the location where this large-scale oil shale development is being proposed. Garfield County, Colorado and many of the towns throughout the county have had negative experience with the disruption that usually accompanies the booms and busts of natural resource extraction. Since the previous oil shale bust in 1981, the area has successfully made a transition from an economy that is dependent on extraction of natural resources to one that relies more heavily on the protection of the natural amenities. This area has developed a thriving retirement community, and has begun to market itself as a destination for outdoor recreation. The proposed oil shale development threatens these economic drivers. It is imperative that the relationship between protected public lands in the area and the local economy be given a more thorough comprehensive examination. See Haefele et al. (2006) for additional details on more complete socioeconomic analysis.

As rural communities diversify their economies, the framework for making public land management decisions must also evolve. Management plans for public lands need to account for all aspects of the economic and social systems of these communities, including investment and retirement income, recreation, tourism, and entrepreneurial businesses attracted to scenic locations, when evaluating alternatives. Management plans must also consider the increasing importance of industries and economic sectors that rely on these public lands, but not necessarily on the extraction of natural resources. As the population of the entire country grows, the presence of undeveloped lands becomes increasingly important because these lands strengthen western rural economies by meeting growing needs for clean air and water, wildlife habitat, and recreation opportunities. 79-053

Furthermore, many rural communities in the Rocky Mountain region are benefiting from the increase in demand for outdoors recreation, especially activities on federal public lands. The Outdoor Industry Foundation reported that more than 161 million Americans participated in outdoor recreation in 2005.[128] Another OIF (2006) analysis shows that the total economic contribution of active outdoor recreation is $730 billion nationwide.[129] The total economic contribution to Colorado alone from active outdoor recreation, including hunting, fishing, and wildlife-watching, is more than $10 billion, and results in 82,840 full-time jobs.[130]

It is this framework that BLM needs to analyze and put in context when assessing the following impacts:

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[128] Outdoor Industry Foundation. 2006. Outdoor Recreation Participation Study Eight Edition, For Year 2005. Trend Analysis for the United States. Boulder CO: Outdoor Industry Foundation. http://www.outdoorfoundation.org/pdf/ResearchParticipation2005.pdf

[129] Outdoor Industry Foundation. 2006. The Active Outdoor Recreation Economy. Boulder CO: Outdoor Industry Foundation. Available at:http://www.outdoorindustry.org/images/researchfiles/RecEconomypublic.pdf?26.

[130] Active Outdoor Recreation Economy in Colorado Available at: http://www.outdoorfoundation.org/pdf/ResearchRecreationEconomyStateColorado.pdf (Other states available at: http://www.outdoorfoundation.org/research.recreation.state.html

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- Lands identified for oil shale development "are currently used for a wide variety of uses, including recreation, mining, hunting, oil and gas production, livestock grazing, wild horse and burro herd management, communication sites, and ROW corridors (e.g., roads, pipelines, and transmission lines). Commercial oil shale development activities would have a direct effect on these uses, displacing them from areas being developed to process oil shale."[131]
- "Indirect impacts of oil shale development would be associated with changing existing off-lease land uses including conversion of land in and around local communities from existing agricultural, open space, or other uses to provide services and housing for employees and families that move to the region in support of commercial oil shale development. Increases in traffic, increased access to previously remote areas, and development of oil shale facilities in currently undeveloped areas would continue changing the overall character of the landscape that has already begun as a result of oil and gas development."[132]
- "Commercial oil shale development is largely incompatible with other mineral development activities and will likely preclude these activities while oil shale development and production are ongoing."[133]
- "Grazing activities would be precluded by commercial oil shale development in those portions" of the lease area. "[T]emporary or long-term reductions in authorized grazing use may be necessary because of loss of a portion of the forage base."[134]
- The number of new residents lured by commercial development of oil shale will substantially change demographics and social fabric of rural communities. Small isolated, close-knit, homogeneous communities with a strong orientation toward personal and family relationships will become more urban.[135]
- "Because of the relative economic importance of oil shale developments in small rural economies and the lack of available local labor and economic infrastructure, large-scale oil shale developments are likely to cause a large influx of temporary population. . . . [L]ocal communities may be unable to quickly absorb new residents, resulting in impacts on local finances and public service infrastructure."[136]
- The new residential population would require the hiring of additional local public service employees, which would also require increases in local revenue and expenditures.[137]
- Property value impacts could be substantial as a result of "deterioration in aesthetic quality, increases in noise, real or perceived health effects, congestion, or social disruption."[138]
- Water is likely to be transferred from traditional agricultural uses to industrial uses, resulting in the loss of traditional irrigated agriculture. Changes may also result in an increase in dryland agriculture, and depending on scale it may also result in a transition from traditional agriculture based community to a more urbanized lifestyle.[139]

79-053 (cont.)

These impacts are significant. They are also wrongly dismissed by the BLM.

The BLM's analysis does not properly evaluate impacts to the region of influence (ROI) and discounts the cost obligations thrust onto local governments who need to develop the infrastructure

79-054

[131] DPEIS at 4-16.
[132] *Id.*
[133] *Id.* at 4-17.
[134] *Id.* at 4-18.
[135] *Id.* at 4-144.
[136] *Id.* at 4-134.
[137] *Id.* at 4-140 to 4-141.
[138] *Id.* at 4-146.
[139] *Id.* at 4-144 to 4-145.

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necessary to support oil shale and tar sands development. These obligations are most notable in the mitigation measures the BLM identifies, measures that are hypothetical in nature and that place the economic and social costs squarely on the backs of communities, not on industry who is seeking to benefit from exploitation of public resources. 79-054 (cont.)

Catherine Keske, an economist and assistant professor at Colorado State University, believes many of the costs and benefits identified in the DPEIS are speculative. She identifies six areas that require further investigation:

1. Use of IMPLAN modeling program
2. Economic costs to recreation, agricultural production, and agri-tourism
3. Non-market values
4. Limitation on the comments on the socio-economic section
5. Dynamics of a mineral economy
6. Market-based incentives to mitigate loss of ecosystem services

One example Keske identifies that highlights the limitations inherent in the BLM's analysis concerns Colorado's TABOR Act. TABOR is a set of constitutional provisions which limit revenue growth for state and local governments in Colorado. One of the provisions requires that any tax increase in any state or local government (counties, cities, towns, school districts and special districts) must be approved by the voters of the affected government. TABOR principally limits revenues state and local governments can collect and retain. Any revenues received in excess of this limit must be refunded to the voters. 79-055

Nowhere in the DPEIS is TABOR mentioned. Nowhere does the BLM identify the true impacts to local governments from what is essentially a federal government-private industry development plan that puts unfunded mandates on the backs of local governments. At the Denver BLM's DPEIS open house Argonne staff who drafted this section admitted they did not know about TABOR. Instead, they projected steady revenues, revenues which are currently insufficient to meet the current oil and gas boom in western Colorado and which governments cannot count on under TABOR limitations.

Another flaw in the BLM's approach is in using IMPLAN to identify impacts to each ROI. As Keske notes, IMPLAN was not appropriately used to measure the effects. The BLM must therefore fully discuss the assumptions used in the IMPLAN model, the shortcomings, and the risk and uncertainty due to the poor track record of the IMPLAN model in planning efforts.

The IMPLAN model was developed to conduct static analyses, not as a predictive model, and therefore it must be used with full awareness of this and other shortcomings. The model is based upon the economic base theory, which assumes a static economy – looking only at the export base at one point in time.

This model also does not consider the impacts of many other important variables that affect economic growth in the rural West. Such factors include the role that the region's natural amenities (for example hunting, fishing and recreational opportunities, open space, scenic beauty, clean air and clean water) and quality of life play in attracting and retaining entrepreneurs and highly skilled workers both of which are in turn associated with economic growth. IMPLAN also does not account for non-labor income, the bulk of which consists of investment and retirement earnings which is becoming increasingly important to rural economies of the West. 79-056

Economists have been skeptical of economic base theory as a predictive tool for decades. Tiebout points out that regions which fail to develop a local economy will be unable to support an export

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economy.[140] It is the amenities which are often key to maintaining a diversified and functioning local economy. Richardson also concludes that economic base theory has been roundly disproved.[141] Krikelas reviewed several empirical tests of the economic base hypothesis and found that fewer than 6% of them were able support the theory.[142] Both Haynes and Horne[143] and Krikelas[144] discuss the limitations of economic base theory as a predictive tool for planning or for long-term policy analysis. Other critiques of economic base theory come from the U.S. Office of Technology Assessment,[145] and from economists with the U.S. Forest Service.[146] These scientists conclude that IMPLAN is not sufficient for assessing the overall impacts of land management on communities.

To best assess the impacts to each ROI, the BLM must complete a trend analysis of regional jobs and income in order to provide a better and more complete understanding of their economic past and their economic future. The Economic Profile System model developed by the Sonoran Institute in cooperation with the Bureau of Land Management (available at www.sonoran.org) is one way to easily develop trend analyses and a broader picture of the economy of the ROI and its component counties.

79-056 (cont.)

Based on the aforementioned, we further request that:

1. The BLM estimate the true costs associated with oil shale and tar sands development to private landowners;
2. The BLM identify the increased public service and infrastructure costs associated with oil shale and tar sands development; and
3. The BLM analyze the socio-economic costs to communities associated the potential future boom and bust cycles of oil shale and tar sands development.

A thorough discussion of these and other costs to communities from extractive industry development, as well as a more thorough critique of IMPLAN and economic base models can be found in Appendix 4 incorporated herein.

In addition to these comments, our comments also incorporate directly and by reference those offered by Catherine Keske.

Cultural and Paleontological Resources

Most if not all historical, archeological, cultural and paleontological resources (hereinafter, "cultural resources") are strictly non-renewable; once marred or destroyed, they are forever lost to future generations. Such fragility demands utmost care and humility from BLM managers and planners. Each

[140] Tiebout, C.M. 1956. Exports and regional economic growth. Journal of Political Economy 64:160-64.
[141] Richardson, H.W. 1985. Input-Output and Economic Base Multipliers: Looking backward and forward. Journal of Regional Science Vol. 25(4).
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[146] Hoekstra, T. W., G. S. Alward, A. A. Dyer, J. G. Hof, D. B. Jones, L. A. Joyce, B. M. Kent, R. Lee, R. C. Sheffield, R. Williams. 1990. Analytical tools and information. Critique of Land Management Planning, Volume 4. USDA Forest Service, FS-455. 47 pp.

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RMP the BLM amends through the DPEIS should reflect and require a conservative approach to managing these priceless and irreplaceable resources.

Federal laws, regulations and executive orders require the BLM to protect properties of cultural and religious significance. FLPMA specifies the BLM must protect cultural resources,[147] while the National Historic Preservation Act of 1966 ("NHPA")[148] provides for enhanced consideration of potential impacts to these resources through a cooperative federal-state program. NHPA compliance includes assessing the effects of management actions on historic and cultural resources listed or eligible for listing to the National Register of Historic Places.[149] Other governing laws include, but are not limited to, the Antiquities Act of 1906,[150] the Archaeological Resources Protection Act (ARPA),[151] and the Native American Graves Protection and Repatriation Act (NAGPRA).[152] BLM's decisions regarding cultural resource management are also governed by NEPA. The BLM must adhere to these and other laws when amending and implementing each RMP, and must provide evidence of cultural resource consideration as part of the DPEIS prepared as part of the RMP revision process.[153]

These responsibilities were reaffirmed by Executive Order 13287 (March 3, 2003): "[The BLM must ensure] the management of historic properties in its ownership is conducted in a manner that promotes the long-term preservation and use of those properties as Federal assets . . . ." It is within this broad context that the BLM must carefully consider federal management actions regarding oil shale and tar sands and the affects of such decisions on archaeological and historic resources of significance to all Americans.

While the BLM's multiple-use mandate requires land managers to consider the value of cultural resources in their decision-making process, these resources are frequently given short shrift in this calculus. Their value is not easily measured, and as a result they are sacrificed in pursuit of more obviously economically profitable resources.

The DPEIS states these resources are significant and identifies four primary ways these resources could be impacted, each of which either degrades or destroys the resource. The DPEIS provides boilerplate language regarding NHPA, even though Section 106 consultations are designed to avoid, reduce, or mitigate the potential for adverse impacts on significant cultural resources. The NHPA requires more from the BLM. 79-057

RMPs serve as the principle guide for the BLM's management of cultural resources.[154] As noted above, the BLM's multiple-use mandate requires managers to balance resource use and resource preservation. The BLM Manual provides that land use plans should take into account the effects other land and resource uses may have on cultural resources. The Manual notes that the need for additional information should be evaluated, responsibilities assigned, and schedules established at the outset of the planning process.[155] In other words, not only must the BLM examine the effects of other land and resource uses on cultural resources, it must evaluate whether or not it possesses sufficient information to assess these potential resource conflicts. If the agency lacks enough information to make informed

[147] 43 U.S.C. §§ 1701(a)(8), 1702(c).
[148] 16 U.S.C. §§ 470 to 470x-6.
[149] *Id.* at § 470f.
[150] *Id.* at §§ 431-33.
[151] *Id.* at §§ 470aa-mm.
[152] 25 U.S.C. §§ 3001-13.
[153] *See* BLM Manual MS-8100.08.A.1.b.(3).
[154] *See* BLM Manual MS-8100.08.A.1.a
[155] *Id. at* MS-8100.08.A.1.b.(2).

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decisions, it must collect data according to a plan and schedule established at the outset of the planning process. The BLM should clearly spell out the process the agency will follow in order to comply with the procedures outlined by the BLM Manual.[156] 79-057 (cont.)

The BLM Manual also makes clear that the BLM can prevent unauthorized use of cultural properties through a variety of measures, including administrative protection measures.[157] The Manual specifically notes that the BLM's protective measures may include "withdrawal, closure to public access and off-road vehicles, special designations," etc.[158] The DPEIS should identify areas where cultural sites are at risk, and, because the DPEIS amends RMPs, should employ one or more of these administrative measures to protect these resources. The areas designated should be of sufficient size to allow viable protection of the resources; designation of just the site itself may not allow for effective management. More specifically, the BLM should consider closing culturally sensitive areas to oil shale and tar sands leasing. 79-058

The BLMs' argument that the RMP amendments through the DPEIS do not commit the agency to a particular course of action and thus do not need to be fully considered is specious. First, Congress' charge to the BLM was to assess the impacts resulting from oil shale and tar sands development. As Jerry Spangler notes in his comments,[159] there are significant cultural resources in the areas under consideration for oil shale and tar sands development. BLM's decision to defer identifying the direct, indirect and cumulative impacts of oil shale and tar sands development under a later date contravenes Congress' charge to evaluate the impacts. 79-059

Second, the BLM's intent in amending the RMPs is to facilitate commercial leasing. As Spangler comments, "identifying lands for potential oil shale and tar sands leasing without critical analysis of the environmental suitability of those lands for leasing puts the cart before the horse." It also contravenes NHPA. The Interior Board of Land Appeals has repeatedly rejected the BLM's position that assessing impacts to cultural resource at a later date was compliant. The IBLA emphasized NHPA compliance must be completed at each phase of a federal action.[160]

Mort importantly, Congress' stated intent in the Energy Policy Act of 2005 was that commercial development of oil shale and tar sands should "be conducted in an environmentally-sound manner using management practices that will minimize potential effects." By BLM's own admission, opening up 2 million acres to commercial development fails Congress' test.

For example, the baseline information provided in the DPEIS on paleontological resources in Wyoming is inadequate. Portions of the Washakie Basin area, including "most prospective" lands proposed for oil shale leasing under both action alternatives, include the Adobe Town member of the Washakie formation, a paleontological resource of worldwide importance. The Wasatchian-Bridgerian interface found here is one of only two exposures of this time sequence known in the Rockies. The other exposure is in Utah. Because the BLM has failed to grasp the importance of the fossil resources in the Washakie Basin, it has likewise failed to grasp the extreme magnitude of impacts to this area. 79-060

[156] *Id. at* MS-8100.08.A.1.b.(2)
[157] *Id.* at MS-8120.32.A
[158] *See id.* at MS-8120.32.A
[159] Appendix 17.
[160] IBLA 2004-124, in SUWA v. UT 055.

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In addition to these comments, our comments also incorporate directly and by reference those offered by Jerry Spangler.[161] 79-060 (cont.)

Human Health

The public needs more information on human health impacts. Protecting human health is a pillar of NEPA, as one of the fundamental purposes of NEPA is "to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man."[162] NEPA's objectives include assuring "healthful" surroundings and attaining beneficial uses of the environment without "risk to health or safety.[163] Federal regulations clearly require federal agencies analyze health impacts. For example, under 40 C.F.R. 1508.27, agencies are directed to consider "the degree to which the proposed action affects public health or safety."

Despite this mandate, the DPEIS does not sufficiently consider the degree to which the proposed action affects public health. For example, Tables 2.6-1 and 2.6-2, in comparing alternatives, only discuss health and safety impacts on workers, not on nearby residents. The DPEIS does not discuss the geographic areas where public health might be impacted, or how many people live within those areas and would be at increased risk of health impacts due to the proposed alternatives.

While there is discussion of potential impacts, it is vague. For example, Tables 4.13.1.1 and 4.13.1.4 state: "Potential adverse health and environmental impacts associated with improper management of hazardous materials could be significant. If hazardous materials are managed according to regulations, impacts are expected to be minimal or nonexistent." The DPEIS does not identify what "significant" or "minimal" mean. Similarly, Tables 4.14.1 and 4.14.2 discuss risks coming from threats such as particles, fumes, chemicals, and contaminants, but do not specify what those might be or their known health threats. 79-061

The DPEIS should include a comprehensive discussion, both qualitative and quantitative, of the threats, the known health risks of those threats, and the populations at risk. In addition, the DPEIS should consider the increased burdens on the medical resources in these areas.

The DPEIS does not consider potential health impacts from increases in global warming. Such impacts include: more frequent and more intensive heat waves, which could result in more heat-related deaths; increases in local air quality problems, which could lead to increases in allergies, asthma, and more; and increases in the potential geographic range and virulence of tropical diseases, such as West Nile virus. Given the substantial increases in global warming that could result from oil shale and tar sands production and usage, the DPEIS should have included consideration of these risks. 79-062

Despite these potential risks, there is no evidence that agencies with relevant health expertise (such as local, regional, or state health agencies) were consulted in developing the DPEIS. There should be thorough consultation with all relevant health agencies. While health research is referenced, there was no discussion of the current health risks created in Canada by tar sands operations and the potential implications for U.S. development. 79-063

[161] Appendix 17.
[162] 42 USC § 4321.
[163] 42 USC § 4331.

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There likewise does not appear to be any systematic or formal process utilized for evaluating substantive health issues. The DPEIS should incorporate one formal methodology to evaluate all health issues, including contaminant risks but also substance abuse and mental health risks. 79-061 (cont.)

Wyoming

In addition to the aforementioned issues and impacts, following are Wyoming-specific impacts.

The Adobe Town Very Rare or Uncommon Area should be Excluded from Leasing

The Draft PEIS does not sufficiently analyze the environmental impacts for locations within Wyoming, and therefore the only reasonable alternative is Alternative A – the "no action" alternative. For example, the BLM notes that certain lands are administratively closed to commercial leasing due to existing laws or regulations.[164] However the list of regulations does not include the State of Wyoming's designation of the Adobe Town area as Very Rare or Uncommon under the state Environmental Quality Act. Adobe Town was so designated due to its geological, fossil, scenic, wildlife, and cultural/historical values. Non-coal surface mining (which would include oil shale) is expressly forbidden in Very Rare or Uncommon areas except in cases where surface mining would not detract from such qualities; in the case of this area, because scenic qualities are part of the designation, there is no possibility that an exemption for oil shale mining could be issued. While part of the Very Rare or Uncommon area is Wilderness Study Area which would not be made available for oil shale leasing under the DPEIS, the remainder is outside the WSA, including lands which fall within the proposed Washakie Basin leasing area.[165] A map of the Very Rare or Uncommon designation is provided as Appendix 5. 79-064

Lands with Wilderness Qualities, ACECs and SMAs

The BLM has not provided baseline information on lands with wilderness characteristics outside WSAs in Wyoming.[166] Specifically, the BLM has concluded on the basis of its own inventories that lands in the Adobe Town area possess all wilderness characteristics.[167] Of these, Areas A, E and F fall partly within the area open to oil shale leasing in Alternatives B and C.[168] In addition, BLM wilderness inventories of the Kinney Rim North and South units, have come up with mixed results, resulting in units that possess all wilderness characteristics in one inventory evaluation but not a conflicting one, and other areas possessing at least some wilderness characteristics in both wilderness inventory evaluations.[169] It is notable that a significant portion of the Kinney Rim South WCA falls within the Rawlins Field Office, but the DPEIS fails to recognize this fact.[170] 79-065

As the DPEIS states, "The BLM has not explicitly excluded leasing within lands it believes may have one or more characteristics of wilderness under any of the alternatives."[171] This approach violates NEPA's requirement that a range of reasonable alternatives be considered. In addition, given the fact that lands with seasonal stipulations and ACECs are excluded from leasing consideration under Alternative C, it is arbitrary and capricious and an abuse of discretion for BLM to fail to consider placing lands with wilderness qualities off-limits, as wilderness resources are at least as sensitive as seasonal wildlife ranges, and equally (if not more) irreplaceable.

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[164] DPEIS at 1-7.
[165] *See* DPEIS Figure 3.1.1-15.
[166] DPEIS at 3-37.
[167] Appendix 6, *see* DPEIS 3-38.
[168] DPEIS at 2-26, 2-31, 3-37.
[169] *See* Appendix 6, excerpted from the Pacific Rim Shallow Gas Exploration and Development Project EA (Rock Springs Field Office, BLM, 2004); *see* DPEIS Table 3.1.1-11; *see also* Appendix 8, maps of Kinney Rim North and South units.
[170] DPEIS at 3-38.
[171] DPEIS at 2-52.

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According to the DPEIS, only ACECs that are currently closed to oil and gas development would be withdrawn from oil shale leasing.[172] This would open up most (if not all) Wyoming ACECs to oil shale leasing, despite the fact that oil shale development is very clearly much greater in impact than oil and gas drilling and is clearly incompatible with the maintenance of the environmental values for which the ACECs were designated. All designated ACECs and SMAs should be exempted from oil shale leasing and development unless the values for which they were designated would not be impacted by oil shale related activities. 79-066

Public Recreation

As noted earlier, BLM states that oil shale activities are largely incompatible with public recreation.[173] Yet the BLM did not thoroughly assess the impacts on the following areas of high recreational value that fall within the "most prospective" oil shale area in Wyoming, where oil shale leasing should be entirely precluded:

Greater Red Creek ACEC, Red Creek WSA, and Sugarloaf Basin SMA – These areas were established under the Green River RMP and constitute an outstanding big game hunting resource. According to the Wyoming Game and Fish Department, the elk hunt in this area is the single most sought-after tag in the entire state. Oil shale activities would be certain to drive away elk and destroy the recreational quality of this area.

Adobe Town State Very Rare or Uncommon Area – The scenic and wilderness qualities in this area and its viewshed need to be protected from oil shale leasing in order to maintain the scenic and wilderness qualities in this area. Oil shale leasing should be precluded from this area in order to maintain FLPMA-required consistency with the state designation preventing non-coal surface mining.

Kinney Rim North and Kinney Rim South citizens' proposed wilderness areas – These lands provide a roadless, primitive/semi-primitive recreation experience, and represent an increasingly rare large tract of public land in the Red Desert that is free of industrial development. 79-067

The Flaming Gorge National Recreation Area – This area lays entirely within the area proposed for oil shale leasing in Wyoming. National Recreation Areas are not specifically listed as units of the National Landscape Conservation System that will be excluded from oil shale leasing.[174] However, all of this NRA as well as its viewshed should be excluded from oil shale leasing consideration in order to preserve the scenic and recreational qualities found here.

Jack Morrow Hills planning area – This is an area highly important for both dispersed recreation and elk hunting. It contains the Boars Tusk and White Mountains Petroglyph Site, both of which are culturally important to Native American tribes. In addition, an archaeological site in the northwest corner of this area is an ACEC and its setting needs to be protected as well. The "most prospective" oil shale area in Wyoming includes portions of the Jack Morrow Hills planning area, a subset of the Rock Springs Field Office set aside from the Green River RMP in the 1990s for special planning due to its outstanding wildlife resources and strong public interest.[175]

[172] DPEIS Table ES-1.
[173] DPEIS at 4-19.
[174] DPEIS at 1-7.
[175] Appendix 9.

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Heart of the West Wildland Network Design

The Heart of the West conservation plan is a science- and GIS-based blueprint for sustainable development in the Wyoming Basin ecoregion. It was submitted to BLM during the oil shale and tar sands scoping period so that the BLM could develop an alternative that prevented oil shale leasing in core areas and corridors identified through rigorous science-base modeling. There is no action alternative that the BLM put forward in the EIS that reflects the "sustainable use areas" identified through the Heart of the West process.

Historic Trails

79-067 (cont.)

Lands within 0.25 mile of Historic Trails would be ineligible for oil shale leasing under the action alternatives.[176] This distance is an inadequate buffer to prevent degradation of the setting of the trails, which contributes significantly to their historical importance. In Wyoming, the Cherokee Trail, Oregon/California/Mormon/Pony Express Trail, Overland Trail, and Lander Cutoff of the Oregon Trail all cross areas proposed for oil shale leasing in both alternatives. In the context of visual resources, BLM has defines foreground-middleground as 0 to 5 miles, and in this area, "management activities can be seen in detail."[177] There should be at least one alternative that provides adequate protection to prevent the degradation of the settings of these important historical resources; certainly, BLM has not made the case that such an alternative would be unreasonable.

Geological Standards for Leasing Should not Differ Among States

BLM states that in Utah and Colorado, the most geologically prospective oil shale deposits are 25 gallons per ton and 25 feet thick, while in Wyoming the most geologically prospective oil shale deposits are 15 gallons per ton and 15 feet thick.[178] This determination is arbitrary and capricious and an abuse of discretion

79-068

Of course, the most geologically prospective deposits in Wyoming are those exceeding 25 gallons per ton and 25 feet in thickness. These are by definition more geologically prospective than deposits averaging 15 feet thick and 15 gallons per ton. It is illogical for the BLM to assign a different standard for Wyoming oil shale as the geologic properties do not change when one crosses the state line. Wyoming shows a much greater "geologically prospective' oil shale area than either Utah or Colorado precisely because the standards have been lowered for Wyoming.[179] Adding to the arbitrary nature of this delineation is that Wyoming has the lowest-quality oil shale deposits of all three states.

Colorado

In addition to the aforementioned issues and impacts, following are Colorado-specific impacts.

The commitment of more than 350,000 acres of public land to a single-use does not comply with multiple-use mandates of FLPMA

79-069

The DPEIS clearly states commercial oil shale development activities will directly displace other land uses from development areas.[180] Displaced uses in Colorado will include: recreation, mining, hunting, oil and gas production, livestock grazing, wild horse and burro herd management, communication sites, and ROW corridors. The most geologically prospective oil shale development areas in Colorado also overlap with important wildlife and plant habitat, other ecological resources, unique geologic features, irreplaceable paleontological and cultural resources, and sensitive natural landscapes.

[176] DPEIS at 2-20.
[177] DPEIS at 4-110.
[178] DPEIS at 2-10.
[179] DPEIS Figure 2.3-1
[180] DPEIS at 4-16.

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The preferred alternative will open more than 350,000 acres of public land to industrial development of oil shale in Colorado. The result, of course, will be displacement of all other uses and values. Given the stated impacts detailed in the DPEIS, the BLM cannot pave the way for commercial-scale oil shale development on the "preferred" scale while complying with the multiple-use mandate of FLPMA.[181]

79-069 (cont.)

BLM's preferred alternative does not protect ACECs.

According to the DPEIS, BLM intends to exclude from leasing only those Areas of Critical Environmental Concern (ACECs) where leasing is not currently allowed. This commitment is insufficient to protect all designated ACECs and the values for which they were designated. FLPMA defines ACECs as "areas within public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes, or to protect life or safety from natural hazards."[182] While all ACECs are designated to protect different and unique values, commercial-scale oil shale development will undermine the values for which these ACECs were designated.

In fact, the Draft PEIS admits the likely impacts to ACECs stemming from oil shale development: "commercial development in both existing and potential ACECs could result in direct and indirect loss of the relevant and important (R&I) values that support either designation or identification of areas leading to the removal/nondesignation of the ACECs."[183] This tradeoff is unacceptable. These areas should remain unavailable for oil shale development.

East Fork Parachute Creek – The Area was designated as an ACEC for visual, wildlife, fisheries, botanical and ecological values.[184] East Fork Parachute Creek is a biologically significant tributary to the Colorado River.[185] Any oil shale development in this area will likely have significant impacts on the important values for which this ACEC was designated.

79-070

The Creek provides year-round habitat for Colorado River Cutthroat Trout (CRCT). The CRCT is the only native trout in the Colorado River basin. The CRCT has been designated a "special status species" by the BLM and is classified as a "sensitive species" by Regions 2 and 4 of the US Forest Service, and the states of Colorado, Utah, New Mexico and Wyoming.[186]

East Fork Parachute Creek is also identified as one of the five areas containing conservation populations by the *Conservation Agreement and Strategy for Colorado River Cutthroat Trout in the States of Colorado, Utah, and Wyoming*.[187] These populations also meet the BLM's own criteria for a conservation population.[188] The Conservation Agreement gives highest priority for management and protection to streams identified as containing conservation populations. Populations of CRCT in East Fork Parachute Creek are at least 90% genetically pure.[189] The BLM considers the entire watershed to be

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[181] 43 USCS § 1701(a)(7).
[182] 43 USC 1702(a).
[183] DPEIS at 4-20.
[184] Roan Plateau Plan Amendment (2002), at 20.
[185] ROD Designating ACECs for the Roan Plateau RMPA and EIS (2008), at 5.
[186] *Conservation Status of Colorado River Cutthroat Trout,* USDA Forest Service (1996), at 1; Available at: http://www.fs.fed.us/rm/pubs_rm/rm_gtr282.pdf.
[187] Available at: http://www.fws.gov/mountain-prairie/species/fish/crct/CRCT/.
[188] A conservation population is defined as: "A reproducing and recruiting population of native cutthroat trout that is managed to preserve the historical genome and/or unique genetic, ecological, and/or behavioral characteristics within a specific population and within geographic units." *See* Roan Plateau Planning Area Proposed Plan/Final EIS, pp. 3-114.
[189] Roan Plateau Plan Amendment (2002), at 20.

important to the long-term functionality of vital ecosystem processes that maintain upland and stream habitats important to these fishes.[190] Also, the BLM declared, "these streams are regionally and nationally important producers of native, genetically pure and naturally reproducing Colorado River cutthroat trout," going on to proclaim that these streams should be given the "highest priority for management and protection."[191]

The importance of these trout populations is clear. This area must be protected from oil shale development in order to ensure the subspecies continues reproducing and recruiting. Oil shale development will likely result in increased sedimentation, reductions in water quantity and quality, ground water flow alteration, and increased likelihood of water contamination with toxic byproducts. These impacts will add stresses to CRCT populations and, in so doing, may undermine one of the values this ACEC was designated to protect.

Other values for which this ACEC was designated include scenery as well as unique and rare plant communities. Of special note is a 200-foot canyon waterfall. The BLM has described the waterfall on the level of a "national park quality scenic attraction." The ROD for the Designation of ACECs for the Roan RMPA and EIS designated the lower stretches of the East Fork of Parachute Creek as a VRM 1.[192]

79-070 (cont.)

A rare community of Mancos columbine and a BLM "sensitive plant," Eastwood's monkeyflower, are also present in the unique hanging gardens in this ACEC. Also exceptional are several plant communities such as the Colorado blue spruce/red osier dogwood; the boxelder, narrowleaf cottonwood, red osier dogwood community; and the Indian ricegrass shale barrens community. These communities are considered rare on global and statewide scales.

There are also a few imperiled plants in this ACEC that may be particularly susceptible to oil shale development. Utah fescue, for example, is a perennial grass and an oil shale endemic species found within East Fork Parachute Creek ACEC. Southwest stickleaf, a BLM sensitive species, is an oil shale endemic that frequently occurs in the area. The Roan Plateau Final EIS makes it clear that this ACEC "contains a diversity of rare or uncommon riparian plant communities and BLM sensitive plant species."[193] The EIS goes on to say: "the rare plants and plant communities found in this drainage are of excellent condition and abundance and are vulnerable to adverse change."[194]

Trapper/Northwater Creek ACEC – This area was designated for wildlife, fisheries, botanical and ecological values. Trapper and Northwater Creeks are tributaries to the Colorado River. The creeks provide year-round habitat for CRCT. This ACEC is a critical conservation area for the CRCT. Three of the five conservation populations of Colorado River cutthroat trout that exist atop the plateau are found within this ACEC. Included in these are "core conservation populations," identified by a genetic purity of 99% or higher.[195]

79-071

The BLM considers the entire watershed vital to the long-term functionality of ecosystem processes that maintain upland and stream habitats important to these fishes.[196] The BLM also said, "These streams are regionally and nationally important producers of native, genetically pure and naturally

[190] *Id.*
[191] *Id.*
[192] ROD (2008), at A-8.
[193] Roan Plateau FEIS (2006), at 3-116.
[194] *Id.*
[195] *Id.* at 3-116.
[196] Roan Plateau Plan Amd. (2002), at 27.

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reproducing Colorado River cutthroat trout."[197] The nearly pure genetic populations of CRCT that exist in this area are irreplaceable, and should be protected from any habitat degradation that may accompany development of oil shale in the area.

Botanical and ecological values sought to be protected in this ACEC include, hanging garden sullivantia and Utah fescue. Combining known occurrences of hanging garden sullivantia in the Trapper/Northwater Creek ACEC with known occurrences in the East Fork Parachute Creek ACEC, accounts for 62% of total known occurrences.[198] Utah fescue is a perennial grass and an oil shale endemic. The Indian ricegrass shale barrens community can also be found in this ACEC. This community is found in only three other Western Colorado counties.[199] 79-071 (cont.)

The important CRCT populations as well as rare plant communities and species in this ACEC should be protected. Opening this area to oil shale development may undermine protection of these values and undermine stated BLM management priorities.

The Duck Creek, Ryan Gulch, Dudley Bluffs ACECs – These areas are located within the White River Field Office in the northern portion of the Piceance. These ACECs provide habitat for several federally and state-listed threatened plant species and candidate species.[200] Federally threatened, endangered, proposed, and candidate species include the Dudley Bluffs bladderpod, the Piceance twinpod, the Ute-lady's tresses orchid, the Graham beardtongue, and the White River beardtongue.

Along with important and imperiled plant species, these ACECs also retain unique and irreplaceable cultural resources.[201] Among cultural resources of note is a Wickiup Village in and around the Duck Creek ACEC.[202] This village is listed on the National Register of Historic Places and is one of the cultural resources that should remain unharmed by oil shale development. Other cultural resources in these ACECs identified by the cultural resource interpretation program undertaken by the White River Field Office should also be preserved. 79-072

The Draft PEIS is unclear on whether these ACECs are currently closed to mineral development and therefore closed to prospective oil shale development. The resources and values contained in all ACECs must be fully protected from oil shale development, including Duck Creek, Ryan Gulch, and Dudley Bluffs ACECs.

BLM's proposal fails to protect the Trapper/Northwater Watershed from oil shale development.

Not all of Trapper and Northwater Creeks are included in the Trapper/Northwater Creek ACEC. In fact, vital segments in the high reaches of this watershed were excluded from the ACEC. This omission threatens nearly all of the Northwater Creek and a significant portion of the Trapper Creek populations of CRCT. Sediment caused by surface disturbing activities may choke aquatic insects and trout eggs. In the event of a spill or a mining mishap, toxic effluent may do the same. In this drainage, downstream habitat is the best CRCT habitat. Below the confluence of Trapper and Northwater Creeks this drainage attains the volume and depth necessary to maintain suitable CRCT habitat. Allowing oil shale development, or any surface disturbing development, in the upstream portion of the Northwater 79-073

[197] Roan Plateau FEIS (2006), at 3-116.
[198] Roan FEIS (2006), at 3-117.
[199] *Id.*
[200] DPEIS at 3-125.
[201] *Id.*
[202] White River Field Office RMP Amd. (2007), at 4-69.

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drainage may compromise the integrity of CRCT populations lower in the watershed. In order to protect this sensitive resource, oil shale development be prohibited in the entire drainage. 79-073 (cont.)

BLM should protect all areas eligible for Wild and Scenic designation as well as important watersheds.

Colorado's surface water resources should be protected from impacts of oil shale development.

BLM examined the eligibility of streams and stream segments for Wild and Scenic River status in 2002. The eligibility report showed portions of East Fork Parachute Creek, East Middle Fork Parachute Creek, Trapper Creek, and Northwater Creek are all eligible for Wild and Scenic River status.[203] These streams are all "free-flowing" and contain outstandingly, remarkable values – unique, rare, or exemplary botanical/ecological, scenic features or fishery values that are significant on a regional or national scale. These river segments hold many and various important values and should not be sacrificed to commercial oil shale development. These areas, along with all watersheds eligible for Wild and Scenic designation, should be protected from development.

79-074

Even those streams and stream segments not eligible for Wild and Scenic status deserve protection. At the very least, protective Watershed Management Areas (WMAs) should be designated and utilized to protect important Colorado watersheds overlapping with oil shale development areas. Watersheds of concern include: Clear Creek, Spring Creek, Corral Gulch, Ryan Gulch, Black Sulphur Creek, Fawn Creek, Hunter Creek, Willow Creek, West Fork Parachute Creek, Parachute Creek, Piceance Creek, and Dry Fork Piceance Creek. Protection of these important streams is important to protect values associated with fisheries, botanical resources, and municipal water quality.

The ROD for the Designation of ACECs for the Roan RMPA and EIS implemented a WMA for Parachute Creek.[204] This management tool was implemented to protect important watershed values in Parachute Creek from looming threats like natural gas development. Similar measures should be implemented to protect other Colorado watersheds from detrimental oil shale development.

The BLM must protect any and all areas with wilderness qualities outside of Wilderness Study Areas.

Though we do not have a complete list of areas within the geologically prospective study area with wilderness qualities, all such areas should be preserved as wilderness quality lands. For example, the most recent Wilderness Character Inventory of the East Fork Parachute Creek watershed found that 10,389 acres met the criteria for a Wilderness Study Area (WSA).[205] Because this area retains such a wealth of visual, botanical, wildlife, and ecological values, and because it meets the BLM criteria for a Wilderness Study Area, it should be excluded from areas open to oil shale development. All areas that meet the BLM criteria for Wilderness Study Areas and all wilderness quality lands should be protected from oil shale development. 79-075

While the PEIS excludes numerous sensitive areas from oil shale leasing, these areas will not escape unacceptable indirect impacts and must be analyzed more thoroughly.

The Draft PEIS explicitly excludes from oil shale leasing designated wilderness areas, WSAs, lands within the National Lands Conservation System (NLCS) like National Monuments, National Conservation Areas, Wild and Scenic Rivers, and National Historic and Scenic Trails. The BLM also excludes Areas of Critical Environmental Concern (ACECs) that are closed to mineral development. 79-076

[203] Roan FEIS (2006), at 3-121.
[204] ROD (2008), at 6.
[205] Roan Plateau RMPA (2002), at 20.

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Importantly, however, indirect impacts from commercial scale oil shale are still likely to impact these areas. 79-076 (cont.)

More specifically, PSD Class 1 Areas in Western Colorado, like the Maroon Bells-Snowmass Wilderness Area and the Flat Tops Wilderness Area, may already be experiencing air quality deterioration as a result of increased oil and gas activities on the West Slope. As discussed above, further deterioration of air quality in these airsheds contravenes federal law. The DPEIS raises this issue, but fails to analyze it. Colorado National Monument and Dinosaur National Monument are both Colorado Category 1 Areas. Though not as stringently regulated, these areas may experience deteriorating visibility, nitrogen and sulfur deposition, changes in water chemistry, as well as impacts to vegetation and human health. These impacts should be understood and documented before the BLM undertakes revision of numerous RMPs opens the door to extensive oil shale development. 79-077

Given what we know about the energy needs of this industry and the likely sources of generation for that energy, it is irresponsible for the BLM to pave the way for more than 350,000 acres of oil shale development in Western Colorado without an adequate air quality analysis. Such activity may require a dozen or more large new power plants. Obvious results will include deterioration of distant and pure airsheds. No RMP revisions should be authorized until we have a clear picture of the impacts to sensitive lands.

Utah

Utah's spectacular public lands included in the planning area – particularly the regions near the Circle Cliffs special tar sands area (STSA), the San Rafael STSA, the Tar Sands Triangle STSA, the White Canyon STSA, the PR Springs STSA, the Hill Creek STSA, the Argyle Canyon STSA, the Sunnyside STSA, and the areas with wilderness characteristics found within the most geologically prospective oil shale resource – would be irrevocably impacted by the development of oil shale and tar sands. The greatest tar sands resource are in Utah. Yet, with tar sands development in Alberta serving as industry's model for environmental protection, these critical resources – geologic, wildlife, cultural, water, and many more – would be would be placed at great risk. Doing so violates NEPA, FLPMA and other environmental laws. 79-078

In addition to the aforementioned issues raised throughout these comments, Utah-specific impacts, issues and concerns are incorporated directly as Appendix 23.

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APPENDICES:

1. Governor Bill Ritter, Unconventional Fuels Letter, September 2007
2. Western Governors Association, Letter, June 12, 2007
3. Senator Ken Salazar, Press Release, March 13, 2008
4. The Wilderness Society: *The Economic & Social Impacts of Oil and Gas Development*
5. Adobe Town Very Rare or Uncommon map
6. BLM wilderness inventory evaluation of Adobe Town
7. BLM wilderness inventory evaluations, Kinney Rim North unit
8. Maps of Kinney Rim North and South units
9. Special Values of the Jack Morrow Hills
10. State of Wyoming sage grouse lek data overlay of oil shale prospective area
11. ESA petition, Wyoming pocket gopher
12. Wyoming pocket gopher technical conservation assessment
13. Presentation of Dr. Jay Lillegraven for Adobe Town Very Rare or Uncommon hearing
14. Erik Molvar: Wildlife Impacts
15. Natural Resources Defense Council: Climate Change
16. Independent Expert Comment: A. William Alldredge
17. Independent Expert Comment: Jerry D. Spangler
18. Independent Expert Comment: Dr. Catherine M. Keske
19. Independent Expert Comment: Megan Williams
20. Independent Expert Comment: David Atkins
21. Independent Expert Comment: Bruce Lytle
22. Independent Expert Comment: John Woodling
23. Southern Utah Wilderness Alliance - Utah Impacts
24. Bibliography

Appendix 1

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STATE OF COLORADO

OFFICE OF THE GOVERNOR
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Bill Ritter, Jr.
Governor

To the Members of the Task Force on Strategic Unconventional Fuels:

The State of Colorado appreciates the opportunity to comment on the Unconventional Fuels Strategic Task Force's plan for commercialization of our nation's unconventional fuels. Colorado is one of five states specifically designated in the Energy Policy Act of 2005 to participate in this process and we take this obligation very seriously. As part of this obligation, I respectfully submit Colorado's statement regarding the Unconventional Fuels Strategic Task Force Plan and request that it be included within any final plan submission.

Colorado will play an active role in the development of our unconventional fossil fuels. My administration has placed the development of renewable sources of energy at the top of our list of priorities but we understand that traditional and unconventional fossil fuels will continue to play an important role in supplying our nation's energy needs as we move to a more renewable based energy supply.

The draft Preparation Strategy, Plan and Recommendations (Volume 1), Resource-Specific and Cross-cut Plans (Volume 2), and Resource and Technology Profiles (Volume 3)(collectively referred to hereafter as "The Plan") is dated February 2007. I was inaugurated on January 9 2007. The fact that the draft Commercialization Plan was written almost entirely before I took office presents a unique issue for Colorado that the other participants in this process do not have to address. As Colorado's Governor, I am committed to ensuring that all energy development in Colorado, and oil shale development in particular, occur in a manner that protects Colorado's unique environment and that the impacted communities are protected before, during and after the development.[1]

It is important to understand the social and environmental circumstances in Colorado. We are currently experiencing an unprecedented energy boom in many portions of our state. We also have the memories of the prior oil shale boom and bust and we are certainly mindful of the lessons from our prior experience. The proposed oil shale development overlaps areas with increasing tourism and recreational opportunities. Oil shale leasing on top of this existing network of energy development and changing land uses will put more pressure on an already fragile ecosystem and public temperament.[2]

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[1] While oil shale is the primary area of concern for Colorado, it should be assumed that the concerns articulated in this letter are also applicable for any other development of unconventional fuels that may be developed in Colorado.

[2] Russell George, testimony on behalf of Governor Bill Owens in the Oil Shale and Oil Sands Resources Hearing, Tuesday April 12, 2005; testimony for the Committee on Energy and Natural Resources.

Colorado has consistently articulated a desire to move forward slowly with the development of oil shale. As the epicenter of the oil shale resource in the United States, Colorado has the most to gain if this resource is developed responsibly and the most to lose if the risks are not managed appropriately. The five Research, Development and Demonstration projects (RD&D) located in Colorado will form the foundation for further analysis relative to the economic viability and environmental impacts resulting from oil shale development. Colorado supports the RD&D approach and is concerned that movement toward commercial leasing regulations and ultimately commercial leasing prior to evaluation of the RD&D projects will not be in the best interest of the state or our nation. Further, another failed attempt at oil shale development could preclude development of this resource for decades. Industry leaders are publicly saying that they will likely refrain from making a decision on commercial leasing until 2014. No RD&D applications are expected to be received by the state until fall of 2009. While Colorado does not wish to unnecessarily impede the development of oil shale, it seems premature to promulgate commercial leasing regulations six or seven years prior to any demand from industry for such regulations. Once data begins to become available from the RD&D projects, it is likely that regulatory modifications will be required to address impacts and issues that arise during that process. Promulgating regulations in the absence of the data from the RD&D projects will likely create an illusion of "regulatory certainty" rather than a comprehensive set of regulations that will be viable for commercial leasing and development.

In evaluating the Plan it is critical that Colorado's energy policy be understood and incorporated into the final draft. Colorado will not support any commercialization plan that calls for the promulgation of commercial leasing regulations, or commercial leasing itself, prior to a meaningful evaluation of the RD&D projects. The proposed oil shale development will utilize as yet untested technology with potential long-term negative impacts to Colorado's communities and environment. Adverse impacts to Colorado's ground and surface water, wildlife and air quality must be avoided wherever possible and mitigated to an acceptable level where avoidance is not possible.

The three primary areas of concern relative to the draft Plan relate to "Resource Access," and "Regulation/permitting" and "Socio-economic impacts." The Plan that is currently under consideration is by necessity a "high level" view of an accelerated oil shale development plan. After a thorough review of this document, it is apparent that while most of the objectives don't necessarily preclude the considerations that Colorado considers paramount, neither does the draft expressly recognize our concerns or assure that our considerations will be reflected in the more detailed planning yet to come. It is imperative that the federal government and industry understand and address these concerns as development moves forward.

<u>Resource Access</u>

Colorado's vast oil shale reserves are located primarily on federal land within our state. We have actively participated as a "cooperating agency" on most major National Environmental Policy Act (NEPA) evaluations within Colorado. We are currently a cooperator on the Programmatic Oil Shale Environmental Impact Statement (PEIS). We believe this process is valuable and look forward to participating on all oil shale proposals as development proposals arise. Extensive NEPA analysis will be critical to

gaining public support for oil shale development. Attempts to fast track environmental analysis have resulted in public criticism, lawsuits and community opposition. We believe that representatives from the state can contribute valuable insight into the environmental and technical analysis as well as the socio-economic impacts of oil shale development. In addition, the Governor will continue to provide the consistency review as required by law.

Given the density of natural gas and coal development in some areas of Northwestern Colorado, the need for recreational, wildlife habitat and undeveloped areas and the network of privately held oil shale lands that did not exist in the last boom, the federal government must determine those areas where oil shale development could be accommodated in a manner that is least disruptive to communities and existing activities. Not all types of resource development can occur everywhere. The carrying capacity of the land, communities and infrastructure must be evaluated.[3] The cumulative impacts to the environment and the socio-economics of impacted communities from energy development pose a huge risk if not addressed and managed effectively.

The development of one type of energy development today may preclude or limit another type of resource development tomorrow. This is even more problematic where the extraction of a finite resource (gas or oil shale) has the potential to adversely impact a sustainable activity (hunting, fishing, wildlife viewing or other forms of recreational tourism). We cannot forget the consequence of the oil shale pull-out of the 1980's, and the transformation of the Northwest Colorado economy from an energy base to a tourism, retirement and recreation based economy.[4]

Regulation/permitting

Colorado cannot and will not support any proposal that would result in the state abdicating any portion of its independent regulatory authority. While we agree that an evaluation of options to streamline the process may be appropriate, we will retain the existing authority the state has to permit oil shale development. In addition, we will continue to assert that local governmental agencies within Colorado retain their full jurisdiction during the permitting process. The state has reviewed the permitting structure within Colorado and would welcome the opportunity to share that evaluation with the Task Force.

Colorado is concerned that the development of technologies without adequate oversight will result in unacceptable impacts to Colorado's environment and communities. By retaining our regulatory authority we will ensure that impacts to Colorado are acceptable. Colorado will not support any attempt to streamline regulations and permitting through such process as were proposed by the Energy Mobilization Board during the last oil shale boom.

Socio-economic impacts

A financial safety net for local governments that allows for growth to pay its way, and allows front-end financing of some infrastructure is essential. Bonus lease payments from federal leases for local government facilities and services will help mitigate impacts

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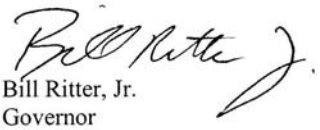
[3] Id.
[4] Id.

to local communities and build public acceptance for oil shale developments. This economic cushion is essential to community stability, and the ability to withstand the economic shock of project termination. [5]

Colorado strongly believes that state representatives can best evaluate the comprehensive and cumulative impacts to Colorado's residents and economy. As stated previously, Colorado is experiencing an unprecedented energy boom with a significant amount of the current development occurring in the same area as the richest oil shale deposits. The timing of evaluation of the socio-economic impacts will be critical to a meaningful review. Colorado is on the cusp of having over 45,000 gas wells included in the various Reasonable, Foreseeable Development scenarios for Resource Management Plans (RMP) currently under revision. These include the Little Snake, Roan, White River, Glenwood Springs/Kremmling RMPs. Industry leaders have stated publicly that they will refrain from a decision to pursue commercial development until 2013/2014 and no RD&D applications expected until 2009. A significant amount of the conventional fuel development will occur between now and the time when industry will make their decision regarding commercial viability. We believe that a cumulative socio-economic impact for energy development will be largely obsolete unless conducted at a time much closer to the commercialization decision. Colorado will continue to expect that cumulative impact analyses (both environmental and socio-economic) will include all energy related impacts and not be segmented by discreet products.

In conclusion, we believe that successful oil shale development may be possible if it is pursued with diligence and significant oversight. The effective commercialization of oil shale requires more data than is currently available. The RD&D program will provide the necessary data and should be allowed to proceed. Commercialization of oil shale should proceed only after a thorough evaluation of the RD&D development. Colorado looks forward to working with our federal and local governments to ensure that we receive the benefits of oil shale development while minimizing the risk presented by development of this unconventional fuel.

Sincerely,



Bill Ritter, Jr.
Governor

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[5] Id.

Appendix 2

WESTERN GOVERNORS' ASSOCIATION

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OSTS_00079

June 12, 2007

The Honorable Nick J. Rahall II
Chairman, Committee on Natural Resources
1324 Longworth Building
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Rahall:

On behalf of the Western Governors, we are writing in strong support of the revised section 104 of H.R. 2337, included in your amendment in the nature of a substitute to that bill, which would revise provisions of the Energy Policy Act of 2005 (EPAct) related to oil shale. We are very concerned about the accelerated timetable mandated in EPAct for the development of a commercial-scale oil shale industry. Enactment of your provision would greatly alleviate our concerns. Thank you for your leadership on this issue.

We recognize that oil shale is a critical resource for the entire nation, but the potential development of a large scale commercial oil shale program demands a thoughtful discussion—both at a federal and state level. Unfortunately, an oil shale program development schedule has been imposed that hampers the ability of the states to constructively participate in the process. Our concerns are heightened by the lack of detailed information about the technologies that would be involved; the potential effects on our lands, water, air quality, and wildlife; the conflicts with other uses of scarce resources; and the potentially serious adverse impacts on local communities.

Recently, the Governors of Colorado and Wyoming requested a reasonable extension—from 14 to 120 days—of the time period for cooperating agencies, including states, to comment on the preliminary draft Programmatic Environmental Impact Statement (PEIS). In order to provide meaningful comments on such a large and wide ranging document, states need adequate time to review and analyze it. The BLM denied the request and instead extended the review period to 30 days. This is simply too short of a timeframe to complete a thorough analysis, and the failure of the federal agencies to respect the request of the states significantly undercuts the very federal/state relationships that are crucial to responsible development.

The Honorable Nick J. Rahall II
June 12, 2007
Page 2

We are very interested in working with your Committee and with the Administration to complete an overall strategy for sustainable and publicly acceptable large-scale development of oil shale. This would likely reduce the chance of another boom-and-bust oil shale cycle like the one Colorado experienced in the 1980's, and potentially provide a sustainable and environmentally friendly energy source for our nation.

Accordingly, we urge the Natural Resources Committee to retain the revised section 104 in the bill. Thank you for your consideration of this request and look forward to working with you on Western issues in the future.

Sincerely,

M. Michael Rounds
Governor of South Dakota
Chairman

Dave Freudenthal
Governor of Wyoming
Vice Chairman

cc: Members of the House Natural Resources Committee

Appendix 3

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U.S. Senator Ken Salazar

Member: Finance, Agriculture, Energy, Ethics and Aging Committees

2300 15th Street, Suite 450 Denver, CO 80202 | 702 Hart Senate Building, Washington, D.C. 20510

For Immediate Release
Thursday , March 13, 2008

CONTACT: Stephanie Valencia – 202-494-8790
Cody Wertz – 303-350-0032

Sen. Salazar: 'Another Victory for Responsible Oil Shale Development'

WASHINGTON, DC – Today, the United States Senate voted down a Republican amendment to the Senate Budget Resolution that sought to override a one-year moratorium on oil shale development included in the omnibus appropriations bill late last year. The one-year moratorium is necessary to allow states and affected communities to work with the BLM to help restore order to the regulatory process, so that oil shale development can occur responsibly.

"The defeat of this amendment is another victory for responsible oil shale development in our Nation and especially in Colorado. BLM is rushing towards a commercial lease sale when the technology is not ready and the potential environmental impacts are unknown. Because of this uncertainty, we do not even know whether state and local governments support a commercial lease sale.

"The communities of Colorado's West Slope are wary of unchecked oil shale development in their backyard. We must take a judicious approach that will help, not hurt, West Slope communities and avoid any economic bust that could follow an unchecked boom on commercial leasing. This amendment would have put that approach in jeopardy.

"I have long fought for responsible oil shale development on Colorado's West Slope. I am very pleased that the Senate voted down this amendment and said yes to responsible, tempered oil shale development."

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Appendix 4

OSTS_00079

THE WILDERNESS SOCIETY

ECOLOGY AND ECONOMICS RESEARCH DEPARTMENT

THE ECONOMIC & SOCIAL IMPACTS OF OIL AND GAS DEVELOPMENT

June 2006

I. PURPOSE

This brief is submitted as part of the NEPA process for this public land oil and gas development proposal. It is intended to identify some of the socio-economic issues that must be analyzed as part of the NEPA process. We also offer methodologies to assist agencies responsible for analyzing the impacts of proposed land use decisions on communities and economies. These issues are particularly relevant in the Rocky Mountain West, where current land management priorities have shifted distinctly toward oil and gas extraction. For this reason our analyses and examples in his brief will center on the five states which have been the focus of the current oil and gas development: Colorado, Montana, New Mexico, Utah, and Wyoming.

In making land use decisions, federal agencies have an obligation under the National Environmental Policy Act (NEPA) to take a "hard look" at the environmental consequences of a proposed action, and the requisite analysis "must be appropriate to the action in question." This brief presents issues to be analyzed, and data and methods for use in the analysis of the impact of oil and gas development proposals on the social and economic health of Western communities. Federal agencies, the public and communities cannot evaluate the consequences of proposed decisions or determine how best to avoid or mitigate negative impacts without adequate data and analysis. Through the examination of the issues and potential costs described below, federal agencies can better fulfill their obligations to evaluate the direct, indirect, and cumulative impacts of oil and gas development on the communities adjacent to Western public lands.

II. INTRODUCTION

As an agency prepares a management plan or an Environmental Impact Statement for publicly owned lands, it must do a full and accurate accounting of the costs and benefits of each of the alternatives proposed, including both market and non-market values (Loomis, 1993). Historically, analyses by land management agencies of alternatives that emphasize resource extraction alternatives (oil and gas drilling, mining, timber) emphasized the benefits of extraction and ignored the costs. Failure to include all the costs of an oil and gas drilling proposal has two distorting influences on the decision making process. First, the alternatives that emphasize drilling appear more attractive than they actually are, and second, the opportunity costs of conservation-oriented alternatives will appear greater than they really are. Agency planners must provide a full accounting of the costs associated with extraction activities. Only when all the costs and benefits are fully accounted for can a truly informed assessment of the alternatives occur.

We have organized this paper to facilitate the identification of key issues related to oil and gas development on public lands, and the environmental, social, and economic impacts these decisions have on communities in the West. The first section discusses the need to examine economically recoverable resources, the need to correctly assess net benefits by accounting for all impacts and costs, and presents several potential impacts of oil and gas development that are either absent from, or incorrectly represented in, many federal agency oil and gas leasing analyses. We also provide examples of specific analyses or methods for improving the analysis. The next section presents our NEPA scoping comments which include specific costs and impacts that we feel must be analyzed in order to complete a thorough examination of land use plans. These analyses and

methods provide a necessary, but not sufficient, analysis of the impacts of oil and gas leasing on public lands and the adjacent communities. We formally request that the agency incorporate these analyses and methods into its planning for, and analysis of, land allocation decisions that lead to oil and gas leasing and drilling proposals and at the project level implementation phase.

III. Characterizing Oil and Gas Development Potential

A. Estimating the Economically Recoverable Volume of Oil and Gas

Technically recoverable oil and gas resources are the subset of the total resource base for which technology currently exists making extraction possible. This definition relies only on technological feasibility without regard to the cost of extraction or the prevailing prices. Economically recoverable oil and gas resources are the subset of technically recoverable resources that would be economic to produce.
Analyses of the benefits of oil and gas development must be made based on accurate and appropriate estimates of the resources that are economically recoverable.

As noted by LaTourrette, et al. (2002), economic constraints are, in most cases, the limiting factor on gas production in the Rocky Mountains, not environmental laws. The majority of undiscovered natural gas currently being proposed for exploitation in the Rocky Mountains are "unconventional" gases (continuous-type, tight sands gas, and coalbed methane). Economic recovery rates for unconventional oil and gas resources are lower than recovery rates for the conventional resources – reinforcing the need to base decisions on estimates of economically recoverable amounts of gas, not estimates of technically recoverable resources.

The Congressional Research Service (Corn, et al. 2001) and most, if not all, economists agree that the policy relevant opportunity cost of an environmental regulation is the economically recoverable amount of gas – not the technically recoverable amounts. It is inappropriate to base energy policy decisions solely on technically recoverable estimates. When economic criteria are considered, the estimates of oil and gas that are actually recoverable drop significantly from the initial estimates of technically recoverable resources (Attanasi 1998, LaTourrete et. al, 2002, 2003).

If economic factors are not considered, the opportunity costs of all forms of environmental protection will be overestimated. The agency will also likely overestimate the cost of lease stipulations, wilderness designation, and other protective measures if technically recoverable estimates are used. If the oil and/or gas are not economical to extract, there is no adverse impact on resource supplies from protecting wildlife, archeological sites, recreation sites and other public resources with leasing stipulations. Further, an EIS that relies on misleading economic information or fails to include all relevant costs in its economic analysis will violate NEPA, because it does not provide decision-makers and the public a valid realistic foundation on which to judge proposed projects.

Recent research by economists at The Wilderness Society indicates that the federal government's assessments of the oil and gas resources on public lands are flawed and consistently over-estimate the energy potential of these lands (Morton, et al. 2002, The Wilderness Society 2004a and b). The oil and gas industry also has a history of exaggerating the amount of gas recoverable and exaggerating the cost of protecting the environment. Rose (2001) states, "Since 1993, most oil companies have acknowledged that their geotechnical staffs persistently overestimate prospect reserves, commonly by about 30% to 80%." Rose goes on to say, "...over optimism is not limited to certain companies -- it appears to be a chronic industry shortcoming that has proved to be difficult to correct." The inherent upward bias in industry estimates of energy potential should eliminate them for use by public land agencies. Shanley et al. (2004), veterans of the oil and gas industry, reinforce this point for public land in the Rockies: "…it is likely that resource volumes are substantially overestimated, while the risks associated with finding and recovering those resources have most certainly been underestimated."

Exaggeration of the oil and gas resources by relying on technically recoverable estimates, distorts the analysis and increases risks to communities from false promises. For example, relying on estimates of technically recoverable resources will lead the agency to dramatically overestimate the number of new jobs that oil and gas drilling might create in a community. Basing decisions on technically recoverable estimates will exaggerate the potential tax revenues to the federal treasury, as well as state and local tax revenue. In addition, the potential spillover effects in the local economy from drilling will be exaggerated. Such exaggeration of the benefits of an oil and gas drilling project is an inappropriate distortion of the analysis of public land management alternatives and will lead to unrealistic expectations and possibly inappropriate support in local communities.

The agency should not rely exclusively on a deterministic, single value resource estimate due to the high risk and uncertainty with such estimates. According to Rose (2001), "Single-value estimates…predict an outcome that is possible, usually optimistic, and nearly always wrong." A better approach is to base estimates of gas and oil resources on a probabilistic range of values based on different levels of confidence. A probabilistic range of values more accurately portrays the risk and uncertainty inherent in industry estimates of undiscovered gas and oil resources. Reliance on a single value estimate does not comply with NEPA because it fails to use a range of values in order to fully consider the risk and uncertainty inherent in oil and gas estimates.

In addition to a range of probabilistic resource values, estimates of economically recoverable resources must be made based on a realistic range of prices in order to account for the uncertainty in forecasting future prices. Figure 1 shows historic prices for oil and gas in the U.S., and the potential volatility of these prices. To account for price uncertainty, USGS scientists use high and low price scenarios when estimating economically recoverable resources. We recommend a similar approach, including using USGS data for estimating undiscovered oil and gas resources

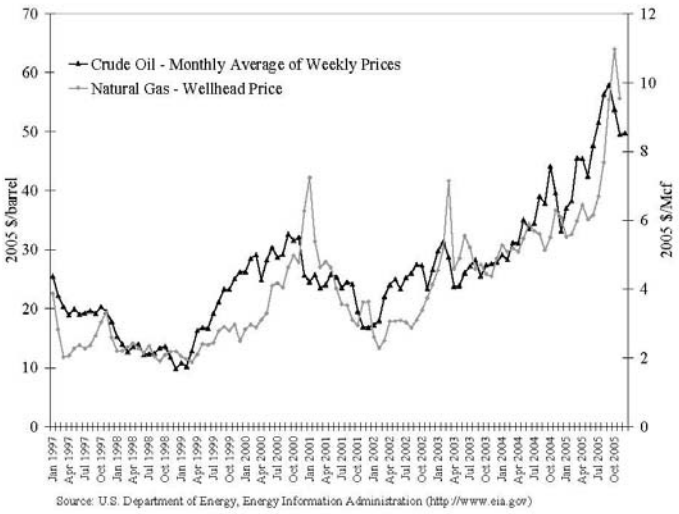


Figure 1. US Crude Oil and Natural Gas Prices

Many factors (flow rates, market price, drilling costs, etc.), not just environmental protection will influence whether resources are economic to produce, and economists make these assessments all the time. The price and costs assumptions used to estimate total production under each alternative must be critically examined

and made clear. To be specific, when estimating the amount of gas recoverable the price or price range that was assumed, and the costs of production that were assumed in the analysis must be spelled out. If a company cannot get the gas out of the ground at a cost less than the assumed wellhead price, then the opportunity costs of protecting the environment are zero. This is just basic economics. To comply with NEPA, all analyses of impacts must be based on estimates of economically recoverable resources.

Please review the RAND Corporation reports (LaTourette, et. al 2002, and 2003; Vidas et. al, 2003) detailing methods to estimate economically recoverable resources. We also request that the agency review Attanasi (1998) which describes methods used by the USGS to estimate economically recoverable resources for all the basins analyzed in the Energy Planning and Conservation Act's (EPCA) 2002 Assessment. It should be noted that the RAND analyses include some environmental cost, however, because they exclude non-market costs, USGS estimates are just the starting point to determine whether undiscovered gas is economically viable to extract. The RAND and USGS documents both demonstrate the feasibility of making estimates of economically recoverable resources and provide useful guidance on methodology.

NEPA requires a realistic assessment of economic impacts, and it is not realistic to assume that 100% of the technically recoverable oil and gas will ever be recovered The potential cost of protecting the environment and the possible benefits of drilling must all be based on estimates of economically recoverable resources. As the management plan and Reasonably Foreseeable Development scenario are developed, we formally request that they be based on economically recoverable amounts of oil and gas, not technically recoverable oil and gas.

B. Estimating the Employment and Income Benefits from Oil and Gas Development.

The IMPLAN model is an economic model often used by public land management agencies to project jobs and income from proposed actions. While the IMPLAN model can be useful as a tool to develop static analyses of the regional economy, the agency and local communities must be aware of the shortcomings and poor track record of the model as a predictive tool.

In general, models like IMPLAN are grounded in economic base theory, which makes the incorrect assumption that an economy is static (i.e. it does not change). IMPLAN models do not consider the impacts of many important variables that affect regional growth in many rural communities, especially in the West. Such as amenities as high quality hunting, fishing and recreational opportunities, open space, scenic beauty, clean air and clean water, a sense of community, and our overall high quality of life are not measured or accounted for in IMPLAN models. Many of these amenities are associated with attracting new migrants as well as retaining long-time residents.

Many residents of Western communities (both long-time and new) earn retirement and investment income. An analysis of economic trends will show that retirement and investment income is becoming increasingly important to rural economies of the West. A recent letter from 100 economists (Whitelaw, et al. 2003) reinforces the importance of non-labor income to the economy of the West. While it is technically possible, most IMPLAN models completely fail to consider the important economic role of retirement and investment in the economy of a community or region. A more accurate, dynamic, and complimentary approach requires planners to examine regional trends in jobs and income.

In a review of 23 studies that empirically tested the economic base hypothesis, Krikelas (1991) found only four that provided any evidence in support of economic base theory as a long run theory of economic growth -- a dismal track record. Despite dire predictions, history is replete with cases of communities and areas that lost their export base and continued as successful economies with their social capital intact. The local-serving sectors of the economy were the persistent ones, as new exports were substituted for the old. Tiebout (1956) recognized the shortcomings of the economic base theory when he wrote, "Without the ability to develop residentiary activities, the cost of development of export activities will be prohibitive." Krikelas (1992) concludes that economic base theory has severe limitations, especially for economic planning and policy

analysis. This is a conclusion that community leaders and land management officials and planners can no longer ignore, and one that should be incorporated into public land and community-level planning. As Haynes and Horne (1997) note:

> Where the economic base approach gets into trouble is when it is **used inappropriately as a tool for planning or predicting impacts** (emphasis added) of greater than one year in duration; a snapshot of current conditions tells little about the form a region's future economy may take.

Economists with both the Forest Service (Hoekstra, et. al 1990) and the Office of Technology Assessment (1992) concluded that while IMPLAN is useful for appraising the economic impacts of a management plan, the model is insufficient for evaluating the overall economic impacts for communities. And according to the OTA (1992), IMPLAN has an additional shortcoming for assessing community impacts: the economic data used to construct IMPLAN do not provide comparable details for all resource-based sectors of the economy. While economic data for oil and gas is classified as a separate manufacturing industry, recreation is scattered among a variety of industries generally classified in services and retail, with some in transportation. The ease of data acquisition for estimating oil and gas impacts combined with the difficulty of estimating the impacts of recreation and tourism underscores the potential bias favoring oil and gas development in IMPLAN modeling.

The 25th anniversary issue of the Journal of Regional Science includes an article by H.W. Richardson, a noted regional scientist, who believed that 40 years of research on economic base models "has done nothing to increase confidence in them." In addition, he concluded that it would be hard to "resist the conclusion that economic base models should be buried, and without prospects for resurrection" (Richardson, 1985). He is not alone. Many have suggested that economic base theories be abandoned in favor of other, more comprehensive theories of regional growth and development (Krikelas, 1992; Rasker, 1994; Power, 1995 and 1996). Many of these economists recommend analysis of regional trends in total personal income as a better way to understand where the local economy came from and where it is headed.

Our more specific concerns have to do with the technical assumptions used in most IMPLAN models. These questionable assumptions include: no changes in relative prices, no input substitution or technological change in the production processes, no labor mobility, no change in products or tastes, no regional migration, and no changes in state and local tax laws. The assumption of no labor mobility is particularly important for oil and gas drilling proposals, since it draws into question the issue of local versus non-local job creation. Workers are mobile, especially in the oil and gas industry as crews move from drill site to drill site. There is no guarantee that the oil and gas jobs projected by IMPLAN will be filled by local workers. And in fact, there is considerable evidence that workers in non-local crews fill most, if not all the direct jobs in oil and gas drilling.[1]

Another major assumption used by IMPLAN is the constant technology assumption. Most IMPLAN models, by failing to consider the downward impact of technology on job growth, will exaggerate the job potential from oil and gas drilling. Industries attempting to maximize profits seek to reduce production costs. One way to do this is to replace labor with technology resulting in fewer jobs. The downward trend in resource extraction jobs only becomes apparent if the agency completes a trend analysis showing changes in jobs and income over time.

Laitner, et. al (1998) cite Bureau of Labor Statistics (BLS) data which indicate that in 1988, oil and gas drilling generated about 1.72 jobs per million dollars of spending. By 1998 that number fell to 1.44 jobs per million dollars. Further, BLS (cited by Laitner et al.) estimates that the number of oil-gas jobs will fall to 0.71 jobs per million dollars of spending by 2008. This indicates that the direct jobs estimated with a static model like

[1] For example: "Where Will the Workers Come From?" Casper (WY) Star Tribune, 6 October 2005, and "Chinese Labor for Oil Drilling Eyed in Colo." United Press International, 11 July 2005 both discuss the origins of oil and gas workers in the Western U.S.

IMPLAN model will be much more than the number actually created from drilling. As a result of this failure to account for technology improvements, input-output models are well known to predict higher multiplier effects than are actually experienced (Hoffman and Fortmann, 1996). A review of government data confirms this downward trend: since 1987 output per worker in the oil and gas industry has been increasing (Figure 2). Investments in technology in the oil and gas industry have resulted in fewer and fewer workers required to drill each well and to produce natural gas and oil. The trends of technology replacing jobs in the oil and gas industry will continue.

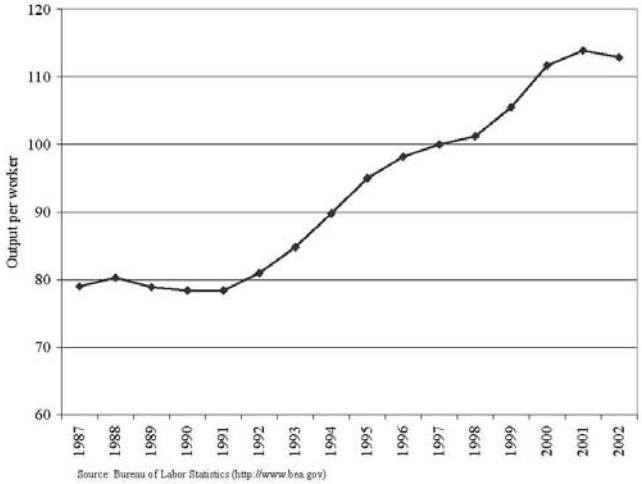


Figure 2. Labor Productivity in Oil and Gas Extraction

The concern over the accuracy of models like IMPLAN combined with concern over the use of these models for planning, suggests that it is not only inappropriate but a disservice to rural communities to rely on IMPLAN to estimate the economic impacts of public land management alternatives on rural communities.

We recommend that the agency stop relying on IMPLAN and other models derived from economic base theory.

If planners use IMPLAN, the model must account for non-labor income, as well as income from hunting, fishing, and recreation. If the agency uses IMPLAN, it must also account for the fact that most drilling is completed by non-local crews. If the agency uses IMPLAN, the analysis must account for increasing labor productivity and hence declining jobs per well drilled. We insist that the agency fully discuss the assumptions, the shortcomings, and the risk and uncertainty due to the poor track record of the IMPLAN model in planning efforts. We also request that all data and multipliers used to project local impacts be made public.

We also request that the agency complete a trend analysis of regional jobs and income – to provide a better and more complete understanding of their economic past and their economic future. We formally request and recommend that the agency analyze economic trends using the Economic Profile System model developed by the Sonoran Institute in cooperation with the Bureau of Land Management (available at http://www.sonoran.org).

C. Estimating Gross and Net Revenues from Oil and Gas Production

Oil and gas production results in revenues flowing to federal, state and local governments. To help make better informed decisions, the revenues must be estimated accurately and with full consideration of resource production over time (production curves) and all relevant tax laws.

Furthermore, oil and gas revenues, by themselves, only represent flows of **gross** revenue – while **net** revenue is the policy relevant metric that must be analyzed. In order to estimate the **net** revenues from oil and gas production, the associated costs must be fully accounted for in the analysis (see next section). The costs to local communities from drilling are real and have already been demonstrated to be significant (Western Organization of Resource Councils 1999, Darin 2000, Pedersen Planning Consultants 2001, Pinedale Anticline Working Group, 2005), must be accounted for in the analysis of net revenues from gas production.

1. Estimate revenues based on the realities of oil and gas production

As conventional oil and gas fields are developed, production is initially high, before gradually decreasing over time. Production is not linear. This declining production curve for gas and oil wells must be taken into account when estimating tax revenues based on the value of produced resources. In the case of conventional wells this means that communities might enjoy large initial revenues that will decline in later years. The decline in revenues leaves communities with a lower stream of income when the time comes to deal with increasing oil and gas cleanup and remediation costs.

In contrast with production from conventional gas, production of coalbed methane (an unconventional gas) is initially slow due to the "dewatering" phase that may last several years before production can begin. In coalbed methane areas local communities are more likely to experience significant increases in the costs to local governments early without the immediate benefit of corresponding increases in local tax revenues.

We request that the agency make realistic assessments of the likely production curves along with the expected rate of development and production for the type of resources to be produced, and that all estimates of local revenues be made on an annual basis which reflects the expected annual production.

2. Estimate revenues based on the realities of Federal, state, and local tax laws

Revenue estimates must also account for variations and exceptions in local tax structures rather than simply estimating the value of the total resource and multiplying by the current or average tax rate. For example, Montana's tax structure encourages exploration and development by taxing the first year of production at a lower rate. In Colorado, producers are able to deduct any local property taxes and ad valorem severances taxes paid from their state severance taxes. Other policies which may reduce overall revenues are lower tax rates for directional drilling and for wells that are considered "marginal" (that is, producing below some minimum daily amount). These exceptions and reductions in the actual taxes paid need to be accounted for and included in the analysis of potential public revenue estimates for oil and gas drilling proposals.

We request that the agency determine all applicable Federal, state and local tax laws (including exceptions and reductions) and that these laws and regulations be used to make realistic and accurate estimates of net tax revenues from oil and gas production. As discussed above, revenue estimates must be made based on economically recoverable resources rather than technically recoverable – and must include the environmental and community costs from drilling and production.

D. Include a full accounting of the hidden economic costs from oil and gas extraction

As discussed, oil and gas revenues, by themselves, only represent flows of **gross** revenue – while **net** revenue is the policy relevant metric that must be analyzed. In order to estimate the **net** revenues from oil and gas production, the associated costs must be fully accounted for in the analysis. Similarly, oil and gas jobs by

themselves, represent gross jobs. In order to estimate the net jobs associated with an alternative, the job losses associated with drilling must be accounted for.

In addition to market costs, economic analyses of recoverable gas must include a full accounting of non-market costs. After 35 years of research by academic and federal agency economists (Krutilla 1967, Krutilla and Fisher 1985, Peterson and Sorg 1987, Loomis and Richardson 2001), it is now possible to quantify non-market environmental costs that arise from development of natural resources (see Table 1). The BLM and the Forest Service should include a full accounting of non-market costs in the effects analysis required by the National Environmental Policy Act (NEPA) for leasing and drilling decisions (Morton et al. 2004). To assist the agency with this task, we have included in the table various methods for estimating these costs. Furthermore, while the details are beyond the scope of this brief, agency analyses should also include estimates of the non-market benefits associated with each alternative.

Table 1. Economic Costs of Mining and Oil and Gas Extraction

Cost Category	Description of Potential Cost	Methods for Estimating Cost
Direct use	Decline in quality of recreation including hunting, fishing, hiking, biking, horseback riding. Loss of productive land for grazing and farming	Travel cost method, contingent valuation surveys.
Community	Air, water and noise pollution negatively impacts quality of life for area residents with potential decline in the number of retirees and households with non-labor income, loss of an educated workforce, and negative impacts on non-recreation businesses. Decline in recreation visits and return visits negatively impacts recreation businesses. Socio-economic costs of boom and bust cycles.	Surveys of residents and businesses. Averting expenditure methods for estimating the costs of mitigating health and noise impacts. Change in recreation visitation, expenditures and business income. Documented migration patterns.
Science	Oil and gas extraction in roadless areas reduces the value of the area for study of natural ecosystems and as an experimental control for adaptive ecosystem management.	Change in management costs, loss of information from natural studies foregone.
Off-site	Air, water and noise pollution decrease the quality of recreation experiences for downstream and downwind visitors. Haze and drilling rigs in viewsheds reduce the quality of scenic landscapes, impacting activities like driving for pleasure, and other recreation activities and negatively impacts adjacent property values. Groundwater discharged can negatively impact adjacent habitat, property, and crop yields, while depleting aquifers and wells.	Contingent valuation surveys, hedonic pricing analysis of property values, preventative expenditures, well replacement costs, restoration and environmental mitigation costs, direct impact analysis of the change in crop yields and revenues.

Table 1. Economic Costs of Mining and Oil and Gas Extraction

Cost Category	Description of Potential Cost	Methods for Estimating Cost
Biodiversity	Air, water and noise pollution can negatively impact fish and wildlife species. Ground water discharge changes hydrological regimes with negative impacts on riparian areas and species. Road and drill site construction displaces wildlife and fragments wildlife habitat.	Replacement costs, restoration and environmental mitigation costs.
Ecosystem services	Discharging ground water negatively impacts aquifer recharge and wetland filtration services. Road and drill site construction increase erosion causing a decline in watershed protection services.	Change in productivity, replacement costs, increased water treatment costs for cities, preventative expenditures.
Passive use	Roads, drilling and pipelines in roadless areas results in the decline in passive use benefits for natural environments.	Contingent valuation surveys, opportunity costs of not utilizing future information about the health, safety, and environmental impacts of oil and gas drilling.

We request that the agency include both market and non-market costs and benefits in order to fully account for all the impacts of potential development.

E. Estimating the Socio-economic Costs to Communities from Oil and Gas Development

1. Increased costs to private land owners and residents

The current oil and gas boom has generated significant costs to communities in the West. Notably in Wyoming's Powder River Basin, the site of massive coalbed methane development. While this development has increased the fortunes of some, others are not faring as well (Pederson Planning Consultants 2001). Landowners in the Powder River Basin are spending thousands of dollars on attorneys in order to attempt to protect their property, often to no avail, as these areas have seen dramatic declines in property values. Other areas are also experiencing declines in private property values as the result of the accelerated oil and gas development. A recent study in La Plata County, Colorado found that coalbed methane wells there resulted in a decline in property values of 22 percent (BBC Research and Consulting 2001).

Residents' quality of life also suffers during accelerated oil and gas development. These costs must be accounted for in the analysis. In a survey of residents of Sublette County, Wyoming (one of the communities currently experiencing accelerated oil and gas development, McLeod et al. (1998) found that when asked why people chose to live in the area, most cited the scenery, recreation, lifestyle, and clean air and water over economic factors such as jobs or low taxes. Another more recent survey of Sublette County Wyoming (Porter et al. 2004) residents also found that many listed the quality of life and the beauty of the area among the assets they value. These results also pointed out an awareness among county residents of the need to diversify the economy, and that opportunities and settings for tourism and recreation are important economic assets. All of these amenities are diminished when oil and gas drilling increases in pace and scale. The loss of amenities and the economic impacts created by this loss must be acknowledged and accounted for in the analysis.

We formally request that the agency estimate the costs associated with oil and gas development to private landowners as part of the NEPA process.

2. Increased costs to local governments

Accelerated oil and gas development is often touted as a fiscal savior for struggling Western communities. However, the potential windfall is not without costs (Morton, et al. 2002). These include added strain on infrastructure, increased road maintenance costs, increased demand for public services such as hospitals and schools, increased need for emergency services (due both to increased population and an increase in the number of people working in more dangerous occupations such as those found in oil and gas extraction), and a host of less tangible costs due to the effects of a changing demographic and social makeup of the towns and communities.

Costs to boomtowns in the West include an increase in truck traffic resulting in increased road maintenance costs (Pinedale Anticline Working Group 2005, Craig Daily Press 2004, 2005). Increased traffic also results in dust from poorly constructed access roads which causes health problems for both humans and livestock, reduces the grass available for cattle, and negatively impacts air quality and visibility. Crime and other social problems intensify in boomtowns, with these areas seeing increases in larceny, traffic violations and accidents, destruction of private property, family violence, and child abuse. Oil and gas workers facing long shifts and time away from families often turn to drugs (High Country News 2005). All of these escalating problems increase the cost of emergency and social services for cities and counties. Boomtowns also often experience a shift in the labor force. Workers leave for oil and gas jobs, resulting in instability in the labor force and difficulty hiring public workers (e.g. policemen, firemen) at a time when the counties and cities are stretched thin to handle the increased workload (Pederson Planning Consultants 2001).

Gulliford (1989) examined the consequences of the boom and bust nature of oil and gas development. He chronicles the fortunes of Garfield County, Colorado before, during, and after the push to extract oil from oil shale in the late 1970's. Oil shale production proved to be uneconomical even at high prices. The companies who had planned to exploit the resources encouraged the communities in the area to make large investments in infrastructure to accommodate workers for the oil shale boom, and then abandoned them before any oil was produced, leaving overbuilt towns with large debt burdens. Before leaving the county however, the oil shale boom also resulted in an increase in social problems related to rapid population growth and the prospect of easy money.

These added costs due to rapid increases in oil and gas drilling are being experienced by the communities in the Pinedale Anticline area of Wyoming (Pinedale Anticline Working Group 2005). Emergency calls more than doubled between 2000 and 2003, while ambulance runs increased by 36% since oil and gas drilling has accelerated. Traffic and automobile accidents have also increased in conjunction with oil and gas drilling. One major intersection in Sublette County saw traffic rates nearly triple between 1995 and 2003. After declining in the mid 1990's, accident rates per capita increased 23% between 1999 and 2003, and this increase mirrors the increase in drilling rigs in the area (Pinedale Anticline Working Group, 2005).

Accelerated oil and gas development has left many counties and communities unable to pay for or finance the increase in public service costs or the cleanup cost after the bust. We have every reason to believe that similar costs and burdens will be placed on other communities where public and private land is threatened by oil and gas drilling. When estimating the benefits of an oil and gas development project the agency must show these benefits as net rather than gross. The increased public service and infrastructure costs associated with expedited oil and gas development must be fully accounted for as part of the NEPA process for the current push to develop oil and gas in the West.

3. Economic instability and a loss of economic diversity

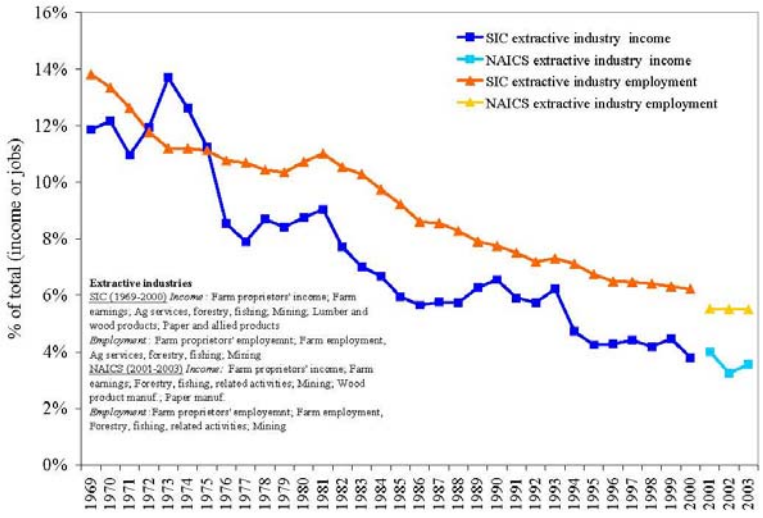
The agency should analyze and discuss the socio-economic costs associated with an historic emphasis on resource extraction, which has resulted in repetitious cycles of socio-economic distress for rural communities. When

an area is dependent upon only one or a few industries for most of its employment and income, there are often negative consequences, mostly stemming from fluctuations in the dominant industries. Limerick et al. (2002) describe Western resource-dependent communities this way:

> "In many towns, communities, settlements, and sub-regions of the West, everyone's fortune depended on the production and marketing of one commodity. Dependence on one commodity brought a particular kind of precariousness, instability, and vulnerability to external changes, whether of markets or climate. Farm towns, mining towns, cattle towns, and logging towns had no insulation from any problems that might strike the industries on which they relied."

Research has indicated that an emphasis on resource extraction results in inherently economically unstable communities. This instability in income and employment is usually a result of labor saving technological improvements and fluctuations in world resource markets -- macroeconomic forces completely outside local control. Such economic instability and lack of local control can be expected if agencies are successful promoting rapid oil and gas development. Communities have little control over the local economy because they have absolutely no control over global commodity prices. When prices drop, companies abandon wells, lay off workers, and leave the communities high and dry to suffer the economic and environmental consequences.

The extractive industries, including oil and gas development represent an ever smaller portion of the total jobs and income in the Rocky Mountain West (see Figure 3). This is true even during the current boom. The relative importance of these industries compared to expanding industries in the professional and service sectors and those which depend on non-labor income must be acknowledged in the NEPA and planning process for public land management.



Source: US Department of Commerce, Bureau of Economic Analysis (http://www.bea.doc.gov)
Note: The figure is based on SIC data for 1969-2000 and NAICS data for 2001-2003 in order to show the long-term trend. While not explicitly compatible, the two classification systems show similar trends for extractive industry income and employment and illustrate the general downward trend, even during the current oil and gas drilling boom in the Rockies.

Figure 3. Extractive Industry Income and Employment in the Rocky Mountain Region

Several studies have examined the problem of poverty in rural areas which are dependent on the extraction of only one or a few natural resources for most of their economic activity. As Freudenburg and

Gramling (1994) point out, "At the regional level, the highest levels of long-term poverty in the United States… tend to be found in the very places that were once the sites of thriving extractive industries…" They point out that the problem of poverty in these resource-dependent regions is not limited to the times of lower or zero production, but also occurs during the active operations of the extractive industry. Resource extractive workers find themselves in a vicious cycle of relatively high paying jobs with frequent layoffs and unemployment. This cycle is what Freudenburg (1992) calls the "intermittent positive reinforcement regime." While resource extractive workers develop high skills, such skills are not readily transferable to other jobs, and the workers become overspecialized (Freudenburg and Gramling, 1994). These areas attract resource extraction industries, often to the exclusion of other industries. Investment in education and job retraining is low because "the potential return on their investment in their education is either too low or too uncertain to justify sacrifice" (Humphrey et al. 1993). The resultant pattern of "rational under-investment" in the development of skills and other forms of human capital can result in reduced economic competitiveness in resource-dependent communities.

Economic instability is of concern to community leaders because if a local economy is unstable, economic development plans are more likely to fail. The economic instability created in the "boom and bust" economies associated with resource extraction increases the risk for capital investment in linked industries. As such, resource specialization and the resulting economic instability can prevent the formation of forward and backward economic linkages in the local and regional economy. After examining the less desirable aspects of the wood products industry Fortmann et al. (1989) concluded:

> Disincentives for stable employment, preferences for younger and cheaper labor that leave the less mobile and less trainable older worker out of work, cycles of market activity that carry with them high rates of unemployment, injury and illness rates and fatality rates that top all other employment categories are not attributes of a stabilizing industry, no matter how stability is defined.

Similar socio-economic patterns are associated with the oil and gas industry. Smith (1986), examining the boom and bust phenomenon in oil and gas extraction, points out that high prices for oil in the late 1970's led to an increase in drilling, but there was no corresponding increase in production during the same period. He speculates about the reason for this: "Drilling in some states may have been extended into marginal areas under very optimistic price expectations, and such operations had to be abandoned when prices were no longer adequate." These sorts of activities lead to the classic boom and bust economic cycle typical of many rural resource-dependent areas. "Those states that showed the largest rate of growth in oil and gas extraction during 1972-81 tended to have the largest rate of decline in the post 1981 period." There is every reason to expect that the current boom will eventually lead to a similar bust. See also Goldsmith (1992) and Guilliford (1989) for further research examining the socio-economic costs to communities associated with an economy focused on oil and gas drilling.

Continued emphasis on export activities, if left unchallenged, will only insure future cycles of socio-economic distress in rural communities in the West, especially in isolated Western communities The impacts on local economic diversity, the socio-economic risks to communities from cycles of boom and bust, as well as the economic instability associated with oil and gas development, must be analyzed and addressed as part of the NEPA process.

F. Estimate and Evaluate the Environmental Costs of Oil and Gas Development

The environmental costs of drilling include erosion, loss of wildlife and fish habitat, declines in the quality of recreational opportunities, proliferation of noxious weeds, and increased air and water pollution. These costs increase with the scale and speed of oil and gas operations. Environmental impacts can be mitigated with the implementation and enforcement of lease stipulations and monitoring of impacts throughout the project's life. Proper monitoring of the environmental impacts of oil and gas and other development programs require that accurate and complete data be collected and used.

1. Water Impacts

One of the major environmental costs associated with oil and gas drilling is increased water pollution. Oil and gas drilling will have impacts on the amount of water available for other uses and the displacement of large volumes of water - *quantity* impacts, as well as *quality* impacts resulting from the discharge of pollutants and from the increased levels of pollutants resulting indirectly from quantity changes.

a) Water quantity impacts

Accelerated drilling activity for coalbed methane is having profound real life impacts on many families and communities in the West. In order to release the natural gas from coal beds, enormous amounts of ground water must be pumped from coal aquifers to the surface. While all oil and gas operations result in produced water, the amount of water produced from individual coalbed methane wells is generally much higher than that from other types of oil and gas wells (USGS, 1995). Coalbed methane wells in Wyoming and Colorado discharge between 20,000 to 40,000 gallons per day per well (Darin, 2000). The disposal of the produced water not only affects the economics of development, but also poses serious environmental concerns.

The total amount of water discharged from CBM wells in Wyoming alone has skyrocketed in recent years, increasing from approximately 43.5 million gallons (134 acre feet) in 1990, to 18 billion gallons (56,000 acre feet) in 2005 (Wyoming Oil and Gas Conservation Commission, 2006). The discharging of 56,000 acre feet of water in the arid West is wasteful in the short-term (generally an acre-foot of water will supply a family of four for one year), and has potentially devastating economic impacts for affected communities in the long-term. Dewatering of deep aquifers may upset the hydrologic balance, eliminating or reducing the availability of this water for future agricultural and domestic uses, and impacting the recharge of shallow aquifers and surface water.

The discharge of ground water can deplete freshwater aquifers, lower the water table, and dry up the drinking and irrigation water wells of homeowners and agricultural users. The short-term economic costs include drilling new wells for current and future landowners, when successful wells can be found, and the costs of acquiring new water sources when they cannot. If the freshwater aquifers do not fully re-charge, the long-term economic costs to affected landowners, homeowners, communities, and states across the West could be severe, including the foregone opportunity (option value) to use aquifer water in the future. The expected costs of these damages must be accounted for in the analysis.

The discharge of tens of thousands of gallons of ground water transforms many streams that normally flow intermittently (only during spring runoff or after storms) into all-season streams. The influx of water has resulted in deep channel scouring, erosion, and increased sedimentation. Increased sedimentation in streams can negatively impact native fisheries. This in turn increases the financial costs for fishery restoration projects. The altered water flows from surface discharge of produced water will negatively impact thermal and flow regimes, and likely contribute to bank erosion and changes in riparian vegetation (Allan, 2002). Gore (2002) warned that the loss of habitat caused by increased water flows from discharged water at coalbed methane projects could eliminate up to 30 aquatic species within 20 years.

The discharge of water into intermittent stream channels damages native flora and fauna not adapted to year-round water and promotes the spread of noxious weeds such as Scotch burr and Canadian thistle. The change in native vegetation composition, combined with the increase in noxious weeds, negatively impacts threatened and endangered species and other wildlife, along with cattle production. The loss of native species and the spread of noxious weeds across the West has enormous economic costs to both public and private interests.

The landscape is also impacted from the retaining ponds or reservoirs constructed to store the water discharged from the drilling operation. The constructed earthen dams and retaining ponds destroy additional habitat and introduce artificial structures to the landscape. Habitat and homes on property near these reservoirs also face the potential risk of flooding from structural failure.

When proposing oil and gas development, the agency must fully examine and account for the risks and costs associated with water depletion, loss of native fisheries and fisheries restoration, the additional costs of noxious weed mitigation, and the costs associated with the building and potential failure of artificial water retention structures.

b) Water quality impacts

Trout Unlimited recently published a literature review of the impacts of oil and gas development and exploration on coldwater fisheries (Trout Unlimited, 2004). The findings of the report conclude that many of the studies reviewed "point towards confirmed deleterious effects caused by gas and oil exploration and development." One study found that the allowable discharge level in most states were far too high, 400 times that recommended by the EPA, and produced significant physical and toxic effects on trout in Wyoming. The Trout Unlimited study supports the conclusion that oil and gas development results in substantial negative effects on water and the wildlife that depends on it for survival.

The water discharged from oil and gas wells can be highly saline with a very high sodium absorption ratio (SAR) – a ratio that affects how water interacts with soil. Water with a high SAR can permanently change chemical composition of soils, reducing soil, air, and water permeability and thereby decreasing productivity of both native plants and irrigated crops.

Oil and gas drilling and production can also lead to increased sedimentation of water bodies, which in turn is harmful to aquatic species. According to Clement (2002), referring to proposed coalbed methane development in the Powder River Basin:

> "Increased sedimentation resulting from erosion of stream banks, overland flow, and road construction will likely impact aquatic organisms… Input of sediments to aquatic ecosystems is widely regarded as a major source of stream degradation in North America."

And finally, drilling for oil involves ecological risks and potential economic costs associated with blowouts -- the catastrophic surge of the highly pressurized fluid from the drill hole that can cause fires, loss of life and property, and the potential contamination of surface drinking water sources. To reduce the number of blowouts, rotary drilling operations typically inject a fluid of drilling muds into the drill hole in order to lubricate and cool the drill bit. While reducing the number of blowouts, the drilling fluids themselves create the risk of contamination of adjacent freshwater aquifers (Gauthier-Warinner, 2000). Recently, the New Mexico Oil Conservation Division (OCD) compiled and posted on its website information regarding groundwater impacts from leaks, spills and releases resulting from oil and gas operations. Although this data does not include all such impacts or all sources associated with oil and gas development and operations it illustrates the nature and extent of the potential for water contamination from oil and gas drilling. There are close to 1400 groundwater contamination instances in the OCD's database that are attributed to oil and gas activities.

We formally request that all of the potential impacts on and risks to water quality from oil and gas be fully analyzed and that the costs of these impacts be included in the NEPA analysis for oil and gas development.

2. Oil and Gas Footprint

Oil and gas drilling operations leave behind a large footprint on the landscape – a footprint that extends well beyond the several-acre drilling sites. Beginning with exploratory activities, large trucks with seismic surveying equipment crisscross the landscape using a crude system of roads. These roads are made to the lowest standards possible in order to minimize the financial costs of gathering geophysical information, with little consideration for wetlands, fragile soils, storm water runoff or critical habitat. Exploratory drilling operations then require more large trucks with drill rigs using a network of constructed roads to access drill sites. If the exploratory well is determined to have no potential for production, the well is plugged, but the landscape scars

remain. If producible resources are found more wells, along with the attendant roads and pipelines will follow. Depending on the agency with oversight, there is typically little enforcement or monitoring of environmental regulations. In addition, no surety bonds are required for restoration or clean up. All of these factors create a footprint that extends beyond the drill-pad and the costs associated with this extended zone of impacts must be accounted for in agency analyses of oil and gas development.

a) Well spacing and actual well numbers

States usually have general rules setting default minimum spacing requirements between producing wells. They are set to establish the maximum area of an oil or gas deposit that can be efficiently drained with one well. In most cases the operator can petition for a reduction in well spacing if they can show that such spacing changes will result in more efficient production. Well spacing limits apply to each formation, meaning that if formations overlap, more well pads may be established on the surface than might be indicated by the stated spacing limits. The spacing limits do not include dry holes, only producing wells.

When a well is drilled it is unknown whether it will eventually produce oil or gas, or whether it will be a dry hole. If the well has potential for production, the well is cased with pipe and cemented (in an attempt to prevent oil and gas from seeping into nearby aquifers), and the drilling rig is replaced by a well head or pump jack. Electric or gas powered motors are used to power the pumps that collect the gas at each well and to power the series of compressor stations that pressurize gas for pipeline transport from the wells to customers in distant markets (WORC, 1999). These compressors run 24-hours a day. Furthermore, additional wells are usually drilling in the immediate vicinity when a producing well is discovered. All of these activities create a cumulative impact on wildlife habitat, air quality, water quality, and noise levels that goes beyond the immediate footprint of development.

Many drill sites also involve the construction of sediment ponds and retention reservoirs to collect storm water drainage and store the ground water brought to the surface as a result of the drilling and extraction operation. Injection wells are sometimes used to dispose of the water produced and to enhance oil and gas recovery – an action that may necessitate additional drilling of up to hundreds of injection wells throughout the field (Gauthier-Warinner 2000). The ecological footprint not only extends across the landscape, it also penetrates to shallow aquifers as well as aquifers thousands of feet below the earth's surface.

Exploiting the gas in unconventional, tight sands deposits will require drilling a significant number of wells, as the distribution of these resources is not well understood. Extracting this tight sands gas may require 5 or 10 acre spacing, which has been proposed in the Jonah field in Wyoming. As noted by the USGS (1996), "…**land-use planners are not in a good position to determine the societal impacts of the drilling (density) that would be necessary if these continuous reservoirs of (tight) gas were exploited** (emphasis added)."

In order to estimate the full extent of surface disturbance, the agency must correctly account for potential decreases in spacing limits, success rates for both exploratory and development wells, and estimate the cumulative environmental and economic impact of all wells drilled and all well pads established on the surface. The agency must fully examine the environmental impacts from the footprint associated with oil and gas development and include the pipelines, roads, and other oil and gas infrastructure and the impacts on the landscape from this development.

We formally request that the agency provide an accurate estimate of the numbers of producing wells, dry holes, and injection wells. We request that the cumulative impacts of all wells and associated roads, pipelines and other infrastructure be analyzed fully as part of the NEPA process.

b) Pace of development

The pace at which an oil or gas field is developed will influence the extent of the oil and gas footprint. When drilling is phased to take place over a longer period of time, the impact of concurrent drilling operations

can be lessened, and dry holes and wells that stop producing can be reclaimed before beginning new well drilling. When drilling is pushed through in a short period of time the total area impacted is much larger. Rapid development also intensifies the socio-economic impacts which accompany drilling. More wells being drilled at once mean more workers moving into an area at the same time. If development is staged the community will be better able to absorb them, reducing the need for accelerated infrastructure upgrades. Phased development will also prevent the rapid economic swings associated with the boom and bust cycle typical of the oil and gas industry.

We formally request that the agency require phased development of oil and gas resources on public lands, and that the costs associated with rapid versus phased development be fully analyzed and compared as part of the NEPA process.

c) Impacts on wildlife

The impacts of oil and gas development extend beyond the footprint of development (Trombulak and Frissell 2000, Lyon and Christensen 2002, Lutz et al. 2003, WGFD 2004, Sawyer 2005). It is insufficient to simply indicate the percentage of the planning area that will be impacted by drilling. The analysis must estimate the percentage of critical wildlife habitat that will be directly and indirectly impacted. These estimates must include measures of the direct fragmentation of wildlife habitat, the indirect impacts, and not just the footprint. In addition to their direct effects (such as immediate landscape disturbance and habitat fragmentation), motorized routes also have negative impacts on wildlife such as noise, dust, air pollution, water pollution, erosion, and human presence that extend beyond the immediately disturbed area. Road densities as low as one percent or less of a given landscape can impact more than 99 percent of that landscape, leaving little undisturbed area in which wildlife can thrive. (Weller, et al., 2002; Hartley, et. al, 2003, Thomson, et. al, 2004; Thomson, et al., 2005).

Lease stipulations help protect wildlife but only if they are required and enforced, and data from the Bureau of Land Management and other sources indicate that they are not (GAO 2005). In the Rocky Mountain West, where hunting, fishing, and wildlife viewing generated $5.9 billion in revenue in 2001 (U.S. FWS and U.S. Census Bureau 2001). Drilling (and its direct impacts on wildlife and their habitat) has hidden economic costs in terms of lost revenues from license fees, equipment sales, and other related purchases. See Morton et al. (2002), Weller, et al,(2002), Hartley, et. a,(2003), Morton et al. (2004), Thomson, et. al, (2004,) and Thomson, et al (2005).

Wildlife habitat fragmentation results in both market and non-market costs. These costs must be analyzed as part of the NEPA process for oil and gas development.

d) Pipelines

In order to bring gas to market, thousands of miles of pipeline must be constructed – extending the impacts of gas drilling far from the actual drill site. There are currently more than 270,000 miles of gas transmission pipelines and another 952,000 miles of gas distribution lines. The cumulative costs and environmental impacts associated with pipeline construction must be included in the agency analysis – because drilling wells and building pipelines are connected actions.

The environmental costs associated with construction, maintenance, and repair of pipelines, as well as the costs of the habitat fragmentation due to pipelines must be examined as part of the NEPA process for and oil and gas development.

e) Roads

Oil and gas exploration also requires roads which increase ecological costs and invite cross-country travel and subsequent habitat damage. Oil and gas drilling and production often require daily vehicular trips to

monitor and maintain wells and pipelines. The increased traffic disrupts wildlife, may result in more road kill, and diminishes quality of life for local residents. Road construction degrades habitat and fragments travel corridors needed by wildlife species. Roads become conduits for non-native species that displace native species resulting in significant mitigation costs for taxpayers.

Proliferation of roads increases ORV use and thus the costs of the ecological and habitat damage associated with motorized recreation. Increased access and use by ORV-riders leads to increased ORV monitoring and enforcement costs. Roads, by providing access, may increase the frequency of human-caused fires. Humans caused sixty percent of all wildfires in the Rocky Mountains between 2001 and 2005 (National Interagency Fire Center, 2006). Furthermore, Forest Service statistics show that eighty-six percent of human-caused fires occurred in roaded areas (USDA Forest Service, 2000). Roads increase the damage to historical, cultural and archeological resources due to increased ease of access. Roads increase sediment deposits in streams resulting in reductions in fish habitat productivity. Roadless areas protect communities from sedimentation of water supplies and catastrophic events such as landslides.

The agency also needs to analyze the costs of road maintenance and restoration and compare these costs with the budgets available to complete the work. Each new mile of road added to the public lands transportation system competes for limited road maintenance funding. The Forest Service has a 10 billion dollar backlog of road maintenance projects and additional roads on public lands will only increase this backlog unless adequate funding is assured (Taxpayers for Common Sense, 2004).

The costs associated with the ecological damage due to oil and gas roads must be included in the analysis of plan alternatives involving oil and gas drilling and oil and gas projects. The agency must also include a detailed analysis of the costs associated with monitoring and enforcement of increased recreation use of expanded road mileage as part of the NEPA analysis. The costs for road maintenance must also be accounted for in the NEPA process.

G. Correctly Account for Budget Constraints and Fiscal Realities

1. Environmental mitigation costs must be estimated and included in NEPA analysis

The NEPA analysis should be based on reasonable budget expectations, which should be clearly stated. Successful organizations can rarely afford to ignore budgets when developing long-term plans. Without adequate funding, the mitigation plans and resource protection described in management plans will not be attainable. Rather than presenting the maximum production potential of public lands unconstrained by budgets, the agency should present the public with a more accurate picture of what can actually be accomplished given expected appropriations. Williams (1998) says, "policy is the effective result of 'what is intended' and 'what actually happens.'" What actually happens will depend on the budge available to achieve what is intended.

The agency must include a fiscal analysis of each alternative's implementation and mitigation costs. We are especially concerned with a potential lack of analysis of the costs to mitigate the environmental consequences of each alternative. Ignoring budget constraints is completely unrealistic and somewhat deceiving to the public, because the ability to achieve the levels of resource protection and damage mitigation described in each alternative will depend on the agency's budget. While the budget available to manage the planning area should be considered constant across alternatives, the costs to implement each management alternative are not equal. For example, an alternative resulting in resource damage will require more money to mitigate this damage than a less damaging alternative. It makes no sense for taxpayers to subsidize a more damaging and costly alternative when a less damaging, less costly alternative is available. There is simply no justification for any assumption that funding will be sufficient to implement each alternative and that all resource damage will be fully mitigated – unless costs and budgets are fully analyzed.

According to a Council of Environmental Quality memorandum on NEPA requirements [cited in NEPA Compliance Manual, 2nd Edition (Freeman, et al. 1994)]:

> [T]o ensure that environmental effects of a proposed action are fairly assessed, the probability of the mitigation measure being implemented must also be discussed. Thus the EIS and the Record of Decision should indicate the likelihood that such measures will be adopted or enforced by the responsible agencies. (Section 1502.16(h), and 1505.2)

The "probability of mitigation measures being implemented" is directly related to how much the mitigation will cost and how those costs relate to the expected budget available. The U.S. General Accounting Office (1992) reviewed federal land management budgets and found that the funding received by public land management agencies has been significantly less than the budgets required to fully implement plans. The lower-than-planned budgets have prevented public agencies from producing many of the outputs projected in land management plans, and implementing mitigation measures promised in NEPA documents (Morton 1997).

2. Bonding requirements for industry must be estimated and included in NEPA analysis

As part of the fiscal analysis of the plan alternatives, the agency must also realistically assess the bonding needs for the oil and gas development proposed. Operators must be required to post adequate bonds to ensure that acceptable reclamation and remediation are conducted. Insufficient bonds will increase the costs of reclamation for taxpayers and/or reduce the likelihood that reclamation will be adequate.

In order to fully comply with NEPA, the agency must include an analysis of the costs of implementing each alternative, which includes the costs of the mitigation plans contained within each alternative. These costs must then be compared to the expected budget level to assess the probability of mitigation measures being fully implemented. The agency should therefore, as part of the NEPA process, include a reasonable budget limitation and evaluate a set of management alternatives that are constrained by that budget level. The agency must require adequate funding from oil and gas operators (in the form of reclamation bond) to insure that the reclamation is complete and adequate.

3.The cost of enforcement of environmental protection and mitigation requirements must be estimated and included in NEPA analysis

Additional costs are associated with the inability of agency enforcement staff to adequately inspect oil and gas wells and associated facilities for violations of applicable laws and to enforce requirements for protection and restoration of the area. A recent report by the Western Organization of Resource Councils (2005) found that:

- agency enforcement staff levels have not kept pace with the rapid expansion of oil and gas development;
- oil and gas wells and associated facilities are not inspected often enough;
- agency environmental compliance inspectors spend too much time on other activities;
- agencies take too few enforcement actions; and
- citizen complaints are often ignored.

The Government Accountability Office (2005) also found a similar lack of resources for monitoring and enforcement of oil and gas development and attributed this lack to an unbalanced emphasis on processing permits to drill. The resulting costs are evidenced in the impact on the ecosystem.

The agency must assess the adequacy of funding and staffing to achieve the required environmental and safety enforcement for an oil and gas development. If inadequate funding and/or staff resources might prevent thorough enforcement and monitoring, this needs to be made clear and the costs associated with the additional impacts must be analyzed as part of the NEPA process.

IV. SPECIFIC RECOMMENDATIONS FOR ANALYSIS OF SOCIAL AND ECONOMIC IMPACTS OF OIL AND GAS DEVELOPMENT

These recommendations are organized to correspond with the more detailed sections above. We formally request that the NEPA analysis fully reflect and account for the following scoping comments:

A. The agency must base analyses of the impacts of oil and gas development proposals on estimates of economically recoverable resources, rather than technically recoverable resources.

We formally request that the Reasonably Foreseeable Development scenario be based on economically recoverable amounts of oil and gas, not technically recoverable oil and gas.

We formally request that estimates of jobs and income and local and state revenues be based on economically recoverable amounts of oil and gas, not technically recoverable oil and gas.

B. The plan must reflect an accurate and realistic projection of jobs and income associated with the oil and gas development proposal.

We formally request that the agency stop relying on IMPLAN and other models derived from economic base theory.

If the agency planners use IMPLAN:

The agency must fully discuss the assumptions, the shortcomings, and the risk and uncertainty due to the poor track record of the IMPLAN model in planning efforts.

We request that all data and multipliers used in the socio-economic impact analysis, including those used in IMPLAN be made public.

The model must account for non-labor income, as well as income from hunting, fishing, and recreation.

The model must also account for the fact that most drilling is completed by non-local crews.

The analysis must account for increased labor productivity and hence declining jobs per well drilled.

The agency must also complete a trend analysis of regional jobs and income – to provide a better and more complete understanding of their economic past and their economic future.

We formally request and recommend that the agency rely on trend analysis of income and employment for the counties impacted using the Economic Profile System (EPS) developed by the Sonoran Institute in cooperation with the BLM (available at http://www.sonoran.org).

C. The agency must make accurate and realistic estimates of gross and net revenues.

We requests that the agency determine all applicable Federal, state and local tax laws (including exceptions and reductions) and that these laws and regulations be used to make realistic and accurate estimates of net tax revenues from oil and gas production.

Revenue estimates must be made based on economically recoverable resources rather than technically recoverable – and must include the environmental and community costs from drilling and production.

D. The agency must Include a full accounting of the hidden economic costs from oil and gas extraction.

We request that the agency include both market and non-market costs and benefits in order to fully account for all the impacts of potential development.

E. The agency must analyze and discuss the socio-economic costs to communities associated the boom and bust cycles of oil and gas development.

We formally request that the agency estimate the costs associated with oil and gas development to private landowners as part of the NEPA process.

When estimating the benefits of an oil and gas development project the agency must show these benefits as net benefits rather than gross benefits.

The increased public service and infrastructure costs associated with expedited oil and gas development must be fully accounted for as part of the NEPA process for the current push to develop oil and gas in the West.

The impacts on local economic diversity, the socio-economic risks to communities from cycles of boom and bust, as well as the economic instability associated with oil and gas development, must be analyzed and addressed as part of the NEPA process.

A thorough plan for monitoring the socio-economic impacts of oil and gas development must be developed and implemented as part of the NEPA process and the implementation of all development and non-development alternatives.

F. The agency must fully and correctly account for the environmental costs of oil and gas development.

Impacts on water resources must be analyzed and accounted for

When proposing oil and gas development, the agency must fully examine and account for the risks and costs associated with water depletion, loss of native fisheries and fisheries restoration, the additional costs of noxious week mitigation, and the costs associated with the building and potential failure of artificial water retention.

We formally request that the impacts on water quality from oil and gas be fully analyzed and the costs of these impacts included in the NEPA process for oil and gas development.

The full extent of the footprint of oil and gas development must be analyzed and accounted for in the NEPA process

We formally request that the agency provide an accurate estimate of the numbers of both producing wells and dry holes and that the impacts of these wells be analyzed fully as part of the NEPA process.

We formally request that the agency require phased development of oil and gas resources on public lands, and that the costs associated with rapid development be fully analyzed as part of the NEPA process.

Wildlife fragmentation results in both market and non-market costs. These costs must be analyzed as part of the NEPA process for oil and gas development.

The environmental costs associated with construction, maintenance, and repair of pipelines, as well as the costs of the habitat fragmentation pipelines cause must be examined as part of the NEPA process for and oil and gas development.

Roads

The agency must include a detailed analysis of the costs associated with increased road mileage as part of the NEPA analysis.

The costs for road maintenance must be accounted for in the NEPA process.

The additional ORV monitoring and enforcement costs associated with expanded road mileage must be included in the NEPA analysis.

The agency must make a realistic estimate of the probability for enforcement of existing environmental protection

F. The agency must fully and correctly account for the environmental costs of oil and gas development.

The agency must assess the adequacy of funding and staffing to achieve the required environmental and safety enforcement for an oil and gas development. If inadequate funding and/or staff resources might prevent thorough enforcement and monitoring, this needs to be made clear and the costs associated with the additional impacts must be analyzed as part of the NEPA process.

G. The agency must correctly account for budget constraints and fiscal realities.

In order to fully comply with NEPA, the agency must include an analysis of the costs of implementing each alternative, which includes the costs of the mitigation plans contained within each alternative.

These costs must then be compared to the expected budget level to assess the probability of mitigation measures being fully implemented.

The agency should therefore, as part of the NEPA process, include a reasonable budget limitation and evaluate a set of management alternatives that are constrained by that budget level.

As part of the fiscal analysis of the plan alternatives, the agency must realistically assess the bonding needs for the oil and gas development proposed. Operators must be required to post adequate bonds to ensure that acceptable reclamation and remediation are conducted.

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FOR FURTHER INFORMATION:

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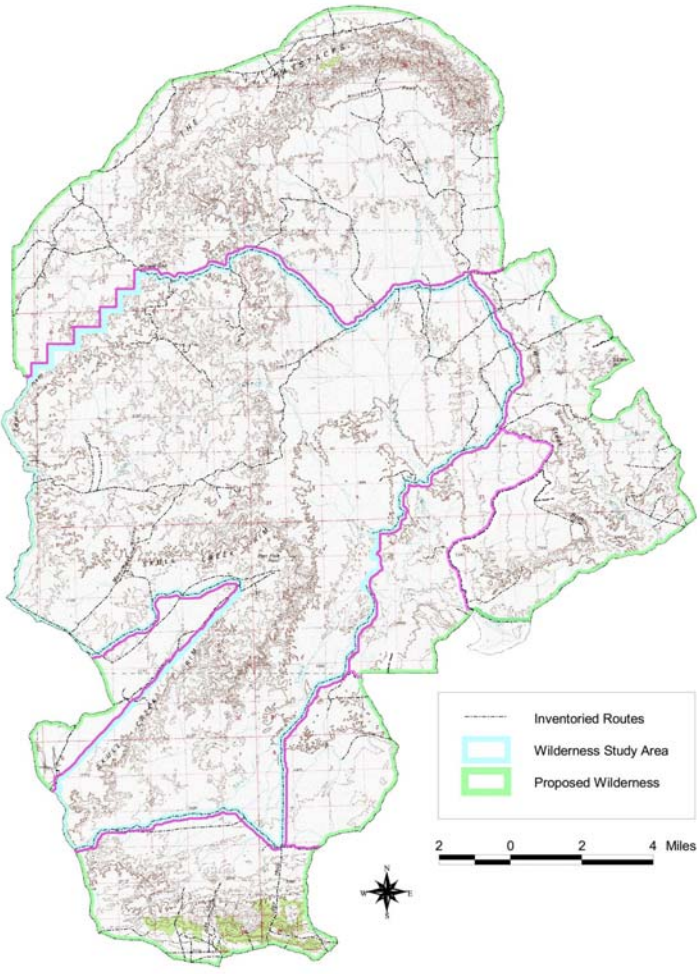
Michelle Haefele: (303) 650-5818 ext. 109

Appendix 5

OSTS_00079

Adobe Town Very Rare or Uncommon area
Final boundary shown in pale green



Appendix 6

OSTS_00079

Adobe Town Citizens' Proposal
INVENTORY AREA EVALUATION

Inventory Area: **A**	Criteria	Yes/no
Acreage meets size requirements? (Approximately 10,787 acres and contiguous with Adobe Town WSA)	Size	yes
Does the area generally appear to be affected primarily by the forces of nature? Is the imprint of man substantially unnoticeable?	Naturalness	yes
Does the area have outstanding opportunities for solitude and/or a primitive and unconfined type of recreation?	Solitude and/or Unconfined Recreation	yes
Does the area contain supplemental values? (Wild horses, artifacts)	Supplemental Values	yes
Conclusion: The area has wilderness character.		**Yes**

Inventory Area: **B**	Criteria	Yes/no
Acreage meets size requirements? (Approximately 23,566 acres and contiguous with Adobe Town WSA)	Size	yes
Does the area generally appear to be affected primarily by the forces of nature? Is the imprint of man substantially unnoticeable?	Naturalness	No
Does the area have outstanding opportunities for solitude and/or a primitive and unconfined type of recreation?	Solitude and/or Unconfined Recreation	No
Does the area contain supplemental values? (Wild horses, artifacts)	Supplemental Values	yes
Conclusion: The area has wilderness character.		**No**

Inventory Area: C	Criteria	Yes/no
Acreage meets size requirements? (Approximately 10,573 acres and contiguous with Adobe Town WSA)	Size	yes
Does the area generally appear to be affected primarily by the forces of nature? Is the imprint of man substantially unnoticeable?	Naturalness	yes - in northern half
Does the area have outstanding opportunities for solitude and/or a primitive and unconfined type of recreation?	Solitude and/or Unconfined Recreation	yes
Does the area contain supplemental values? (Wild horses, artifacts)	Supplemental Values	yes
Conclusion: The area has wilderness character.		**Yes**

Inventory Area: D	Criteria	Yes/no
Acreage meets size requirements? (Approximately 7,539 acres and contiguous with Adobe Town WSA)	Size	yes
Does the area generally appear to be affected primarily by the forces of nature? Is the imprint of man substantially unnoticeable?	Naturalness	yes
Does the area have outstanding opportunities for solitude and/or a primitive and unconfined type of recreation?	Solitude and/or Unconfined Recreation	yes
Does the area contain supplemental values? (Wild horses, artifacts)	Supplemental Values	yes
Conclusion: The area has wilderness character.		**Yes**

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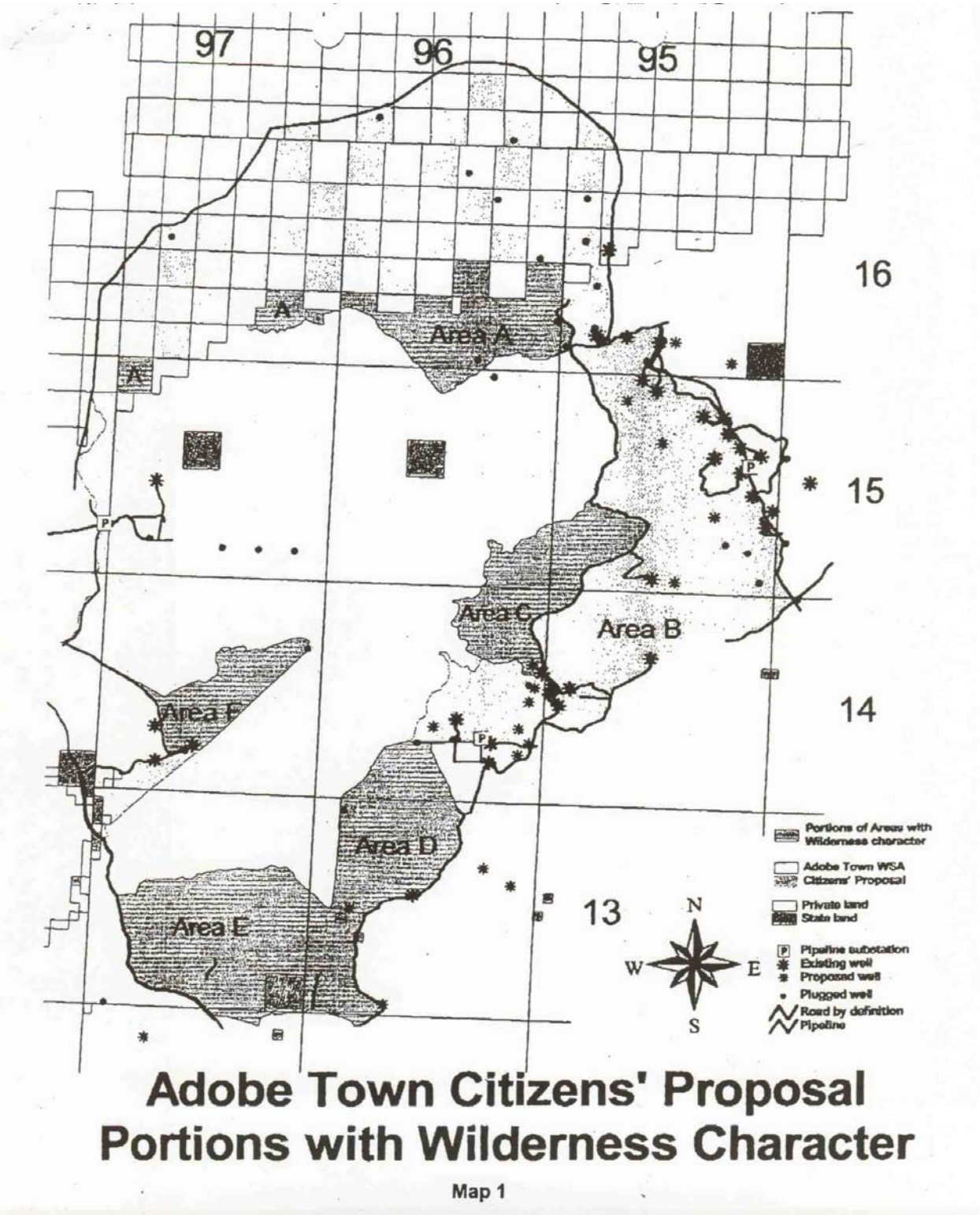
Inventory Area: E	Criteria	Yes/no
Acreage meets size requirements? (Approximately 13,344 acres and contiguous with Adobe Town WSA)	Size	yes
Does the area generally appear to be affected primarily by the forces of nature? Is the imprint of man substantially unnoticeable?	Naturalness	yes
Does the area have outstanding opportunities for solitude and/or a primitive and unconfined type of recreation?	Solitude and/or Unconfined Recreation	yes
Does the area contain supplemental values? (Wild horses, artifacts)	Supplemental Values	yes
Conclusion: The area has wilderness character.		**Yes**

Inventory Area: F	Criteria	Yes/no
Acreage meets size requirements? (Approximately 5,296 acres and contiguous with Adobe Town WSA)	Size	yes
Does the area generally appear to be affected primarily by the forces of nature? Is the imprint of man substantially unnoticeable?	Naturalness	yes - in NE half
Does the area have outstanding opportunities for solitude and/or a primitive and unconfined type of recreation?	Solitude and/or Unconfined Recreation	yes - in NE half
Does the area contain supplemental values? (Wild horses, artifacts)	Supplemental Values	yes
Conclusion: The area has wilderness character.		**Yes**



Adobe Town Citizens' Proposal
Portions with Wilderness Character

Map 1

Appendix 7

OSTS_00079

H-6310-1-WILDERNESS INVENTORY AND STUDY PROCEDURES

Inventory Area Evaluation

Name & No. WY-030/040-Kinney Rim North

I. DESCRIPTION:

This unit is comprised of 90.901 acres of BLM-administered public lands located in T.13, 14, 15, and 16 N., R. 98, 99, 100, and 101 W. The area is located approximately 45 miles southeast of Rock Springs in south-central Sweetwater County, Wyoming. The area includes badlands, buttes, rims, flats, and basins. Major geological features include Kinney Rim and Rifes Rim. The landscape is primarily rangelands vegetated by sagebrush, grasses, saltbush, greasewood, and junipers, with occasional cottonwoods and willows along drainages.

Major human uses of the area include livestock grazing management, oil and gas exploration and development, and big game hunting in the fall.

II. Wilderness Character Analysis:

A. Size
Approximate Acres:

Inventory area= 91,120 acres of BLM administered lands (130,689 total acres)

Subunit(s) A= Checkerboard- 31,750 acres of BLM
B= 59,370 acres of BLM

Contiguous WSA (or other lands with wilderness character) No

Narrative: The Kinney Rim North Inventory Area was broken into two subunits to incorporate the checker board land pattern and solid block BLM- administered lands.

Area A:

Narrative: This sub-unit lacks 5,000 acres of contiguous public lands because of the alternating sections of private and public lands in a checkerboard land pattern.

Summary: 1. Does the area have at least 5,000 acres of contiguous land or is it of sufficient size to make practical its preservation and use in unimpaired condition?

YES _____ NO __X__

NAME & NO. WY-030/040-Kinney Rim North

Area B-

Narrative: This sub-unit clearly has sufficient size as to make practical its preservation and use in an unimpaired condition and of size suitable for wilderness management.

Summary: 1. Does the area have at least 5,000 acres of contiguous land or is it of sufficient size to make practical its preservation and use in unimpaired condition?

YES X NO _____

B. Naturalness

Area A-

Narrative: This sub-unit does not meet the size criteria due to lack of contiguous Federal lands therefore naturalness will not be evaluated.

Area B-

Narrative: Evidence of man's activities is found throughout this sub-unit. An improved road leading to an oil and gas well is located in the northwest portion of the area in R 101 W., T. 14 & 15 N. This improved road totals one and a half miles. Another improved access road leading to oil and gas wells is found in the middle of the area located in R. 100 W., T. 14 N. This improved road totals approximately 5 ½ miles. There is an improved County Road (4-77) leading to private land in T. 14 N., R. 101 W. This improved road is approximately one mile long. There are 12 plugged and abandoned gas wells with differing success on well pad and road reclamation. There is evidence of 8 old seismic lines that creates linear intrusions upon the landscape. There are 13 livestock reservoirs located in the sub-unit. There are four livestock water wells located in the sub-unit. There are 10 producing oil and gas wells in the area. There is a horse trap located in Section 8, R. 99 and T. 14 N.

Summary: Does the area generally appear to have been affected primarily by the forces of nature, with the imprint of people's work substantially unnoticeable?

YES _____ NO X

NAME & NO. WY-030/040-Kinney Rim North

C. Outstanding Opportunity for Solitude or Primitive and Unconfined Recreation

1. Solitude

Area A:

Narrative: This sub-unit does not meet the size criteria due to lack of contiguous Federal lands therefore solitude will not be evaluated.

Area B:

This sub-unit lacks outstanding opportunities for solitude because most of the area lacks topographic and vegetative screening to shield user activities from one another.

The sub-unit is bounded by a State Highway on the western boundary, an improved County Road on the southern boundary, and the checkerboard land pattern configuration on the north boundary. The outside influences of man in the form of vehicular traffic and lack of lack of land management controls on private land could influence solitude within the northern part of this sub-unit.

Access to producing oil and gas wells on existing improved roads within the sub-unit impacts the user's ability to escape the sights and sounds of man. The northern portion of the Vermillion Basin Oil and Gas project lies throughout the middle of this area. Activities from oil and gas development would impede upon one's ability to find solitude.

Summary: Does the area have outstanding opportunities for solitude?

YES _____ NO X_____

2. PRIMITIVE AND UNCONFINED RECREATION

AREA A:

Narrative: This sub-unit does not meet the size criteria due to lack of contiguous Federal lands therefore the primitive and unconfined recreation characteristics will not be evaluated.

NAME & NO. WY-030/040-Kinney Rim North

AREA B:

Narrative: This sub-unit does not possess outstanding opportunities for a primitive and unconfined type of recreation because the area lacks the diversity of possible activities and does not possess one activity of outstanding quality. The area is typical Wyoming rangeland with a lack of intrinsic features such as unique topographic features or diverse vegetation types. The quality of primitive and unconfined recreation opportunities is influenced by man's past and current activities in the form of livestock improvements and oil and gas developments.

Summary: Does the area have outstanding opportunities for a primitive and unconfined type of recreation?

YES _____ NO __X__

D. Supplemental Values

Area A:

Narrative: This sub-unit does not meet the size requirement due to lack of contiguous Federal land therefore the supplemental value characteristics will not be evaluated.

Area B:

Narrative: This area contains remnants of the historic Cherokee Trail and wild horses from the Salt Wells Wild horse Herd Management Area.

Summary: Does the area contain ecological, geological, or other features of scientific, educational, scenic, or historical value?

YES __X__ NO _____

NAME & NO. WY-030/040-Kinney Rim North

III. SUMMARY:

AREA A:

Results of wilderness character analysis:

1. Does the area meet any of the size requirements? _____Yes X____No

The wilderness characteristic inventory for Area A stopped at this point due to the lack of 5,000 acres of contiguous public lands criteria.

AREA B:

Results of wilderness character analysis:

1. Does the area meet any of the size requirements? X Yes _____ No
2. Does the area appear to be natural? _____ Yes X____ No
3. Does the area offer outstanding opportunities for solitude or a primitive and unconfined type of recreation? __Yes X____ No
4. Does the area have supplemental values? X____ Yes _____ No

Area A:

IV. Conclusion:

Check one:

_____ The area or apportion of the area has wilderness character.

X_____ The area does not have wilderness character.

NAME & NO. WY-030/040-Kinney Rim North

V. Prepared BY: Andy Tenney

Title: Outdoor Recreation Planner Date: 09/23/02

VI. Approved BY:

Title: Rock Springs Field Manager Date: _____

Approved BY:

Title: Rawlins Field Manager Date: _____

Area B:

IV. Conclusion:
Check one:

_____ The area or apportion of the area has wilderness character.

X_____ The area does not have wilderness character.

V. PREPARED BY: Andy Tenney

Title: Outdoor Recreation Planner Date: 9/23/02

VI. Approved BY:

Title: Rock Springs Field Manager Date: _____

Approved BY:

Title: Rawlins Field Manager Date: _____

Inventory Area Evaluation

Name: Kinney Rim North (including parts of Kinney Rim South Located in the Vermillion Basin Oil and Gas Project Area)

DESCRIPTION:

This Unit is comprised of 100,930 acres of BLM administered public lands. The area is located 45 miles southeast of Rock Springs in south-central Sweetwater County, Wyoming. The area includes badlands, buttes, rims, flats, and basins. Major geological features include Kinney Rim and Rifes Rim. The landscape is primarily open undisturbed rangelands vegetated by sagebrush, grasses, saltbush, and greasewood, with occasional cottonwoods and willows along drainages.

The major use of the area is livestock grazing, oil and gas exploration and development, and big game hunting in the fall.

II. Wilderness Character Analysis:

A. Size

Approximate Acres:

Inventory area= 100,930 acres of BLM administered lands
Subunit(s) A= Checkerboard- 34,921 acres of BLM, 37,003 acres of Private and State
B= 43,525 acres of BLM
C= Vermillion Basin Oil and Gas Project Area- 22,484 acres of BLM (12,455 acres in Kinney Rim North, 10,029 acres in Kinney Rim South)

Contiguous WSA (or other lands with wilderness character) No

Narrative: The Kinney Rim North Inventory Area was broken into three subunits to incorporate the checker board land pattern, solid block BLM lands, and the Vermillion Basin Oil and Gas Project area which includes 10,029 acres of the Kinney Rim South Inventory Area.

SUMMARY

Area A: 1. Does the area have at least 5,000 acres of contiguous land or is it of sufficient size to make practical its preservation and use in unimpaired condition?

YES NO X

Area B-
1. Does the area have at least 5,000 acres of contiguous land or is it of sufficient size to make practical its preservation and use in unimpaired condition?

YES X NO

This sub-unit contains 34,921 acres of BLM administered lands that have the basic minimal roadless characteristics.

Area C-

1. Does the area have at least 5,000 acres of contiguous land or is it of sufficient size to make practical its preservation and use in unimpaired condition?

YES NO X

Area C meets the size requirement but does not meet the roadless requirement. Crowned and ditched maintained roads leading to oil and gas wells are found throughout this unit.

B. Naturalness

Area A-

Does not meet the size criteria due to lack of contiguous Federal lands therefore naturalness will not be evaluated.

Area B-

Narrative: Generally, this area appears to have been affected by the forces of nature. However, there are staked access roads that will be upgraded to maintained roads leading to oil and gas drilling activity that could affect this determination. The staked roads are located in R. 101 W., T. 14 & 15 N., and R. 99 W., T. 14 N.. There is also an existing improved road located in R. 100 W., T. 14 N. There are livestock improvements in this area but they remain subordinate on the landscape. The area has large amount of oil and gas leases that are a valid existing right and could affect the naturalness component of this unit.

2. Does the area generally appear to have been affected primarily by the forces of nature, with the imprint of people's work substantially unnoticeable?

YES X NO

Area C-

Narrative: Evidence of man's past and present activities dominate much of the area's landscape. These intrusions include producing oil gas wells, plugged and abandoned oil and gas wells, improved roads to oil and gas wells, and livestock reservoirs.

In the Kinney Rim North part of this unit there are 8 livestock reservoirs, 4 plugged and abandoned oil and gas wells, one producing oil and gas well with a major road leading to it, splitting this unit in half. Another improved road is located in the unit. The majority of the area is leased for oil and gas which could mean there will be additional disturbance in the future such as wells, improved roads, and pipelines.

In the Kinney Rim South portion of this unit, there are parts of two producing oil and gas units with active wells and improved roads leading to them. There are 8 livestock reservoirs located in this portion of the unit. There are 4 producing oil and gas wells located outside the units which have improved access roads leading to them.

2. Does the area generally appear to have been affected primarily by the forces of nature, with the imprint of people's work substantially unnoticeable?

YES NO X

C. Outstanding Opportunity For Solitude Or Primitive And Unconfined Recreation

1. Solitude

Area A:

Narrative: Does not meet the size criteria due to lack of contiguous Federal lands therefore solitude will not be evaluated.

Area B:

Narrative: The area in its present condition contains enough size, topographic screening, and vegetative screening for a user to find a secluded spot. However, the development of existing oil and gas leases could affect these features in the future.

Does the area have outstanding opportunities for solitude?

YES X NO

Area C:

Narrative: This area lacks topographic and vegetative screening to allow a user to a find a secluded spot outside the sights and sounds of man because of the high oil and gas activity in this area.

Does the area have outstanding opportunities for solitude?

YES _ NO X

2. Primitive and Unconfined Recreation

Area A:

Narrative: Does not meet the size requirement due to lack of contiguous Federal land therefore the Primitive and Unconfined Recreation chacteristics will not be evaluated.

Area B:

Narrative: Horse back riding occurs in the area but the evaluation team did not consider this unit to be "outstanding" quality based on the opinion that it is typical Wyoming rangeland,

with typical topographic features. There is also a lack of diversity of primitive and unconfined recreation opportunities in this unit.

Does the area have outstanding opportunities for a primitive and unconfined type of recreation?

YES NO X

Area C:

Narrative: Primitive and Unconfined types of recreation could occur in this unit but would not possess the outstanding quality because of the influence man's activities in the form of oil and gas and livestock improvements.

Does the area have outstanding opportunities for a primitive and unconfined type of recreation?

YES NO X

D. Supplemental Values

Area A:

Narrative: Does not meet the size requirement due to lack of contiguous Federal land therefore the supplemental value chacteristics will not be evaluated

Area B:

Narrative: This area contains remnants of the Cherokee Trail and wild horses from the Salt Wells Wild horse Herd Management Area.

Does the area contain ecological, geological, or other features of scientific, educational, scenic, or historic values?

YES X NO

Area C:

Narrative: This area contains remnants of the Cherokee Trail and wild horses from the Salt Wells Creek Herd Management Area.

Does the area contain ecological, geological, or other features of scientific, educational, scenic, or historic values?

YES X NO

III. SUMMARY:

Results of wilderness character analysis:

AREA A:

1.	Does the area meet any of the size requirements?		Yes	X	No

No further evaluation needed.

AREA B:

1.	Does the area meet any of the size requirements?	X	Yes		No
2.	Does the area appear to be natural?	X	Yes		No
3.	Does the area offer outstanding opportunities for solitude? Or a primitive and unconfined type of recreation?	X	Yes		No
4.	Does the area have supplemental values?	X	Yes		No

AREA C:

1.	Does the area meet the any of the size requirements?	X	Yes		No
2.	Does the area appear to be natural?		Yes	X	No
3.	Does the area offer outstanding opportunities for solitude Or a primitive and unconfined type of recreation?		Yes	X	No
4.	Does the area have supplemental values?	X	Yes		No

IV. CONCLUSION
Check one:

AREA A:

The area or a portion of the area has wilderness character.

X The area does not have wilderness character.

AREA B:

X The area or a portion of the area has wilderness character.

The area does not have wilderness character.

AREA C:

The area or a portion of the area has wilderness character.

X The area does not have wilderness character.

Appendix 8

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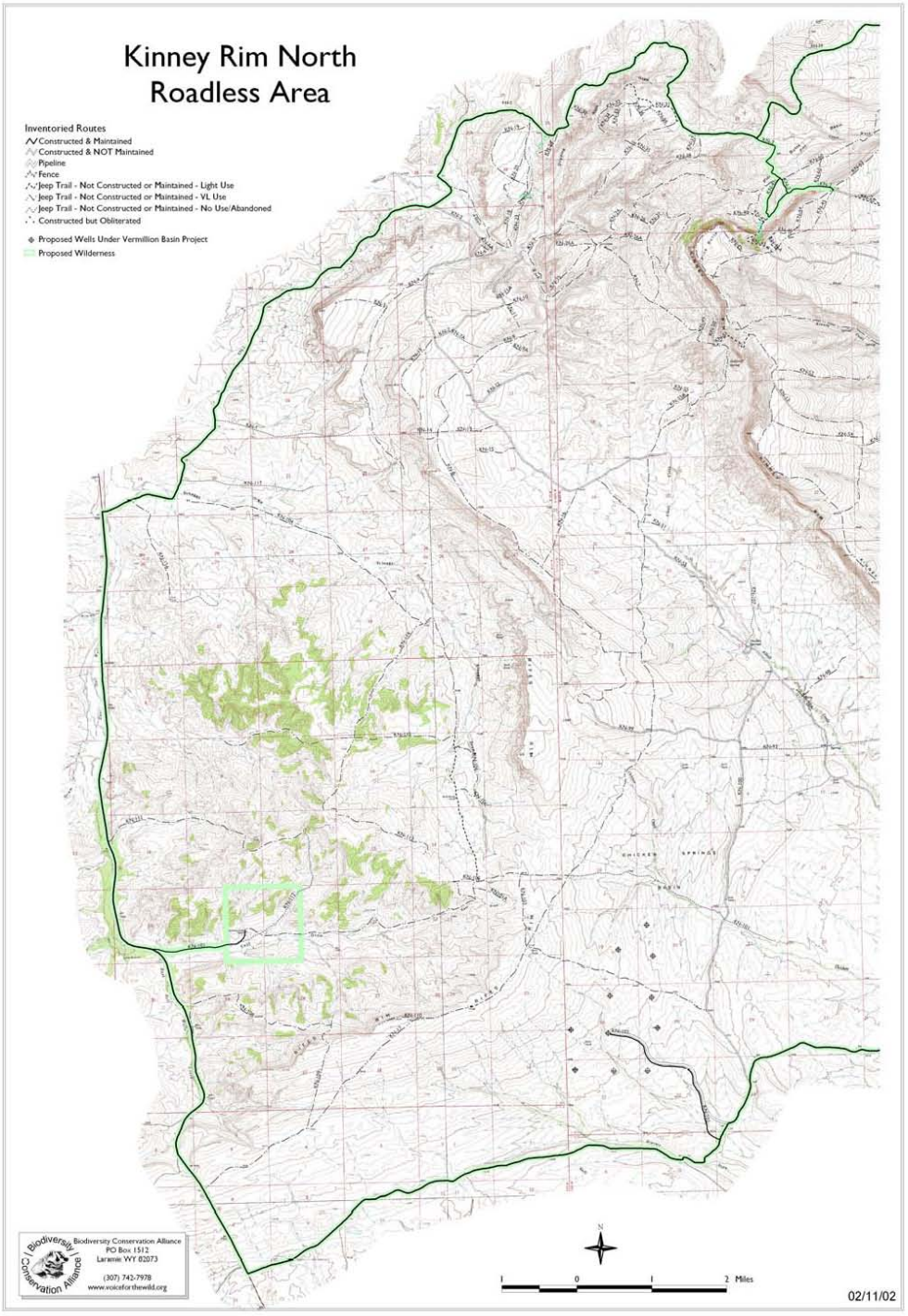

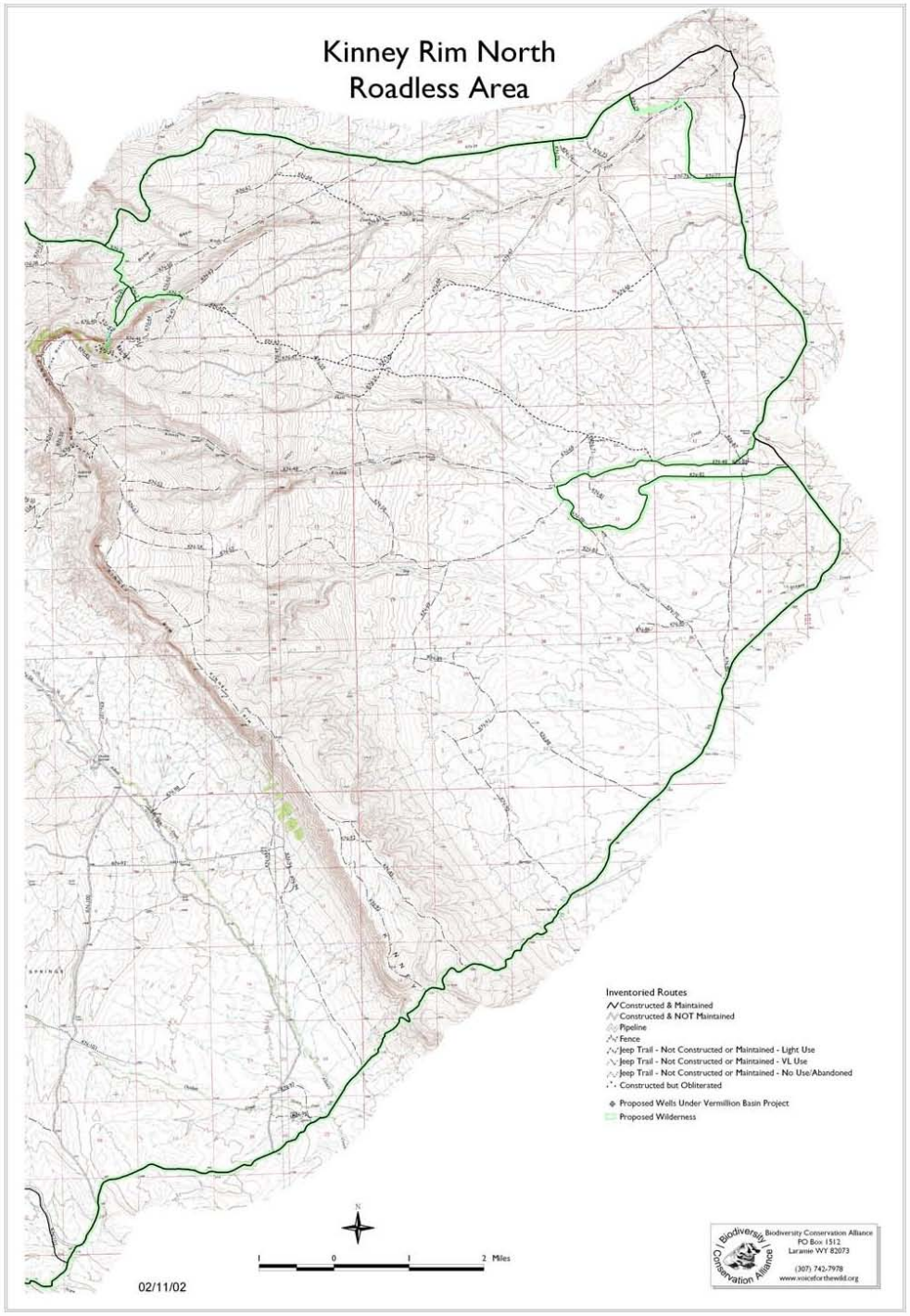
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Roadless Area
Inventoried Routes
Constructed & Maintained
Constructed & NOT Maintained
Pipeline
Fence
Jeep Trail - Not Constructed or Maintained - Light Use
Jeep Trail - Not Constructed or Maintained - VL Use
Jeep Trail - Not Constructed or Maintained - No Use/Abandoned
Constructed but Obliterated
Proposed Wells Under Vermillion Basin Project
Proposed Wilderness
N
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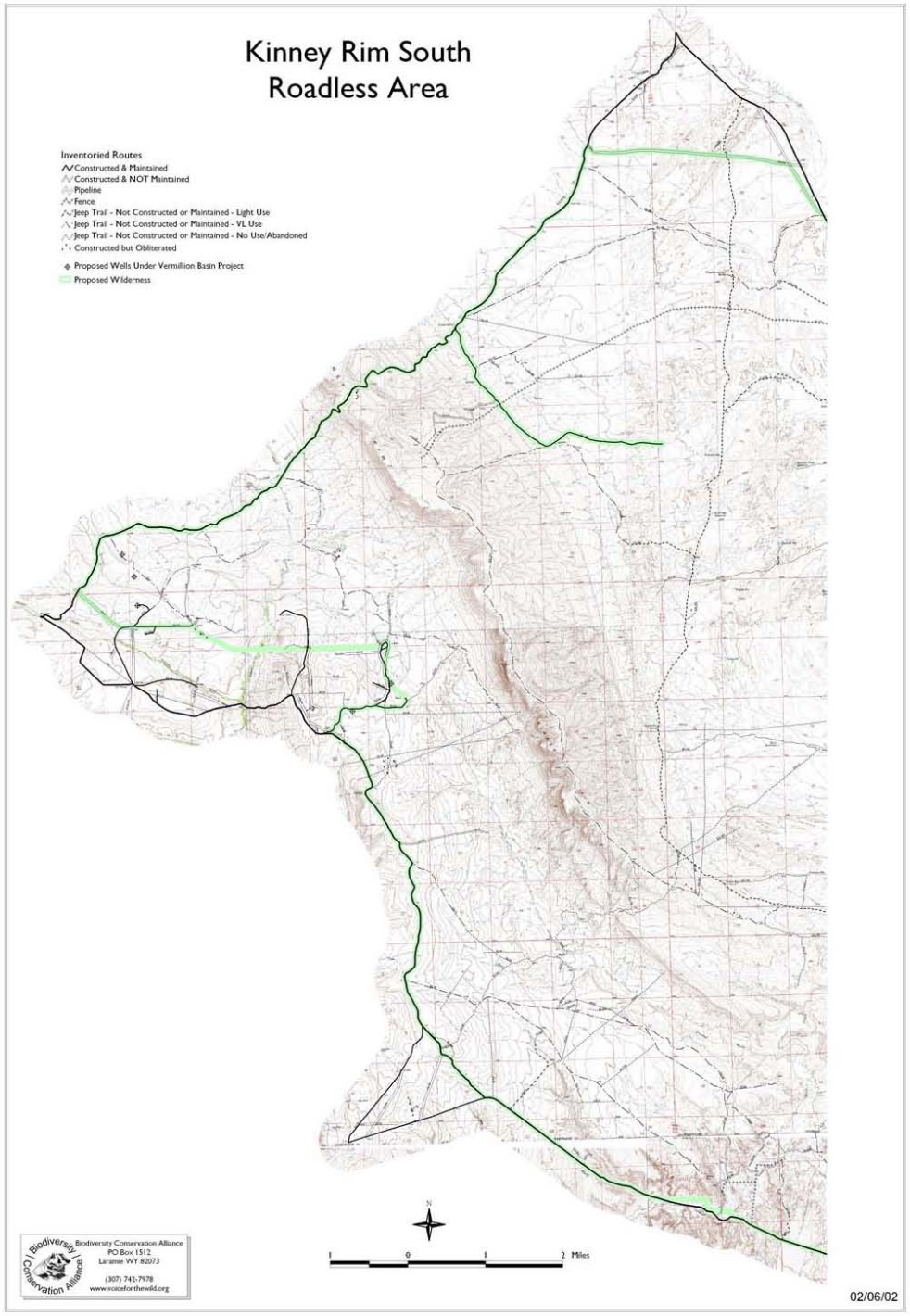
2 Miles
02/11/02
Biodiversity Conservation Alliance
PO Box 1512
Laramie WY 82073
(307) 742-7978
www.voiceforthewild.org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Jeep Trail - Not Constructed or Maintained - Light Use
Jeep Trail - Not Constructed or Maintained - VL Use
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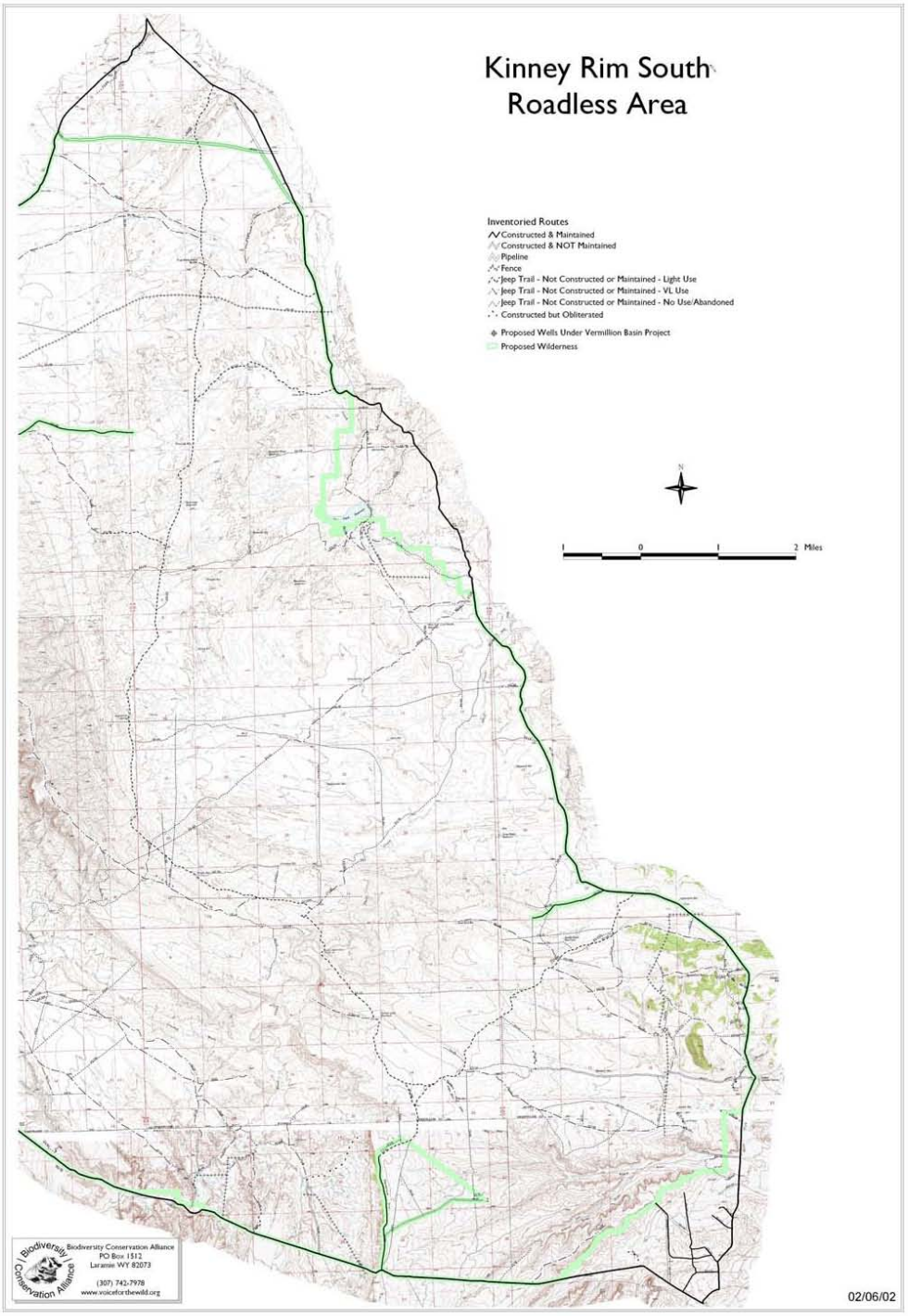
02/06/02


Kinney Rim South
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Proposed Wells Under Vermillion Basin Project
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Appendix 9

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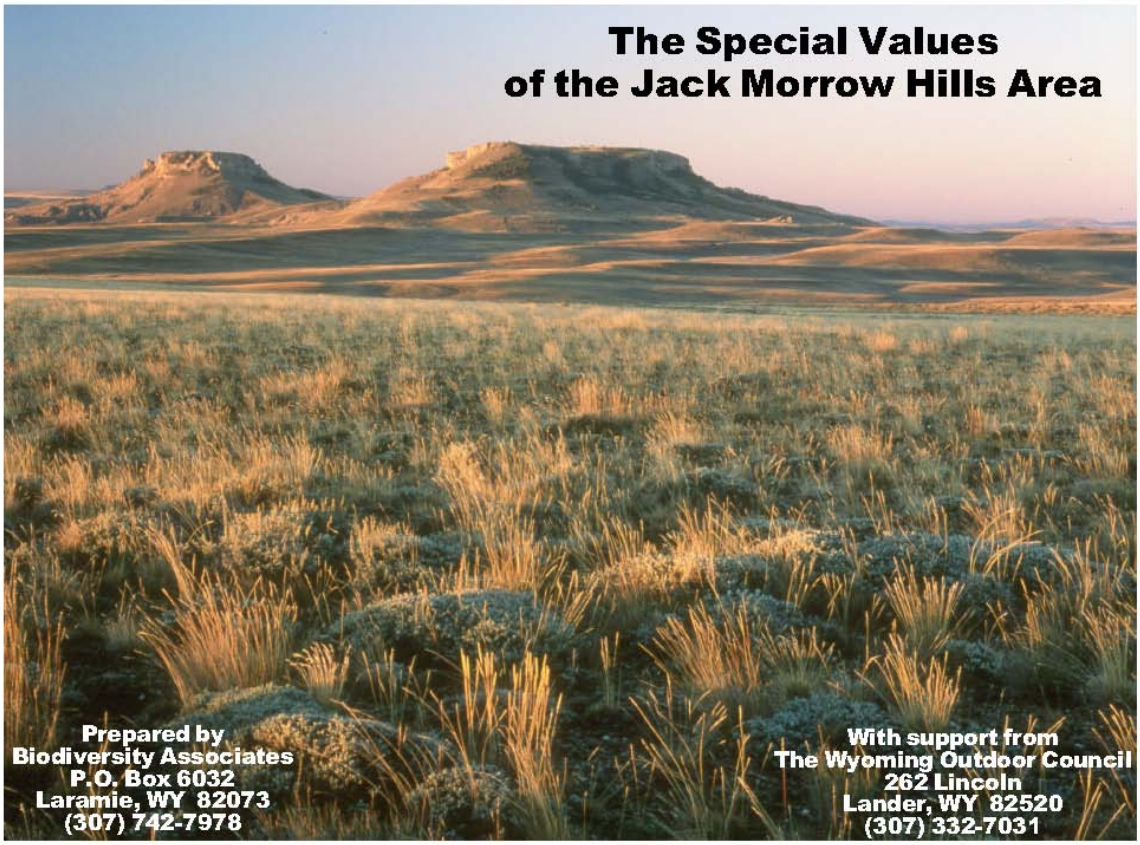


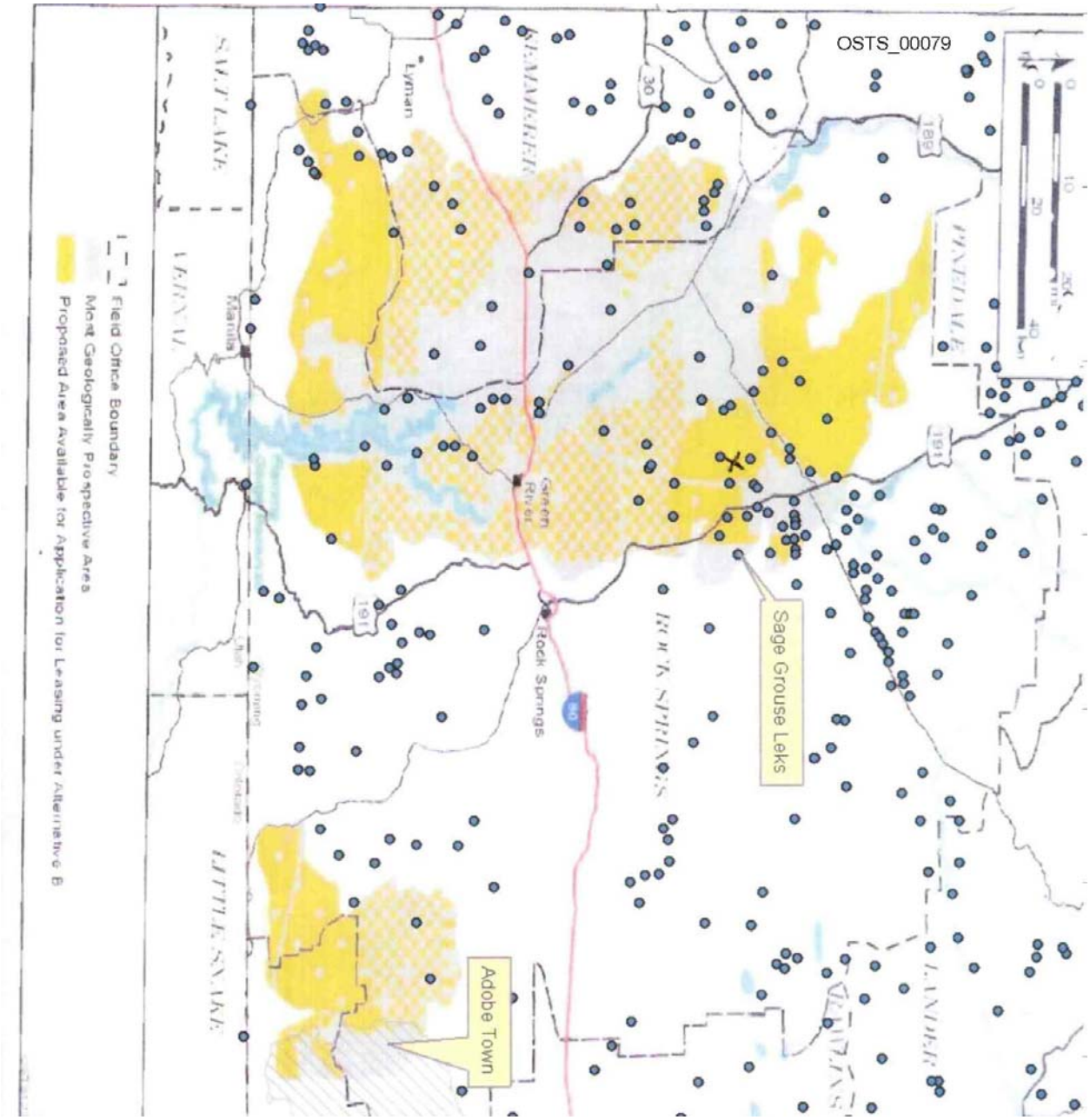
Note: This is the fourth version of *The Special Values of the Jack Morrow Hills Area*, completed February 1, 2001. This version differs slightly from the original version submitted with the Citizens' Red Desert Protection Alternative:

- typographical errors have been corrected
- the page orientation for the narrative has been changed to make it easier to read the maps
- narrative has been added to or changed slightly in these sections: Important Big Game Habitat, Sage Grouse and Mountain Plover, Raptors, Animals of Special Concern, Rare Plants, WSAs and Potential Wilderness, and Threats to Special Values
- map colors have been corrected in the Waters, Wetlands, & Watersheds of Concern map
- several photos have been added (no photos were in the first version), and
- a "summary of special values" foldout map has been added.

This report was written and produced by Biodiversity Associates. Financial support was provided by the Wyoming Outdoor Council, Peradam Foundation, The Wildlands Project, National BLM Wilderness Campaign, and individual donors. Thanks to Wild Utah Project for help with the roadless area inventory. We would also like to gratefully acknowledge GIS hardware and software donations from the Conservation Technology Support Program (CTSP) and ESRI Inc.'s Environmental Conservation Program (ECP).

Cover Photograph of Oregon Buttes by Scott Smith.

Appendix 10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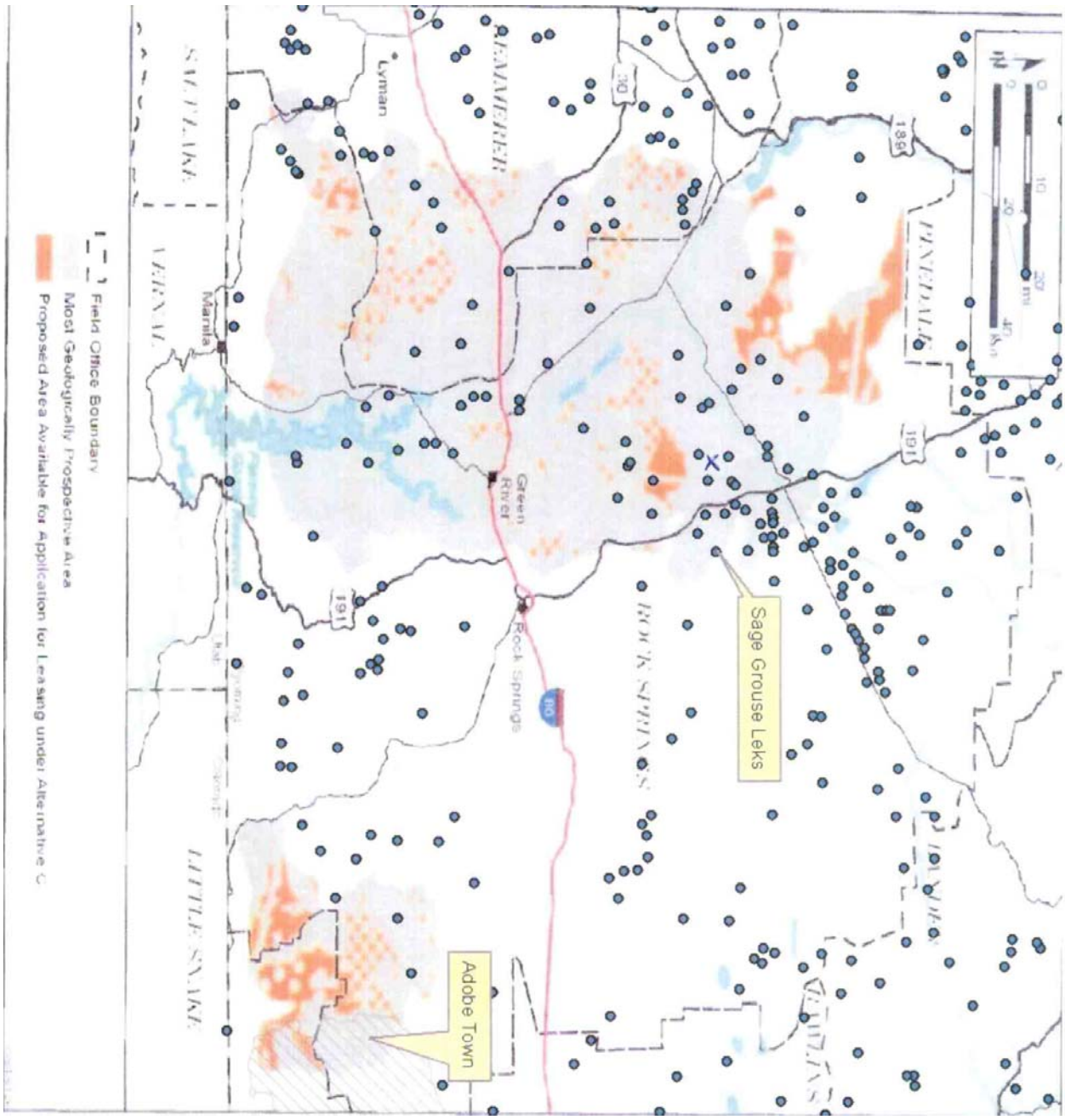
Green River
Rock Springs
Sage Grouse Leks
Adobe Town
Field Office Boundary
Most Geologically Prospective Area
Proposed Area Available for Application for Leasing under Alternative B


Lyman
Green River
Rock Springs
Manila
Sage Grouse Leks
Adobe Town
Field Office Boundary
Most Geologically Prospective Area
Proposed Area Available for Application for Leasing under Alternative C

Appendix 11

Wyoming Pocket Gopher

Thomomys clusius

***Identifiers:**[1]

Integrated Taxonomic Information System Serial Number: 180224

Global Biodiversity Information Facility Taxon Key: 241778

Natural Heritage Network Species Identifier: AMAFC01050

Species2000 Name Code: ITS-180224

Zipcode Zoo Species Identifier: 16729

*Last Revised June 25, 2007

In the Office of Endangered Species

U.S. Fish and Wildlife Service

United States Department of Interior

Petition to the U.S. Fish and Wildlife Service to List the Wyoming Pocket Gopher (*Thomomys clusius*) as an Endangered or Threatened Species Under the Endangered Species Act, 16 U.S.C. § 1531 et Seq. (1973 as amended), and to Designate Critical Habitat.

Submitted

August 7, 2007

Via

Email w/Return Receipt Request

USPS Certified

Fax

[1] ZipcodeZOO.com: http://zipcodezoo.com/Animals/T/Thomomys_clusius.asp

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and via invoking the Freedom of Information Act

Bureau of Land Management , U.S. Fish and Wildlife Service, and U.S.D.A. National Forest Service

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I. Introduction

Biodiversity Conservation Alliance, Center for Native Ecosystems, Duane Short, and Erin Robertson hereby petition the Secretary of the Interior and the U.S. Fish and Wildlife Service (FWS) for a rule to list the Wyoming pocket gopher (*Thomomys clusius*) as Threatened or Endangered within its known historic range under the Endangered Species Act (ESA) pursuant to the ESA, 16 U.S.C. § 1531, *et seq.* and regulations promulgated thereunder, and the Administrative Procedure Act, 5 U.S.C. § 553(e), and for the designation of Critical Habitat. Pursuant to 16 U.S.C. §§ 1533(b)(1)(c)(iii) and 1533(b)(7) and 50 C.F.R. § 424.20, .

Petitioners further petition the Secretary and FWS to promulgate a rule listing *T. clusius* on an emergency basis due to significant risks to the well being of this species, as discussed below. *Thomomys clusius* is endemic to Wyoming and thought to exist currently in only a few locations in Carbon and Sweetwater Counties (Keinath and Beauvais 2006). Historical population and distribution records are unreliable due to taxonomic confusion that persisted prior to more recent advances in genetic profiling (Keinath and Beauvais 2006) but by all scientific accounts *T. clusius* is known to exist in an extremely limited range and in very low numbers.

The Wyoming Natural Diversity Database (Keinath and Beauvais 2006), likely the most comprehensive database for *T. clusius* in existence, states that only 21 individuals have been positively identified in recent surveys. *Thomomys clusius* has extremely limited distribution in an area degraded by grazing, poisoning and herbicide applications, oil and gas development, and effects of global warming on temperature and ultraviolet light sensitive and drought intolerant vegetation. The few surviving

populations of this species are in imminent danger of being extirpated by future development disturbance. Immediate listing is essential for the continued existence of this species.

A central purpose of the ESA is to "provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved…" (16 U.S.C. § 1531(b)). Pocket gophers are considered keystone species and keystone engineers. They have disproportionate effects on the species composition of ecosystems and must be preserved in order to maintain the integrity of the very ecosystems in which they exist. By listing *T. clusius* under the ESA, FWS will provide needed protections to these ecosystems and the other species that inhabit them.

This petition provides sufficient information to demonstrate that the petitioned actions are warranted. *Thomomys clusius* meets the definition of an Endangered species as defined by the Act.

Wyoming pocket gophers, due their historically restricted range, are seriously threatened by land management practices that allow even slight alteration to the natural order of a landscape that best available science has concluded is essential to their survival as a species. Throughout its small range, the Wyoming pocket gopher is vulnerable to catastrophic population declines and range shrinkage due to habitat encroachment and destruction. Federal land managers are not actively conserving known *T. clusius* colonies (Keinath and Beauvais 2006). Destruction of habitat and potential habitat continues in rural areas, primarily from expanding oil and gas development (existing and proposed).

Threats to Wyoming pocket gophers clearly exist all around and throughout its limited and already fragmented ecosystem. Chief among these threats is oil and gas development that is slated for the entire known Wyoming pocket gopher range (See **Attachment D**, **Map 1**). The Wyoming pocket gopher is possibly a keystone species in that it creates and sustains limited but essential habitat for members of phyla annelida, arthropoda, mollusca, nematoda, nemertea, and platyhelminthes (all foundation or primary species of the *T. clusius* ecosystem and its food chain). *T. clusius* also serves as prey to raptors, reptiles, and mammals. As Wyoming pocket gophers decline so, too, do members of numerous phyla. Insects, birds, reptiles, amphibians, and carnivores that benefit from, and in some unknown cases may require, the keystone habitat provided by the burrowing Wyoming pocket gopher. These interdependent species, until proven otherwise, should also be considered at risk if *T. clusius* is not protected. While most efforts to document *T. clusius* range have been limited to federal lands it is prudent for the Service to consider the potential for *T. clusius* threats, including habitat loss, on private lands as well. The Safe Harbor policy relies on the "enhancement of survival" provisions of 16 U.S.C. § 1539(a)(1)(A) rather

than the HCP provisions of 16 U.S.C. § 1539(a)(1)(b) even though the two are closely related (64 Fed. Reg. 32706. June17, 1999).

The signatories of this document understand and agree with the following statement. The fact that the Wyoming pocket gopher (*T. chusius*) is largely "out-of-sight, out" must not be interpreted by the U.S. Fish and Wildlife Service or any other federal agency, department, bureau, or instrumentality thereof as being "out of mind" and, therefore, of lesser significance than any other given more *charismatic* species.

It should be noted at this point that the Wyoming Natural Diversity Database has provided nearly all of the peer-reviewed scientific literature cited in this petition. (**See Attachment C**). With great appreciation to Wyoming Natural Diversity Database (WYNDD), Biodiversity Conservation Alliance is conveying WYNDD's work in terms of literatures searches, laboratory investigations, and on the ground efforts to further understand *T. chusius*. Biodiversity Conservation Alliance also acknowledges, with great appreciation, the body of peer reviewed scientific literature supplied by our co-petitioner, Center for Native Ecosystems, located in Colorado (Center for Native Ecosystems et al. 2003).

The petitioners for the purpose of this specific petition did not seek, as is often the custom, signatures from each state of the United States of America to symbolize a broad scope of support for the diligent protection of the Wyoming pocket gopher (*T. chusius*). Nor did the petitioner and co-petitioner seek to find and present a long list of scientists, conservation organizations, and others to show a broad and deep base of support for our petition. The Wyoming pocket gopher is quite possibly North America's rarest mammal and more likely the least known. Rivaled perhaps only by mammals such as bats, skunks, rats, and our nation's only marsupial, the ubiquitous opossum, the Wyoming pocket gopher, among the few who are aware of its existence, suffers from a palpable lack of charisma.

To the U.S. Fish and Wildlife Service its utter lack of charisma and present insufficient scientific understanding of *T. chusius* represents neither legal, social, ethical, or scientific cause to reject this petition. The discussion below (Buck, et al. 2005) is available online at:
http://www.ncseonline.org/NLE/CRSreports/05apr/IB10144.pdf

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Use of "Sound Science". The ESA requires that decisions to list a species be made "solely on the basis of the best scientific and commercial data available...." (See CRS Report RL31546, *The Endangered Species Act and Science: the Case of Pacific Salmon*,

by Eugene H. Buck, et al.) In several recent situations, legal, economic, and social disputes have resulted from actions taken to list, protect, and recover species under the ESA. Recent examples of these controversies have concerned the Canada lynx, Florida panthers, and Klamath River Basin suckers and coho salmon. Critics in some of these disputes suggest that the science supporting ESA action has been insufficiently rigorous or mishandled by the agencies.

A major issue is how the FWS and NMFS are to proceed when the "available" data are not extensive. Under current law and agency interpretations, a margin of safety is provided dwindling species pending completion of additional studies. Some suggest that considerations other than species conservation should prevail; others seek to change the current posture of the law by changing the role of "science." For others, recent bills are seen as an attempt to undermine the ESA, which they see as having struck a reasonable balance, and they question whether an amendment concerning science is advisable or practical. These considerations are complicated by the costs and time required to acquire more complete data, particularly in connection with many lesser-known species. Many rare and endangered species are little studied because they are hard to find or because it is difficult to locate enough of them to support scientific research. There may be little information on many species facing extinction, and only limited personnel or funds available to conduct studies on many of the less charismatic species, or those of little known economic import. What should be done in such instances?

The ESA does not elaborate on this question, but some argue that, combining the protective purpose of the ESA — to save and recover species — with the wording of "best ... data *available*," arguably dwindling species are to be given the benefit of the doubt and a margin of safety provided. This is the position taken in the *FWS Handbook* at pages 1-6, which states that efforts should be made to develop information, but if a biological opinion must be rendered promptly, it should be based on the available information, "giving the benefit of the doubt to the species," with consultation possibly being reinitiated if additional information becomes available. This phrase is drawn from (H. Rept. 1979 96-697, p. 12), which stated that the "best information available" language was intended to allow the FWS to issue biological opinions even when information was incomplete, rather than being forced to issue negative opinions. The report also states that if a biological opinion is rendered on the basis of inadequate

information, the federal agency proposing an action has the duty to show its actions will not jeopardize a species and a continuing obligation to make a reasonable effort to develop information, and that the statutory language "continues to give the benefit of the doubt to the species" (Buck et al. 2005).

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Precedent certainly exists that uncharismatic and poorly understood species have been listed as threatened or endangered based on the scientific facts of their circumstances or lack thereof. Below is an account of one representative "out of sight, out of mind" and "uncharismatic" species listed, first, as Threatened in 1997 and in 1988, as Endangered under the Endangered Species Act. (See **Attachment A**)

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Source: *Endangered and Threatened Species of the Southeastern United States (The Red Book)* FWS Region 4 -- As of 2/91. Also, available online at: http://www.fws.gov/endangered/i/e/sae1c.html

ALABAMA CAVEFISH

(*Speoplatyrhinus poulsoni*)

FAMILY: Amblyopsidae

STATUS: First listed as threatened on October 11, 1977 (42 Federal Register 45526); reclassified as Endangered (Federal Register, September 28, 1988).

DESCRIPTION AND REPRODUCTION: The Alabama cavefish is a blind, white, cave dweller distinguishable from other cavefish by its long, anteriorly-depressed head with flat snout, absence of bifurcate fin rays, notably incised fin membranes, and other features. The maximum known size is 58.3 millimeters standard length. This species' diet probably includes copepods, isopods, amphipods, and small cavefish.

Little information is available on the reproductive cycle of the Alabama cavefish. As their range becomes more restricted, most cavefish show a concurrent decrease in reproductive potential and population growth. However, the longevity of adult cavefish may increase. Of the small percentage of females which reproduce, only a few eggs are produced per female, and reproduction does not occur in some years. Because the Alabama cavefish is

endemic to only one cave, all of these life history features are probably more extreme in the Alabama cavefish than in some other amblyopsids.

RANGE AND POPULATION LEVEL: This species is apparently restricted to Key Cave, Lauderdale County, Alabama (Tennessee River drainage). Extensive surveys have been conducted in other area caves with no results. The caves west of Key Cave were inundated by Pickwick Lake. This species' former distribution is unknown. However, this species appears to be the rarest of all American cavefish and one of the rarest freshwater fish. (U.S. Fish and Wildlife Service 1985). Cooper (1985) estimated the Alabama cavefish population in Key Cave to be fewer than 1OO individuals. No more than 1O cavefish have ever been observed on a single visit.

HABITAT: Key Cave is a large multi-level cave with over 1O,OOO feet of mapped passage (Dept. of Interior 1988). Water depths may rise to about 2O feet in late spring (U.S. Fish and Wildlife Service 1985). This cave has a stable environment with low temperature and a lack of visible incident radiation. An underwater species, the Alabama cavefish is less affected by photoperiod and temperature changes within the cave than are surface species. However, seasonal flooding is necessary to trigger hormonal changes within the cavefish for growth and reproduction. Gray bat guano contributes essential nourishment for all species involved in Key Cave's food chain.

CRITICAL HABITAT: Key Cave in Lauderdale County, Alabama. More specific locality data for Federal agencies fulfilling their obligations under Section 7 of the Endangered Species Act can be obtained from the U.S. Fish and Wildlife Service, Post Office Drawer 119O, Daphne, Alabama 36526. Alabama Cavefish 2/91

REASONS FOR CURRENT STATUS: One of the primary threats is interference with the associated bat populations which indirectly contribute to the fish's food chain. Another serious threat is groundwater contamination from agricultural operations and a sewage disposal project for the City of Florence, Alabama. Most of Key Cave's recharge area is in row crops, and the sludge disposal project is also within the recharge area. Natural factors contributing to the vulnerability of this species are its small population size and low reproductive potential. Competition with the more numerous and agressive southern cavefish for food and space is also a problem. Cave crayfish, a known predator of this species, are also abundant in Key Cave.

MANAGEMENT AND PROTECTION: The Tennessee Valley Authority owns the two entrances to Key Cave, and has erected a fence to minimize human disturbance. Key Cave and nearby Bone Slough Cave have been mapped. Other needed measures include further research on the biology and distribution of the species; monitoring of the Key Cave population; and physicochemical monitoring of its habitat. Recovery efforts also need to be implemented or continued to protect the endangered gray bat, an essential link in the cave's ecosystem.

REFERENCES:

Cooper, John E. and R.A. Kuehne. 1974. Speoplatyrhinus poulsoni, a New Genus and Species of Subterranean Fish from Alabama. Copeia, No. 2, pp. 486-493.

Department of the Interior. U.S. Fish and Wildlife Service. September 28,

1988. Endangered and Threatened Wildlife and Plants: Reclassification of the Alabama Cavefish from Threatened to Endangered. Federal Register, 53:188. pp. 37968-3797O

Federal Register, Vol. 42, No. 175. September 9, 1977.

**U.S. Fish and Wildlife Service. 1985. Revised Recovery Plan for the Alabama Cavefish, Speolatyrhinus poulsoni Cooper and Kuehne 1974. Prepared by John E. Cooper, North Carolina Museum of Natural History. U.S. Fish and Wildlife Service, Atlanta, Georgia. 66 pp.

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This petition document reveals and, certainly, the Service's subsequent investigation will reveal, Wyoming pocket gopher (*Thomomys clusius*) shares a similar lack of scientific attention; a relatively equally limited range of critical habitat; a near total absence of protective measures by

private and public entities; and a risk of extinction equal to or greater than that which threatened, prior to its Listing, the now E.S.A. Endangered Alabama Cave Fish (*Speoplatyrhinus poulsoni*).

Perhaps the most revealing document is the document, prepared by Biodiversity Conservation Alliance for the National Wildlife Federation which reveals that the Wyoming pocket gopher (*T. clusius*) is not mentioned by the Bureau of Land Management as a species of concern nor does the Bureau recognize the existence or even possible existence of T. clusius in BLM lands, leased for oil and gas exploration and drilling, within or around the Great Divide which includes known T. clusius populations (Biodiversity Conservation Alliance. 2005)(also, **See Attachment F**).

This petition document's limited, but sound, scientific and strong legal bases for listing the Wyoming pocket gopher as an Endangered or Threatened species under the ESA. This petition announces a near absence of scientific literature concerning the ecology of *T. clusius*. Biodiversity Conservation Alliance FOIA requests of the Bureau of Land Management and USFWS each produced virtually no scientific literature on *T. clusius*. The U.S. Forest Service produced very limited information (See **Attachment B**). The glaring lack of life cycle, general ecological, and evolutionary knowledge about *T. clusius* combined with well accepted scientific knowledge of this species' severely and quite probably naturally limited range is more than sufficient to raise *T. clusius* to the level of Endangered Species Act consideration for listing as endangered or threatened. In two separate Forest Service Routt National Forest Small Mammal Inventory project proposals *T. clusius* is included. Both 2006 and 2007 proposals included the following as justification for the projects (USDA Forest Service 2006, 2007).

> *"Petitioners are requesting listing of the Wyoming pocket gopher under the Endangered Species Act as threatened or endangered and request the designation of critical habitat for this species. Best available scientific information and rapidly expanding oil and gas field development indicates at least a significant potential for rapid population declines and range shrinkage of T. clusius. Across their limited range, acreage occupied by Wyoming pocket gophers appears to have declined in less than a century. In short, T. clusius possesses intrinsic threats and faces rapidly intensifying extrinsic threats."*

In his *Description of the Proposal* Responsible Officer, Robert Skorkowsky also stated in both 2006 and 2007,

> "There are several Sensitive Species listed on the 2005 Regional Foresters Sensitive Species List for the Routt National Forest with little to no data. These obscure small mammals include the pygmy shrew (*Sorex hoyi*), fringed myotis (*Myotis thysanodes)*, Townsend's big-eared bat (*Plecotus townsendii)* and the Wyoming pocket gopher (*Thomomys clusius)*. The proposal is to conduct a systematic inventory on the Routt Forest to determine if and where these species occur. The project will also involve specific sampling at historic observation locations to determine if the species is still present at historic known locations." (USDA Forest Service 2006, 2007)

One emerging intrinsic threat adding impetus to the need to list and further study *T. clusius* is a pathophysiological threat from endoparasites (Todd and Lepp 1971). Because of research conducted in Park County Wyoming on the much more common Northern pocket gopher (*Thomomys talpoides*) it is incumbent upon the U.S. Fish and Wildlife Service to consider that Wyoming pocket gopher (*T. clusius*) populations are likely impacted by endoparasites, *Eimeria fitzgera/di and E. tizomomysis. In 1971* the finding of *E. thomomysis* in *T. talpoides* was deemed "evidently a new host and geographic record (Todd and Lepp 1971). This is evidently the only other record of larval tapeworms from *Thomomys.* The rare and obscure nature of *T. clusius* has precluded it from studies such as those conducted involving *T. talpoides* and other more common species of pocket gophers. Small population size, alone, is a fundamental threat to any given species and has long been recognized as such by biologists and even lay persons.

T. clusius populations are known to exist on ridge tops where, often, the Northern pocket gopher, *T. talpoides*, a more physically robust species, populates an area that essentially surrounds *T. clusius* habitat (Keinath and Beauvais 2006).

Anthropogenic sourced habitat destruction is also a very real threat to Wyoming pocket gophers, largely in the form of oil and gas operations on Bureau of Land Management (BLM) lands. (See Exhibit B - National Wildlife Federation and Biodiversity Conservation Alliance: Great Divide Special Values Report. March 2005.) Oil and gas exploration and extraction causes harm to Wyoming pocket gophers from habitat loss (especially from road-building) and human disturbance. While much of this leasing is occurring on federal lands, public land managers and those sworn to protect threatened and endangered species are categorically failing to do so. While this situation exists
in various degrees within agencies, departments, and other instrumentalities at federal, state, and local levels, recent Office of Inspector General investigations have concluded that responsible officials at high levels have manipulated science to delist or deny listing of species that are now being reviewed. This kind

of hostile political environment, alone, must be recognized for what it is, a threat to species at risk. Former Deputy Assistant Secretary for Fish and Wildlife and Parks, Julie MacDonald, resigned earlier this year in the wake of what could be an incriminating investigation by Department of Interior Inspector General, Earl E. Devaney. Devaney's report revealed a pattern of abuse of authority, intimidation of US Fish and Wildlife staff, and tampering with science used to determine whether plants and animals should be listed or delisted as threatened or endangered species under the Endangered Species Act (Devaney 2007) (See **Attachment G**).

The decline of *T. clusius* from historic levels, combined with the severe, multiple threats that currently face remaining populations, provide a sound biological basis for listing this species under the Endangered Species Act. In fact, Wyoming pocket gophers will likely have difficulty sustaining their populations due to their small numbers alone. Other anthropogenic threats compounding the impact of declining numbers and – poisoning, shooting, and rapid habitat destruction – must be addressed. Listing under the federal Endangered Species Act is the most effect way to address and harness these threats and alter their course to extinction, from one where Wyoming pocket gophers are essentially "out of sight and out of mind" to one which acknowledges their imperiled status and their important, if not keystone, role in native ecosystems.

> Section 424 of the regulations implementing the Endangered Species Act (50 C.F.R. § 424) is applicable to this petition. Subsections that concern the formal listing of the Wyoming pocket gopher as an Endangered or Threatened species are:
>
> 424.02(e) "Endangered species" means a species that is in danger of extinction throughout all or a significant portion of its range."…(k) "species" includes any species or subspecies that interbreeds when mature.
>
> "Threatened species" means a species that "is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range" (16 U.S.C § 1532(20)).
>
> 424.11(c) "A species shall be listed…because of any one or a combination of the following factors:
>
> 1. The present or threatened destruction, modification, or curtailment of habitat or range;

2. Overutilization for commercial, recreational, scientific, or educational purposes;
3. Disease or predation;
4. The inadequacy of existing regulatory mechanisms; and
5. Other natural or manmade factors affecting its continued existence."

All five of the factors set forth in 424.11(c) have resulted in the continued decline of the Wyoming pocket gopher. At least four factors are causing the species to face endangerment and extinction. Effects of disease and predation are essentially unknown but cannot be considered to insignificant because the Northern pocket gopher is known to be susceptible to endoparasites that produce lower fecundity and even death in individuals. It is reasonable to expect similar effects of endoparasites on *T. clusius*.

The purposes of the ESA are two-fold, to conserve threatened and endangered species and the ecosystems on which they depend. The Act's Section 2 reads:

> *"The purposes of this chapter are to provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species and threatened species..."*

See 16 U.S.C.A. § 1531(b). This is set forth as the purpose and cornerstone of the ESA and our petition therefore goes to the very heart of this visionary law.

There is sufficient literature on pocket gophers in general as playing keystone roles in the ecosystems where they are found (Kotliar et al. 1999; Kotliar 2000; Miller et al. 2000; Lomolino and Smith 2003).

Given its possible status as a keystone species, listing the Wyoming pocket gopher as an Endangered or Threatened species under the ESA would further the ecosystem protection purpose of this law and should therefore be a high priority listing action. FWS has committed itself to the principle of ecosystem management (e.g., GAO 1994; FWS 1997), and federal protection for the Wyoming pocket gopher is an important manner in which the agency could fulfill this commitment.

II. Petitioners

Biodiversity Conservation Alliance

The mission of the Biodiversity Conservation Alliance is to protect and restore biological diversity, habitat for wildlife and fish, rare plants, and roadless lands in Wyoming and surrounding states. We started doing conservation work in 1988 to preserve the natural character of the Medicine Bow National Forest in southeastern Wyoming. Although we continue to fill this niche today, by the early 1990's our work had expanded far beyond the 'Bow, with increasing attention to wildlife issues. In 1994 we legally incorporated as Biodiversity Associates, but we have recently changed our name to Biodiversity Conservation Alliance to better reflect our strong advocacy work and the growing nature of our organization. We are a lean, efficient non-profit organization with a current full time staff of five.

We concentrate our efforts on the forests, prairies, and rivers of Wyoming, western South Dakota, and northern Colorado. Our focus is on entire ecosystems and on individual species, particularly those which are in need of immediate conservation help but lack a constituency and do not have a high public profile. The Biodiversity Conservation Alliances' guiding principle is that all species and ecosystems deserve protection. For example, numerous groups are working to gain protection for the Yellowstone ecosystem and charismatic species such as the Grizzly Bear, but few are advocating for protection of the Desert Yellowhead (a rare plant known to exist in only one small area in central Wyoming), Vertigo snails in the Black Hills, or the Bluehead Sucker in the Little Snake River. Biodiversity Conservation Alliance, along with other conservation groups, continues to work at its original mission of protecting the Medicine Bow ecosystem and its critical forested links to the Rocky Mountains in Colorado.

We use outreach and education to foster public support for biodiversity and wild areas. And we use science and the law to hold public managers and decision-makers accountable for protecting the nation's natural heritage and upholding the public trust. Our three primary strategies to gain increased protection for wild species and their habitats are:

(1) educating the public and decision makers (like the U.S. Forest Service and Bureau of Land Management) about the importance of conserving biological diversity and wild lands,
(2) advocating directly through citizen alerts, written comments, meetings, technical analyses, etc., for the conservation of wildlife and sensitive habitats, and concurrently advocating for less damaging alternatives to ill-conceived development proposals,
and

(3) opposing by lawsuit and administrative protest developments that threaten rare species or sensitive ecosystems.

Of course, to do these things, it is necessary to first determine where sensitive species and sensitive habitats exist, so an important part of our work is dedicated to this task as well. This component involves field work, literature searches, interviews with scientists, and analysis using Geographic Information Systems (GIS) and computer mapping. We also provide technical assistance on legal issues, conservation science, and GIS to a number of citizen groups.

Although we work collaboratively with a large number of other conservation groups, The Biodiversity Conservation Alliance is not affiliated with any other local, regional, or national organizations. Biodiversity Conservation Alliance is interested in the conservation of species that face high levels of imperilment, especially those who play important umbrella and keystone functions within their ranges. The Wyoming pocket gopher is therefore a high priority species for Biodiversity Conservation Alliance. In addition, Biodiversity Conservation Alliance strives for the restoration and preservation of all naturally occurring components and processes within native ecosystems.

Center for Native Ecosystems

We are dedicated to conserving and recovering the native species and ecosystems of our region. We value the clean water, fresh air, healthy communities, sources of food and medicine, and recreational opportunities provided by native biological diversity. We also passionately believe that all species and their natural communities have the right to exist and thrive. We use the best available science to forward our mission through participation in policy, public outreach and organizing, administrative processes, legal action, and education.

III. ESA listing criteria

Under the ESA, imperiled species need to meet only one of the following listing criteria to merit formal listing (16 U.S.C. § 1533(a)(1)). *Thomomys clusius* meets all five listing criteria and therefore clearly warrants designation as an Endangered or Threatened species under the ESA. Moreover, given the imminent risk of extinction of *T. clusius*, it should be provided with emergency listing under the Act.

A. The present or threatened destruction, modification, or curtailment of the species' habitat or range

Development pressure including grazing and, in particular, oil and gas development have degraded and destroyed *T.clusius* habitat (Keinath and Beauvais 2006). These threats are ongoing as many areas of remaining undeveloped land in Carbon and Sweetwater Counties, in Wyoming, have been purchased or leased, and reserved for future development.

B. Overutilization for commercial, recreational, scientific, or educational Purposes

Development, habitat conversion, recreational, and other activities may have resulted in the destruction of individual *T. clusius* populations during the pursuit of commercial or recreational activities (Keinath and Beauvais 2006). Remaining individuals are similarly threatened. The preferred habitat of this species occupies an area with high potential for alternate use [oil and gas development] (Keinath and Beauvais 2006). Destruction of property as a result of burrowing activity in residential and commercial areas may lead to increased poisoning and trapping of *T. clusius* (Keinath and Beauvais 2006).

C. Disease or predation

Residential and commercial development and other human activities may increase rates of predation by domestic cats and dogs and by disturbance-tolerant predators such as raccoons and coyotes. Furthermore, additional and more varied raptor perches created by commercial and residential development increases predation risks from above ground (Keinath and Beauvais 2006). Recent studies indicate endoparasites common to pocket gophers are having harmful effects not before seen (Todd and Lepp 1971). While the underlying cause remains unknown, the threat to populations is clear.

D. Inadequacy of existing regulatory mechanisms

State and federal agencies have failed to conduct even basic monitoring for this rare species, let alone protect it from development, recreational, and other pressures. Remaining populations of *T. clusius* are at least partly on private land, and no regulations pertaining to *T. clusius* apply to these lands. While some populations may be partly on land owned by public entities including cities, recreational districts, and water districts, these lands are generally managed for either active recreation or municipal use rather than for maintenance of wildlife habitat (Keinath and Beauvais 2006).

E. Other natural or man-made factors affecting the species' continued existence

The small size of all remaining populations of *T. clusius* makes them extremely vulnerable to extirpation due to factors such as environmental and demographic stochasticity and the loss of genetic variability (Keinath and Beauvais 2006). Increases in soil moisture and stochastic events such as flooding could potentially extirpate entire populations of this species (Keinath and Beauvais 2006). Changes in climate such as warmer average temperatures and drought can create potentially drastic changes to *T. clusius* habitat (Keinath and Beauvais 2006). Stress resulting from continuous habitat disturbance has been documented to affect biological processes, such as birth rates, in a wide variety of species (Keinath and Beauvais 2006). *Thomomys clusius* is no exception.

IV. Classification and nomenclature

Thomomys clusius is known as the Wyoming pocket gopher. Pocket gophers are part of the family Geomyidae (Keinath and Beauvais 2006). Pocket gophers comprise the family *Geomyidae*, within which there are currently six recognized genera: *Cratogeomys* (eight species), *Geomys* (nine species), *Orthogeomys* (11 species), *Pappogeomys* (two species), *Thomomys* (nine species), and *Zygogeomys* (one species) (Keinath and Beauvais 2006). Species of the genus *Thomomys* have recently been allocated to two subgenera based on chromosome number and molecular characters: (Wilson and Reeder, eds. 2005) *Megascapheus* (four species) and *Thomomys* (five species, including the Wyoming pocket gopher and its close relative the Northern pocket gopher). (Keinath and Beauvais. 2006).

The placement of the Wyoming pocket gopher in this scheme has changed somewhat over time, and the name *clusius* has been variously applied at both the species and subspecies level to pocket gophers whose range centered roughly on southern Wyoming (Keinath and Beauvais 2006). The type specimen was collected in 1857 by Dr. W. A. Hammond about 18 miles southwest of

Rawlins, Wyoming, but it was not described until 18 years later when it was given the name *Thomomys clusius* (Coues, E. 1875). After that, it was sometimes referenced as a subspecies of the northern pocket gopher (*T. talpoides clusius*) until investigators Thaeler and Hinesley clarified its taxonomy and range boundaries by conducting karyotype analyses (Thaeler and Hinesley 1979). These analyses also showed that specimens assumed to be *T. clusius* in earlier publications (Bailey, V. 1915, Long, C.A. 1965) were in fact *T. talpoides*. Even after the terminology was solidified and a reasonable estimate of range was formed through the work of Thaeler and Hinesley some authors persisted using the subspecific classification of *T. t. clusius* (Hall, E.R. 1981). *Thomomys clusius* is now widely recognized as a unique species (Wilson, D.E. and D.M. Reeder, editors. 2005) whose range is more-or-less completely encompassed by the range of *T. talpoides* (See **Attachment C**: (Keinath et al. 2006.) **Figure 2**, **Figure 3**, **Figure 4**). Its distinctiveness is mainly based on the unique karyotype of 2n = 46, with support from the more pale and yellowish pelage and generally small size.

The reader should note this confusing taxonomic history when reviewing literature and specimen locations, since most collections labeled as *Thomomys clusius* are no longer thought to be Wyoming pocket gophers. Further, some references to *T. talpoides clusius* may refer to the Wyoming pocket gopher while others would now be considered belonging to different subspecies of northern pocket gopher, likely *T. t. ocius* (Keinath and Beauvais. 2006).

V. Description

A. General description

Pocket gophers are powerfully built mammals, characterized by a heavily muscled head and shoulders that taper into relatively narrow hips and short legs (See **Attachment C**: Keinath et al. 2006. **Figure 1**). As typified by both the northern and Wyoming pocket gophers, they have small eyes and ears and fur-lined cheek pouches that open external to the mouth. Front feet are strong with claw-like nails used for digging (Verts and Carraway. 1999).

The Wyoming pocket gopher is smaller and paler than other pocket gophers in its geographic range (Keinath and Beauvais. 2006. See **Attachment C**: Keinath et al. 2006. **Figure 1**), with a yellow cast to the pelage, especially in younger animals (Clark and Stromberg 1987). Dorsal pelage is uniform in color, and the margins of the pinnae are fringed with whitish hairs (Thaeler and Hinesley 1979). Adults may attain the following dimensions: total body length

161 to 184 mm, tail length 50 to 70 mm, hind foot length 20 to 22 mm, ear length 5 to 6 mm, and a weight of 44 to 72 grams.

Pocket gophers appear to have extreme interpopulation chromosomal variation relative to other mammals, with proximate populations of the same species often exhibiting different karyotypes (Thaeler 1974a, b, and Patton and Dingman 1968). However, diploid chromosome count appears to be a distinguishing feature at the species level (Patton and Dingman 1968, Thaeler 1974a) which holds true for Wyoming pocket gophers (Thaeler and Hinesley 1979). Thus, given the difficulty of distinguishing gophers in the field (described above), positive identification of Wyoming pocket gopher requires karyotype analysis (i.e., a count of the number of diploid chromosomes). The Wyoming pocket gopher has a karyotype of 2n = 46 chromosomes while the northern pocket gopher has a karyotype of 2n = 48 and the Idaho pocket gopher has a karyotype of 2n = 58 (Thaeler and Hinesley 1979, Thaeler 1972). This is a straightforward procedure, but it does require some technical expertise and equipment and, under typical circumstances, cannot be accomplished in the field. Given appropriate time and funding, it is possible that further genetic research on the Wyoming pocket gopher could develop genetic markers capable of distinguishing it from related species, thus eliminating the need for highly invasive karyotype analyses, but the feasibility of this is highly speculative (Keinath and Beauvais 2006).

B. Morphological differences between male and female *T. clusius*

There is no sexual dimorphism displayed in this species (Clark and Stromberg 1987). Mammals.

C. Morphological differences between *T. clusius* and other species of Thomomys

Four species of pocket gopher occur in Wyoming: the Wyoming pocket gopher (*Thomomys clusius*), the northern pocket gopher (*T. talpoides*), the Idaho pocket gopher (*T. idahoensis pygmaeus*), and the plains pocket gopher (*Geomys bursarius*) (Keinath and Beauvais. 2006). The plains pocket gopher (*G. bursarius*) occupies only far eastern Wyoming; aside from this wide geographic separation, *G. bursarius* is easily distinguished from *T. clusius* by distinctive parallel grooves on the front surface of its protruding incisor teeth (Clark and Stromberg 1987). Characteristics separating the remaining three taxa are presented in ((Keinath and Beauvais. 2006. **Attachment C, Table 1)**. The ranges of *T. clusius* and *T. idahoensis*

pygmaeus are close but likely do not overlap, leaving *T. talpoides* as the primary taxon of confusion. Despite some differences, the potential for confusing these two taxa in the field is high. **The range of *T. clusius* lies almost entirely within the range of *T. talpoides*, but the two species are suspected to occupy different habitats** (Thaeler and Hinesley 1979); *Thomomys clusius* prefers well-drained, gravelly soils on ridge tops while *T. talpoides* occurs in sandy soils proximal to watercourses (Patton and Dingman 1968, Wison and Reeder eds. 1993). Morphometric characteristics recorded in the field (e.g., weight, body length, hind foot length, pelage characteristics, gross skull morphology) can be helpful, but they are often not diagnostic due to overlap between species, especially in the presence of juvenile *T. talpoides*.

VI. Population dynamics

Even less is known about the demographics of pocket gopher populations than other aspects of their biology and ecology (Keinath and Beauvais 2006). Other than coarse scale habitat availability, it is unclear what limits the structure and growth of populations. The extremely varied diets of various pocket gopher species have led to the conclusion that food is seldom a limiting factor in pocket gopher distribution, but the nature and amount of vegetation may affect local population densities (Miller 1964).

There is not enough known about pocket gophers in general, and Wyoming pocket gophers in particular, to confidently assess the spatial dynamics of populations. This issue, however, is intriguing given the apparent karyotypic differences within the same genus, wherein morphologically and geographically proximate species or sub-species can have radically different chromosome numbers (see Taxonomy section above). Such cellular divergence is likely facilitated by the limited dispersal ability of pocket gophers and a resultant high rate of inbreeding for some species (Patton and Dingman. 1968). All these factors (e.g., low dispersal ability, high inbreeding, and high variation over small geographic area) suggest that pocket gophers could have an easily disrupted metapopulation structure wherein local populations are readily isolated over relatively short distances. The magnitude of these distances, however, is unknown. **This is particularly important for small and isolated taxa, such as the Wyoming pocket gopher, where isolation may also raise the risk of local extinction.** Although the management implications of this situation are unclear, it would likely mean that continuity of suitable habitat would be an important component in the conservation of pocket gopher populations.

A. Reproduction

Breeding behavior and phenology

Studies of reproduction of the Wyoming pocket gopher are lacking, but presumably, its reproductive biology closely resembles that of the northern pocket gopher (Keinath and Beauvais 2006). Northern pocket gophers are solitary creatures, except during the breeding season (Keinath and Beauvais 2006). Male northern pocket gophers are polygamous, exploring the burrows of females living next to them, but females will only permit the males to remain in their burrow during the breeding season (Miller 1964). Very little is known regarding the courtship practices of pocket gophers. Sex ratios for adult pocket gophers are generally close to 50:50, but estimation of sex ratios may be biased depending upon when sampling is done in the annual population cycle (Reid 1973).

The precise phenology of reproduction is unclear, but the breeding season of northern pocket gophers in Colorado is thought to extend from mid-March to mid-June (Hansen 1960, Vaughan 1969) and (Vaughan 1964) claimed that it occurred in May or June at elevations of 3,020 meters 18 and noted that most litters in Colorado were probably born in June. Pregnant northern pocket gophers have been captured in June in Sweetwater County, Wyoming, which is near the range of the Wyoming pocket gophers, but they were captured as late as July in the Black Hills (Clark, and Stromberg 1987). The northern pocket gopher is thought to have a gestation period of 19 to 20 days (Reid 1973). Young are born hairless into subterranean nests within the burrow system, their eyes open at about 26 days of age, and they are weaned by 35 to 40 days of age (Andersen 1978, Chase et al. 1982).

Young northern pocket gophers can appear above ground as early as June but they often remain with the mother for 6 to 8 weeks. Clark and Stromberg (1987) indicated that young in Sweetwater County disperse from maternity burrows in early June, but this could occur much later, perhaps even late July, if females are still pregnant in June. It takes about 180 days for newborns to reach near-adult weights, at which point young of the year can only be distinguished from adults by the size of their reproductive organs (Hanson and Reid 1973).

Fecundity

No data are available regarding the fecundity of the Wyoming pocket gopher, so the best one can do is assume general similarity with the closely related northern pocket gopher. Litter size of northern pocket gophers is highly variable, averaging 4 to 6 young in Wyoming (Verts

and Carraway 1999, Tryon and Cunningham 1968, Wirtz 1954, Andersen 1978). Studies in Colorado suggest similar litter sizes that are likely influenced by habitat, averaging 6.4 young in irrigated alfalfa fields and 4 to 5 young in native forb-grass rangelands (Reid 1973, Hansen, R.M. 1960). It has been suggested that some female northern pocket gophers may produce more than one litter per year, based largely on the synchronous capture of pregnant females and juveniles in the same burrow systems (Miller 1946, Burt 1933). However, Hansen (1960) found no evidence of more than one annual litter per female in the Rocky Mountain region, and Miller (1964) suggested that this only occurred in southern climates. It is therefore unlikely that multiple litters would occur in Wyoming pocket gopher populations. Young northern pocket gophers are able to reproduce in the calendar year following their birth (Moore and Reid 1951). The proportion of females that produce litters every year can vary greatly (Verts and Carraway. 1999). In a study conducted in Utah, 62.5 to 100 percent bred annually during a 4-year period, and differences among the years were not significant (Andersen and MacMahon. 1981). Seventy-nine percent of 112 females collected from mid-March to mid-April were found to be reproductively active (Wight 1930).

B. Mortality

Survivorship

Very little is known generally regarding survivorship and mortality in pocket gophers, much less for Wyoming pocket gophers in particular (Keinath and Beauvais 2006). As with many small mammals, individual pocket gophers often do not live more than two breeding seasons, typically surviving 18 to 20 months in the wild; however, they are capable of living longer, perhaps up to 5 years under favorable circumstances (Reid, V.H. 1973, Clark and Stromberg 1987). About 75 percent of a breeding population of northern pocket gophers were yearlings, and only 25 percent were two years or older (Lechleitner 1969). In a 4-year study of northern pocket gophers in Utah, annual survival rates were 0.27, 0.18, 0.23, and 0.70, with weekly survivorship greater in summer than winter (Andersen and MacMahon. 1981). In Colorado, Hansen (1965) studied an introduced population of northern pocket gophers in a controlled exclosure; mortality was approximately 10 percent per month from June through September and approximately 13 percent per month from September through June. Sixty-three percent of the study population survived the summer, but only 17 percent survived the winter. One of the very few studies investigating natal pocket gopher mortality occurred in Oregon, where pocket gophers (then classified as *Thomomys quadratus*) were repeatedly trapped within individual burrow systems (Wight 1930). This resulted in an average of 2.8 young being captured, which was well below the mean natal litter size of 6.3, causing the author to suggest that young

pocket gophers experienced heavy mortality or dispersed before sampling occurred. Researchers also stated that sub-adult pocket gophers appeared to be exposed to unusually heavy mortality as they were forced to live in marginal habitats (Howard, W.E. and H.E. Childs 1959). Moreover, although Wight and Howard and Childs did not study species closely related to the Wyoming pocket gopher, the results suggest the possibility of high juvenile mortality (Keinath and Beauvais 2006).

C. Effects of climate

Based on studies of *T. t. macrotis*, (Vaughan 1967) climate may be a factor in *T. clusius* survival and recruitment. Vaughan (1967) noted that pocket gophers are generally more abundant in years of normal or above-normal moisture and lower in years of below-normal precipitation. Snowpack can also provide northern pocket gophers with access to vegetation and protective cover from predators (Reid 1973). On the other hand, when soils are too wet, due to excessive water levels in snowpack, early snowpack melting, or a rising groundwater table, northern pocket gophers may perish or be dislocated (Reid, V.H. 1973, Chase, et al. 1982, Hansen and Reid 1973). Particularly harsh winters lead to sub-optimal burrowing conditions, affecting survivorship. Freezing temperatures combined with moist soil make burrowing nearly impossible (Andersen and MacMahon 1981) and pocket gophers may avoid moist soils to prevent the heat loss associated with wet fur (Vaughan 1966).

VII. Ecology

As a group, pocket gophers have been widely recognized for their impacts on the ecosystems they inhabit. These effects primarily result from their extensive tunneling activity, which can affect soil formation, hydrology, and nutrient flows, and their consumption of below ground plant biomass, which can alter the competitive interactions of plants and thereby influence vegetation patterns and aboveground herbivory (Keinath and Beauvais 2006). Like other "ecosystem engineers" (e.g., ants, beavers, prairie dogs), pocket gopher activities can drive ecosystem function, making them important to native ecosystems while simultaneously causing them to be labeled as pests in many areas where they occur in abundance and coincide with humans. For example, due to potentially detrimental impacts on agricultural production, such effects have been studied for pocket gopher species occurring in agrarian landscapes. Such a discussion, although interesting, is not directly pertinent to this assessment, particularly since no such investigation has studied the impact of Wyoming pocket gophers and since the purported habitat of this species is sufficiently different than that of studied species to make comparisons rather tenuous. Parties interested in such information are encouraged to consult the following literature: (Keinath and Beauvais 2006) (See Supplemental Literature Cited).

A. Habitat requirements

Apparent habitat requirements

Pocket gophers are strongly fossorial, living most of their lives in burrow systems and underground tunnels (Keinath and Beauvais 2006). Based on the very limited information base, the Wyoming pocket gopher appears to segregate from northern pocket gophers by preferentially occupying dry, gravelly, shallow-soil ridge tops rather than deeper soiled swales and valley bottoms (Clark and Stromberg 1987). Many existing capture locations are from greasewood (*Sarcobatus* spp.) communities on the edges of eroding washes (Thaeler and Hinesley 1979). However, this information is predominantly the result of inference from specimen tags and anecdotal accounts rather than from actual habitat studies. Moreover, it is not known if such accounts represent actual habitat preference by Wyoming pocket gophers since unknown biases could be masked by such *ad hoc* reports (Keinath and Beavais 2006). For example, documented specimen locations could represent a biased geographic sample, Wyoming pocket gophers could be more readily captured in marginal habitats, or there may have been unaccounted for competitive exclusion from preferred habitats by other species of pocket gophers. In any case, the above habitat description should be viewed as hypothetical.

Beyond this, nothing is known regarding the habitat affinity of the Wyoming pocket gopher. In the absence of data, we can draw some basic inferences on habitat use from the northern pocket gopher, but we must realize that such comparisons are tenuous and useful mainly to inform further investigation. In general, pocket gopher habitat appears to be limited by two factors: the presence of a soil layer deep and tractable enough to hold burrow systems and enough herbaceous plants to form a food base. Northern pocket gophers are very adaptable and occur across much of the western United States at various elevations, vegetation types, and soil types (Verts and Carraway 1999, Clark and Stromberg 1987). They apparently prefer deep and tractable soils, but they also occupy heavily compacted soils and shallow gravels (Miller 1964) that are more reminiscent of suspected Wyoming pocket gopher habitat.

In some regions, pocket gophers appear to preferentially occupy habitat dominated by "mima mounds" (i.e., circular to oval mounds each 4 to 30 meters in diameter, up to 2 meters higher than the surrounding soil, and occurring at various densities on the order of 25 to 50 mounds per hectare (Cox and Hunt 1990, Knight 1994). There is ongoing debate whether burrowing

mammals, typically gophers, caused these mounds through their diggings or inhabit mounds that previously existed in the landscape due to other processes, such as post-glacial cycles of freezing and thawing that cause differential soil development based on substrate characteristics. No one has reported whether the Wyoming pocket gopher is preferentially found in habitat reminiscent of mima mounds. Although such mounds are much less common in the range of Wyoming pocket gophers than in the deeper soils of eastern Wyoming, this is a possibility worthy of investigation (Keinath and Beauvais 2006).

Pocket gophers use burrow systems consisting of a network of feeding tunnels connected to a smaller and deeper system of chambers that are used for nesting and food storage (Miller 1964). In general, pocket gopher tunnels vary from 6 inches to a foot below the surface of the ground and are 1.5 to 3 inches in diameter, depending on the size of the gopher (Bailey, V. 1915). Unlike ground squirrels and many rodents, which have regular tunnel openings, the surface tunnels of pocket gopher burrows are kept plugged with loose soil (Clark and Stromberg 1987). Pocket gopher burrow systems are typically found in areas with large herbage yields of succulent forbs with fleshy underground storage structures, such as alfalfa fields (Reid 1973). However, it is assumed that because such cultivation is relatively rare in southern Wyoming and occurs primarily in valley bottoms occupied by northern pocket gophers, such habitats do not substantially influence populations of Wyoming pocket gophers.

Movement, territoriality and area requirements

Given their fossorial nature, once pocket gophers establish territories and burrows, they move very little over the course of their entire lives, except for minor alterations of territory boundaries (Miller 1964, Reichman et al. 1982). Moreover, the long distance movement and dispersal capabilities of pocket gophers are limited since they stay underground most of the time, foraging above ground only at night or on overcast days (Verts and Carraway. 1999). Also, despite their considerable tunneling capability, the energetic costs of burrowing are high enough to be a physiological limitation to movement (Vleck 1979). Vaughan (1963) recorded distances dispersed by northern pocket gophers and valley pocket gophers (*Thomomys bottae*) when they were released into unfamiliar habitat. He found that over the course of a year northern pocket gophers moved much farther from the release area (mean of 13 individuals = 785 m; range 50-2590 m) than valley pocket gophers (mean of 18 individuals = 198 m; range 0-900 m) (Vaughan 1963). This demonstrates that, although movement of both pocket gopher

species was very restricted, there is substantial interspecies variation in dispersal. This variation could be attributed to either (or both) innate interspecies' differences in propensity for dispersal or variable restrictions on dispersal caused by the different environments used by the two species. If the main restriction on dispersal is environment (admittedly a large assumption) and if we consider that northern pocket gophers appear to occupy areas with looser soils that are presumably more amenable to long-distance movements than the gravelly ridge-top soils occupied by Wyoming pocket gophers, then we can hypothesize that Wyoming pocket gophers could be more restricted in their movements than northern pocket gophers. In this case, the figures presented above likely represent the upper limit of Wyoming pocket gopher dispersal. All speculation aside, in the absence of additional information, it is reasonable to assume that the dispersal distances recorded by Vaughan (1963) represent bounding estimates for the dispersal capabilities of Wyoming pocket gophers. Pocket gophers are active year-round, and some have suggested that longer-distance dispersals may occur beneath the snow (Vaughan 1963, Marshall 1941). This does not seem likely for the Wyoming pocket gopher because the dry ridges presumed to be its preferred habitat have typically low snow accumulation due to low winter precipitation and wind scouring that tends to deposit existing snow in depressions.

The territory of a pocket gopher is essentially equivalent to the extent of its active burrow complex. Pocket gophers such as the northern pocket gopher generally defend against intrusion into their burrow system by other gophers (Verts and Carraway. 1999, Tryon 1947) but during the breeding season territoriality appears to be somewhat relaxed. Observations on the plural occupancy of pocket gopher burrow systems. Journal of Mammalogy 40:577-584.) (Hansen and Miller 1959, Miller and Bond. 1960).

The defense and maintenance of a territory usually involve some form of aggressive behavior or display. Once a pocket gopher establishes a territory and has lived in its burrow for one breeding season, it tends to remain in that burrow for life, with only minor boundary changes (Miller 1964). Many animals alter their tolerance of neighbors in response to resource availability; home ranges often are smaller and closer together in resource-rich areas than resource-poor areas. However, an investigator found that pocket gophers in a northern Arizona study area altered burrow length but did not change territory spacing to compensate for differences in forage production (Reichman et al. 1982). Despite defense of their burrows, burrow systems of valley pocket gophers (particularly those of reproductive males) are

generally configured to contact numerous other territories, presumably to facilitate finding mates, which is assumed to hold true for other species (Keinath and Beauvais 2006).

The home ranges of the Wyoming pocket gophers are assumed to be similar in size and nature to those of the northern pocket gopher, which are very small. The home range of the northern pocket gopher has been documented to be 0.015 hectares (Banfield, 1974). In Utah, density estimates for populations of northern pocket gophers in early summer were 5.3 to 16.9 per hectare (2 years) in meadow, 2.1 to 14.4 per hectare (3 years) in aspen, 6.3 per hectare (1 year) in fir, and 0.4 per hectare (1 year) in spruce (Andersen and MacMahon. 1981). During a 3-year study at 3,020 meters in subalpine parks in Colorado, densities of northern pocket gophers in early summer were 6.2 to 12.4 per hectare and 14.8 to 34.6 per hectare in late summer; much of the variation in late summer was attributed to differences in survival of young (Vaughan 1969). It has been observed that male territories in a population of valley pocket gophers averaged 0.025 hectares and were considerably larger than those of females and sub-adult males (Howard, W.E. and H.E. Childs 1959). This assessment has been confirmed, noting that reproductive males had longer burrow systems, greater home ranges, and a greater number of neighbors than either females or non-reproductive individuals (Reichman et al. 1982).

Landscape pattern

Considering that very little information is known regarding pocket gopher habitat use in general, it is hard to say what may constitute a suitable landscape pattern for Wyoming pocket gophers. "Soil depth and texture, and interspecies competition are clearly the most critical factors in both the geographic and habitat distributions of pocket gophers" (Miller 1964). Also, population density and body size of pocket gophers is related to food quantity and quality (Smith and Patton 1988). For example, because fields of alfalfa produce more and more consistently available food than fields of annual cereals, they support more and larger pocket gophers (Reid 1973). This likely occurs because gophers in these resource-rich areas can thrive in smaller burrow systems than in resource-poor areas, although the spacing and arrangement of individual territories likely does not change with resource availability (Reichman et al. 1982).

In this context, a suitable landscape for Wyoming pocket gophers may be loosely defined as a dry upland with gravelly, yet still tractable, soils (i.e., which presumably favors Wyoming pocket gophers over northern pocket gophers; see the above section on Apparent habitat

requirements) and relatively high productivity of grasses and forbs (i.e., high food availability). Given relatively small home ranges (see previous section), the continuous area of such habitat capable of supporting a local population of pocket gophers may be relatively small, perhaps on the order of tens of hectares. However, long-term persistence of gophers would likely depend on larger areas of such habitat arranged in patches of sufficient proximity to allow dispersal between patches. Since no supporting information exists, the necessary scale and arrangement of such a landscape are conjecture.

B. Social behavior

Interspecific interactions

Species of pocket gophers are generally distributed so that their ranges do not overlap (Bailey 1915, Vaughan 1967, Thaeler 1968a). However, given that the Wyoming pocket gopher's range is completely subsumed within that of the northern pocket gopher, it is possible that sympatry could exist (Keinath and Beauvais 2006). However, the species are thought to exclude one another from particular environments in a classic competitive exclusion manner based on differential habitat preferences and requirements (i.e., soil type and depth) (Miller 1964). Given its highly restricted distribution, if populations of Wyoming pocket gophers are found to be declining, competition with northern pocket gophers could become a limiting factor in their persistence. This is, of course, very speculative, as no studies have been published that suggest this.

C. Population densities

Population demographics

Even less is known about the demographics of pocket gopher populations than other aspects of their biology and ecology (Keinath and Beauvais 2006). Other than coarse scale habitat availability, it is unclear what limits the structure and growth of populations. The extremely varied diets of various pocket gopher species have led to the conclusion that food is seldom a limiting factor in pocket gopher distribution, but the nature and amount of vegetation may affect local population densities (Miller 1964).

There is not enough known about pocket gophers in general, and Wyoming pocket gophers in particular, to confidently assess the spatial dynamics of populations. This issue, however, is intriguing given the apparent karyotypic differences within the same genus, wherein

morphologically and geographically proximate species or sub-species can have radically different chromosome numbers. Such cellular divergence is likely facilitated by the limited dispersal ability of pocket gophers and a resultant high rate of inbreeding for some species (Patton and Dingman 1968). All these factors (e.g., low dispersal ability, high inbreeding, and high variation over small geographic area) suggest that pocket gophers could have an easily disrupted metapopulation structure wherein local populations are readily isolated over relatively short distances. The magnitude of these distances, however, is unknown. This is particularly important for small and isolated taxa, such as the Wyoming pocket gopher, where isolation may also raise the risk of local extinction. Although the management implications of this situation are unclear, it would likely mean that continuity of suitable habitat would be an important component in the conservation of pocket gopher populations.

D. Food habits

Food and feeding habits

As with most other aspects of Wyoming pocket gopher biology, food habits have not been studied. Roughly speaking, diet is assumed to be similar in variety and opportunistic composition to other pocket gophers in the region, with a general reliance on roots, shoots, and leaves of forbs, and a lower utilization of grasses and other plants (Ward and Keith. 1962). In general, pocket gophers are strictly herbivorous (Reid 1973) eating roots and tubers while underground and, to a lesser extent, harvesting surface vegetation occurring near burrow entrances (Verts and Carraway. 1999). A large part of their diet throughout the year is comprised of belowground plant material (i.e., roots, tubers, bulbs, corms), but it appears that in summer they tend to include green plants and aboveground material to a greater extent than in winter (Reid 1973, Aldous 1951). For example, the summer diet of northern pocket gophers in one sub-alpine habitat in Colorado consisted of 87 percent forb leaves, 12 percent roots, and 1 percent grasses (Vaughan 1974). In another location in Colorado, their summer diet consisted of 93 percent forbs, 6 percent grasses, and 1 percent shrubs, with 74 percent of this material being aboveground plant parts and 26 percent roots (Verts and Carraway 1999). Reports document that forbs occurred in northern pocket gopher diet disproportionate to their occurrence in the environment, representing over 92 percent of stomach contents but only 42 percent of site biomass (Ward and Keith 1962). Experimentally confirmed is the importance of forbs to northern pocket gophers, as gophers forced to eat a larger dietary proportion of grasses lost body mass (Tietjen 1973).

In general, pocket gophers can subsist on a very wide variety of plant species, but they have a strong preference for forbs (Keinath and Beauvais 2006). It makes sense that the relative consumption of specific species of forbs is likely different for Wyoming pocket gophers than for other pocket gophers, simply because they inhabit a different environment with different vegetation. The overwhelming preference by other gophers for forbs, however, provides strong evidence that forbs are likely to be an important component of Wyoming pocket gopher diet. The northern pocket gopher probably eats most species of succulent plants within its range, but it is capable of selecting plants with higher levels of protein and fat from those available (Tryon and 1968). Alfalfa fields are known to provide large amounts of high quality, succulent vegetation to pocket gophers in Colorado (Reid 1973). In a shortgrass prairie region of Colorado, northern pocket gophers consumed 67 percent forbs, 30 percent grasses, and 3 percent shrubs; the major components of the diet included prickly pear (*Opuntia polyacantha*) (49.9 percent), needle-and-thread grass (*Stipa comata*) (12.1 percent), red globe-mallow (*Sphaeralcea coccinea*) (10.3 percent), bluestem wheatgrass (*Agropyron smithii*) (10.1 percent), blue grama (*Bouteloua gracilis*) (3.0 percent), and fourwing saltbush (*Atriplex canescens*) (2.5 percent) (Vaughan 1967). At elevations between 2,750 and 3,050 meters in Utah, the species consumed most frequently and in the greatest amounts were dandelion (*Taraxacum* spp.), penstemon (*Penstemon rydbergii*), sweet sage (*Artemisia discolor*), meadowrue (*Thalictrum fendleri*), and slender wheatgrass (*Agropyron trachycaulum*) (Aldous 1951).

Pocket gophers tend to change their diet seasonally in response to habitat conditions and the availability and nutritional quality of food (Reid 1973). A summer preference for aboveground plant parts was found in Colorado's shortgrass prairies, where 70 percent of foods consumed by northern pocket gophers were from above ground (Vaughan 1967). In winter, diet is assumed to shift more toward belowground forage, unless sufficient subnivean space is available in which case aboveground components of forbs and grasses may be supplemented by woody material (Verts and Carraway 1999).

The northern pocket gopher normally forages in underground burrows, but it occasionally forages above ground, in close proximity to a burrow entrance, at night or on overcast days. Some experts have suggested that pocket gophers rarely forage above ground beyond where they can reach by keeping their hind feet in the burrow entrance, suggesting that virtually all aboveground vegetation is taken in the immediate vicinity of entrance mounds (Aldous 1951).

Many of the plants cut by gophers, particularly above ground, are not immediately consumed, often being cut into small pieces and carried in the cheek pouches back to the burrow where they are either consumed, stored for winter, used for nest building, or taken into runways and later pushed to the surface (Verts and Carraway 1999, Aldous 1951). Pocket gophers generally cache food collected in late summer. In Utah, five food caches of northern pocket gophers collected in late summer contained an average of 380g of stored food items (Aldous 1945).

E. Pocket gopher roles within their ecosystems

Northern pocket gophers have been described as a "biological excavation service" (Armstrong 1987) and the actions of pocket gophers have been likened to those of "an animated bulldozer" (Hansen and Reid 1973). The reasons for such metaphors are becoming increasingly clear, as studies indicate the important relationships between pocket gophers and the ecosystems in which they are found. One study concluded "the activities of pocket gophers cascade through the trophic web" (Huntly and Inouye 1988). Pocket gophers play important roles in soil formation and movement (Huntly and Inouye 1988, Armstrong 1987) and consequent plant diversity; as a prey base for avian, mammalian, and reptilian predators (CDOW 2000); and their burrows provide habitat for other species (Chase et al. 1982, Vaughan 1961, CDOW 2000).

The northern pocket gopher has been described as a keystone species (Sherrod 1999) which is defined as "one that makes an unusually strong contribution to community structure or processes" (Meffe and Carroll 1994).

Additionally, pocket gophers have been described as ecosystem engineers (Sherrod 1999). defined as "capable of altering the normal functioning of ecosystems or the interactions of organisms even in relatively small numbers"(Byers et al. 2002). Therefore, the northern pocket gopher may be considered to be a keystone engineer (Sherrod 1999).

1. Soil impacts

Pocket gophers alter their ecosystems by increasing soil aeration and fertility, and the ability of surface soils to absorb groundwater (Hafner et al. 1998). Pocket gophers move large amounts of soil, modify its qualities, and create mima mounds (described below), all of which significantly impact the ecosystems in which pocket gophers reside (Center for Native Ecosystems 2003).

Per capita estimates are that three tons of soil may be excavated for one pocket gopher burrow system measuring 150 meters in length, and 10-45 cm from the surface (Armstrong 1987). Other approximations suggest similarly massive soil movement conducted by pocket gophers. Another studies shows an annual per capita soil movement of 1,130 kg (Chase et al. 1982). Turner (1973) and Chase et al. (1982) cite an estimate of over 93 tons of soil being moved on one hectare with 74 pocket gophers. Turner (1973: 51) states, "Pocket gophers have markedly influenced the development of rangeland soils during the thousands of years they have inhabited North America. By continually burrowing and pushing soil to the surface, they promote vertical cycling and mixing of soil constituents."

Others estimate that the impact of pocket gophers on western rangelands dates back multiple millions of years, to the Pliocene Epoch (Chase et al. 1982). Whatever the timeline, researchers have described how pocket gophers have significantly shaped the ecosystems in which they are found (Center for Native Ecosystems 2003).

This characterization is corroborated by other investigators as well. "Mammals also affect vegetative composition and structure by disturbing the soil. Wallowing by bison and digging by badgers, pocket gophers, prairie dogs, and other mammals provide unique microhabitats, affect soil conditions, and break the dominance of perennial grasses to provide habitat for annual forbs and grasses…" (Benedict et al. 1996)

The abundance of these disturbances on the prairies of the past certainly led to a substantial increase in vegetative diversity and further enhanced the mosaic nature of grasslands. Of the three most important groups of mammals involved in soil disturbance (pocket gophers, prairie dogs, and bison), the latter two have been drastically reduced in number. Mutually beneficial relationships among the faunal shapers of the prairie have been observed. Prairie dogs (Cynomys spp.) and bison (Bison bison) benefit each other (Krueger, Kirsten. 1986). Corroborating this idea, "…the bison…grazed and trampled the dense prairie vegetation, accelerating forb growth, on which the gophers thrived. The gopher, in turn, worked the soil, thus increasing soil fertility and stimulating vegetative growth, increasing food for the bison" (Chase et al. 1982).

The impact of pocket gophers on soils goes beyond their movement of the soil to their fundamental effects on soil condition. These changes in soil condition result in important and ecologically significant alterations in plant growth and diversity. Pocket gophers alter plant diversity by modifying soil nutrients. They create heterogeneous levels of soil nitrogen by bringing nitrogen-poor subsurface soils to the surface. In addition, backfilling activities may result in different soil densities and nutritional content than undisturbed soils. Uneaten food caches, located in sealed compartments only 3-4 inches below ground (Ward 1973) and excrement can also provide areas of high nutrient content (Ward 1973). "Food habits (Turner 1973). It is not uncommon for pocket gophers to leave food caches unutilized (Ward 1973) thus providing more opportunity for their transformation into soil nutrients.

A fascinating component of pocket gopher soil impacts is the mima mound. Mima mounds are circular soil formations up to two meters in height, 25-50 meters in diameter, found in densities of 50-100 per hectare. Mima mounds accumulate over long periods from the activities of burrowing mammals, particularly pocket gophers (Cox and Hunt 1990, Huntly and Inouye 1988).

Investigations of Mima mounds in western North America support the hypothesis that mounds are formed by the gradual translocation of soil by pocket gophers (Rodentia: Geomyidae) toward deep, well-drained microsites… Pocket gophers center their activities and locate their nests in such microsites. Moundward translocation results from the backward displacement of soil that occurs during outward tunneling from activity centers.

In northern Oregon, 0-6 individual northern pocket gophers inhabited each mima mound (n=18) (Cox and Hunt 1990). Mounds with single pocket gopher inhabitants tended to feature centripetal soil translocation, with the mound growing upward and outward in a proportional relationship. Once the mound reached a large enough diameter, there was greater potential for occupancy by two animals and a consequent flattening of the shape of the mound.

Soils within these mounds are deeper and more fertile, primary productivity is higher, and they host a different species composition than surrounding areas. These mounds

create an undulating topography, may serve as hotspots of activity for other small mammals and ungulates, and may lessen soil erosion (Turner 1973).

Another soil impact involves winter casts. Pocket gophers dig tunnels through the snow to store the soil that they excavate during the winter. When the snow melts, ropes of excavated soil are left on the surface of the ground (Hansen and Ward. 1966). All of these soil impacts reflect the important ecological services that *T. clusius* likely provides in its role as a keystone species.

2. Plant diversity and succession

Pocket gopher impacts on soils result in lower than average nitrogen content as lower-nitrogen subsurface soils are brought to the surface. In addition to alteration of the level of nitrogen in the soil, pocket gophers cause a more heterogeneous distribution of nitrogen in their ecosystems. (Center for Native Ecosystems 2003, Huntly and Inouye 1988).

Pocket gophers also impact the availability of light in the microclimates they create. Their grazing and burying of vegetation results in increased light filtration to remaining plants. Moreover, their reduction of nitrogen levels results in decreased plant growth and biomass, and consequently higher light infiltration. The combination of more variability in nitrogen levels and distribution and light infiltration results in increased plant diversity. Plant diversity was significantly higher near or on pocket gopher mounds because of pocket gopher impacts on nitrogen and light availability. Vegetation around gopher mounds also shows signs of increased primary productivity (Grant et al. 1980, Spencer et al. 1985). High nitrogen environments are conducive to invading noxious weed populations, such as cheatgrass, and decreased yields of native flora such as bluebunch wheatgrass (Wilson et al.).

Evidence suggests winter casts suppress the growth of some plants and thereby impact plant succession (Armstrong 1987).

Pocket gopher activities often benefit their favorite forage species. For example, pocket gopher diggings bury vegetation, which some plant species cannot tolerate. Pocket gopher forage species are resistant to burial, and benefit from the decreased competition that results from gopher digging. This interdependent relationship where pocket gophers improve conditions for their own forage has often been likened to farming (Sherrod 1999, Cortinas and Seastedt. 1996).

3. Prey base

Predation

Pocket gophers are preyed upon by a number of birds and mammals, but it is suspected that natural predation is not a factor limiting pocket gopher distribution and abundance (Chase et al. 1982). This hypothesis is logical since gophers evolved with natural predators, making it unlikely that such predation would play a role in population declines unless accompanied by other extenuating circumstances (Keinath and Beauvais 2006). Such extenuating circumstances might include increased predation from generalist predators whose distributional expansion has been facilitated by human alteration of the landscape (e.g., feral cats, coyotes, raccoons) (Keinath and Beauvais 2006). Also, in the event that Wyoming pocket gopher populations become small and/or isolated, even natural predation events could cause a marked population decline (Wilcove 1985, Sinclair et al. 1998).

Documented predators of pocket gophers include gopher snakes (*Pituophis catenifer*), rattlesnakes (*Crotalus viridis*), long-tailed weasels (*Mustela frenata*), coyotes (*Canis latrans*), bobcats (*Lynx rufus*), martens (*Martes americana*), badgers (*Taxidea taxus*), foxes, skunks, and numerous owls (Clark and Stromberg 1987, Criddle 1930, Young 1958, Vaughn 1961, Hansen and Ward 1966, Marti 1969, Bull and Wright 1989).

4. Burrows and other species

The extensive burrow systems described above provide habitat for numerous other burrowing and opportunistic species. Abandoned pocket gopher burrows provide habitat for salamanders, snakes, insects, and other rodents (Center for Native Ecosystems 2003, Armstrong 1987). Other researchers similarly describe the use of burrows by amphibians, reptiles, and other mammals (Huntly and Inouye 1988, Vaughan 1961.) The most complete list of species occupying both abandoned and active pocket gopher burrows includes: tiger salamander (Ambysoma tigrinum), spadefoot toad (Scaphiopus spp.), ornate box turtle (Terrapene ornate), six-lined racerunner (Cnemidophorus sexlineatus), earless lizard (Holbrook maculata), gopher snake (Pituophis catenifer), prairie rattlesnake (Crotalus viridus), eastern mole (Scalopus aquaticus), desert cottontail (Sylvilagus auduboni), ground squirrels (Spermophilus spp.), Ord's kangaroo rat (Dipodomys ordii), deer mouse (Peromyscus maniculatus), meadow voles (Microtus spp.), and long-tailed weasel (Mustela frenata). Less frequent inhabitants of these burrows include plains

toad (Bufo cognatus), burrowing owl (Athene cunicularia), northern grasshopper mouse (Onychomys leucogaster), and striped skunk (Mephitis mephitis) (Chase et al. 1982).

5. Other associations

Higher grasshopper (Melanoplus spp.) populations have been linked to pocket gopher mounds. Grasshoppers utilize gopher mounds for reproduction, as they oviposit in the open soil (Center for Native Ecosystems 2003). Additionally, the mosaic of low- and high-density vegetation in pocket gopher-occupied areas creates conditions where grasshoppers can more efficiently forage (Huntly and Inouye 1988). Recent research also suggests that harvester ants (Pogonomyrmex occidentalis) select for old northern pocket gopher mounds as sites for new ant-mounds (Hopton 2001). The mutually beneficial relationship between bison and pocket gophers has been described above, and the petitioners note that other native ungulates who prefer forbs, such as pronghorn (Antilocapra americana), would likely benefit from pocket gopher impacts on vegetative composition and succession (Center for Native Ecosystems 2003).

VIII. Geographic distribution and abundance

The general distribution of the Geomyidae family in North America is limited only by suitable soils, but particular species may also be limited by climatic factors or other factors associated with altitude and latitude (Keinath and Beauvais 2006, Miller 1964).

Pocket gophers of the genus *Thomomys* can be found in much of the central and southern Rocky Mountains, and from the Pacific coast in Washington to Minnesota and Manitoba in the central plains (Hall, E.R. 1981, Tryon, C.A., Jr. and H.N. Cunningham 1968). However, the Wyoming pocket gopher is known to occur only in Sweetwater and Carbon counties in Wyoming (See **Attachment C**: **Figures 3, 4 & 5**), although there is some indication (pending further investigation) of occurrences in northern Colorado (Clark and Stromberg 1987). In comparison, the Idaho pocket gopher is found in southwestern Wyoming (Lincoln, Uinta, and Sublette counties) and adjacent portions of Idaho; the northern pocket gopher occurs throughout Wyoming and adjacent states in virtually all vegetation types underlain by loose soil; and the plains pocket gopher occupies true grasslands of the Great Plains including far eastern Wyoming (Keinath and Beauvais 2006, Clark and Stromberg 1987). It is important to recognize that all *Thomomys* in this region are undersampled, and additional field inventory may dramatically alter the limits of known range for any taxon, including the Wyoming pocket gopher (Keinath and Beauvais 2006).

As its range is currently defined, the Wyoming pocket gopher appears to occur primarily on multiple-use lands managed by the U.S. BLM; these lands are extensively intermixed with parcels of private land.

Little, if any, of this species' supposed distribution falls on lands managed by the USFS (See **Attachment C**: **Figure 4**). However, this may be an artifact of the lack of field inventory, and it is possible that survey efforts could document the species on National Forest System lands. The highest probability of such occurrence would likely be in lower elevations of the Medicine Bow – Routt National Forest (Region 2) near Rawlins and Saratoga, Wyoming, but the possibility also exists for the species to occur on lands administered by the Ashley and Wasatch National forests (Region 4) of southwestern Wyoming (Keinath and Beauvais 2006).

No information exists on the abundance of the Wyoming pocket gopher in any portion of its restricted range. No one has surveyed extensively for pocket gophers within this species' range in at least the last 30 years, and there has never been a systematic survey of the Wyoming pocket gopher. The entire assumption of this species' distribution is based on a handful of museum records and anecdotal reports from about 30 years ago (See **Attachment C**: **Figure 4**). Given this paucity of information, in the summer of 2005 the Wyoming Natural Diversity Database revisited some locations of former occurrence. Each site was searched for the presence of gopher mounds, and sites with mounds were trapped using Victor EasySet™ Gopher traps http://www.victorpest.com/. **Only one site of 17 sites showed evidence of recent gopher activity**. Of the remaining 16 sites, half showed no evidence whatsoever of gophers, and the rest had only scattered mounds and collapsed tunnels that probably had not been used for several seasons (See **Attachment C**: **Figure 5**). Moreover, no gophers were captured at any site, despite about 500 trap days expended at sites where mounds were witnessed (Wyoming Natural Diversity Database unpublished data). Since the effort expended was minimal and not uniform, such *ad hoc* surveys cannot be used to make a definitive determination of Wyoming pocket gopher status. However, they suggest that this species is likely quite rare. They also suggest that the gophers could be absent from many areas where they were heretofore presumed present, raising the disturbing possibility of a population decline since the mid-1900's (Keinath and Beauvais 2006).

Mostly, the 2005 survey results highlight the need for a thorough, systematic survey for Wyoming pocket gophers throughout their known range. (See **Attachment C**: **Figure 2**). Karyotype map adapted from Thaeler and Hinseley (1979; Copyright American Society of Mammalogists, Journal of Mammalogy, by C.S. Thaeler and Hinseley. Reprinted by permission of Alliance Communications Group, a division of Allen Press, Inc.) showing the distribution of samples analyzed in their study and the differences in chromosome number among taxonomic groups of *Thomomys* in central Wyoming. Open symbols represent localities where chromosome material was examined and closed symbols represent

localities were it was not examined. Legend in upper left provides a species key to symbology, with chromosome count (2n) noted in parentheses (Thaeler and Hinseley 1979).

IX. Current population status throughout the range of T. clusius

A. Carbon and Sweetwater Counties

(See **Attachment C**: **Figures 3, 4 & 5** and accompanying text. pp. 11-16)

Critical to this petition (emphasis added) for listing is the comparison of *T. clusius*' extremely limited range with proposed U.S. Dep't of Interior Bureau of Land Management (Rawlins Wyoming Field Office) drilling projects. See **Map 1**: RAWLINS FIELD OFFICE - MINERALS & LANDS PROJECTS.*

**This comparison makes exceedingly clear the present threat posed by gas and oil development overlapping T. clusius populations located, specifically, within and near to the Continental Divide – Creston, Atlantic Rim, and Desolation Flats proposed projects on Bureau of Land Management (public) land.*

X. *Thomomys clusius* meets all five criteria for listing

A. Threats

Abundance and trends

Virtually nothing is known regarding the actual abundance of the Wyoming pocket gopher within its range, and even the boundaries of its range are questionable. Therefore, all published statements estimating the prevalence of this species are conjecture, and more information is needed for a confident assessment. For example, Clark and Stromberg (1987) stated that it may be abundant within its range, but their analysis included locations currently believed to be occupied by northern pocket gophers rather than Wyoming pocket gophers (See **Attachment C**: **Figure 4**). **There are now only 14 known locations where specimens of the Wyoming pocket gopher have been documented, representing 21 captured and positively identified individuals.** The Wyoming Game and Fish Department used this information to list the Wyoming pocket gopher as an uncommon resident (Oakleaf, B., A. Cerovski, and M. Grenier. 2002) while Wyoming Natural Diversity Database currently categorizes the abundance of the Wyoming pocket gopher as rare and possibly declining (See **Attachment C**: **Figure 5**, and the previous section on Distribution and abundance).

The Wyoming pocket gopher has an exceedingly small global range, essentially being endemic to one or two counties in Wyoming, with a possible small extension into northern Colorado (See **Attachment C**: **Figure 3**, **Figure 4**). Given the overall lack of field inventory, the bounds of this range are not well defined. Even if additional field efforts document significant range expansions and moderate or high abundances within that range, the overall population of Wyoming pocket gophers is still likely to be very small.

Population trends of Wyoming pocket gophers are essentially unknown across both the historical and recent periods. Recent *ad hoc* evidence, however, suggests a possible decline based on an absence from historic locations (Keinath and Beauvais 2006). Similarly, very little is known about habitat trends for this species. A small amount of habitat may have been lost to urbanization and other disturbances such as road and pipeline construction, but a substantial amount of generally undisturbed habitat probably remains. It is likely that remaining available habitat has been fragmented and/or degraded by these same processes, as well as vegetative shifts caused by grazing, drought, and global climate change, but we have no information to support or refute this hypothesis.

Intrinsic vulnerability

A variety of biological factors can make animals intrinsically susceptible to disturbance. These factors include narrow distribution, habitat specificity, restrictive territoriality and area requirements, susceptibility to disease, lower dispersal capability, high site fidelity, and low reproductive capacity. After reviewing available information (summarized below), Keinath et al. (2003) considered the intrinsic vulnerability of Wyoming pocket gophers to be moderate. This was due to their highly limited distribution, their limited dispersal ability, and the uncertainty surrounding many aspects of their biology (e.g., habitat use) (Keinath and Beauvais 2006).

Small mammals with restricted distributions and/or narrow habitat requirements are more vulnerable than others to habitat loss (Hafner 1998). Since the habitat requirements of the Wyoming pocket gopher are so poorly understood, it is not clear how restrictive they are. It appears to be an upland species dependent on habitat that is not uncommon in southern Wyoming (i.e., ridges with gravely, loose soils in sparse shrubland). However, the paucity of information requires extreme caution when interpreting habitat patterns, as they may be responding to subtle factors of soil texture or vegetation that are not apparent based on scant

available information. Moreover, their highly restricted distribution and apparently low abundance suggest that this could be the case. Until we learn otherwise, it makes sense to interpret their habitat use conservatively/ Therefore, for purposes of estimating intrinsic vulnerability, we assume that they have some, as yet undefined, habitat requirements that restrict their occurrence and make them potentially vulnerable to disturbance (Keinath and Beauvais 2006).

Given their fossorial existence, and the fact that dispersal capabilities of other species of pocket gophers are rather limited (Vaughan 1963) it can be assumed that the Wyoming pocket gopher is similarly restricted. Because of this limit, it may be relatively easy to fragment suitable habitat, as relatively small habitat disturbances could be a movement barrier. (Emphasis added).

Very little information exists to make further determinations of vulnerability for Wyoming pocket gophers. If we consider them similar to northern pocket gophers, other biological factors do not seem to predispose them to harm from disturbance. In general, pocket gophers can persist in fairly small areas (Howard and Childs 1959, Banfield 1974, Ingles 1952) so it is not likely that area requirements are a major limiting factor. Neither does the literature suggest that disease is a major factor in pocket gopher persistence, although research is sparse. The northern pocket gopher shows somewhat lower fecundity than other small mammals, but in the absence of major neonatal mortality, it does not appear restrictive. For example, the northern pocket gopher is able to reproduce one calendar year after birth, has a gestation of only 19 to 20 days, and has a relatively long breeding season (March to June), but it generally produces only one litter of four to seven young per year (Verts and Carraway 1999, Moore and Reid. 1951).

1. Present and threatened destruction, modification, and curtailment of habitat and range

Habitat destruction is the primary threat to *T. clusius*. The following quote represent the convention in the biological sciences: "Axiomatic that species with small geographic distributions and low ecological tolerances are most vulnerable to habitat loss" (Center for Native Ecosystems 2003, Hafner 1998) Reflecting a circumstance similar to that of *T. clusius* in Wyoming, Colorado's Dep't of Wildlife's COVERS REPORT indicates that this subspecies's range is very

limited and is in an area undergoing rapid development "which will likely impact any resident pocket gophers" (CDOW 2000).

Habitat fragmentation and isolation also threaten *T. clusius*. Continued oil and gas development creates increasingly dense road networks, diminishes corridors suitable for *Thomomys* dispersal, and further separates *T. clusius* populations. Roads act as barriers to finding mates, leading to inbreeding and loss of gene flow within individual populations. Habitat fragmentation results in shrinking islands of intact habitat with increased exposure to edge effects. The impacts of the disturbances associated with oil and gas development will only increase, given the tremendous municipal development pressures within *T. clusius* geographic range.

Moreover, development is not just destroying and fragmenting habitat; it is also causing habitat degradation. Soil disturbances typical of oil and gas development projects, motorized recreation, and other high soil impact activities are known to exacerbate the introduction and subsequent spread of noxious weeds. Noxious weeds threaten half of the imperiled species in the U.S. (Wilcove et al. 1998, Wilcox 1985), and *T. clusius* is likely no exception.

Noxious weeds have been shown to limit population density in other fossorial mammals (Slobodchikoff et al. 1988). For example, Gunnison's prairie dog (Cynomys gunnisoni) burrow densities at six sites and found that burrow density was significantly negatively correlated with the number of noxious weed species present. In fact, number of noxious weed species present accounted for 45.3% of burrow density variability (Groves and Steenhof 1988, Yensen et al. 1992). Other investigators have discovered numbers of active Townsend's ground squirrel (Spermophilus townsendii idahoensis) burrows significantly declined in areas where fire frequency and intensity increased because of cheatgrass presence.

Herbicide use that invariably precedes and follows most forms of development also degrades pocket gopher habitat. Research has demonstrated that herbicides used for forb control have negatively impacted, for example, *T. talpoides* population levels in the past (Reid 1973, Hansen and Ward 1966, Tietjen 1973, Chase et al. 1982, Miller 1964, Tietjen et al. 1967). For example, an early study demonstrated that an application of the toxicant 2,4-D on a Colorado northern pocket gopher site caused an 87% decrease in the gopher population when the production of perennial forbs had decreased by 83%.(Miller 1964). *T. talpoides* prefer foods such as lupine (Lupinus sp.), western yarrow (Achillea lanulosa), penstemon (Penstemon redbergii), and agoseris (Agoseris sp.), but eat a wide variety of plants (Miller 1964).

Where these plants exist on *T.clusius* sites, herbicide application may be especially pernicious. Habitat destruction in the range of *T. t. macrotis* will and perhaps already has also disrupted natural water run-off patterns. This may pose a threat to *T. clusisus* by altering soil moisture and limiting habitat availability.

The petitioners assert, based on best available scientific and commercial information, "habitat degradation, fragmentation, and loss associated with proposed oil and gas development, in particular, is threatening *T. clusius* with imminent extinction" (emphasis added).

2. Overutilization for commercial and recreational purposes

Individual pocket gophers are killed in the pursuit of commercial and residential development. Individuals may also be killed for agricultural purposes. Finally, individuals may be destroyed to create recreational facilities.

a. Residential and commercial development kills individual pocket gophers

Pocket gophers are known to be killed as land development occurs (CDOW 2000). The cultivation of gardens and other planned landscaping projects in residential areas may also result in poisoning or trapping of pocket gophers. It follows that large scale industrial and commercial developments (slated for the entire known T. clusius range) such as those proposed on Bureau of Land Management public lands (e.g., Pinedale Anticline, Continental-Creston, and Atlantic Rim gas fields) will have certain devastating effects on *T. clusius* and its extremely limited habitat and range (See **Attachment D, Map 1**).

b. Pocket gophers are poisoned in an attempt to increase productivity on farmland and ranchland

Given the extremely difficult field and even laboratory distinction of *T. clusius* from both *T. t. macrotis* and *T. idahoensis* it is clear that the best trained pesticide applications technicians cannot possibly prevent inadvertent pesticide contact with *T. clusius* (emphasis added).

Chemical toxicants continue to be available for pocket gopher control. As a case in point, the Colorado Division of Wildlife cites poisoning as a threat to T. t. macrotis (CDOW 2000). It is common knowledge that pocket gophers are widely regarded as an agricultural pest. Within

the U.S. Department of Agriculture's Animal Plant Health Inspection Service, Wildlife Services (previously called Animal Damage Control) manufactures and disseminates toxicants to federal agencies, non-federal agencies, organizations, and private applicators (USDA/WS 1995, Wildlife Services 2001) to control pocket gopher populations for agricultural and silvicultural activities.

Wildlife Services's researchers have described an effective lethal control program as resulting in 90% annual mortality rates of targeted pocket gopher populations (Engeman and Gary 2000).

To further imperil *T. clusius*, a wide range of toxicants and traps are available for lethal control of pocket gophers. The favored methods of controlling pocket gophers are kill-traps, fumigants, and poisoned baits. The tunnel of a pocket gopher is located, and the toxicant or trap is applied (Tietjen 1973, Chase et al. 1982). These methods are legal and fully available to landowners and managers of the five known remaining populations of this subspecies. More specifically, toxicants and traps available for use on pocket gophers include the oral toxicants strychnine alkaloid, zinc phosphide, warfarin, chlorophacinone, and diphacinone; the fumigants carbon monoxide/dioxide and aluminum phosphide; pincher traps, which crush pocket gophers with two spring-loaded jaws, or box chokers, which pin pocket gophers to the floor of the trap with a spring-loaded wire jaw (Engeman and Witmer. 2000).

While pocket gophers may be considered a pest in rangelands, their actual impact on those lands is unclear. Two divergent perspectives, each possessing some degree of experimental evidence. According to the first viewpoint, pocket gophers are pests on rangeland and should be controlled, while the second view is that pocket gophers cause insignificant detrimental impact and therefore should not be controlled (Tietjen 1973). Given the extreme rarity of *T. clusius* it is essentially inconceivable to view this species as pest of any significance.

c. Constructing and maintaining recreational facilities may kill individual gophers

Since data is non-existent for *T. clusius* is should be noted that in Colorado where four of the five sites where *T. t. macrotis* has been found in the past decade, the development and maintenance of recreational facilities may have destroyed individual gophers (Center for Native Ecosystems 2003).

3. Disease and predation

Parasites and disease

According to Wyoming Natural Diversity Database, parasites and/or disease have not been shown to limit pocket gopher populations and are thus not suspected to be a factor in the conservation of Wyoming pocket gophers. Pocket gophers carry a typical complement of endoparasites and exoparasites, most of which have been documented incidentally to other research. Lists of such are presented by several investigators (Reid 1973, Chase et al. 1982, Engeman and Witmer 2000, Verts and Carraway 1999, Miller and Ward 1964). Although most parasitic infestations appear to be minor and non-lethal, the northern pocket gopher has been found to be infested with warbles of the botfly, sometimes severely enough to cause mortality and occasionally involving 25 to 37 percent of local populations (Richens 1965a.). This same cause of mortality cannot be ruled out for *T. clusius*.

Although, historically, parasites and disease have not be considered a major threat to *T. clusius* more recent research suggests physiological stress created from habitat loss and degradation may be increasing Thomomys vulnerability to both. (emphasis added).

The following excerpt clearly illustrates the degree of uncertainty associated with the significance of endoparasites, in particular, to the health of pocket gophers. Although Wyoming Natural Diversity Database reports parasites and/or disease have not been suspected to be a factor in the conservation of Wyoming pocket gophers, this may not be the case and should be considered in light of saving this species from imminent extinction.

> *[Eimeria fitzgeraldi* was described from this population of pocket gophers by Todd and Tryon." They also found oocysts of *E. tizomomysis* in 25 of the same 65 fecal samples from which *E. fitzgeraldi* was described (Todd, unpublished data). The finding of *E. thomomysis* in *T. talpoides* is evidently a new host and geographic record. *Eimeria 1zomomysis* was described from *Thomomys bottae* in Arizona by Levine et al."
>
> The only other report of coccidia from pocket gophers was by Skidmore, who described *Eimeria geomydis* from *Geomys bursarius* in Nebraska. Lubinsky" reported cysticerci of *Taenia mustelae* Gmelin, 1790 from *T. talpoides* from Alberta. This is evidently the only other record of larval tapeworms from *Thomomys*. *Paranoplocephala variabalis* and *P. infrequens* were described by Douthitt from *Geomys bursarius*. Rausch and Schiller reviewed the literature on *Paranoplocephala* spp. in rodents. The finding of these is a new geographic record.

Ransomus rodentorum was originally described by Hall as a species of *Chabertia* from *T. talpoides* in Colorado, but he later assigned the specimens to a new genus and species. This species is still the only one in the genus. *Ransotnus rodentorum* has since been reported from *T. talpoides* and *T. umbrimus* in Utah. Our finding is evidently a new geographic record.

Longistriata vexillata was described by Hall from *T. talpoides* from Colorado, and since then the taxonomic position of this species has been frequently changed. A review of the literature concerning this parasite is given by Skrjabin et al.'6 Evidently the only other report of this parasite, other than that by Hall' and the present study, was by Travassos and Darriba,'8 who found it in *Ranus norvegicus*. The present finding is a new geographic record. *Protospirura ascaroidea* was described by Hall from *Geomys breviceps* and has since been reported from *T. talpoides* by Lubinsky." The present finding is evidently a new geographic record.

Journal of Wildlife Diseases Vol. 7, April, 1971 103. Hall' described *T. fossor* from *T. talpoides* collected in Utah; since then the species has been reported from the following hosts: *T. bottae* from California,2" *T. talpoides* from Alberta and *T. talpoides* and *T. umbrinus* from Utah.' *Triclzuris fossor* from Wyoming is a new geographic record.

Capillaria Izepatica has been reported from many species of mammals. A summary of North American host and locality records was given by Layne. The parasite has previously been reported from *T. talpoides* in Wyoming by Dikmans and Rausch."

The differences in prevalence of parasitism by different groups or species of parasites are of interest. Although the sample size was small (46), there seem to be some trends. The high prevalence of coccidia from animals collected at 8400 ft., the absence of cestodes in animals from 6800 ft. and the apparent altitudinal distribution of *R. rodentorum, T. fossor* and *C. Izepatica* need further study. The complex relationships of the host, intermediate host and environment are all interrelated factors which determine the prevalence and distribution of parasites of *Peromyscus floridanus* by Layne is an example of the types of information that are needed to properly evaluate the interaction between hosts, parasites and the environment.] (Todd and Lepp 1971)

A variety of mammalian, avian, and reptilian species prey on northern pocket gophers. Predation is generally not a limiting factor for pocket gopher abundance or distribution, however, "[p]ocket gophers are more important as a prey item to predators than predators are as a controlling factor of gophers (Chase et al. 1982)." However, this may not be as true of avian predators, as studies have indicated raptors can significantly reduce pocket gopher populations (Chase et al. 1982)." For example, predation has not historically been documented as limiting *T. t. macrotis* numbers or range but, given the extraordinarily small size of the remaining population, and new predation threats associated with municipal

development, it may pose a limitation currently. How much more true this concern for *T. clusius* (Emphasis added).

Three-dimensional structures like powerlines and buildings create raptor perches (Bureau of Land Management 2003). Such development has transformed pocket gopher habitat from a largely flat plane to a three-dimensional world with increased opportunities for raptor predation. Residential, commercial, and industrial development also raises the risk of predation from domesticated predators such as cats and dogs (Yensen et al. 1998).

Thomomys talpoides serves as a host for several endoparasites (internal parasites) and ectoparasites (external parasites). Internal parasites include roundworms and tapeworms, while external parasites include lice, fleas, ticks, and mites (Reid 1973). Endoparasites and ectoparasites of *Thomomys talpoides* are as follows: Protozoa (Eimeria spp.), Cestoda (Cysticerci, Paranoplocephala spp.), Nematoda (Ransomus rodentorum, Longistriata vexillata, Protospirura ascaroidea, Trichuris fossor, Capillaria hepatica), Diptera (botfly: Cuterebra spp.), Acarina (mites and ticks: Haemogamasus ambulans, Hirstionyssus geomydis, Haemolaelaps geomys, Ixodes sculptus), Mallophaga (lice: Geomydoecus spp.), Siphonaptera (flea: Foxella ignota). These are established as a significant limiting factor on the abundance or distribution of the *T. t. macrotis* (and the petitioners suggest, likely, *T. clusisus*).

While predation is a natural part of *T. clusisus* and all pocket gopher ecology, the influx of people, the introduction of new predators, noxious weeds, soil disturbance and pollution, water pollution and redirection to its habitat may threaten this species with population declines because of elevated predation rates.

4. The inadequacy of existing regulatory mechanisms per Wyoming Natural Diversity Database

Petitioners agree with the WYNND assessment (Keinath and Beauvais 2006) and add: The Wyoming BLM has been issuing unprecedented numbers of oil and gas exploration and drilling permits since 2000 and in the range of *T. clusius*.) In the Atlantic Rim Coalbed Methane project, alone, 2000 wells would be drilled and at a density of 8 wells per square mile. The Atlantic Rim, the Continential Divide-Creston, and the Desolations Flats projects each include the known and potential *T. clusius* range. In spite of this fact, the BLM's Final Environmental Impact Statement

for this project does not even mention the Wyoming Pocket Gopher (*Thomomys clusius*) much less discuss protection measures (Bureau of Land Management 2006) (Emphasis added).

MANAGEMENT STATUS AND NATURAL HISTORY

Management Status

Federal Endangered Species Act

The U.S. Fish and Wildlife Service does not give any special status to the Wyoming pocket gopher at this time (Keinath and Beauvais 2006).

USDA Forest Service

Beginning in 2001, Region 2 of the USFS undertook a major revision of its sensitive species list, which was finalized in December 2003; this list subsequently underwent a minor revision in May 2005 (Keinath and Beauvais 2006).

As of the last revision, the Wyoming pocket gopher was listed as a sensitive species in Region 2 (USDA Forest Service 2005, http://www.fs.fed.us/r2/projects/scp/assessments/index.shtml). Sensitive species are defined by the USFS as "those animal species identified by the Regional Forester for which population viability is a concern as evidenced by: (a) significant current of predicted downward trends in population numbers or density, and/or (b) significant current or predicted downward trends in habitat capability that would reduce a species' existing distribution" (USDA Forest Service 1994). The Region 2 area in Wyoming includes the Bighorn, Black Hills, Medicine Bow, and Shoshone national forests and the Thunder Basin National Grassland. Based on known distribution, the Medicine Bow–Routt National Forest is the only National Forest System unit in Region 2 that possibly supports the Wyoming pocket gopher, but we are not aware of any known occurrences on USFS lands (Keinath and Beauvais 2006).

Bureau of Land Management

The Wyoming Bureau of Land Management (BLM) developed their sensitive species list in 2001 and assigned the Wyoming pocket gopher to that list. The

BLM developed the list to "ensure that any actions on public lands consider the overall welfare of these sensitive species and do not contribute to their decline." The BLM's sensitive species management will include:

- determining the distribution and current habitat needs of each species
- incorporating sensitive species in land use and activity plans
- developing conservation strategies
- ensuring that sensitive species are considered in National Environmental Policy Act analysis
- prioritizing what conservation work is needed (Bureau of Land Management Wyoming 2001).

To date, however, no such action has been taken for the Wyoming pocket gopher, and the authors are not aware of plans to do so (Keinath and Beauvais 2006).

State Wildlife Agencies

The Wyoming Game and Fish Department classifies the Wyoming pocket gopher as NSS4 and includes it on a long list of species of concern under Wyoming's Comprehensive Wildlife Conservation Strategy (Wyoming Game and Fish Department 2005). In general, this ranking means that although populations appear to be restricted in distribution, the species' habitat does not appear to be declining, and there are no known sensitivities to human disturbance (Oakleaf et al. 2002). The primary issues identified by the conservation strategy regarding this species were a need for more information on its status, trends, and habitat use.

Natural Heritage Program

The Wyoming Natural Diversity Database (WYNDD) has assigned the Wyoming pocket gopher a rank of G2/S2 (http://uwadmnweb.uwyo.edu/wyndd/; Keinath et al. 2003). The G2 refers to a relatively high probability of global extinction, based primarily on the taxon's extremely small global range. The S2 rank refers to a relatively high probability of extinction from Wyoming, based largely on range restriction, but also considering apparently low range occupation, uncertain abundance trends, and moderate biological vulnerability. Further, WYNDD

assigns a Wyoming Significance Rank of Very High to the Wyoming pocket gopher (Keinath et al. 2003a, b), which reflects the extremely high contribution of Wyoming population segments to continental persistence of the species. Clearly, because the species is thought to occur only within the state of Wyoming (possibly extending slightly into northern Colorado pending further investigation), the fate of Wyoming populations is synonymous with the fate of the species as a whole.

Existing Regulatory Mechanisms, Management Plans, and Conservation Strategies

To date, there are no management plans or conservation strategies pertaining explicitly to the Wyoming pocket gopher although one status assessment has been drafted with support of the Wyoming State Office of the BLM and WYNDD (Beauvais and Dark-Smiley 2005). With its listing on most major sensitive species lists in Wyoming (see above section on Management Status), there appears to be consensus among management agencies of the importance of conserving this species and some leverage to initiate such action. The tenants of such lists generally require that the agencies maintaining those lists consider the welfare of those species when developing land use and resource management plans and in planning project actions. This generally includes, but is not limited to:

- evaluating current distribution and status of sensitive species, including sensitive species concerns in NEPA analyses
- employing best management practices for conserving sensitive species
- monitoring the status of populations and/or habitat for sensitive species
- collaborating with other agencies to further exchange of information beneficial for conserving sensitive species (e.g., USDA Forest Service 1994, Bureau of Land Management Wyoming 2001, Wyoming Game and Fish Department 2005).

If such mandates are rigorously adhered to, there appear to be sufficient mechanisms by which conservation of Wyoming pocket gopher could be achieved. However, conservation will only be effective if the mandates are given

> institutional priority by the agencies in question, whereby collection of needed information is funded and the data from such research are allowed to influence management actions. The primary issue stated by most studies looking at this species is the lack of information on virtually all aspects of its biology and ecology (e.g., this report, Keinath et al. 2003, Beauvais et al. 2004, Wyoming Game and Fish Department 2005). Without such information, decisions regarding its conservation are not likely to be effective or enforceable. Unfortunately, given other issues of management concern, no efforts have been taken to date by any agency to resolve this lack of information. Thus, the mechanisms by which conservation can be achieved (at least on public lands) are in place, but their efficacy depends on the rigor with which responsible agencies implement them, which has yet to be determined (Keinath and Beauvais 2006).

Given the circumstances stated above, the petitioners request expeditious consideration of listing *Thomomys clusius* as threatened or endangered and its known and potential habitat designated as Critical Habitat. (emphasis added).

5. Other natural or manmade factors affecting its continued existence

a. Vulnerability of small populations

This species occupies an extremely narrow range. **Only fourteen (14) locations are known where twenty-one (21) specimens** of *T. clusius* have been documented recently, and substantial barriers have been created between these populations. *T. clusius* is clearly extremely vulnerable to extinction (emphasis added).

Stochastic or random events pose a great threat to small populations because they often simply do not possess the resources to recover. Three main forms of stochasticity have been recognized as increasing extinction risk: demographic, environmental, and genetic (Brussard and Gilpin 1989, Miller et al. 1996). These factors often work synergistically (Vucetich and Waite 1999). As Lacy (1997: 329) states, "Genetic instability and decline can cause demographic instability and decline, and greater susceptibility to environmental fluctuations and catastrophes. Demographic fluctuations and catastrophe-caused bottlenecks can in turn cause more genetic instability and depletion of genetic variation." *Thomomys clusius* is vulnerable to each of these three forms of stochasticity.

i. Demographic stochasticity

Demographic stochasticity represents events influencing individual birth and death rates, such as random variability in the sex ratio of offspring. Demographic events are generally not important in large populations, but they can be significant in extremely small populations where one individual represents a substantial proportion of the population.

ii. Environmental stochasticity

Environmental stochasticity refers to random events influencing all individuals in a given population, such as weather events, fires, disease outbreaks, or unusual predation events. Environmental events can have a substantial impact on even relatively large populations, but small or geographically restricted populations are in far more danger of becoming extinct from such events.

iii. Genetic stochasticity

Genetic stochasticity refers to variability in random recombination in the gene pool of a particular species and is generally not a problem in normal, heterozygotic populations. However, in very small and/or isolated populations, it can result in loss of fitness due to inbreeding depression and the resultant expression of deleterious alleles (Lacy 1997).

Small, fragmented, and isolated populations have fewer opportunities for genetic flow. Breeding partners are often limited to those found in the immediate area, and loss of fitness due to inbreeding depression can result. Lacy (1997:321) states:

> Inbreeding has been observed to cause higher mortality, lower fecundity, reduced mating ability, slower growth, developmental instability, more frequent developmental defects, greater susceptibility to disease, lowered ability to withstand stress, and reduced intra- and inter-specific competitive ability (Allendorf and Leary 1986, Darwin 1868, 1876, Falconer 1989, Ledig 1986, Lerner 1954, Ralls et al. 1988, Wright 1977).
>
> More highly inbred wild common shrews (*Sorex araneus*) were smaller at time of weaning and had a decreased probability of reaching adulthood (Lacy 1997, Stockley et al. 1993).

Inbreeding depression is often more severe when coupled with harsh or variable environmental conditions (Lacy 1997, Lerner 1954, Schmitt and Ehrhardt 1990, Keller et al. 1994, Miller 1994, Frankham 1998). As fitness is lost from inbreeding, population size continues to diminish, and further inbreeding becomes even more likely (Brussard, Peter F. and Michael E. Gilpin. 1989) while at the same time survivors become more vulnerable to extinction from demographic or environmental stochasticity (Lacy 1997, Goodman 1987).

There are several mechanisms that cause inbreeding depression. Without reliable sources of immigration, genetic diversity may quickly be lost through the random process of genetic drift, and deleterious mutations and alleles may spread throughout a population. These deleterious alleles can become fixed in small populations because allele frequencies in populations with fewer than a thousand breeding individuals are usually influenced more by random genetic drift than natural selection (Lacy 1997, Kimura 1983). As these maladaptive genes accumulate, populations decline and genetic drift may occur even more rapidly, creating the positive feedback termed "mutational meltdown." (Lacy 1997, Frankham 1998, Vucetich and Waite. 1999). When only a few individuals establish a new population or survive a population bottleneck, their progeny are highly vulnerable to the effects of genetic drift and loss of genetic variability (Lande 1995, Lacy 1997). Many populations of mammalian species that have experienced bottlenecks have been shown to experience lower fitness compared to populations that did not experience bottlenecks (Lacy 1997). While inbreeding in some plants that reproduce by self-fertilization has been found to purge populations of maladaptive recessive alleles, there is little evidence that this occurs in mammals (Lacy 1997, Ralls et al. 1988, Barrett and Charlesworth. 1991, Barrett and Kohn. 1991).

Inbreeding depression may also result from the loss of the competitive advantage conveyed by heterozygosity, or heterosis. White-tailed deer (Odocoileus virginianus) with a greater number of heterozygous allozyme loci also had higher rates of twin births, more massive pregnant females, and faster

fetal growth (Lacy 1997, Cothran et al. 1983). Faster horn growth is reported in bighorn sheep with higher levels of heterozygosity (Fitzsimmons, et al. 1995). Higher measures of population size, heterozygosity, and genetic variation were all "positively and significantly correlated with population fitness" (Reed, D.H., and R. Frankham 2003).

As heterozygosity is lost, populations are less able to adapt to change because there are simply fewer combinations of alleles available (Lande and Shannon. 1996, Myers 1996). As Lacy (1997:321) summarizes:

Fluctuations in genetic variance in small populations can reduce the rate of adaptation sufficiently to cause small populations to go extinct in the face of environmental change to which large populations would be able to adapt (Bürger and Lynch 1995). We cannot know what adaptations will be required for persistence in future environments, but we do know that the rate of environmental change is much more rapid presently than perhaps at any time in past evolutionary history (Bürger and Lynch 1995).

Effective population sizes of 5,000 individuals may be necessary to maintain potentially adaptive genetic variation, which means that actual population sizes should be even larger (Lande 1995). Effective breeding populations often only include one-quarter of the individuals in mammal populations because young and old individuals are not involved in breeding and certain mature individuals are more likely to pass on their genetic material (Groves and Clark. 1986, Noss and Cooperrider 1994, Brussard and Gilpin. 1989). It is highly likely that considerable loss of heterozygosity has already occurred given the small number of *T. clusius* individuals that probably remain.

Since physical barriers separate the remaining *T. clusius* sites, dispersal between them is unlikely. The total number of remaining individuals of this species is very low. Therefore, the results of inbreeding depression may be irreversible. Lacy (1997:331) writes, "When a population is the only representative of its taxon, or exchange with other populations is not possible, then reversal of genetic depletion would come about only if the population can

recover to large numbers and survive the 100s- 1000s of generations needed for new mutations to restore variation" (Lacy 1997). Clearly this will not be possible if *T. clusius* habitat and population loss continues.

b. Climate change

Of these three types of stochasticity, only environmental events are likely to be of current import to Wyoming pocket gopher populations. In the event that populations decrease to the verge of extinction, demographic and genetic stochasticity could become major concerns. Weather and its influence on food and cover [i]s a dominant factor in determining annual populations of pocket gophers. Although extreme climatic events can affect pocket gopher populations, their overall effects are not well understood (Howard, W.E. and H.E. Childs 1959). Pocket gophers are more abundant in years of normal or above-normal moisture and lower in years of below-normal precipitation, suggesting a potentially negative impact from prolonged drought (Vaughan 1967). This effect can be extended to include impacts from global climate change if it results in a general desiccation of habitat within the range of the Wyoming pocket gopher. Runoff from melting snow and high groundwater tables can force temporary redistribution of pocket gophers (Reid 1973). Harsh winters and late spring/ early fall freezes can also affect pocket gopher populations, (Reid 1973) probably mostly by increasing juvenile mortality.

A small amount of habitat may have been lost to urbanization and other disturbances such as road and pipeline construction, but a substantial amount of generally undisturbed habitat probably remains. It is likely that remaining available habitat has been fragmented and/or degraded by these same processes, as well as vegetative shifts caused by grazing, drought, and global climate change, but we have no information to support or refute this hypothesis. It is likely that remaining available habitat has been fragmented and/or degraded by these same processes, as well as vegetative shifts caused by grazing, drought, and global climate change, but we have no information to support or refute this hypothesis.

c. Stress

Many of the factors endangering *T. clusius* habitat could also contribute directly to increased pocket gopher stress levels. Development and the overall increase in human presence leads to increases in general surface disturbance. Additionally, noxious weed invasion and drought can lead to physical stressors such as malnutrition. "Many stresses have a metabolic cost and

this should tend to make the effects of different stresses cumulative…." (Hoffmann, A.A., and P.A. Parsons. 1991). Studies in other fossorial species, such as the white-tailed prairie dog, have shown reduced birth rates due to resorptions and abortions in pregnant females when exposed to environmental stressors (Foreman, D. 1962). Stress similarly impacts *T. clusius* reproduction and/or survival rates.

B. Continued oil and gas exploration and development within the range of *T. clusius* translates to imminent, high magnitude threats

1. Carbon and Sweetwater Counties oil and gas development

Petitioner, Biodiversity Conservation Alliance, has long monitored and advocated for ecologically and environmentally responsible oil and gas development on Bureau of Land Management lands in Wyoming and surrounding states. The collective Jonah Field oil and gas project in southwestern Wyoming is widely recognized as no less than an environmental disaster even with several organizations like Biodiversity Conservation Alliance constant official pleas for restraint on the part of the BLM and energy interests. In spite of strong scientific evidence that should have resulted in the restraint called for by Biodiversity Conservation Alliance and its partners, the BLM and energy interests have virtually destroyed any hope for the sustained survival of many species of wildlife in the Jonah Field project region. The Jonah Field precedent is described in brief in Biodiversity Conservation Alliance's fact sheet, The Jonah Field – Poster child for Drilling Gone Wrong. **(See Attachment E)** Petitioners request the Service review the voluminous historical and scientific information provided on Biodiversity Conservation Alliance's website concerning the destruction of wildlife habitat in the Jonah Filed project area. Please view: http://www.voiceforthewild.org/blm/Jonah_field/index.html and follow links to additional information.

Biodiversity Conservation Alliance's compelling historical account of "out-of-control" oil and gas development in Wyoming, particularly on BLM lands, provides impetus to this petition to list and thus protect Thomomys clusius under the Endangered Species Act.

Virtually the entire known range of the Wyoming pocket gopher is leased for oil and gas development, and BLM has approved or is currently approving full-field oil and gas development, specifically the Atlantic Rim, Desolation Flats, and Continental Divide - Creston Projects totaling 11,335 wells and covering most of the known range of this species (Biodiversity

Conservation Alliance 2005) (also, **See Attachment D, Map 1.**). Given that oil and gas development has been recognized as a primary threat to the viability of this species, together with the lack of specific measures to protect the Wyoming pocket gopher in the documents approving these projects to date, emergency listing is needed to prevent the potential loss of the species.

The BLM approved 2,000 natural gas and coalbed methane wells and 1,000 miles of roads with pipelines buried beneath them across 270,000 acres under the Atlantic Rim Coalbed Natural Gas Project on May 21, 2007 (BLM 2007). The BLM approved 385 wells, 542 miles of road and 360 miles of pipeline across 233,542 acres under Desolation Flats Natural Gas Field Development Project on July 27, 2004 (BLM 2004). The agency is proposing 8,950 wells and an undisclosed mileage of roads and pipelines across 1.1 million acres under the Continental Divide - Creston Project (BLM 2006).

XI. Summary

Petitioners have demonstrated that the species *Thomomys clusius* meets multiple criteria for protection under the ESA as either an Endangered or Threatened species. *Thomomys clusius* meets the definition of an Endangered species as defined CNE et al. ESA listing petition for *T. clusius* by the Act. "The term "endangered species" means any species which is in danger of extinction throughout all or a significant portion of its range other than a species of the Class Insecta determined by the Secretary to constitute a pest whose protection under the provisions of this Act would present an overwhelming and overriding risk to man" (16 U.S.C. § 1532(6)).

The number of known remaining populations (i.e., **only fourteen** locations producing **only twenty-one** documented specimens) and its presumed extremely low total population (which produces inherent genetic variability issues) in consideration with the fact that *T. clusius* is thought to occupy a total of only 1,102 km2 or 0.44% of Wyoming's land base (See **Attachment C: Appendix -** *Predictive Distribution Model for Wyoming Pocket Gopher*) and considered alongside the multiple imminent and high-magnitude threats of habitat loss and degradation (due primarily to oil and gas development), potential eradication from chemical toxicants, invasive noxious vegetation, impacts from human recreation and companion animals, climate change, and a variety of other intrinsic and extrinsic threats, present a collection of irrefutable facts and factors that combine to force the conclusion that *T. clusius* is facing imminent threat of extinction.

If *T. clusius* is not provided with ESA protections, it is extremely likely the species will go extinct. On this basis, petitioners request ESA listing for the *T. clusius* species of the Wyoming pocket gopher. The Wyoming pocket gopher is a keystone engineer species that actively shapes plant community structure and soil characteristics, and that serves as prey to a variety of predators.

Pocket gophers have played foundational roles, alongside prairie dogs and bison, in shaping North American grasslands. It is therefore with humility and foresight that we must safeguard those life forms threatened by on-going anthropogenic threats such as habitat destruction.

XII. Requested designation

Petitioners hereby petition the USFWS to list the Wyoming pocket gopher, *Thomomys clusius,* as a Threatened or Endangered species throughout its range pursuant to the Endangered Species Act.

XIII. Request for emergency listing rule

The ESA provides authority for the Secretary to issue temporary listing rules in the event of "any emergency posing a significant risk to the well being of any species of fish or wildlife or plants" (16 U.S.C. § 1533(b)(7)). Indeed, the Secretary is commanded to make "prompt use" of this authority "to prevent a significant risk to the well being of any such species" (16 U.S.C. § 1533(b)(3)(C)(iii)).

Extremely rare *Thomomys clusius* is not protected by any state or federal regulations. Yet this species is more imperiled than ever as continued human development and subsequent habitat degradation continue at a furious pace in Sweetwater and Carbon Counties. The remaining populations of *T. clusius* are dangerously close to being extirpated, if they have not been already. The extent of undeveloped *T. clusius* range remaining in Sweetwater and Carbon Counties is deceiving, as many areas have already been leased by the energy sector for future development.

The introduction of exotic grasses and noxious weeds further imperils *T. clusius* by jeopardizing the continued availability of food and suitable soil conditions. No regulatory mechanisms currently exist to protect this species from continued residential and commercial development. Current regulatory mechanisms are not adequate to protect this highly imperiled species from extinction, and the magnitude and imminence of the threats involved require immediate attention; irrevocable harm will likely occur in the period of time (usually multiple years) expended during the standard listing process.

Therefore, in addition to requesting ESA listing, Petitioners further request that an emergency listing rule be promulgated immediately.

XIV. Benefits of ESA listing

The benefits of ESA listing for *T. clusius* will be substantial, as we suggest in earlier sections of this petition.

- Listing will require that federal agencies, in conjunction with FWS, carefully consider the potential impacts to *T. clusius* of ongoing and proposed activities under their jurisdictions. The result will be significantly improved protection from commercial and residential development, noxious weeds, and other human disturbance.

- The designation of critical habitat, yet another exclusive benefit of ESA listing, will result in significant additional protection not only for occupied *T. clusius* habitat but also for other habitat areas deemed essential to the recovery of the species but currently unoccupied.

- Listing will result in the development of a *T. clusius* recovery plan aimed at biological recovery (and, if possible, delisting).

- Listing will help spur research (and the required funding and scientific interest) necessary to fully understand how biological recovery of *T. clusius* can be achieved. This research may further the recovery of similar imperiled species.

- Listing will help improve and standardize *T. clusius* management.

- The Bureau of Land Management, State of Wyoming, and Sweetwater and Carbon Counties have failed to adopt conservation measures to ensure *T. clusius* recovery. Listing will significantly increase the likelihood that necessary measures are adopted.

- Listing will require protections that are not occurring now and will not occur otherwise through requirements for section 7 consultation for federal projects or projects with federal funding and section 9 prohibitions on take by government or private parties.

- Listing is necessary to ensure the persistence of *T. clusius* given the ferocious rate of residential and commercial development throughout its range.

- Even the most ambitious scenario involving state and federal agencies adopting their own conservation measures would, at best, result in the reduction of threats to *T. clusius*, not biological recovery.

- Listing *T. clusius* may reduce the loss of other native wildlife species from development and secondary poisoning and trapping.

- Listing *T. clusius* would be a step toward ecosystem protection, given the Wyoming pocket gopher's status as a keystone species.

XV. Critical Habitat

This petition requests that critical habitat be designated for *T. clusius* concurrent with final ESA listing.

XVI. Documents cited

Petitioners hereby incorporate by reference every document cited in this petition and/or cited in the References below. We are happy to provide copies of any of these documents upon request.

XVII. 90 day petition finding

This petition and accompanying material provide substantial scientific and commercial information indicating that ESA listing for *Thomomys clusius* may be warranted. Petitioners expect to receive a formal acknowledgment of this petition and a decision within 90 days of its receipt.

Respectfully submitted,

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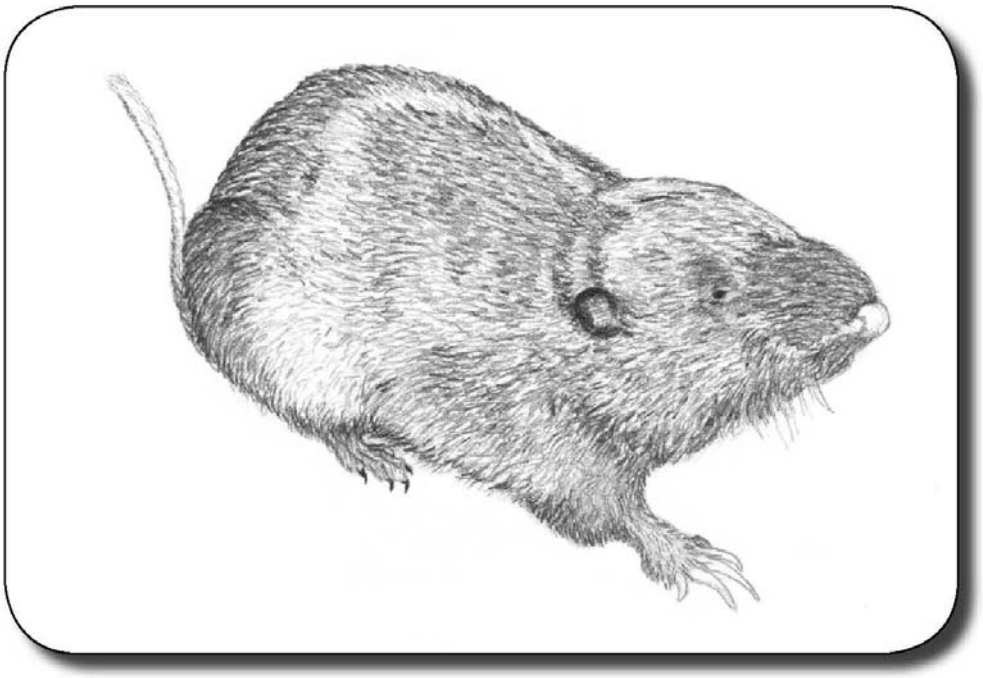
Appendix 12

OSTS_00079

Wyoming Pocket Gopher (*Thomomys clusius*): A Technical Conservation Assessment



Prepared for the USDA Forest Service,
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Species Conservation Project

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Peer Review Administered by
Society for Conservation Biology

Appendix 13

OSTS_00079

Articles

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Evolution of Wyoming's Early Cenozoic Topography and Drainage Patterns

A series of nine pairs of paleogeographic maps of the state of Wyoming that begins in the Late Cretaceous and ends in the early Oligocene is presented. One map of each pair indicates relative topography, including inferred fluvial/lacustrine drainage patterns, and is shown in a perspective view; its complement indicates probable limits of hydrographic basins for each of the major river systems and is shown planimetrically. Drainage patterns and areas of hydrographic basins changed profoundly through the 30-million-year interval in sequential (and partly overlapping) response to: Laramide tectonic events; Absaroka–Gallatin–Challis volcanism; major erosion; and massive, distant volcanism. The area of a hydrographic basin affects, or is related to, virtually all hydrologic and geomorphologic processes that occur within the watershed. In turn, these watershed characteristics directly and importantly influence biotic factors and the accumulation of economically important minerals. Thus reconstructions of paleolandscapes and ancient drainage patterns have implications for the study of the evolution of life, in addition to their economic applications.

Wyoming's Paleogene (Paleocene through Oligocene) topographic evolution was dramatic and complex. Major changes were wrought by the successive (and partly overlapping; Figures 1 & 2) influences of Laramide tectonism, Absaroka–Gallatin–Challis volcanism, widespread erosion, and massive influxes of volcaniclastic debris from regions outside the state. The resulting fluvial and lacustrine drainage patterns reflect this topographic evolutionary sequence. These patterns of drainage, in turn, allow recognition of regional uplifts that previously were not discerned from more detailed, geographically localized investigations. Previous reconstructions of Wyoming paleolandscapes and drainage patterns have tended to focus on rather limited geographic areas and temporal intervals.

The series of nine reconstructions for Wyoming presented here begins with the latest Cretaceous and ends with the early Oligocene (Figure 1; see Berggren et al. 1985). A three-dimensional, topographic perspective map (views are due north, as seen from 25° above the horizon, with sun azimuth at 290° set 15° above the horizon) plus a fluvial pattern map (planimetric view, emphasizing major drainage-divides) were prepared for each of nine intervals. The perspective maps include considerable vertical exaggeration (probably about sixfold); an exact value cannot be established because only relative, not absolute, elevations can be surmised for the paleolandscapes. Differences in relief (associated

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Appendix 13 (cont.)

Adobe Town Presentation — Public Hearing

October 24, 2007 — BLM Hdqtrs., Rock Springs, WY

(Sponsored *by State of Wyoming Environmental Quality Council*)

FILED
OCT 24 2007
Terri A. Lorenzon, Director
Environmental Quality Council

Greetings/thanks

Name — Jason A. Lillegraven

Presentation will be in the spirit of your needs — provision of facts

Background qualifications
- UW Geology/Zoology faculty — 3 decades (teaching/research/service) — with focus on
  - Systematic paleo of vertebrates (fish through mammals)
  - Principles of paleontology
  - Paleogeographic evolution of WY within geological contexts of Rocky Mtns. and High Plains
- Past-President Society of Vertebrate Paleontology
- National Science Foundation Program Director in Systematic Biology
- NSF proposal review panel in Geology/Paleontology
- In 4th year of retirement but continuing as
  - Co-editor of *Rocky Mountain Geology*
  - Field mapping of NW Bighorn Basin, E Wind River Basin, and E Hanna Basin
- State of Wyoming Professional Geologist (# 24)

Representing only myself

< SLIDES >

SLIDE 1 — Why important?
- Focus today is on unique aspects of Washakie Basin (in general) and Adobe Town (in particular)
- Just one geological/paleontological perspective of many possible

SLIDE 2 — Principal physiographic features
- Locate Washakie Basin and surrounding features
- Most features across WY (except Yellowstone and Tetons) are relict from c. 45 Ma — preserved since then by ashfall cover from NV volcanoes

SLIDE 3 — Relevant geologic time scale
- "Ma"
- Assemblages of fossil mammals form the main means of dating WY Cenozoic strata — Used as standards across western North America to date nonmarine rocks

SLIDE 4 — Relative timing
Go through components — late in Cretaceous through Eocene
Washakie Basin *uniquely* contains the entire pile (through the Uintan)
This is the *only* place in WY, and one of only *two* places in the entire Rockies

SLIDE 5 — End of the Cretaceous (65 Ma)
Extinction of dinosaurs
Explain the two views
All one drainage basin — into retreating mid-continental seaway

SLIDE 6 — End of the Paleocene (55 Ma)
Crustal contraction (c. 20%) led to rugged topography and drainage subdivisions (to Gulf of Mexico and maybe Hudson Bay)

SLIDE 7 — Late in early Eocene (48 Ma)
Advent of Absaroka (and Challis/Gallatin) volcanism
General internal drainage into Lake Gosiute and Fossil Lake
Lake Tatman in S Bighorn Basin

SLIDE 8 — Early in late Eocene (45 Ma)
Lake Gosiute became filled and drained to S — and maybe into *Pacific* Basin
Geologic story closely tied to volcanism in NW Wyoming, SW Montana, and E-central Idaho — Huge drainage basin

SLIDE 9 — Late in Eocene (33 Ma)
Dominance of distant volcanism — prodigious ashfall across the continent
Filled the basins, subdued the topography, and restored the E-ward drainage — "Nebraska with lumps"
Preserved the middle Eocene landscape from erosion — until the last 10 my years or so — entire continent now under unrelenting erosion

SLIDE 10 — Principal physiographic features [again]
Refer to stack of plates — explain erosional relationships — unique preservation at Adobe Town — "unique" goes beyond "rare"

QUESTIONS?

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Appendix 14

Erik Molvar, Biodiversity Conservation Alliance

Big Game
The longest remaining ungulate migration corridor in the contiguous United States, the pronghorn migration between Grand Teton National Park and Seedskadee National Wildlife Refuge, would be affected by the proposed oil shale leasing. BLM itself acknowledges that migration corridors could be disrupted by oil shale projects. DEIS at 4-69. The migration corridor should be buffered by at least 5 miles, and this area should not be offered for oil shale leasing under any circumstance.

Sensitive Species
Instruction Memorandum (IM) 97-118 governs BLM Special Status Species management and requires that actions authorized, funded, or carried out by the BLM do not contribute to the need for any species to become listed as a candidate, or for any candidate species to become listed as threatened or endangered. All action alternatives clearly violate this IM for sage grouse, Wyoming pocket gopher, midget faded rattlesnake, pygmy rabbit, bluehead sucker, flannelmouth sucker, and roundtail chub. This IM recognizes that early identification of BLM sensitive species is advised in efforts to prevent species endangerment, and encourages state directors to collect information on species of concern to determine if BLM sensitive species designation and special management are needed. In addition, for special status species, including sensitive species, BLM must:

> Identify strategies and decisions to conserve and recover special status species. Given the legal mandate to conserve threatened or endangered species and BLM's policy to conserve all Special Status Species, land use planning strategies and decisions should result in a reasonable conservation strategy for these species. Land use plan decisions should be clear and sufficiently detailed to enhance habitat or prevent avoidable loss of habitat pending the development and implementation of implementation-level plans. This may include identifying stipulations or criteria that would be applied to implementation actions. Land use plan decisions should be consistent with BLM's mandate to recover listed species and should be consistent with objectives and recommended actions in approved recovery plans, conservation agreements and strategies, MOUs, and applicable biological opinions for threatened and endangered species.

BLM Land Use Planning Handbook H-1601-1, Appendix C at 5. Additionally, if Sensitive Species are designated by a State Director, the protection provided by the policy for candidate species shall be used as the minimum level of protection. BLM Manual 6840.06. The policy for candidate species states that the "BLM shall carry out management, consistent with the principles of multiple use, for the conservation of candidate species and their habitats and shall ensure that actions authorized, funded, or carried out do not contribute to the need to list any of these species as threatened/endangered." BLM Manual 6840.06. Specifically, BLM shall:

(1) Determine the distribution, abundance, reasons for the current status, and habitat needs for candidate species occurring on lands administered by BLM, and evaluate the significance of lands administered by BLM or actions in maintaining those species.
(2) For those species where lands administered by BLM or actions have a significant affect on their status, manage the habitat to conserve the species by:
    a. Including candidate species as priority species in land use plans.

b. Developing and implementing rangewide and/or site-specific management plans for candidate species that include specific habitat and population management objectives designed for recovery, as well as the management strategies necessary to meet those objectives.
c. Ensuring that BLM activities affecting the habitat of candidate species are carried out in a manner that is consistent with the objectives for those species.
d. Monitoring populations and habitats of candidate species to determine whether management objectives are being met.

(3) Request any technical assistance from FWS/NMFS, and any other qualified source, on any planned action that may contribute to the need to list a candidate species as threatened/endangered.

BLM Manual 6840.06. This provides additional baseline data gathering responsibilities for the Atlantic Rim Project, responsibilities that have yet to be fulfilled. Clearly, the BLM must survey for special status species before allowing any ground disturbance for this project, must develop site-specific management plans for these species, and must monitor special status species populations within the ARPA to ensure that the agency is promoting their recovery. The BLM must acquire baseline data and analyze the impacts of the four alternatives on these species. In the Draft EIS, the BLM has flouted its special status species obligations, which makes this safety net less meaningful and increases the need for Endangered Species Act protection.

BLM notes that both Alternatives could result in "reduced abundance and distribution of affected species," particularly Wyoming BLM Sensitive Species such as sage grouse and raptors (such as golden eagles and ferruginous hawks). DEIS at 2-63. Furthermore, "There is a potential for commercial oil shale development projects to adversely affect most of the threatened, endangered, and sensitive species that occur in the counties where development could occur." DEIS at 4-85.

Overall the DEIS fails to provide baseline information on population size and trend, or even geographic range, of BLM Sensitive Species that stand to be impacted by oil shale development. In addition to the species outlined in detail below, rare or BLM Sensitive Species likely to be impacted by oil shale development but insufficiently considered in the DEIS include the northern leopard frog (petitioned for listing under the ESA), Great Basin spadefoot, northern plateau lizard (not even mentioned in the DEIS despite its rarity), smooth green snake, sage sparrow, Scott's oriole, long-billed curlew, white-faced ibis, Forster's and Caspian terns, pallid and spotted and Townsend's big-eared bats, Preble's shrew, and Idaho pocket gopher. The DEIS contains a lack of baseline information concerning population size, trends, and distribution of these species as well as analysis of impacts to them, both direct and cumulative. The Wyoming Natural Diversity Database provides occurrence data for these species, and may have predicted distribution maps and even technical conservation assessments for some of these species, yet BLM has apparently not gathered these readily-available data for their EIS analysis.

In Wyoming, the total distribution of mystery wormword, large-fruited and narrow-leaved and prostrate bladderpods, Hayden's milkvetch, Moab milkvetch, Sodaville milkvetch, precocious milkvetch, Wolfe's orache, Crandall's and Selby's rockcresses, little-leaved brickell-brush, Dwarf mountain mahogany, fullstem, Cedar Rim and Ownbey's thistles, slender crypantha, Payson's tansy-mustard, Uinta draba, Great Basin downingia, Long-awned alkali wildrye, green Mormon tea, Wilcox, eriastrum, crisp-leaf and Hooker wild buckwheats, Ephedra buckwheat, Colorado bedstraw, Nevada sweetpea, entire-leaved peppergrass, ternate desert-parsley, Nuttall sandwort, red poverty-weed, tree-like oxytheca, stemless and white and Gibbens' and Garrett's beardtongues, a number of rare phaecelias (including desert glandular, western, Nelson, and tiny), tufted and Dorn's twinpods, dwarf ninebark, Deep Creek cinquefoil, dwarf woolly-heads, yellow water-crowfoot, and persistent sepal yellowcress have not been mapped against the proposed oil shale leasing, which needs to occur. The proportion of plant populations for each species

potentially erased by oil shale leasing/development both in terms of statewide and worldwide populations needs to be analyzed and disclosed, as these plants will not be able to move out of the way of bulldozers or walking draglines. In addition, the ability of these plants to be recovered needs to be analyzed and disclosed. Are native, local seed sources available under cultivation for each of these species? Do each of these plants have a reasonable chance of taking root in a reclamation setting, with disturbed soil structure and hydrograph? Overall, we are concerned that many of these sensitive species have narrow ranges and could become Threatened or Endangered as a result of oil shale development proceeding from this leasing EIS.

Midget Faded Rattlesnake

The midget faded rattlesnake is believed to be rare throughout its range, which includes northwest Colorado, northeast Utah, and southwest Wyoming and along the lower Green River and Bitter Creek valleys (*see* Baxter and Stone 1985). According to Parker (2003, p. 103), "Low abundance, relative isolation, and relatively low reproductive potential likely made the midget faded rattlesnake more vulnerable to disturbances." The worldwide range of this species closely overlaps the oil shale/tar sands most prospective areas proposed for leasing under Alternative B. However, BLM has failed to undertake a spatial analysis of the range of this rare reptile, and indeed the only baseline information on this species provided in the DEIS is a mention of it in a list of species that occur in the oil shale area. *See* DEIS at 3-138. Midget faded rattlesnakes exhibit a high degree of den site fidelity and are very poor dispersers (Parker 2003). According to Parker, "Midget faded rattlesnakes occupy discrete areas and are anchored to those areas due to dormancy periods and high fidelity of their hibernacula" (Id., p. 88). Hibernacula are widely separated in distance in this study, indicating that an oil shale project that destroyed a hibernaculum could eliminate the metapopulation using that area. Because virtually the entire range of this subspecies lies within the oil shale/tar sands proposed leasing area, the implementation of Alternative B in conjunction with heavy subsequent leasing and development would provide impetus for listing the subspecies under the ESA, and could even become the critical factor leading to the extinction of this unique and divergent subspecies.

Sage Grouse

BLM's analysis of impacts to sage grouse is completely vacuous and free from any meaningful estimate of the magnitude of direct and cumulative impacts of oil shale development on the grouse. *See* DEIS at 4-74 through 76. While BLM does provide an abbreviated literature review of sage grouse life history attributes (DEIS at 3-141), and presents the spatial distribution of sage grouse leks within the areas proposed for leasing (DEIS at 6-49), it does not analyze population size and trends for these leks, data which should be reasonably available from state fish and game agencies. This failure to provide the key baseline data needed to support an impact analysis is a critical failure under NEPA. How many sage grouse leks fall within the potentially leased areas, and what are their estimated populations? What other activities are already affecting these populations in either positive or negative ways, and what is their overall population trend? These are obvious questions which the BLM's lack of analysis leaves unanswered.

BLM's spatial data on sage grouse lek distribution within the "most prospective" oil shale area also shows far fewer leks than data from the State of Wyoming. We have attached the State of Wyoming data as Appendix 10 so that the BLM can begin from an accurate baseline, and hopefully perform the 'hard look' analysis using these data which is not presented in the DEIS.

BLM mentions its national Sage Grouse Strategy, which insults the intelligence of the reader because this "strategy" consists of nothing more than a commitment to communicate with other agencies; no management standards or directions apply. Sage grouse conservation is not going to occur simply by

holding roundtable discussions to talk about the problems facing the brid; BLM is going to actually have to do something about its decline. The oil shale DEIS is bereft of actual solutions or even constructive recommendations concerning how to accomplish this in the context of oil shale leasing and development.

Wyoming sage grouse populations are some of the largest left in the nation and are relatively stable (showing a 17% decline from 1985-1994); nonetheless, sage grouse populations have experienced major declines rangewide in recent decades (Connelly and Braun 1997). WGFD (2000) reported that since 1952, there has been a 20% decline in the overall Wyoming sage grouse population, with some fragmented populations declining more than 80%; Christiansen (2000) reported a 40% statewide decline over the last 20 years. These declines can be attributed to habitat loss (due to agriculture, mining and energy development, reservoirs, roads, and buildings), habitat fragmentation (due to fences, powerlines, roads, and reservoirs), habitat degradation (due to overgrazing, changes in fire regime, and mechanical and chemical sagebrush control efforts), drought, predation (the importance of which is controlled by the amount and quality of sage grouse habitat), and hunting (Braun 1998).

Connelly et al. (2000) provide a review of the many short- and long-term effects of energy development on sage grouse. Aldridge (1998) noted that oil and gas development has contributed to the serious decline of Canadian sage grouse populations, stating,

> the removal of vegetation for well sites, access roads, and associated facilities can fragment and reduce the availability of suitable habitat. Furthermore, human and mechanical disturbance at wells may disrupt breeding activities, and traffic on access roads could cause some fatalities of birds…. Even if sites are reclaimed at a later date, birds may fail to return to previously used habitats.

Currently, only 7 of 31 historic lek complexes remain active in Canada (Braun et al., 2002). For this Canadian population, these researchers have stated, "The future plans for oil and gas developments within the range of sage-grouse are unknown, but expansion is expected. The cumulative impacts of further activities could result in reduction of the Alberta sage-grouse population to non-viable levels."

Coalbed methane development has even greater impacts on sage grouse. According to Braun et al. (2002), "Impacts to sage grouse from CBM development include direct loss of habitats from all production activities along with indirect effects from new powerlines and significantly higher amounts of human activity, both during initial development and during production." For leks within 0.25 mile of coalbed methane facilities, significant reductions in males/lek and rate of growth, presence of overhead power lines within 0.25 mile of a lek also depressed sage grouse population growth, and compressor stations within 1 mile of a lek significantly reduced sage grouse numbers (*Ibid.*).

But the definitive study on the impacts of oil and gas development to sage grouse was undertaken by Holloran (2005). The study considered sage grouse populations in the Pinedale Anticline and Jonah gas fields in Western Wyoming, as well as sage grouse in adjacent areas where development was not occurring. This study reached the following findings:

Impacts to Breeding Males

- Populations of breeding males on leks (sage grouse mating sites) in areas subjected to full-field natural gas development in the Pinedale Anticline and Jonah fields declined by an average of 51 percent from the year prior to development to 2004, compared to only a 3 percent decline at undisturbed leks.

- Males at three leks surrounded by natural gas development declined by 89%; two of the three leks were abandoned entirely within 3 to 4 years of initiation of gas drilling.

- Active drilling within 3.1 miles of a sage grouse lek reduced the number of breeding males that used the lek.
- After drilling and construction had been completed, the presence of producing gas wells within 1.9 miles of a lek site reduced the number of breeding males using the lek.
- As road traffic increased, the number of breeding males on affected leks decreased.
- As well densities increased, the number of breeding males on affected leks decreased.
- Well densities of 1 or more wells per square mile reduced the number of males at affected leks.

Impacts to Nesting Females

- Some 64% of sage grouse nested within 3.1 miles of a lek site.
- Females showed strong fidelity to their nesting areas, and continued to nest in affected areas even after roads and wells were developed nearby. Older females remained in affected areas, while yearling females departed from gas fields.
- Overall, females strongly avoided nesting in areas of high well density.
- There was a 21 percent decline in the population of nesting females relative to undisturbed females over the 5 years of the study.
- Females nesting in developed areas had a significantly lower survival rate than female grouse in undeveloped areas. Although nest success rates were higher in developed areas, this increase was not sufficient to overcome the lowered female survival rates, resulting in an overall 21 percent decline in sage grouse population growth in developed gas fields relative to undeveloped areas.
- The study predicted that sage grouse populations would become extinct in the Pinedale Anticline and Jonah Fields within 19 years if current population trends continue. (Both of these fields are in the early stages of development. As impacts to sage grouse habitat become progressively worse with the planned increase in gas drilling, the population declines could become steeper in the future).
- Population reductions likely result from a combination of dispersal away from gas fields and increased mortality rates for birds affected by development.
- The author's findings suggest that "current development stipulations are inadequate to maintain greater sage-grouse breeding populations in natural gas fields" (page 57).

The findings of this study make clear that projects like the Atlantic Rim CBM project, under standard stipulations like those in the Proposed Action and Alternative B, are clearly insufficient to prevent significant impacts to and ultimate depopulation of sage grouse. It is important to note that the data for this study were gathered from 2000 to 2004, when the Pinedale Anticline Field had a similar or lower density compared to the Atlantic Rim CBM project under all action alternatives.

Importantly, because this study found that well densities greater than 1 well/699 acres negatively impacted sage grouse lek populations, proposed well densities of 80 to 160 acres spacing should be

expected to have heavy impacts on sage grouse populations. Because the presence of production wells (post-drilling) within 1.9 miles of a sage grouse lek had negative effects on breeding populations, and because all alternatives will allow the siting of wells within 1.9 miles of lek sites, heavy impacts to breeding populations at impacted lek sites would be expected. However, because BLM has not planned the location of wells and roads, the agency will not be able to analyze the direct and cumulative impacts of the project on sage grouse, either on a project-wide basis or lek by lek.

It is important to note that the sage grouse is a BLM Sensitive Species, which must be managed to avoid a trend toward listing under the ESA. The USFWS's "not warranted" decision on sage grouse was largely predicated on healthy and expanding populations in Wyoming. The ARPA contains 88 sage grouse leks, a significant proportion of the Wyoming proportion. The total number of sage grouse in the ARPA remains undisclosed, as BLM has failed its baseline information responsibility to gather and present lek count data gathered by the WGFD.

Pygmy Rabbit

The pygmy rabbit has been petitioned for listing under the Endangered Species Act, and the USFWS has issued a positive 90-day finding on this petition, indicating that there is substantial scientific information that listing may be warranted. 73 Fed. Reg 1312. This species is an obligate resident dense stands of large, "decadent" sagebrush (Id.). Pygmy rabbit habitat is characterized by taller, broader, denser big sagebrush types which tended to accumulate more snow (Katzner 1994, Katzner and Parker 1997). Green and Flinders (1980) found that pygmy rabbits were associated with areas of greater woody cover and canopy height. Fragmentation can reduce the size, stability and success of pygmy rabbit populations because these animals are reluctant to cross open habitats (Weiss and Verts 1984, Katzner 1994). Purcell (2006, 34) noted, "the conversion of big sagebrush communities to energy production sites within southwestern and southcentral Wyoming creates a concern for pygmy rabbits in these regions." BLM should undertake a thorough analysis of the acreage of surface disturbance and the degree of habitat fragmentation in this habitat type as an index of the potential impacts to pygmy rabbits. Given the heavy impacts of oil and gas development projects both approved and in the approval process (and therefore reasonably foreseeable) across the range of this species, the widespread leasing for oil shale in Alternative B and even the more limited leasing proposed in Alternative C are likely to contribute to the need to list this species under the Endangered Species Act.

Wyoming Pocket Gopher

The Wyoming pocket gopher has recently been petitioned for listing under the Endangered Species Act. *See* Appendix 11. The Wyoming pocket gopher is a unique, endemic, and very rare rodent that possesses a different number of chromosomes (and is therefore genetically distinct) from its nearest relatives (Clark and Stromberg 1987). A conservation assessment has recently been completed for the Wyoming pocket gopher, and it concludes that this species is rare and possibly declining, and its known range includes portions of the most prospective oil shale area in Wyoming (Keinath and Beauvais 2006; Appendix 12). A review of the best available science indicates that heavy grazing pressure is deleterious to pocket gophers (*id.*); because oil shale related disturbance is likely to concentrate ungulate grazing away from impacted areas to the point of impacting vegetation, this aspect of the project is likely to have significant impacts on the Wyoming pocket gopher. The authors of this study point out that soil compaction and habitat fragmentation associated with oil and gas development are a principal threat, stating, "A more likely threat is soil disturbance and compaction due to increased petroleum exploration and extraction. In this context, increased road density that accompanies petroleum development may be more of a threat than the construction of well pads and pipelines, since it would fragment habitat, which could impede population persistence." *Id.* at 22. These researchers further recommend that "compaction of soils, in areas of known occupation will be detrimental to gophers and should be avoided;" (this, of course, requires BLM to conduct field inventories to ascertain the location of occupied areas) that roads should

not be permitted to bisect occupied areas; and that man-made raptor perches such as power poles, tanks, and fence poles should not be located near occupied habitat. Id at 25-26.

Obviously, oil shale development activities would erase pocket gopher habitat where it occurs, and further fragment the habitat that remained. The direct and cumulative impacts of oil shale development on this very rare and genetically unique species must be fully explored in the EIS, a duty which has heretofore been neglected in violation of NEPA's requirements.

Mountain Plover

Mountain plovers are often found closely associated with prairie dog colonies of all species. Kotliar et al. (1999) listed the mountain plover as a species that is dependent on prairie dog colonies for its persistence, with abundances higher on prairie dog colonies, habitat selection for prairie dog colonies, reproductive fitness higher on colonies, and population declines occurring when prairie dogs decline. An analysis of pre-settlement records of mountain plover occurrence in Montana indicates that this species was closely associated with prairie dog colonies even before the arrival of EuroAmerican settlers (Knowles et al. 1999). Knowles went so far as to state that prairie dog colonies are "necessary to provide suitable habitat for mountain plovers" on Montana's Great Plains, and termed prairie dogs "necessary for the long-term persistence of mountain plovers" in that region (Knowles 1999). This study also found that even small areas of active colonies are important plover habitat. In Wyoming, the distribution of plovers has been linked with the widespread occurrence of white-tailed prairie dogs (Oakleaf et al. 1996).

The reduction in prairie dog colonies has been directly implicated as an important cause of mountain plover declines rangewide. Knowles et al. (1999) found that the disappearance of prairie dogs due to plague and/or recreational shooting also led to abandonment of nesting habitat by plovers, and plover numbers increased on sites where prairie dog populations were expanding. According to the U.S. Fish and Wildlife Service (1999: 7594), "Further loss of prairie dog towns within the current breeding range of the mountain plover would be detrimental to plover conservation. Conversely, the conservation of the mountain plover can be enhanced by implementing strategies to increase the distribution and abundance of prairie dogs on breeding habitat." Thus, the conservation of prairie dog colonies may be a prerequisite to maintaining viable populations of mountain plover.

Swift Fox

The swift fox was determined to be "warranted but precluded" for listing under the Endangered Species Act by the U.S. Fish and Wildlife Service in 1995 (60 Fed. Reg. 31663). The swift fox is listed as a Species of Special Concern by the Wyoming Game and Fish Department, and is protected from intentional take by state regulations (Oakleaf et al. 1996). This species has been listed as dependent on the prairie dog for its persistence, and that its populations decline when prairie dogs decline (Kotliar et al. 1999). In one study, swift fox home ranges averaged 32 km^2. The diet of swift fox in various parts of its range is dominated by prairie dogs, grasshoppers, and beetles (Uresk and Sharps 1986), small rodents, including prairie dogs (Kilgore 1969), mainly lagomorphs (particularly jackrabbits) with some prairie dogs (Zumbaugh et al. 1985), and may include carrion and plant matter (Hines and Case 1991).

According to Kahn et al. (1997), "Swift fox are frequently observed along roadways, which may increase the rate of animals being killed specifically by vehicles. Factors such as road density, miles traveled and driver speed may increase the rate of swift fox mortalities" (p. 17). Kilgore (1969) noted, "The chief mortality factors to which swift foxes are subjected are those associated with the activities of man. These foxes are frequently killed crossing highways and county roads, shot by hunters or farmers, and killed by farm implements" (p. 525). Swift fox are also particularly vulnerable to poisoning programs targeted at rodents or other carnivores (Kilgore 1969, Uresk and Sharps 1986). In their conference opinion on the Seminoe Road Coalbed Methane Project, the USFWS recommended that activities which might disrupt denning swift fox be prohibited between March 1 and July 31 (Long 2001).

It is clear that oil shale development activities stemming from this leasing EIS will have negative direct and cumulative impacts on swift foxes, particularly when the concomitant impacts of oil and gas development are considered. Yet BLM has attempted no direct or cumulative effects analysis for this species.

White-tailed Prairie Dog

White-tailed prairie dogs have declined to 8% of their native range in North America, and the survival of remaining populations is threatened by habitat destruction and modification, sylvatic plague, recreational shooting, poisoning, oil, gas, and mineral extraction, fire suppression, overgrazing, off-road vehicle use, noxious weeds, and climate change (Center for Native Ecosystems et al. 2002). In Wyoming, the white-tailed prairie dog occupies less than 2% of the suitable habitat for the species (Center for Native Ecosystems et al. 2002). For Wyoming's Great Divide Basin, Maxell (1973) noted, "Most active prairie dog towns were located some distance from the main thoroughfares in the Basin, probably due to human predation in the form of varmint hunters" (p.85). Throughout the Great Divide RMP area, prairie dog colonies are radically reduced from historic distributions, and are in need of protection and recovery.

According to Miller et al. (1990), "Ecologically, the prairie dog ecosystem is an oasis of species diversity on the arid plains" (p. 764). Sharps and Uresk (1990) found that 134 vertebrate wildlife species are associated with prairie dog colonies in western South Dakota. The importance of prairie dogs as prey for raptors has been noted in many studies (e.g., Tyus and Lockhart 1979, Campbell and Clark 1981, MacLaren et al. 1988, Jones 1989, Cully 1991, Kotliar et al. 1999). In a comparative study which incorporated Wyoming sites, Clark et al. (1982) found that white-tailed colonies showed a greater number of associated vertebrate species (83 species) than either black-tailed or Gunnison prairie dogs; larger towns had a greater species diversity than smaller towns.

Many rare and declining species, notably black-footed ferret, mountain plover, burrowing owl, ferruginous hawk, and swift fox are dependent on prairie dogs for their own persistence (Kotliar et al. 1999). In Wyoming, other species associated with white-tailed prairie dogs that are of particular note due to special status or management concern include the eastern short-horned lizard, northern plateau lizard, Great Basin gopher snake, midget faded rattlesnake, prairie falcon, merlin, sage grouse, burrowing owl, sage thrasher, Brewer's sparrow, sage sparrow, swift fox, and pronghorn (Clark et al. 1982).

Obviously, oil shale development activities will erase white-tailed prairie dog habitat as development (either in situ or surface mining) moves through active prairie dog colonies. BLM must identify all prairie dog complexes suitable for black-footed ferret reintroduction, as well as colonies where ferrets already potentially occur, and place these off-limits to surface-disturbing activities as a leasing stipulation with a buffer of ¼ mile. Also, all other active prairie dog colonies should become subjected to No Surface Occupancy stipulations with regard to oil shale activities. The DEIS fails to map the location of known active prairie dog colonies and how they overlap with the oil shale leasing areas under each action alternative. This information should be readily available from state fish and game agencies, and the omission of this baseline information from the analysis violates NEPA. Furthemore, the absence of direct and cumulative impacts analysis for this species, recently given a positive 90-day finding for ESA listing by the USFWS, is a particularly egregious violation of NEPA's 'hard look' requirements.

Burrowing Owl

Nationwide, the burrowing owl is a species on the decline. As of 1997, over half of the agencies across North America tracking burrowing owl population trends reported declining populations, while none reported increasing populations (James and Espie 1997). Burrowing owl populations are highly susceptible to stochastic disturbances such as drought, and thus may decline more rapidly than would be predicted on the basis of demographic factors alone (Johnson 1997). In Wyoming, data suggest an overall

population decline, with 17.5% reoccupancy of historic sites, but the spotty quality of historical data makes comparisons difficult (Korfanta et al. 2001). The burrowing owl has been identified as a species of concern by both the BLM and the Wyoming Game and Fish Department.

Burrowing owls are in a select group of wildlife most closely tied to prairie dog colonies, and prairie dog burrows are preferred nest sites for burrowing owls. Thompson (1984) reported that owls preferred abandoned prairie dog burrows in the early stages of succession. Green and Anthony (1989) found that nest burrows lined with dung were less susceptible to predation, perhaps explaining this unusual behavioral attribute. On the Great Plains, Sidle et al. (n.d.) found that burrowing owls actively selected for active prairie dog towns, and showed much lower usage of towns that had been decimated by plague, shooting, or poisoning. Desmond and Savidge (1999) found that burrowing owl nest success was positively correlated with density of active prairie dog burrows, and recommended preserving prairie dog colonies to maintain the viability of burrowing owl populations. And in the Columbia Basin, where prairie dogs are absent, burrowing owls nested in badger burrows, but as a result were subjected to badger predation (Green and Anthony 1989). Thus, the ongoing loss of prairie dog colonies has undoubtedly been a prime factor in the decline of the burrowing owl.

It is critically important that this leasing program minimize impacts to the burrowing owl. We are concerned both with the impacts that this program might have in reducing prairie dog populations, and also with the potential for direct mortality of burrowing owls due to vehicle collisions, particularly at night. What are the nighttime traffic patterns likely to be in the leasing area as a result of this proposed project? How many miles of road will cross known prairie dog colonies (and index of burrowing owl habitat), and how much will be directly obliterated? The BLM should require that prairie dog colonies be exempted from surface disturbing activities (except, perhaps, pipelines) to minimize the potential impact of the project to burrowing owls.

Sage Thrasher, Sage Sparrow, and Brewer's Sparrow

There are three species of sagebrush obligate songbirds found within the oil shale area and on the BLM Sensitive Species List. Ingelfinger (2001) conducted a study of sagebrush birds in a western Wyoming gas field and found that as gravel roads increased, densities of sagebrush obligate birds, Brewer's sparrows, and sage sparrows declined, while horned larks (a grassland species) increased. According to his findings, "roads associated with natural gas development negatively impact sagebrush obligate passerines. Impacts are greatest along access roads where traffic volume is high" (p. 69), but "bird densities are reduced along roadways regardless of traffic volume" (p.71). Obviously, oil shale development activities will destroy sagebrush obligate habitats over the long term, as Wyoming big sagebrush, upon which the species depends takes between 75 and 150 years to recover to natural mature stands following surface disturbance. The BLM must therefore analyze the direct and cumulative effects of oil shale development on habitat fragmentation and direct disturbance for these birds, a task that goes wanting in the DEIS.

Sensitive Fishes

Roundtail chubs, flannelmouth suckers, and bluehead suckers can be found in the watersheds to be affected by oil shale development. These species reside in large, slow-moving rivers and also in smaller tributary streams (Bezzerides and Betsgen 2002). According to Wheeler (1997), these species "have experienced dramatic reductions in their range in western Wyoming since 1965, and may need immediate conservation attention" (p. 54). In the Upper Colorado Basin, the roundtail chub has been extirpated from 45% of its historical range, bluehead suckers occupy about 45% of their historical range, and the flannelmouth sucker occupies about 50% of its historic range (Bezzerides and Bestgen 2002). All three of these species are on the BLM Sensitive Species list, and merit special conservation attention.

The Yampa River also holds important roundtail chub populations; Karp and Tyus (1990) reported that roundtail chub were three times more abundant in the Yampa than in the Green River.

The loss of stream habitats as a result of oil shale development would likely contribute significantly to the trend toward ESA listing for these three species, as each species is down to less than 50% of its historic range (see Rees et al 2005a, 2005b; Ptacek et al. 2005). The two action alternatives therefore violate the BLM's Sensitive Species policy, and should not be implemented.

According to Rees et al. (2005a:17), "Land use practices that can impact stream channels include construction of roads through highly erodible soils, improper timber harvest practices, and overgrazing in riparian areas." The same is true for bluehead suckers (Ptacek et al. 2005) and flannelmouth suckers (Rees et al 2005b). (These researchers recommended "minimization of sediment input due to anthropogenic sources (e.g., road building, timber harvest)" to maintain viable populations. Further, "It is likely that increased sediment loads or sediment deposition could negatively impact roundtail chub populations." *Id.* at 19. The impacts of sediment loading on these species must be fully evaluated in the PEIS, an analysis which has not occurred to date.

Endangered Fishes

The Yampa, Green, Colorado, and Little Snake Rivers harbor populations of Threatened or Endangered fishes. The Washakie Basin oil shale prospect is largely within the Little Snake River and Yampa River watersheds, and these rivers are home to populations of Endangered humpback chub and Colorado pikeminnow, with spawning habitat for humpback chub as well as roundtail chub and bluehead and flannelmouth sucker in the Little Snake (*see, e.g.,* Hawkins et al. 2001a). Marsh (1991) captured an adult Colorado pikeminnow in the Little Snake 18 km west of Baggs, and noted, "suitable habitat at least for adult big-river fishes remains available in the Little Snake River in Wyoming, and our capture of Colorado squawfish there is positive evidence for that species" (p. 1092). In the Little Snake River, specific spawning sites for razorback sucker and Colorado pikeminnow have been identified, and humpback chub have been monitored in this river for protracted periods of time during the spawning season, but spawning has not yet been confirmed (Hawkins et al. 2001a). According to Marsh (1991), the Little Snake should be considered among potential recovery sites for Colorado pikeminnow.

During baseflow periods in late summer and autumn, pools linked by trickles of river flow serve as refugia for native fishes, and are isolated by river reaches that are shallow, sandy, and constitute impassable barriers to dispersal (Hawkins et al. 2001a). The Little Snake's unusually high peak flow to baseflow ratio, large sediment load, and extremely low base flow have been cited as principal reasons that the Little Snake still harbors a largely native fish fauna, including humpback chub and Colorado pikeminnow (Hawkins et al. 2001a). BLM actions must maintain this natural disparity between peakflow and baseflow in affected rivers by providing a moratorium on activities that change the natural flow regimes for rivers, and requiring that any changes in flow regimes bring these river back toward their natural (presettlement) flow regimes.

The Yampa River watershed, affected by oil shale leasing (DEIS at 3-108), is critically important for the survival of the Colorado River Endangered fishes. According to Holden and Stalnaker (1975b), "The Yampa River is very important to the preservation of rare and endangered fishes in the Colorado basin primarily because all these rare forms are at least present in small numbers and some are apparently reproducing" (p. 411). Karp and Tyus (1990:263) proclaimed:

> Existing flows of the Yampa River may be singularly responsible for enabling the persistence of chubs in the Yampa and Green Rivers. Alteration of Yampa River flows could reduce the availability or character of chub spawning habitat and presumably

> adversely affect their reproduction, aid in further proliferation of introduced competitors and predators, and reduce the quality and quantity of usable habitats. Dinosaur National Monument should be considered a refugium for native fishes, and efforts should be made to protect flows of the Yampa River.

According to the USFWS (2000), "The Yampa River, a tributary to the Green River, is essential for the maintenance and recovery of the Green River basin. The relatively unaltered flows of the Yampa River are responsible for providing a natural shape to the hydrograph of the Green River." The Little Snake River, also affected by the prospect of oil shale leasing, provides 28% of the Yampa River's flow (USFWS 2000), and 77% of the Yampa's sediment load (Hawkins and O'Brien 2001). The flow and sediment contribution of the Little Snake are important in maintaining nursery habitats for Colorado River Endangered fishes in the alluvial reaches of the Green River (Hawkins and O'Brien 2001). According to Hawkins and O'Brien (2001), "One of the most important resources of the Little Snake River to the habitat and recovery of endangered fish is the highly variable water discharge and sediment supply to the Green River system" (p. 9).

Scientists have also recommended protective measures for these rivers. Hawkins et al. (2001a: viii) recommended, "Identify and maintain the discharge and physio-chemical conditions in the Little Snake River that support Colorado pikeminnow, humpback chub, and a mostly native fish community. These conditions might include the timing, magnitude, and pattern of runoff and baseflow and associated physico-chemical conditions such as turbidity, diel temperature fluctuations, or sediment load." Baseline hydrograph, chemical composition, and turbidity data for the lower Little Snake River are provided by Hawkins et al. (2001a). The BLM must maintain hydrograph and sediment load levels at these baseline levels through their management activities.

Actions which alter the sediment load, salinity, or water quantity jeopardize the survival of the Colorado River Endangered fishes. According to the US Fish and Wildlife Service (1999b), "it is assumed that these endemic fishes [Colorado River Endangered Species] evolved under natural conditions of high turbidity; therefore, the retention of these highly turbid conditions is probably an important factor in maintaining the ability of these fish to compete with non-natives that may not have evolved under similar conditions" (p.7). The U.S. Fish and Wildlife Service (1999b) found that flow depletion inherent to the proposed High Savery Dam "is likely to jeopardize the continued existence of the Colorado pikeminnow, razorback sucker, humpback chub, and bonytail, and is likely to destroy or adversely modify designated critical habitat" in the Yampa and Green Rivers (p. 34). Actions which significantly alter the flows of rivers inhabited by Threatened or Endangered fishes must be prohibited.

Total dissolved solids are one measure of chemical contaminants which may impact native fishes, and oil shale slag heaps are potentially a major source of leached salts and hydrocarbons. *See* DEIS at 4-25. Pimintel and Bulkley (1983) performed a study of the effects of Total Dissolved Solids (TDS) on the Endangered fishes of the Colorado River system in anticipation of oil shale development in western Colorado. This research revealed that for juveniles, Colorado pikeminnows preferred a TDS of 560-1150 mg/l and avoided levels greater than 4,400 mg/l; humpback chub preferred a TDS of 1000-2500 mg/l and avoided levels higher than 5100 mg/l; bonytail preferred TDS levels of 4100-4700 mg/l and avoided levels lower than 560mg/l and higher than 6600 mg/l. Tests were performed at 12°C for this study; TDS tolerances may have been higher if tested at a warmer temperature. These researchers concluded,

> "problems could arise for fish in localized situations where saline oil-shale-processing waters enter tributaries of the main river system. Fox et al…found that TDS concentrations of oil-shale-process waters ranged from 1,750 to 24,500 mg/liter and averaged 6,800 mg/liter. Tributaries polluted with such high TDS concentrations may be avoided by these species resulting in a loss of habitat" (p.599).

According to Tyus (1990b), "Water degraded in temperature or chemical composition can displace, or limit growth in fish populations" p. 19. These species may use chemical signatures of their native waterways to guide their spawning migrations (Tyus 1990a, Muth et al. 2001). Wastewater discharge or surface runoff that enters the Little Snake system directly or via groundwater as a result of the Atlantic Rim project would alter the chemical signature of the water; this must not be allowed.

The cumulative impacts assessment addresses water quantity, but not water quality. Important cumulative impacts include runoff from oil shale projects, oil and gas drilling and production and pipeline rights-of-way; changes in salinity from leaching of oil shale slag heaps and in situ operations together with saline runoff from oil, gas and coalbed methane roads and wellpads, pipeline corridors, coalbed methane wastewater discharge (e.g., Cow Creek Pod in Wyoming's Atlantic Rim project), and agricultural operations; and runoff of heavy metals and other toxic inorganic and/or organic compounds from oil shale leachates, oil and gas operations, and agricultural operations. The sediment load of these rivers is critically important to the viability of Sensitive and Endangered fishes. Temperature regimes also are critical to survival of these fishes; actions that change water temperature regimes could have disastrous effects that cascade downstream into these rivers. Finally, the low flows and wide disparity between spring flows and base flows are what keeps these river systems free of non-native fishes that threaten the survival of Sensitive and Endangered species, and an increase and steadying in flow amounts or decreases in flows could lead to the invasion of this last bastion of native fishes by non-native competitors and predators.

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Appendix 15

Climate Change
Prepared by the Natural Resources Defense Council

Climate change is a subject that has been intensely studied by the world's scientists, and broad consensus exists around its causes, magnitude and effects. The planetary warming that scientists predict will result from human emissions of heat-trapping gases is already underway. In February 2007, the Intergovernmental Panel on Climate Change (IPCC) declared, "[w]arming of the climate system is unequivocal," and it is "very likely" that most of the warming since the middle of the 20th century is the result of human pollutants. Climate change is a global phenomenon with well-documented and serious local impacts. Those impacts affect the both ecosystems and the welfare of citizens not only around the world, but in the United States and the nation's Western states in particular. In addition to its other disruptive direct effects, oil shale and tar sands leasing, development and use poses serious climate threats: first, production of oil from shale and tar sands will likely result in the generation of huge quantities of greenhouse gas emissions and second, transportation fuels derived from oil shale and tar sands are highly energy intensive and have a carbon footprint that is known and calculated to be higher than conventional fuels, and significantly higher than other cleaner fuel alternatives. As stated in scoping comments submitted by many of the same groups submitting these comments, the BLM was obligated to consider these and related impacts in this DPEIS.

The DPEIS fails dismally to consider climate change on many fronts. It fails to quantify the carbon emissions from leasing, development and use and compare them to a baseline. It fails to analyze the direct, indirect and cumulative impacts that climate change and increased carbon emissions will have on the welfare of ecosystems and humans – both qualitatively and quantitatively. It also fails to analyze alternatives to oil shale and tar sands development in meeting energy needs. Federal agencies generally and the BLM in particular are required to incorporate climate change and its impacts in their decision calculus under a number of mandates, including NEPA, FLPMA and Secretarial Order 3226. Thus, the current DPEIS is fatally flawed, violates NEPA and must be supplemented to integrate climate change in its analysis.

The Climate Change crisis

Global warming is a threat to public health, welfare, and the environment. The Intergovernmental Panel on Climate Change (IPCC) was established by the World Meteorological Organization and the United Nations Environment Programme in 1988. The IPCC's mission is to comprehensively and objectively assess the scientific, technical and socioeconomic information relevant to human-induced climate change, its potential impacts, and options for adaptation and mitigation[1]. The IPCC completed its First Assessment Report in 1990, its Second Assessment Report in 1995, and its Third Assessment Report in 2001.[2] The IPCC recently finalized its Fourth Assessment Report, "Climate Change 2007."[3] The summaries include the following significant conclusions that are relevant to Public Lands and the West[4]:

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[1] See http://www.ipcc.ch/about/index.htm.
[2] See http://www.ipcc.ch/ipccreports/assessments-reports.htm.
[3] Id.
[4] IPCC, 2007: Summary for Policymakers. In: Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M.Tignor and H.L. Miller (eds.)]. Cambridge University

- By mid-century, annual average river runoff and water availability are projected to decrease by 10-30% over some dry regions at mid-latitudes and in the dry tropics, some of which are presently water stressed areas;
- In the course of the century, water supplies stored in glaciers and snow cover are projected to decline, reducing water availability in regions supplied by meltwater from major mountain ranges, where more than one-sixth of the world population currently lives;
- Warming in the mountains of western North America is projected to cause decreased snowpack, more winter flooding, and reduced summer flows, exacerbating competition for overallocated water resources;
- Disturbances from pests, disease and fire are projected to have increasing impacts on North American forests, with an extended period of high fire risk and large increases in area burned;
- In North America, major challenges are projected for crops that are near the warm end of their suitable range or depend on highly utilized water resources;
- Approximately 20-30% of plant and animal species assessed so far are likely to be at increased risk of extinction if increases in global average temperatures exceed 1.5-2.5 Degrees Celsius;
- Even the most stringent mitigation efforts cannot avoid further impacts of climate change in the next few decades, which make adaptation essential, particularly in addressing near term impacts. Unmitigated climate would, in the long term, be likely to exceed the capacity of natural, managed and human systems to adapt.
- Global greenhouse gas (GHG) emissions have grown since preindustrial times, with an increase of 70% between 1970 and 2004;
- The largest growth in global GHG emissions between 1970 and 2004 has come from the energy supply sector (an increase of 145%).

The IPCC reports authoritatively document the adverse environmental and socio-economic impacts of global warming at local, regional, national and global scales, and the primary role of the burning of fossil fuels, including oil derived from shale and tar sands, in causing global warming. The evidence in the IPCC reports conclusively shows that greenhouse gases, including CO2, endanger public health, welfare, and the environment.

Many researchers have highlighted the severity of the threats posed by global warming. A recent study found that from 2000 to 2006, the average emissions growth rate was 3.3% per year, compared to 1.3% per year during the 1990s.[5] The study estimates that global warming is happening faster than expected, and attributes this to recent growth in the world economy, increasing carbon intensity, and decreasing

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Press, Cambridge, United Kingdom and New York, NY, USA; IPCC, 2007: Summary for Policymakers. In: Climate Change 2007: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, M.L. Parry, O.F. Canziani, J.P. Palutikof, P.J. van der Linden and C.E. Hanson, Eds., Cambridge University Press, Cambridge, UK, 7-22; IPCC, 2007: Summary for Policymakers. In: Climate Change 2007: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, M.L. Parry, O.F. Canziani, J.P. Palutikof, P.J. van der Linden and C.E. Hanson, Eds., Cambridge University Press, Cambridge, UK, 7-22. IPCC, 2007: Summary for Policymakers. In: Climate Change 2007: Synthesis Report, Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M.Tignor and H.L. Miller (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. Available at http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr_spm.pdf

[5] Canadell, J.G., *et al.*, *Contributions to Accelerating Atmospheric CO2 Growth from Economic Activity, Carbon Intensity, and Efficiency of Natural Sinks*, Proceedings of the National Academy of Sciences, October 25, 2007.

efficiency in carbon sinks on land and in oceans.[6] This evidence suggests that even the estimates of the IPCC6 are too conservative, and that the threat of global warming may be even more imminent than originally anticipated.

The World Health Organization reported in 2005 that, over the past 30 years, global warming has contributed to 150,000 deaths annually.[7] EPA has already recognized this and other potentially adverse effects of climate change on public health: Throughout the world, the prevalence of some diseases and other threats to human health depend largely on local climate. Extreme temperatures can directly lead to loss of life, while climate-related disturbances in ecological systems, such as changes in the range of infective parasites, can indirectly impact the incidence of serious infectious diseases. In addition, warm temperatures can increase air and water pollution, which in turn harm human health.[8] One threat identified by EPA is fatalities due to extreme temperatures. Indeed, increased heat waves lead to heart failure and other heat-related deaths. Global warming also exacerbates the problem of ground-level ozone ("smog"), intensifying the public health dangers associated with air quality violations. Breathing ozone can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion, and repeated exposure can lead to bronchitis, emphysema, asthma, and permanent scarring of lung tissue.[9] In addition, global warming will result in increased surface water evaporation, which in turn could lead to more wildfires and increased dust from dry soil, both of which generate particulate matter emissions. Particulate matter triggers a host of health problems, including aggravated asthma, development of chronic bronchitis, irregular heartbeat, nonfatal heart attacks, and premature death in people with heart or lung disease.[10]

Public Land Resources are already being adversely affected by climate change

Many of the public resources managed by the Department of the Interior are being harmed by climate change resulting from increased greenhouse gas emissions[11]. The West in particular is being affected more by a changed climate than any other part of the United States outside of Alaska: compared to the 20th century average, the West has experienced an increase in average temperature during the last five years that is 70 percent greater than the world as a whole.

The West Is Getting Hotter

The American West has heated up even more than the world as a whole. For the last five years (2003 through 2007), the global climate has averaged 1.0 degree Fahrenheit warmer than the 20th century average. RMCO found that[12] during the 2003 through 2007 period, the 11 western states averaged 1.7 degrees Fahrenheit warmer than the 20th century average. That is 0.7 degrees, or 70 percent, more warming than for the world as a whole. And scientists have confirmed that most of the recent warming in the West has been caused by human emissions of heat-trapping gases. The West has also experienced

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[6] *Id.*
[7] Jonathan A. Patz, *et al.*, *Impact of Regional Climate Change on Human Health*, Nature, 438, 310-317, November 17, 2005, *available at* http://www.nature.com/nature/journal/v438/n7066/full/nature04188.html
[8] EPA, *Climate Change, Health and Environmental Effects*, December 20, 2007. *See also* Centers for Disease Control, *CDC Policy on Climate Change and Public Health.*
[9] EPA, Ground-Level Ozone: Health and Environment, March 6, 2007.

[10] EPA, Particulate Matter: Health and Environment January 17, 2008.
[11] See generally, GAO, Climate Change: Agencies Should Develop Guidance for Addressing the Effects on Federal Land and Water Resources (Aug. 2007).
[12] Saunders S and others. "Warming in the West: Evidence of Climate Diusruption in Western States". The Rocky Mountain Climate Organization and Natural Resources Defense Council, March 2008.

more frequent and severe heat waves, with the number of extremely hot days increasing by up to four days per decade since 1950. These heat waves, particularly those with excessive nighttime heat, can be deadly. Climate change has eroded the severe winter cold of the West's mountains. This has resulted in declining springtime western snowpacks.[13] This limits winter recreational opportunities on public lands and diminishes water supplies that the public lands provide residents across the West.

The West Is Getting Drier

In the arid and semi-arid West, global warming is already having serious consequences for the region's scarce water supplies, particularly the snow that makes up most of the region's precipitation and, when melted, provides 70 percent of its water. Already, decreases in snowpack, less snowfall earlier snow melt, more winter rain events, increased peak winter flows, and reduced summer flows have been documented. Scientists have recently attributed more than half of these changes in the West between 1950 and 1999 to the effects of heat-trapping pollutants. As global warming continues, the IPCC also predicts more intense and longer droughts, and characterized the severe drought that began in the western United States in 1999 and continues today as a "notable extreme climate event."

Utah has seen 5 year average temperatures rise +2.1°F. In Utah, ongoing drought has qualified most of the state for disaster relief during several years. In the summer of 2007, the U.S. Department of Agriculture (USDA) declared 24 of 29 Utah counties primary disaster areas due to drought, wildfire, and flash floods.[14] In 2003, the USDA declared all 29 counties primary disaster areas due to drought, insect infestations and high winds.[15] In 2002, the amount of non-irrigated farm lands that were harvested fell by more than 30 percent, compared to 1997.[16] Drought hit Utah so hard in 2002 that every county in the state qualified for disaster relief. 2,600 Utahans lost their agricultural jobs and the dryland harvest shrunk 30 percent. In northeastern Utah in 2002, the fourth straight year of drought, depleted water sources and loss of forage led to a 75 percent drop in pronghorn numbers.[17]

Climate change is disrupting ecosystems

The IPCC also concluded that "recent warming is already strongly affecting" ecosystems and wildlife. One study found that warmer spring and summer temperatures are responsible for increases in wildfire in

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[13] Mote P. W., Hamlet A. F., Clark M. P., and Lettenmaier D. P. 2005. Declining Mountain Snowpack in Western North America. Bulletin of the American Meteorological Society. 86: 39-49. See also Intergovernmental Panel on Climate Change (IPCC), "North America," in *Climate Change 2007: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*, M.L. Parry and others, eds., Cambridge University Press, Cambridge, UK (2007), 621-22.

[14] U.S. Department of Agriculture, *USDA designates 24 Utah counties primary natural disaster areas* (news release), August 23, 2007, http://www.fsa.usda.gov/FSA/newsReleases?area=newsroom&subject=landing&topic=edn&newstype=ednewsrel&type=detail&item=ed_20070823_rel_1510.html.

[15] Utah Department of Agriculture, *USDA designates Utah federal drought disaster area* (news release), July 2, 2003, http://www.fsa.usda.gov/FSA/newsReleases?area=newsroom&subject=landing&topic=edn&newstype=ednewsrel&type=detail&item=ed_20070823_rel_1510.html.

[16] U.S. Department of Agriculture, *2002 Census of Agriculture – State Data, Utah* Vol. 1, Ch. 1, Part 44, Table 11 (Washington, D.C.: National Agricultural Statistics Service, 2004), 17, http://www.nass.usda.gov/census/census02/volume1/ut/st49_1_011_011.pdf.

[17] W. Donaldson, "Drought to impact wildlife," *Vernal Express*, July 31, 2002, http://droughtreporter.unl.edu/map.jsp?Cmd=filter&scn=rv&st=Utah&co=Garfield&c_en=on&src=&daterange=custom&month1=1&day1=15&year1=2002&month2=2&day2=15&year2=2003.

the West. The researchers found[18] that spring and summer temperatures in the West in the 17 years after 1987 were 1.5 degrees Fahrenheit warmer than in the previous 17 years, leading to: 1. a 78-day increase in the length of the fire season; 2. a fourfold increase in the number of fires; 3. a fivefold increase in the time needed to put out the average wildfire; and 4. 6.7 times as much area being burned.

Forests across the West have suffered as warming has extended the range of some damaging insects, such as bark beetles. As outlined in Saunders et. al.[19], the IPCC concluded that recent warming trends have led to "proliferation" of mountain pine beetles in the West. Because they kill their host trees to reproduce, mountain pine beetles are agents of great disturbance in western forests. Their populations normally are held in check by extreme cold, but now western mountains are warmer and so more beetles can survive winters; they can survive at higher latitudes and higher elevations where it used to be too cold; and they even can complete their life cycles in just one year rather than two.[20] Largely for these reasons, beetle outbreaks are now widespread across the West. In Colorado, the U.S. Forest Service (USFS) and the Colorado State Forest Service recently predicted, "At current rates of spread and intensification of tree mortality, the MPB [mountain pine beetle] will likely kill the majority of Colorado's large diameter lodgepole pine forests within the next 3-5 years."[21] Beetles are also now causing widespread devastation of whitebark pines, a high-altitude species that grow where winters almost always have been too cold to allow beetle populations to reach outbreak numbers.[22] In the Yellowstone ecosystem, the loss of whitebark pines threatens the survival of the region's grizzly bears, which depend on the fatty seeds of the whitebark pine as their single most important food source.[23]

Also newly linked to global warming is a rapid mortality of aspen trees that scientists call "sudden aspen decline." New research by the USFS has, for the first time, linked the sudden aspen decline in Colorado to the hotter and drier conditions that represent an altered climate in the interior West.[24]

Glaciers are melting across the West. U.S. Geological Survey researchers projected in 2003 that all glaciers in Glacier National Park could be completely melted by 2030, but they actually are melting so fast they are likely to be gone by 2022. In Washington's North Cascades Mountains, 47 glaciers monitored since 1984 have lost, on average, 20 to 40 percent of their volume, with five having melted entirely away. In North Cascades National Park in Washington, the total area covered by glaciers has fallen by 13 percent since 1971.

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[18] A. Westerling and others, "Warming and earlier spring increases western U.S. forest wildfire activity," Science 313, no. 5789 (August 2006): 940-943.

"[19] Saunders S and others. "Warming in the West: Evidence of Climate Diusruption in Western States". The Rocky Mountain Climate Organization and Natural Resources Defense Council.

[20] Regniere J, Bentz B. 2007. „Modeling cold tolerance in the mountain pine beetle, Dendroctonus ponderosae", Journal of Insect Physiology, 53: 559–572, http://www.usu.edu/beetle/documents/Regniere_Bentz2007.pdf.). Logan J., J. Powell. 2003. Ghost Forests, Global Warming, and the Mountain Pine Beetle (Coleoptera: Scolytidae). American Entomologist, 47:3 161-162, 166-168. Logan J., Regniere J., Powell J. 2003. Assessing the impacts of global warming on forest pest dynamics. Front. Ecol. Environ, 1:130-37.

[21] U.S. Forest Service, Region 2, and Colorado State Forest Service, "Forest Health Aerial Survey Highlights," available at http://www.fs.fed.us/r2/news/2008/01/press-kit/survey_higlights.pdf.

[22] J. Connelly, "West Can't Beat Heat of Global Warming," *Seattle Post-Intelligencer,* April 23, 2006, http://seattlepi.nwsource.com/connelly/282173_joel23.html.

[23] Logan J., Powell J. 2003. Ghost Forests, Global Warming, and the Mountain Pine Beetle (*Coleoptera: Scolytidae*). American Entomologist. 47:3 161-162, 166-168. C. Petit, "In the Rockies, Pines Die and Bears Feel It," *New York Times*, January 30, 2007, http://query.nytimes.com/gst/fullpage.html?res= 9403E5DB143FF933A05752C0A9619C8B63.

[24] J. Worrall and others, "Rapid mortality of Populus tremuloides in southwestern Colorado, USA," Forest Ecology and Management (in press), 11 pp., 3-6.

The warming of the West is also disrupting the natural timing of seasons and leading to loss of wildlife. Lilacs and honeysuckle bushes are blooming earlier in the spring, marmots are emerging from hibernation earlier, jays are nesting earlier, ptarmigan are hatching earlier, and butterflies are emerging earlier. Species of wildlife are adapting to an altered climate by changing where they live (moving toward the poles or to higher elevations) —and in a few cases are being eliminated from areas where they used to live. In Yosemite National Park, for example, 14 of 50 studied animal species can no longer be found in lower-elevation portions of the range they occupied early in the 20th century. In Yosemite, a century ago pikas lived as low as 7,800 feet. Today, they cannot be found any lower than 8,300 feet.[25] As one researcher has said, "We might be staring pika extinction in the Great Basin, maybe in Yosemite, too, right in the face. […] They don't have much up-slope habitat left."[26] Warming is reducing the amount of alpine tundra in the West. For instance, scientists studying the effects of climate change on Rocky Mountain National Park, home to the largest expanse of alpine tundra in the United States outside of Alaska, projected that warming of 5.6 degrees Fahrenheit could cut the park's area of tundra in half.[27] An increase of 9 to 11 degrees Fahrenheit could virtually eliminate the park's tundra.[28]

Climate Change is Affecting Wildlife

Greenhouse gas emissions are also having direct and indirect impacts on wildlife species, including numerous listed species. The IPCC has reported that 30 percent of animal and plant species could be at an increased risk of extinction if global warming continues unabated.[29] Another recent report chronicles the various types of extinction threats posed by global warming.[30] Undeniably, the global warming pollution that would be associated with leasing, development and use of oil shale and tar sands would affect many western wildlife species, including endangered and threatened species, as the result of changes to habitats and migration corridors as well as other impacts.

Warmer Temperatures Affect Business, Recreation, and Tourism

In the first few years of the 21st century, western farmers and ranchers have suffered significantly from the combination of above-normal heat and drought. Across the country, four of the five top years for crop loss claims due to drought have been since 2000. Warming temperatures and other manifestations of a changing climate are already diminishing fishing and hunting opportunities in the West. Sea-run salmon stocks are in steep decline throughout much of North America. Some have predicted losses of western trout populations as high as 64 percent and of Pacific Northwest salmon of 20 to 40 percent by 2050.[31] In Montana, drought and higher temperatures have led to fishing closures and restrictions to sustain fish

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[25] C. Mortiz, "Report – Year 4 of the terrestrial vertebrate resurvey of the 'Grinnel sites' in Yosemite National Park' (2006 report), 1, http://mvz.berkeley.edu/Grinnell/pdf/Yosemite_Report_2006-FINAL.pdf.

[26] J. Schwarz, "Tiny Pikas Seem to Be on March Toward Extinction in Great Basin," University of Washington Office of News and Information, December 29, 2005. See also, Beever EA, Brussard PF, Berger J. 2003. Patterns of apparent extirpation among isolated populations of pikas (*Ochotona princeps*) in the Great Basin. J. Mammal. 84:37-54.

[27] N. Hobbs and others, "Future Impacts of Global Climate on Rocky Mountain National Park: Its Ecosystems, Visitors, and the Economy of its Gateway Community – Estes Park," (2003) 1-45, 16-17, http://www.nrel.colostate.edu/projects/star/papers/2003_final_report.pdf.

[28] Id.

[29] IPCC, 2007: Summary for Policymakers. In: Climate Change 2007: Fourth Assessment Report, Synthesis Report, available at http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr_spm.pdf

[30] Randall, J., Climate Change, Wildlife and Endangered Species (2007).

[31] J. Williams, Trout Unlimited, testimony, U.S. Senate, Committee on Energy and Natural Resources, Subcommittee of Water and Power, June 6, 2007, http://www.livingrivers.org/pdfs/CongressionalTestimony/WilliamsTestimony.pdf

populations in eight out of the last ten years.[32] During the summer of 2007, closures were in force on 29 rivers in Montana by August 2. Since 2000, the number of annual fishing permits issued to Yellowstone National Park visitors has dropped by nearly a quarter, from 67,700 to 51,900, even as total park visitation remained steady.[33] One fly fisherman who has traveled from California each of the past 15 years to fish the Yellowstone River reacted to the decline: "I decided yesterday that I won't be back anymore. There just aren't enough fish to make it worthwhile."[34] Hotter and drier conditions have also led to fewer opportunities for hunting in some places and times. In the West, ski areas at lower elevations have recently suffered from less snow, with the Northwest and the Southwest taking turns having very bad years.

BLM is required to analyze the impacts of climate change and take action to reduce it

The Supreme Court decision in Massachusetts v. EPA, FLPMA and Dept. of the Int., Sec. Order No. 3226

In April 2007, the U.S. Supreme Court issued a decision that recognized the severity of the climate change crisis, and the U.S. Environmental Protection Agency's obligation to confront the problem. The Supreme Court held, in Massachusetts v. EPA, 127 S. Ct. 1438 (2007), that the "unambiguous" definition of "air pollutants" includes carbon dioxide and other greenhouse gases. This case was initiated by a dozen states and numerous environmental organizations, and the Supreme Court's ruling is widely viewed as a landmark recognition of the global warming crisis by the judiciary. The Court, even without the benefit of the most recent IPCC Summary Reports, noted that the "[t]he harms associated with climate change are serious and well recognized." Id. at 1455. The Court also acknowledged "the enormity of the potential consequences associated with man-made climate change," id. at 1458, and the contribution of carbon dioxide emissions to global warming, id. at 1457-58. As discussed above, evidence abounds that carbon dioxide is present in the atmosphere at concentrations that will be injurious to human health and welfare, animals and plant life. Accordingly, given the Supreme Court's conclusion that, "[t]he harms associated with climate change are serious and well recognized,"[35] the federal government has a responsibility to take action to reduce it, even if such action may not completely reverse global warming.[36] BLM is not exempt from that responsibility.

In enacting the BLM's "organic act," the Federal Land Policy and Management Act (FLPMA), 43 U.S.C. §§ 1701 et seq., Congress enacted a policy that "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource , and archeological values…." Id. at § 1701(a)(8). Further, FLPMA directs BLM to manage the lands under its jurisdiction in such a manner that will "best meet the present and future needs of the American people;" "provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions;" and "take[] into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish…." Id. § 1702(c). In addition, the statute requires BLM to "minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) of the public lands involved." Id. § 1732(d)(2)(a). As documented above, climate change is already threatening many of these very resources in the West including undoubtedly resources on BLM-

[32] Id.
[33] U.S. Department of the Interior, National Park Service, Yellowstone National Park, "Yellowstone Fish Reports," 2000 to 2005, http://www.nps.gov/yell/planyourvisit/fishreports.htm and "Park Statistics," http://www.nps.gov/yell/parkmgmt/statistics.htm.
[34] R. Tosches, "Warm waters deadly to Yellowstone trout," *Denver Post*, July 29, 2007.
[35] Massachusetts v. E.P.A., 127 S.Ct. 1438, 1455 (2007).
[36] Id. at 1458.

administered lands. Accordingly, FLPMA imposes an obligation on BLM to take the effects of climate change into account in managing and in making decisions about various uses of the public lands under its stewardship.

In fact, an order issued by the Secretary of the Interior requires that:

> Each bureau and office of the Department will consider and analyze potential climate change impacts when undertaking long-range planning exercises, when setting priorities for scientific research and investigations, when developing multi-year management plans, and/or when making major decisions regarding the potential utilization of resources under the Department's purview.[37]

Obviously, the proposed decisions that the DPEIS purports to address are covered by this order. Thus, the BLM's failure to address climate change impacts in this review is not only inexplicable, it directly contravenes an explicit Secretarial order.

Oil shale and tar sands leasing and development will result in increased greenhouse gas emissions and exacerbate climate change – NEPA documents are a critical tool for responding to climate change – BLM is obliged to use this tool

The lifecycle emissions of oil shale- and tar sands-oil are well above those of conventional fuels or cleaner alternatives

Regardless of whether shale oil is produced through above-ground or in-situ methods, it is very energy intensive and causes the emission of higher amounts of global warming pollution than conventional oil development. The DPEIS completely fails to analyze the greenhouse gas emissions from the production and combustion of shale or tar sands oil, despite there being a significant and reliable body of literature that has studied the topic, and despite an explicit indirect acknowledgement of such impacts. See, e.g. p. 4-14:

> For the purposes of analysis in this PEIS, the BLM has assumed that future in situ projects would require 2,400 MW of additional electricity generation capacity when commercial production levels are reached. This estimate is based in part on published information indicating that the Shell in situ technologies being evaluated as part of the oil shale RD&D program require about 1,200 MW of power for every 100,000 bbl of shale oil produced (Bartis et al. 2005). The BLM has projected that this new electricity capacity would be provided by conventional coal-fired plants. As noted above, in situ processes that use nonelectric heating technologies would use less power. For surface and underground mining projects, the BLM has assumed that power needs would be met through the expansion of existing power plants.

The Alberta Taciuk Processor is an above-ground oil shale retort that is considered the most promising of above-ground retorts. It was used in a recent oil shale development in Queensland, Australia, and Oil Sands Exploration Company (OSEC) proposed using the Processor in a 2006 application for federal research support. A detailed study of the Processor concluded that the emissions from the production process are likely to lie between 37.5-40.8 gCeq./MJ of final fuel delivered, compared to an average of 25 gCeq./MJ of final fuel delivered.[38]

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[37] U.S. Dept. of the Int., Sec. Order No. 3226 (Jan. 19, 2001), Section 3.

[38] Converting Green River oil shale to liquid fuels with the Alberta Taciuk Processor: energy inputs and greenhouse gas emissions; WORKING PAPER, Adam R. Brandt, Energy and Resources Group University of California, Berkeley, Berkeley, CA 94720-3050, http://abrandt.berkeley.edu/ June 1st, 2007

In a similar fashion, oil derived from tar sands also results in higher lifecycle CO2 emissions. Canada's tar sands are the single largest contributor to global warming pollution growth in Canada.[39] Further, tar sands oil production generates almost three times as much global warming pollution as conventional oil production because of the massive amounts of energy needed to extract, upgrade, and refine the oil.[40] Because of the more widespread deployment of tar sands, these emissions have been calculated more extensively and are well documented.[41] The estimate for tar sands oil is 30-36 gCeq/MJ of final fuel delivered, which is again significantly higher than conventional petroleum based fuels.[42] Moreover, the production emissions are a significant fraction of the well-to-wheels emissions of shale and tar sands oil. The following table[43] summarizes the carbon intensity of those fuels:

gCeq/MJ of refined product	**Gasoline**	**Oil Shale**	**Tar Sands**
Upstream emissions	5.6	13-50	9.3-15.8
Combustion emissions	20.1	20.1	20.1
Total emissions	25.7	33-70	29.4-35.9
Normalized emissions	**1.00**	**1.28-2.72**	**1.14-1.40**

It is clear that both oil shale and tar sands development can add significantly to the carbon footprint of producing transportation fuels compared to conventional petroleum based fuels.

The RAND Corporation in 2005 found that the production of just 100,000 barrels of shale oil a day using Shell's proposed in-situ process would require 1,200 megawatts of power.[44] Producing 1 million barrels of shale oil a day, would require construction of 10 new power plants that could generate up to 121 million tons of CO2 per year. This would represent a 90 percent increase in the CO2 emitted by all existing electric utility generating units in 2005 in Colorado, Wyoming, and Utah combined.[45] Added to this is the CO2 that would result from actually burning the produced shale oil.

BLM is required under NEPA to analyze climate change impacts that result from its actions

Given the threats of climate change to public land resources, the Department of the Interior and the BLM face an increasingly daunting challenge to preserve the public resources for which they are responsible. Citizens depend on the public lands and the ecological resources they contain, such as drinking water

[39] Woynillowicz, Dan. "Oil Sands Fever: The Environmental Implications of Canada's Oil Sands Rush," The Pembina Institute, November 2005, p.19.
[40] Ibid, p. 22. Information gathered from Canadian Association of Petroleum Producers on conventional oil and for oil sands mining and in situ drilling from Pembina research. Actual numbers are 28.6 conventional oil average GHG intensity/barrel of oil compared to 85.5 oil sands average GHG intensity/barrel of oil. It is just under three times as much.
[41] Bramley, Matthew, Neabel, Derek, and Dan Woynillowicz. "The Climate Implications of Canada's Oil Sands Development." The Pembina Institute, November 29, 2005.
[42] Brandt, A. R. and Farrell, A. E. Scraping the bottom of the barrel: CO2 emission consequences of a transition to low-quality and synthetic petroleum resources. Climatic Change (2007) 84:241–263.
[43] Id. at 249.
[44] Bartis, James T., Tom LaTourrette, Lloyd Dixon, D.J. Peterson, and Gary Cecchine. "Oil Shale Development in the United States: Prospects and Policy Issues," p. 21. RAND Corporation, 2005. http://www.rand.org/pubs/monographs/MG414/.
[45] 2005 Emissions from all Electrical Generating Units (EGUs) in Colorado, Wyoming, and Utah that are required to report to EPA under the acid rain regulations. See http://cfpub.epa.gov/gdm/index.cfm.

supplies, fish and game and diversity of species. These public lands also support the economies and life styles of many local communities.[46]

In addressing climate change, the Department of the Interior has two critical roles. First, in making decisions regarding the amount of public lands utilized for various types of energy development including oil shale and tar sands leasing and development, the Interior Department directly influences future greenhouse gas emissions. Second, given its role in managing large tracts of land, the Interior Department influences whether the public's natural resources survive the impacts of climate change.

Existing CEQ regulations and NEPA case law currently require climate change analysis.[47] Greenhouse gas (GHG) emissions are within the direct, indirect and cumulative effects that NEPA documents must analyze.[48] Not only are increased GHG emissions "reasonably foreseeable"[49] but so too are their climate consequences. As discussed previously, the overwhelming consensus of national and international scientific evidence supports the conclusion that the build-up of greenhouse gases in the atmosphere is contributing to global warming, and that the subsequent changes will adversely affect our local, regional and global environments.[50] The impacts of climate change, which will be exacerbated by oil shale and tar sands leasing and development are much more than "reasonably foreseeable" – and as such BLM must analyze them in the PEIS.

Gathering and developing information about how climate change is affecting the public's natural resources is precisely the kind of action NEPA was intended to spark.[51] CEQ regulations require federal agencies to get information "essential to a reasoned choice among alternatives" when the overall costs of obtaining the information are "not exorbitant." 40 C.F.R. § 1502.22(a). Modeling to predict effects of climate change on specific landscapes and wildlife populations is absolutely essential when planning whether to allow thousands of new wells, mining and the construction of associated large scale infrastructure. The cost of failing to obtain such information in terms of damaged forests, shrinking fish and wildlife populations, lost tourist revenue, and disappearing drinking water supplies may very well be

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[46] See, e.g., M. Harris, P. Morton, Culver, Natural Dividends: Wildland Protection and the Changing Economy of the Rocky Mountain West (The Wilderness Society), available at http://www.tws.org/Library/Documents/NaturalDividends.cfm.

[47] See, e.g., Ctr. for Biological Diversity v. Nat'l. Highway Traffic Safety Admin., 508 F.3d 508, 550 (9th Cir. 2007) (NHTSA failed to evaluate adequately global warming impacts of changes to fuel efficiency standards for vehicles); Mid States Coalition for Progress v. Surface Transp. Bd., 345 F.3d 520 (8th Cir. 2003) (increased coal consumption and global warming emissions was reasonably foreseeable effect of railroad expansion to transport coal).

[48] See 40 C.F.R. § 1508.8.

[49] 40 C.F.R. §§ 1508.7, 1508.8.

[50] See, e.g., U.S. Climate Change Science Program, Effects of Climate Change on Energy Production and Use in the United States (Report to Congress by U.S. Secretaries of Energy and Commerce and the Director of the Office of Science and Technology) (October 2007), available at http://www.climatescience.gov/Library/sap/sap4-5/final-report/default.htm. The report concludes, "Climate change is expected to have noticeable effects in the United States: a rise in average temperatures in most regions, changes in precipitation amounts and seasonable patterns in many regions, changes in the intensity and pattern of extreme weather events, and sea level rise. Some of these effects have clear implications for energy production and use." See also, National Academies of Science, Joint Science Academies' Statement: Global Response to Climate Change, available at http://nationalacademies.org/onpi/06072005.pdf (stating "[t]he scientific understanding of climate change is now sufficiently clear to justify nations taking prompt action."); Intergovernmental Panel on Climate Change, Summary for Policymakers of the Synthesis Report of the IPCC Fourth Assessment Report (Nov. 16, 2007), available at http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr_spm.pdf.

[51] See Colorado Environmental Coalition v. Dombeck, 185 F.3d 1162, 1171-72 (10th Cir. 1999)(citing Robertson, 490 U.S. 332 at 350).

exorbitant.[52] As steward of the public lands, the Department of the Interior must act to address the threat climate change poses.[53]

The required scope of BLM's analysis

Programmatic NEPA analyses clearly provide the Interior Department the ability to address climate change in the most efficient and effective way. The DPEIS does acknowledge that climate change exists and will have environmental consequences. See, e.g. pp. 3-95 to 3-98, 5-40 to 5-41. It also acknowledges that development of these resources is certain to require coal fired power and that construction of more such plants will be needed. See, e.g. p. 6-112. It also purports to predict the impacts of such use, albeit selectively – i.e., excluding greenhouse gas and climate change impacts. See, e.g. p. 6-113. The DPEIS, however, does not discuss the potential direct, indirect and cumulative impacts on climate change from oil shale and tar sands development and use, let alone make any attempt to quantify them.

As acknowledged in the DPEIS, coal-fired and other power plants would be needed to meet energy demand from oil shale and tar sands leasing and development. See DPEIS p. 4-56. These plants are a significant contributor to the generation of greenhouse gases[54] and, consequently, to climate change. It is essential that the PEIS examine not only the increase in GHG from the proposed leasing and development, but also the global, regional and local impacts of climate change on resources, such as wildlife, water and air, including precipitation, air temperatures, wind, lightning storms and secondary impacts including decreased snow pack and insect outbreaks. The DPEIS, however, neither discusses these impacts nor attempts to quantify them. Instead, the document asserts:

> The assessment of GHG emissions and climate change is in its formative phase, and it is not yet possible to know with confidence the net impact on climate. Without additional meteorological monitoring systems, it is difficult to determine the spatial and temporal variability and change of climatic conditions, but increasing concentrations of GHG are likely to accelerate the rate of climate change. The direct emissions of climate change air pollutants from tar sands development facilities are likely to be a small fraction of global emissions.

[DPEIS, pp. 5-40 to 5-41]

NEPA's requirements are not satisfied by the assertions quoted above, assertions that lack support or analysis and that are selective. Nor are they satisfied by statements that necessary and relevant information – such as information about the CO2 emissions of the coal plants needed to generate the electricity that will convert shale and tar sands to oil – is "not available." Such statements ignore requirements of NEPA and the CEQ regulations with regard to use of the best available science and procedures to follow when information is incomplete or unavailable. Here, the BLM has not only failed to properly account for available information, including available scientific information, it has also failed

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[52] Even in circumstances where an agency determines that the "costs of obtaining information is exorbitant or the means to obtain it are not known," CEQ regulations require an agency in its EIS to (1) state that the information is unavailable; (2) state the information's relevance; (3) give a summary of the existing "scientific evidence which is relevant to evaluating the reasonably foreseeable significant adverse impacts"; and (4) evaluate such impacts based on "theoretical approaches or research methods generally accepted in the scientific community." 40 C.F.R. § 1502.22(b).

[53] See, e.g., 43 U.S.C. § 1732(d)(2)(a) (FLPMA requires BLM to "minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) of the public lands involved.").

[54] Massachusetts Institute of Technology. "The Future of Coal – Options for a Carbon Constrained World, An Interdisciplinary MIT Study", 2007, p.ix. Available at: http://web.mit.edu/coal/

to properly account for incomplete and unavailable information needed to assess the likely impacts of oil shale and tar sands development.

Section 1502.22 of the CEQ rules addresses "incomplete or unavailable information" and directs that an agency must either obtain the necessary information or, if the overall costs of obtaining it are exorbitant or the means are unknown, the agency must include within an EIS: 1. a statement explaining what information is incomplete or unavailable; 2. an explanation of why that missing information is relevant to the evaluation or reasonably foreseeable significant adverse effects; 3. a summary of the existing credible scientific evidence relevant to the issues; and 4. the agency's evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. In the DPEIS, the BLM has failed to comply with this important regulatory requirement in key respects.

First, the Bureau has failed to present necessary and obtainable information regarding the likely impacts of predictable and foreseeable increased contributions of CO2 to the atmosphere and the likely consequences thereof for climate change. Indeed, as pointed out above, the DPEIS does not even provide quantified information about likely CO2 emissions from coal-fired power plants even though, as pointed out in the scoping comments of some of the groups submitting these comments, CO2 production levels are quantifiable and can be – and should have been – predicted for this environmental document.[55] Moreover, the BLM has simply ignored the extensive body of information that is already available for use in predicting the effects of GHG emissions and climate change. Leading ecologists employed by the US Forest Service, US Geological Survey, other federal agencies and universities are engaged in the study of climate change impacts, yet the DPEIS failed to consider the results of their published studies, including but not limited to the following:

> **Aber, J.D., R.P. Neilson, S. McNulty, J.M. Lenihan, D. Bachelet and R.J. Drapek. 2001. Forest processes and global environmental change: predicting the effects of individual and multiple stressors. Bioscience. 51(9):735–751.** Existing ecological communities probably will not survive climate change intact.
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> **Dale, V.H., L.A. Joyce, S. McNulty, R.P. Neilson, M.P. Ayres, M.D. Flannigan, P.J. Hanson, L.C. Irland, A.E. Lugo, C.J. Peterson, D. Simberloff, F.J. Swanson, B.J. Stocks, and B.M. Wotton. 2001. Climate change and forest disturbances. BioScience, 51: 723-734.** Climate change can affect forests by altering the frequency, intensity, duration and timing of fire, drought, introduced species, insect pathogen outbreaks, hurricanes, windstorms, ice storms and landslides.
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> **Hansen, AJ, Neilson, RP, Dale VH, Flather, CH, Iverson, LR, Currie, DJ, Shafer, S., Cook, R, Bartlein, PJ. (2001). Global change in forests: responses of species, communities and biomes. Bioscience 51 (9): 765-779.** Ranges of tree species and forest communities were predicted over 100 years using several models and six CO2 emission scenarios.
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> **Haynes, R. W., Adams, D. M.; Alig, R. J.; Ince, P. J.; John R.; Zhou, X.. (2007). The 2005 RPA timber assessment update. Gen. Tech. Rep. PNW-GTR-699. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 212 p.** Models can be used to predict the impacts of climate change and elevated CO2 on the inventories of soft and hardwoods. Impacts on markets are at rates that reflect the change in inventories.
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> **Joyce, L. A.; Birdsey, R., Technical Editors. (2000a). The impact of climate change on America's forests: a technical document supporting the 2000 USDA Forest Service RPA Assessment. Gen. Tech. Rep. RMRS-GTR-59. Fort Collins, CO: U.S. Department of**

[55] See January 31, 2006 scoping comments of Colorado Environmental Coalition et al., at 33.

Agriculture, Forest Service, Rocky Mountain Research Station. 133 p. This report documents trends and impacts of climate change on America's forests as required by the Renewable Resources Planning Act of 1974. Recent research on the impact of climate and elevated atmospheric carbon dioxide on plant productivity is synthesized. Modeling analyses explore the potential impact of climate changes on forests, wood products, and carbon in the United States.

Joyce, L.A.; Aber, J.; McNulty, S.; Dale, V.H.; Hansen, A.; Irland, L.C.; Neilson, R.P.; Skog, K. (2000b). Potential consequences of climate variability and change for the forests of the United States. In: National Assessment Synthesis Team, comps. Climate change impacts on the United States: the potential consequences of climate variability and change: foundation. Cambridge, UK: Cambridge University Press: 489-522. Increases in forest productivity by warming and elevated CO2 are likely to be tempered by local environmental conditions (moisture stress, nutrient limitations). Increases in forest inventories are likely to be met with lower prices. Changes in severity, frequency and extent of natural disturbances are possible, with impacts on forest structure, biodiversity and functioning. Ecological models indicated changes in the location and area of potential habitats for many tree species. Recreation and socioeconomic impacts are predicted and discussed.

Joyce, L. R., Haynes, White, R., and. Barbour R. J., Technical Coordinators (2007) Bringing climate change into natural resource management. Proceedings of a Workshop June 28-30, 2005 Portland, Oregon. PNW-GTR-706. Summary of ideas from a workshop to explore climate and natural resource management in the western US. Articles illustrate the complexity of climate change and the need for managers to consider how the impacts will unfold across regional and local landscapes.

Prasad, A. M. and L. R. Iverson. (1999-ongoing). A Climate Change Atlas for 80 Forest Tree Species of the Eastern United States [database]. http://www.fs.fed.us/ne/delaware/atlas/index.html, Northeastern Research Station, USDA Forest Service, Delaware, Ohio. Although exclusive to the Eastern US, this tool developed by the USFS demonstrates the methodology and application of climate change models towards predicting landscape change, especially species distributions.

Walsh, J.E., Chapman, W.L. Romanovsky, V., Christensen, J.H. and Stendel M. 2007. Global Climate Model Performance over Alaska and Greenland. Journal of Climate, submitted.

Second, although as noted above the DPEIS acknowledges the relevance of global warming to the action under consideration, the BLM has tried to avoid its responsibility to address the issue by claiming a lack of "confidence" in what the impacts will be, rather than even attempt to comply with the requirements of the CEQ rules. While there is uncertainty in climate predictions, scientific analysis, as documented above, has revealed clear trends towards warming. Further, there is an extensive body of literature regarding the quantitative analysis of uncertainty and variability in environmental policy and decision making (e.g., Frey 1992 and onward; Morgan and Henrion 1990), including a variety of statistical methods that can be used to address uncertainty (Webster 2002; Roe and Baker 2007). In other words, there is not only extensive and credible scientific evidence regarding the likely impacts of global warming in the West, there are also credible and scientific methodologies for use in predicting those impacts. Thus, BLM has no excuse for not complying with Section 1502.22 of the CEQ rules.

The IPCC used 5 Global Climate Models and several emissions scenario A1B (IPCC 2007). These models can be – and should have been – used to predict changes in temperatures and precipitation from

historical averages. The BLM could then have coupled these types of climate data with Global and Regional Dynamic Ecosystem Models to predict how ecosystems will respond to changes in temperature and precipitation across ranges of values as well as in combination with land use data (e.g. Starfield and Chapin 1996). Coupling the data with a Dynamic Vegetation Model, for example, would make it possible to examine the impact of the climate change on a range of environmental conditions. This kind of analysis represents the best available scientific method for addressing climate change at this time. Data from the studies listed above at a minimum can be – and should have been – be analyzed via this method to model the effects of likely climate change, including cumulative effects.

The BLM must prepare a supplemental PEIS to cure the failures of the existing PEIS to present an analysis of the impacts of climate change that complies with NEPA mandates for use of best available scientific information and for dealing with unavailable information. The supplement must assess the foreseeable GHG and global warming impacts that could result from allocating public land to the production and use of oil from shale and tar sands. Its analysis of impacts must address the following:

Climate change will alter the distribution of species and their productivity, so how will this affect the structure, function and health of the forests and rangelands in the affected states and beyond? How will changes in productivity affect the distribution of suitable grazing lands? How will changes in climate alter the rate of restoration for the hundreds of thousands oil and gas wells in the region?

Because climate change will alter the distribution of species, it is critical that the supplemental DPEIS examine the potential impact on species migration and distribution. How will climate change impact the efforts of state wildlife officials and federal agencies to conserve areas for species migration? How will migration routes change as the climate changes?

Climate change has the potential to affect the structure, function and health of forest as much as timber harvesting (Joyce et al. 2000b). How will climate change, facilitated by the increase in new coal-fired or other power plants that will be necessary to produce oil from tar sands and shale impact the amount and distribution of high quality old-growth forests? What are the impacts on habitat connectivity needed to support viable wildlife populations? How will climate change affect the ability of key species to survive and is there adequate protection for predicted changes in habitat?

The ski industry is already concerned about the impacts of climate change on snow pack. States and communities are also concerned about water yields from the snow pack, the timing of runoff, and the potential for increased drought in the west. What are the impacts to our snow pack and our water yield, if we increase our use of coal to produce oil from shale and tar sands and if we use that oil for transportation?

There is also concern about increased outbreaks of mountain pine beetles and the change in forest structure from such outbreaks. How might insect outbreaks increase if our emissions of GHG increase as a result of the increased use of coal and of oil from shale and tar sands?

There is already much concern about the spread of non-native species in the West. How might climate change affect the threat of invasive species in the west? How will the potential spread of invasive species impact native species, water yields and suitable land for grazing?

The supplement must also contain a quantitative cumulative effects analysis (CEA). A CEA is not intended to be a list of actions and receptors; it is intended to be a quantitative analysis of the "impacts to

resources, ecosystems and human communities that may be affected and used towards developing an adequate understanding of how the resources are susceptible to effects."[56]

The PEIS must complete a quantitative assessment of climate change impacts from the proposed oil shale and tar sands development and use. A solely qualitative assessment will not be sufficient. CEQ provides seven primary methods for developing the conceptual causal model for a cumulative effects study of ecosystem-level effects, including (1) gathering information; (2) checklists to identify potential cumulative effects; (3) development of matrices to determine the cumulative effects on ecosystems by combining individual effects from different actions; (4) networks and system diagrams to trace multiple, subsidiary effects on various actions that accumulate upon ecosystems; (5) models to quantify the cause-and-effect relationships leading to cumulative effects; (6) trends analysis to assess the status of ecosystems over time and identify cumulative effects problems, establish appropriate environmental baselines, and project future cumulative effects; and (7) overlay maps and GIS analysis to incorporate local information into cumulative effects analysis.[57]

Again, as stated above, while some uncertainty is inherent in assessing the impacts of future actions, it cannot be used as an excuse for failing to assess the possible impacts and biological and value-based thresholds for the affected resources, ecosystem and human communities. The CEQ has stated:

> Cumulative effects analysis necessarily involves assumptions and uncertainties, but useful information can be put on the decision making table now. Decisions must be supported by the best analysis based on the best data we have or are able to collect. Important research and monitoring programs can be identified that will improve analyses in the future, but their absence should not be used as a reason for not analyzing cumulative effects to the extent possible now.[58]

As also indicated above, there are publicly available data, including land cover data, coarse and downscaled temperature and precipitation data, and dynamic ecosystem models available for use in predicting how ecosystems will respond to changes in temperature and precipitation on a cumulative basis.

With respect to wildlife, the necessary quantitative CEA should incorporate at least the following components or similar analyses as these methods yield:

> 1. A Resource Selection Model that incorporates wildlife movement monitoring data with land cover classification;
>
> 2. Population Viability Analysis that incorporates harvest and predator demands with wildlife population census data;
>
> 3. Establish Disturbance Coefficients that incorporate wildlife responses to industrial and other human activities;
>
> 4. Climate Change Scenarios that capture changes in temperature and precipitation in order to develop an understanding of the stability and trajectories for change of physical and biological resources;
>
> 5. Model Habitat Availability using a range of climate scenarios.

---

[56] CEQ 1997.
[57] CEQ 1992, at 50.
[58] Id. at 3.

OSTS_00079

Appendix 16

(See OSTS_52577)

A. William Alldredge, Ph. D.
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10 March 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Dear Oil Shale/Tar Sands Planning Team:

I am A. William Alldredge, Ph.D., professional wildlife ecologist and concerned Wyoming resident, commenting on the Draft Oil Shale and Tar Sands Programmatic Environmental Impact Statement (PEIS). These comments, as were my scoping comments of 14 January 2006, are submitted on behalf of The Wilderness Society. Because my expertise is with large wild mammals, I restrict the majority of my comments to those species.

My resume accompanies this letter, but let me briefly establish my professional expertise. I earned a BS degree in wildlife biology, an MS degree in radiation ecology and a Ph.D. degree in earth resources from Colorado State University (CSU). I spent 30 years on the faculty at CSU retiring in 2001 as Professor and Chair of the Wildlife Major. In that employment I conducted research and taught courses in ecology, integrated ecosystems management, and conservation and management of large wild mammals. I helped establish the Center for Ecological Risk Assessment at CSU and was the Center's first director. I have personally been involved in research on deer, elk and pronghorn antelope in the Piceance, Washakie, and Green River Basins and I am knowledgeable regarding impacts to large mammal populations and their habitats that could arise from development of oil shale and tar sands resources. I remain professionally active by attending scientific meetings, workshops, and reading and reviewing manuscripts for professional journals.

The list of large wild mammals considered in the PEIS is inclusive and I am encouraged by the use of some of the more relevant, current literature cited in the document. Indeed, it is a daunting task to develop an environmental impact statement for a project that covers such a large geographic area and one for which the technology is largely unknown. This task does, however, represent an opportunity for the BLM to provide a landscape scale, region wide analysis from which Field Offices (FOs) can tier their resource management plan amendments. Such an analysis would be especially important when considering big game animals that often transcend several jurisdictional boundaries in the course of their seasonal migrations. **In my professional opinion, the current PEIS fails to meet this challenge and it does not fulfill the legal requirements of NEPA or the multiple use mandates of FLPMA.** In the following paragraphs I substantiate my opinion with scientific literature and my considerable professional experience.

OSTS_00079
(See OSTS_00053)

Appendix 17

15 March 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
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Comments: Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement (DOI No. DES 07-60.)

Introduction

Please accept and fully consider these comments on behalf of Jerry D. Spangler, a registered professional archaeologist and executive director of the Colorado Plateau Archaeological Alliance (CPAA). Founded in 2005, CPAA works to protect archaeological and historical properties on public lands throughout the West through sound scientific research into the causes of adverse effects, through public outreach and education, and through collaborative projects with conservation and governmental entities. Our goal is to ensure that cultural resources are protected for future generations, for their scientific as well as aesthetic qualities. We appreciate this opportunity to comment on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement (hereafter PEIS). We believe the federal actions articulated in Alternatives B and C will adversely impact the integrity of cultural resources on more than 2 million acres of BLM-administered lands in the West, and that a more thoughtful consideration of potential adverse impacts to cultural resources is warranted.

FLPMA obligates the Bureau of Land Management (BLM) to protect cultural, geologic and paleontological resource values (43 U.S.C. §§ 1701(a)(8) 1702(c)), whereas the National Historic Preservation Act of 1966 ("NHPA") (16 U.S.C. § 470 et seq.) provides for enhanced consideration of potential impacts to these resources through a cooperative federal-state program for the protection of historic and cultural resources. In particular, Section 106 (16 U.S.C. § 470f) obligates the BLM to consider the effects of management actions on historic and cultural resources listed or eligible for listing to the National Register of Historic Places, as provided under NHPA. Section 110 of the NHPA requires the BLM to assume responsibility for the preservation of historic properties it owns or controls (16 U.S.C. § 470h-2(a)(1)), and to manage and maintain those resources in a way that gives "special consideration" to preserving their historic, archaeological and cultural values. Section 110 also requires the BLM to ensure that all historic properties under the jurisdiction or control of the agency are identified, evaluated, and nominated to the National Register of Historic Places. Id. § 470h-2(a)(2)(A).

As discussed throughout the PEIS, many other federal laws, regulations and executive orders have articulated the BLM's responsibility to protect properties of cultural and religious significance. This responsibility was reaffirmed by President Bush's "Preserve America" initiative (See Exec. Order 13287, March 3, 2003) that requires the BLM to advance the protection, enhancement, and contemporary use of

OSTS_00079
(See OSTS_52669)

Appendix 18

Colorado State University
Knowledge to Go Places

March 17, 2008

Bureau of Land Management
Ms. Sherri Thompson, Project Manager
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2850 Youngfield Street
Lakewood, CO 80215

Bureau of Land Management
Mr. Mitchell Leverette
Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

RE: Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (BLM-WO-GI-08-005-3900; DOI No. DES 07-60) released on December 19, 2007

Dear Ms. Thompson:
I am a natural resource and agricultural economist with training and experience in mineral economics, as well as an assistant professor at Colorado State University and an adjunct professor at Denver University's Sturm College of Law. I am providing written input regarding socio-economic issues within the BLM's Draft Programmatic Environmental Impact Statement. My comments follow on the next few pages.
Thank you for the opportunity to respond to your report. I am appreciative of your consideration of my comments. Should you request further information, please do not hesitate to contact me using the information listed below:

Colorado State University
Dr. Catherine M. Keske
Department of Agricultural and Resource Economics (DARE)
Fort Collins, Colorado 80523-1172
Email: Catherine.Keske@colostate.edu Phone: 970-372-7966

I hope my comments will assist you. Thank you for giving me the opportunity to review this document.
Sincerely,

Catherine M. Keske, Ph.D.

OSTS_00079
(See OSTS_52685)

Appendix 19

March 10, 2008

Bureau of Land Management
Oil Shale and Tar Sands PEIS
Argonne National Laboratory
EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

RE: Comments on the Air Quality Analysis for the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement

Dear Oil Shale and Tar Sands PEIS Project Manager:

I am writing to submit comments on the December 21, 2007 Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS). My comments pertain to the air quality portions of the PEIS. These comments were developed under contract to The Wilderness Society.

The PEIS does not analyze the air quality impacts that could occur as a result of the actions authorized under the Resource Management Plan (RMP) amendments, therefore, failing to comply with the National Environmental Policy Act (NEPA) and the Federal Land Policy Management Act (FLPMA). The BLM is proposing to put off any air quality analysis until specific oil shale and tar sands development projects are proposed. At such time, the BLM indicates that it will conduct air quality analyses as part of the project-specific NEPA evaluations. This future commitment is not an acceptable replacement for a comprehensive quantitative assessment – during the PEIS process - of the environmental and public health impacts resulting from considerable increases in air pollution in areas already heavily impacted by the adverse effects of increasing development. Without such an analysis, the BLM cannot say what the impacts of the activities authorized in the PEIS will be on air quality and human health or whether the BLM will prevent significant deterioration of air quality, as required by the Clean Air Act (CAA).

The BLM has put forth three alternatives as part of this PEIS. The preferred alternative (B) does not satisfy the BLM's responsibility to ensure no significant environmental impacts and to provide for compliance with the Clean Air Act. Even alternative A (the no action alternative), which is the most protective of the environment, is not adequate because it does not fully disclose the adverse air quality impacts from the six oil shale Research, Development and Demonstration (RD&D) projects in Colorado and Utah. The BLM must put forth an alternative that ensures no significant impacts and full compliance with the Clean Air Act. This would include one that fully assesses the impacts on visibility in the affected Class I areas, prevents significant deterioration of air quality in the proposed development areas and affected Class I areas and ensures no violations of the National Ambient Air Quality Standards (NAAQS). Attached are more detailed comments on the important elements of air quality protection, which this PEIS is lacking.

I have over 10 years of experience working on air quality issues. My curricula vitae is enclosed for further information on my expertise. Thank you for consideration of these comments. Please include me

on the mailing list for any future actions on the Draft Oil Shale and Tar Sands RMP Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and PEIS.

Sincerely,

Megan M. Williams
megan@sevenfivesix.org
756 Cottage Lane
Boulder, CO 80304

Attachments

Appendix 20

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Email: d.a.atkins@gmail.com

OSTS_00079
(See OSTS_52786)

March 19, 2008
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

RE: **Comments on Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement**

To Whom It May Concern,

I am writing to submit comments on the December 2007 **Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement** (Draft PEIS). My comments pertain to the water quantity and quality impacts analysis in this document.

The majority of the information provided in the Draft PEIS is too speculative to draw any reasonable conclusions regarding the potential environmental impacts on water resources of commercial-scale oil shale and/or tar sands development. The analysis presented in the Draft PEIS fails to support the BLM's decision to open nearly 2 million acres of public land to commercial oil shale development, and nearly 430,000 acres to commercial tar sands development.

According to my review, the analysis presented in the Draft PEIS shows that water requirements for commercial leasing could be substantial, especially when considered in the context of other current and anticipated activities in the basin, and I do not agree with the BLM determination of no significant impacts. My independent evaluation was hampered by the lack of specific information in the Draft PEIS that would be necessary to determine potential water quality or quantity impacts of commercial oil shale and tar sands production. Baseline conditions are described in only a very general way, and monitoring measures are not discussed.

In general, the Draft PEIS fails to analyze the water-related impacts of both oil shale and tar sands development. Although I acknowledge the uncertainties in locating future commercial development, this uncertainty should not limit the BLM's ability to analyze the scale of the potential impacts that are likely to occur.

Of the three alternatives considered in the Draft PEIS, the BLM has selected Alternative B as the Preferred Alternative. The BLM has determined that there are no direct environmental impacts associated with the amendment of the 12 land use plans, but it provides a programmatic-level analysis of the potential impacts of oil shale and tar sands development technologies that is used to support the establishment of a commercial leasing program. Neither the water quality nor the

Appendix 21

(See OSTS_52780)

OSTS_00079

LYTLE WATER SOLUTIONS, LLC

March 19, 2008

BLM Oil Shale and Tar Sands Programmatic EIS
Argonne National Laboratory
EVS / 900
9700 South Cass Avenue
Argonne, IL 60439

Subject: Comments Related to Water Rights Issues in the *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement.*

Project No. 1148-08

To Whom It May Concern:

The Bureau of Land Management (BLM) issued the draft Programmatic Environmental Impact Statement (PEIS) on December 21, 2007. This PEIS examines alternatives for making BLM-administered lands available for oil shale and tar sands resource development. One of the principal issues that will affect both oil shale and tar sands development is the legal and physical availability of water and the associated impacts with the development of these water resources. Lytle Water Solutions, LLC (LWS) is providing comments on the draft PEIS in the area of water resources and water rights. The resume of the undersigned, Bruce A. Lytle, P.E., of Lytle Water Solutions, LLC (LWS) is attached as Appendix A. I have worked continuously in the field of surface water and ground water resources, including involvement in all types of water rights, for over 30 years.

My comments are arranged in the following sections:

- Overview of Water Rights Issues
- Comments on the Use of Surface Water Resources
- Comments on the Use of Ground Water Resources
- Proposed Systematic Approach to Water Supply/Rights Evaluations

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Appendix 22

(See OSTS_52779)

OSTS_00079

Comments Regarding the Oil Shale and Tar Sand Programmatic Environmental Impact Statement

Prepared by:
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March 19, 2008

Appendix 23

(See OSTS_52734)

OSTS_00079

southern utah wilderness alliance

BY ELECTRONIC SUBMISSION AT OSTSEIS.ANL.GOV AND FIRST CLASS MAIL

March 18, 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory
970 S Cass Avenue
Argone, IL 60439

Re: Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement, DES 07-60 (December 2007)

Greetings:

The Southern Utah Wilderness Alliance and the Grand Canyon Trust (collectively "SUWA") appreciate the opportunity to submit comments on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement, DES 07-60 (December 2007) (the "OSTS PEIS" or the "PEIS"). SUWA members regularly use and enjoy Utah's spectacular public lands included in the planning area – particularly the regions near the Circle Cliffs special tar sands area (STSA), the San Rafael STSA, the Tar Sands Triangle STSA, the White Canyon STSA, the PR Springs STSA, the Hill Creek STSA, the Argyle Canyon STSA, the Sunnyside STSA, and the areas with wilderness characteristics found within the most geologically prospective oil shale resource – and are intensely interested in public lands issues such as this PEIS intended to consider the environmental impacts of commercial leasing, exploration, and development of oil shale and tar sands.

In short, the PEIS complies with neither the letter nor the spirit of several important federal environmental and historic preservation laws, including the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). The PEIS neither fully informs the public or the decision maker as to all of the issues associated with this proposal, nor does it adequately analyze the potential impacts of the proposed action to many of the resources that the BLM manages. In sum, the PEIS amounts to largely irrelevant document riddled with flaws as it postpones all meaningful analysis until some later date and event.

SUWA offers the following specific comments regarding the impacts of oil shale and tar sands leasing and development in Utah and looks forward to reviewing BLM's detailed responses to each issue raised below:[1]

[1] SUWA incorporates the comments submitted by Western Resource Advocates *et al.*

OSTS_00079

Appendix 24

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Responses for Document 00079

00079-001: The proposed action analyzed in this PEIS is a land allocation decision. It does not commit any resources or authorize any BLM action that, with the exception of potential impacts on property values, would result in direct environmental impacts. Making land use planning decisions under federal law necessarily involves compromises among competing land uses and values. The BLM does not believe that the analysis shows irreparable harm to local lives and livelihoods. Any subsequent oil shale or tar sands leasing and development would require additional NEPA evaluations, and those evaluations would assess the potential environmental impacts resulting from these actions, along with appropriate mitigation measures to reduce or minimize those impacts.

00079-002: With the passage of the Energy Policy Act of 2005, Congress declared that it is the policy of the United States that "oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed …." Congress also required the Secretary of the Interior to prepare a PEIS for oil shale and tar sands. The FLPMA, the Mineral Leasing Act, and the Energy Policy Act of 2005 authorize use of some BLM land for commercial oil shale leasing and development. The amendments to the RMPs will only close certain areas and will open other areas to consideration for future leasing of oil shale and tar sands. Additional NEPA analyses will be required for leasing decisions.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands.

The BLM acknowledges the commentor's policy concerns, but many of them are beyond the scope of the PEIS.

00079-003: See response to Comment 00079-001. There is no proposal to lease tar sands in Colorado or Wyoming. Also lessees would have to comply with state law in obtaining rights to use water, for discharge of water, and for emissions of air pollutants.

00079-004: The BLM recognizes that transferring water from agricultural use to municipal use is a trend. The potential impacts of transferring water from agricultural use to oil shale or tar sands development have been added to the Final PEIS (see Section 4.5.1). Whether enough water is physically available for oil shale development remains unclear, as the oil shale development technologies, the scale of the development, the economic situation, and the locations of specific development projects remain undefined at this time. The availability of water, as well as the

potential social and economic impacts, would be addressed in future site-specific NEPA analyses at the leasing and plan of development stages. Lessees would have to obtain and use any rights to water in compliance with state law.

00079-005: Section 3.5.1.2 in the Draft PEIS describes the existing state of knowledge regarding climate change. However, no climate change related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources. Table 6.1.5-3 lists CO_2 equivalent emissions of coal-fired power plants. Per-unit emissions can be calculated, but there is no science available to correlate emissions from oil shale or tar sands operations to climate change that might be experienced in the region.

As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00079-006: It is also important to note that, although NEPA declares a broad national commitment to protecting and promoting environmental quality, NEPA is essentially procedural and does not mandate particular results. Criticism of the Congressional mandate is beyond the scope of the PEIS. This PEIS informs the decision maker and the public of the impacts of amending land use plans to the extent possible based on the reasonably available information. The BLM acknowledges the commentor's evident preference for Alternative A. Nothing in the NEPA, however, requires the BLM to select the alternative that might be environmentally preferable.

The prerequisite level of information necessary to make a reasoned choice among the alternatives is based on the scope and nature of the proposed action. Based on BLM's professional knowledge and experience with surface- disturbing activities from other types of mineral development and the paucity of information on the technology to be employed, the BLM determined that sufficient information on the nature of the effects for an allocation decision was known, but the extent of the effect necessary to make a leasing decision was not known. Therefore, a three-step decision-making process is being used in contrast to the process used for oil and gas leasing. Accordingly, prior to any actual lease sale or plan of development approval, additional NEPA analysis will be required. The analysis could result in decisions not to lease in specific areas or to lease particular areas with stipulations to mitigate or eliminate environmental effects. As required by NEPA, the BLM is taking a "hard look" at the environmental consequences of allocation decisions to enable the decision maker to make an informed decision.

00079-007: The BLM acknowledges the commentor's preference for Alternative A.

00079-008: See response to Comment 00079-002. The comment addresses policy matters beyond the scope of the PEIS.

00079-009: As is repeated in many places in the PEIS (see Chapter 1 for the earliest statement), the PEIS is making land allocation decisions, not leasing decisions. Decisions on future leasing are being deferred until more technology and site-specific information is available. Once a commercial lease application is received, the BLM will initiate NEPA analysis to evaluate the application and its potential impacts on public land resources, prior to making a decision on the application.

The comment that the BLM has admitted that its proposed approach described in the Draft PEIS is unsupported on both legal and public policy grounds is incorrect; there are no such admissions in the document. The BLM is implementing the direction from Congress in Section 369 of the Energy Policy Act of 2005 in a way consistent with the requirements of both NEPA and FLPMA.

The BLM has prepared responses to the comments in your letter (this document, #00079). The additional information appended to the comment letter is also

known to the BLM. The individual comment letters that are appended have been separately submitted as comments on the PEIS and are also being addressed as part of the comment review process. The index of the comment response portion of this Final PEIS can be used to assist you in finding the applicable responses.

00079-010: The BLM acknowledges the commentor's preference for Alternative A.

The comment expressly addresses Congress, and thus is beyond the scope of this PEIS.

00079-011: See response to Comment 00079-002. In addition, the Rand Corporation testimony cited in the comment that commercial development will not occur for some time is consistent with statements in the press and those heard during public open house meetings on the Draft PEIS. Industry is proceeding cautiously, which underscores the point that Rand was making; however, that commentary alone does not obviate the need for the BLM to analyze the environmental impacts of amending land use plans to allow or to prevent leasing of oil shale and tar sands resources. Industry advocates for certainty about what a new government program will look like before it will invest several million dollars in development projects. The PEIS, along with oil shale regulations (such as those proposed separately by the BLM), would be the foundation for that program.

00079-012: The scope of the PEIS is analysis of oil shale and tar sands allocation decisions. The regulatory process is outside the scope of the PEIS.

00079-013: The BLM believes that the approach taken to evaluate impacts in the PEIS is appropriate for the proposed action being considered and the decisions that will be made on the basis of the PEIS analysis. The direct, indirect, and cumulative impacts of commercial oil shale and tar sands development are based on the best information available at the time the PEIS was prepared. The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in project-specific NEPA documents before issuing leases for oil shale or tar sands resources. Those analyses will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands. Those documents will also identify mitigation measures that will be required for particular lease areas.

00079-014: The cumulative analysis in the PEIS is consistent with the requirements of NEPA and does not disregard Congress's intent, nor does it preclude the eventual issuance of commercial leases once additional site-specific NEPA analysis is performed. A cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to

be considered for future leasing). A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

The cumulative impacts analysis in the PEIS summarizes the past, present, and reasonably foreseeable other activities (for example, oil and gas development, coal mining, minerals development) for the study area, and it presents a preliminary qualitative assessment of the incremental impacts of those activities considered in conjunction with oil shale and tar sands development. At this preliminary stage, when the specifics of the extent of future oil shale and tar sands development are unknown, the discussion of the potential impacts of oil shale development are based on BLM's experience with comparable surface-disturbing activities from other types of mineral development.

In order that the decision maker might have sufficient information to make a reasoned choice among the alternatives, the BLM has developed a general analysis of the potential incremental impacts from all past, present, and reasonably foreseeable actions, in conjunction with a single hypothetical oil shale or tar sands facility, with the understanding that there might be more than one, or even many, oil shale/tar sands facilities developed in the future. For the purpose of this analysis, parameters for consideration (such as land disturbed, water use, and jobs created) were developed where possible. For some parameters (such as air emissions), no estimates with respect to possible development could be made because the data would depend entirely on technology-specific inputs.

Prior to leasing (when site-specific and technology-specific data will be available), or approval of a plan of development (when accurate information on water use, air emissions, employment, etc. will be available), additional environmental analysis will be performed, including a cumulative analysis, as appropriate.

00079-015: We agree that the NEPA analysis for leasing should include within its scope a discussion and/or analysis of the impacts from foreseeable transportation requirements, as well as any energy infrastructure or refining projects that might be associated with commercial development of these resources. Transportation issues are discussed within the Socioeconomic sections throughout the PEIS. The PEIS also includes a discussion of the possibility of land disturbance and other impacts from planned power lines, both those required for oil shale/tar sands facilities and those planned for other purposes, in the cumulative impacts analysis. (For example, the transmission and pipeline rights-of-way are included in the total acreage estimate of 14,000 acres for an oil shale facility [Table 6.1.5-9 of the PEIS], and the potential impacts from other energy corridors are also acknowledged in Section 6.1.5.3.1.) At this time, however, it would be an inappropriate exercise in speculation to attempt to present an analysis of impacts from power generation for oil shale/tar sands development, because the amount of power required would vary with the technology to be implemented, and also

because the source of the power and therefore the impacts are unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. Refinery requirements are also highly speculative at this time; however, the PEIS does include a preliminary assessment of these requirements, concluding that, even if significant oil shale/tar sands development occurs over the next 20 years, new national refining facilities are unlikely to be needed, although expansion of existing refineries would likely occur (see Sections 4.1.7 and 5.1.6).

For similar reasons, it is neither required nor possible in this PEIS to present an analysis of cumulative effects showing the impacts of leasing and development of these resources across the entire landscape of Colorado, Utah, and Wyoming. First, the decisions to be made on the basis of this PEIS are limited in character, consisting only of planning/allocation of lands where nominations to lease can be considered. Second, the locations, scope, and scale of future oil shale and tar sands development are highly speculative, and, third, there will be additional NEPA prior to leasing. These points have been clarified in the introduction to the cumulative impacts sections (Sections 6.1.5 and 6.2.5). The BLM is committed to implement its multiple use mandate in FLPMA, in accordance with its planning and other regulations, and notes that authorized uses include commercial development of oil shale and tar sands resources.

The NEPA analyses at the leasing and development stages will consider effects from Reasonably Foreseeable Future Actions (RFFAs) (40 CFR 1508.7). If the proposed action would impact a particular resource that one or more RFFAs would also impact, the impacts of those RFFAs would be included in the cumulative effects analysis for the proposed action. At the leasing or development stage, the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects. For example, the geographic extent of a cumulative effects analysis for leasing or for a proposed development project will reflect not only the geographical limits of the proposed lease/projects but also the geographical limits of the resource being affected (e.g., elk winter range).

00079-016: See response to Comment 00079-015 regarding cumulative analysis of planned power and refinery requirements. Table 6.1.5-3 in the PEIS provides estimated CO_2 equivalent emissions from future power plants. There is no scientific model that can correlate particular emissions to impact on global climate. The estimate of 10 power plants is only an estimate. Because the BLM cannot know the number, location, electrical needs, or fuel source for the power plants, assuming locations and specific transmission corridors would be gross speculation that could not provide meaningful information to the decision maker or the public.

Additional and more detailed cumulative impact analysis for all these areas (transmission corridors, power generation (including greenhouse gas emissions), and refining needs) will be conducted at two subsequent stages of development:

for NEPA analysis of any leasing decisions, and for NEPA analysis for sites with specific plans of development being evaluated.

00079-017: The cumulative impact analyses in this PEIS is necessarily qualitative because of the experimental stage of the oil shale and tar sands industries. The PEIS summarizes available information on ongoing land-disturbing actions in the study area in Tables 6.1.5-4, -5, -6, and 6.2.5-4. As stated in the response to Comment 00079-015, because of the limited character of the decision to be made on the basis of this PEIS (planning/allocation of lands where nominations to lease can be considered), because the locations and magnitude of future oil shale and tar sands development are highly speculative, and because there will be additional NEPA analysis prior to leasing, it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development in this PEIS. The NEPA analyses of cumulative impacts at the leasing and plan of development stages will consider effects from RFFAs; the scope of such analyses will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects.

00079-018: This PEIS complies with the CEQ regulations. This PEIS does not need additional information to support amendments of the RMPs, as opposed to issuing leases or approving surface-disturbing activities. If additional information were necessary, information concerning the technologies that will be commercially viable is not available at any price. The BLM has extensively discussed currently unavailable information so that the decision maker and the public are aware of the limits of the available information. The BLM does recognize that additional NEPA analysis will be required, and is committed to preparing the appropriate level of analysis prior to the issuance of any oil shale lease. Since leasing will be an entirely different decision, a new NEPA analysis will be required. It is inappropriate to speculate at this stage whether such NEPA analysis will be programmatic in nature.

This new NEPA analysis will analyze whether to offer for lease parcels of land for commercial oil shale exploration and development and under what conditions or stipulations to do so. The analysis will also contain any new information or circumstances relevant to the technology, the affected environment and any associated environmental consequences. This information may be a consequence of research on the RD&D leases or a result of industry performing research or studies on nonfederal lands.

As required by NEPA, all subsequent NEPA documents will analyze the cumulative effects from other reasonably foreseeable future actions. The scope and nature of the specific proposed action will drive the type of NEPA analysis the BLM performs.

The affected environment of the action could vary greatly from a large regional area to a small discrete area. The scope of the analysis in the NEPA document

would be dependent upon the number of applications received and the type and size of operations proposed by the applicant(s). This could result in a statewide, regional, basinwide or a site-specific impact analysis. Overall, the geographic extent of the analysis would be limited to those areas that could experience a change in the pattern of land use as a consequence of a direct impact or other induced effects on the natural resources. The nature of the action can also vary greatly based on the type of technology or mining method. Another critical factor would be the type of infrastructure needed to support the operation, in particular, the source of electrical power.

Hypothetically, the proposal in subsequent NEPA documents could offer for commercial lease 1) only a limited number of parcels, 2) parcels located in a geologic basin, or 3) parcels located throughout a state. Estimated oil shale exploration and development activities assumed to occur as a result of issuing the leases would be based on actual applications; therefore, analyses of proposed operations, hypothetical development scenarios, and an RFDS could be developed. Depending on the information included in the applications, technologies whose impacts would be analyzed could include any or all of underground and surface mining with surface retort operations and/or in situ operations.

Based on the nature of the proposed action, existing sources of electrical power may be sufficient to power the operation, or electrical power may need to be generated on lease from either conventional energy sources like natural gas or renewable energy sources like wind or solar. A third hypothetical analysis may include the expansion of existing power plants or the construction of additional power plants (coal, gas, nuclear). In each case, the scope of the NEPA analysis would be limited to the extent of the direct and indirect effects from activities described in a reasonably foreseeable development scenario.

While BLM is committed to performing NEPA analysis prior to leasing, we cannot commit to a certain type of NEPA (regional, planning area, or local). The proposed action will drive what analysis must be done to comply with the requirements of NEPA.

00079-019: The proposed action being evaluated in the PEIS—to identify public lands that would be made available for leasing for oil shale and tar sands development—does not authorize the immediate leasing of these lands for commercial development. Therefore, the specific numbers and locations of projects and required mitigation measures cannot be identified at this time.

Leasing and operating regulations are where control and mitigation requirements are typically specified. Operation-specific impact control measures may depend on the resource development technology. Although the BLM is committed to environmentally sound development with minimal impacts, there is no reasonable expectation that any eventual oil shale or tar sands operation would have zero

adverse impacts to all values of the land. The BLM published in the *Federal Register* on July 23, 2008, the proposed rule for the implementation of a commercial leasing program for the management of oil shale located on federal lands.

Project-specific NEPA evaluations will be prepared prior to leasing and development decisions. These evaluations will include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important resources in the project area. These mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders.

00079-020: At this point, it would be unduly speculative to assume what the "full scale" commercial development alluded to by the commentor might be. As is appropriate for this stage in the process of considering commercial development of these resources, the PEIS presents potential mitigation measures to be considered in NEPA analyses at the leasing and plan of development stages. Please see the response to Comment 00079-018 for a discussion of the scale of cumulative impact analyses at these later stages in the process.

00079-021: The commentor misinterprets the character of the proposed action. In consultation with our cooperating agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Since the questions of whether to lease at all and where to lease will involve entirely different decisions, a new NEPA analysis will be required. It is inappropriate to speculate at this stage whether and to what extent the new NEPA analysis will be able to tier off the information contained in this programmatic document.

As stated in the response to Comment 00079-015, because of the limited nature of the decision to be made on the basis of this PEIS (planning/allocation of lands where nominations to lease can be considered), because the locations and magnitude of future oil shale and tar sands development are highly speculative, and because there will be additional NEPA analysis prior to leasing, it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development in this PEIS. The analyses of cumulative impacts at the leasing and plan of development stages will consider effects from RFFAs. (An RFFA is defined as: a projection of activities [industrial and minerals development, recreational activities and development, wildlife management, air and water resource management, urban development, transportation, etc.] within a defined geographic area and for a specified time frame. RFFAs are identified through available information on resource occurrences, past and present activities or uses and trends, economics, existing project proposals and other reliable

indications of anticipated activities, and other identified factors specific to the area of analysis.) The scope of a cumulative effects analysis will be determined by the location and number of leases/projects and the specific resources that may be affected by those leases/projects.

The commentor attempts to criticize an action the BLM has not taken. Decisions about whether to tier from this PEIS, incorporate parts of it by reference, supplement it, or otherwise use it in the NEPA analyses of decisions on lease issuance or on operating permits are not being made in this document. The appropriate use of this document in informing those decisions will be made when those decisions are ready to be made.

The Secretary retains discretion whether and when to lease any particular tract. The process through which the industry may express interest in particular lands for oil shale, and in which the Secretary may decide to lease any lands, should be addressed in leasing regulations for oil shale and not in the PEIS.

00079-022: It is correct that the FLPMA directs BLM to manage public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." [FLPMA, Section 103(c) (43 U.S.C. §1702(c))]. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. The selected alternative fulfills the Secretary's obligations under FLPMA and other statutes.

00079-023: Although the BLM's handbooks provide for stipulations for oil and gas leases to be made part of the land use plans, that guidance is not applicable to the present analysis to amend land use plans for development of oil shale or tar sands. Oil and gas is a mature industry where there is long experience with leasing stipulations to conserve and to protect affected resources. The present experimental stage of the oil shale and tar sands industries, however, weighs against emplacing lease stipulations in the RMPs at this time. Instead, the BLM will develop appropriate lease stipulations and either (1) include them in appropriate RMPs as part of future amendments, or (2) include them in commercial lease sale announcements. That will allow the BLM to refine lease stipulations over time based on the latest information regarding oil shale or tar sands technologies and their impacts, without unnecessary rounds of amendments to the land use plans. This PEIS does discuss various mitigation requirements, methods, and objectives that will inform both (i) the lease stipulations developed for particular lease sales or future

amendments to RMPs, and (ii) the conditions of approval for plans of development.

In this PEIS the BLM 1) identifies the most geologically prospective oil shale resources on public lands in Colorado, Utah, and Wyoming; 2) supports amendment of certain land use plans to identify areas as available for application for commercial leasing in the future; 3) supports amendment of certain land use plans to identify areas as off-limits to application for commercial leasing in the future; 4) supports amendment of land use plans to specify that the BLM will consider and give priority to the use of land exchanges to facilitate oil shale development; and 5) discloses what is known about oil shale development as well as what information and data must be obtained in order to be able to complete the NEPA analyses necessary to lease. The BLM clarifies in the PEIS, to the extent possible, how potential oil shale development could proceed on public lands and stipulates that site-specific NEPA analysis will be required prior to leasing and to development. This PEIS therefore facilitates subsequent environmental analysis but does not convey any lease or development rights on public lands. The BLM believes the PEIS is fully consistent with its existing planning regulations.

00079-024: The results of various reports are used to evaluate water availability. The reports provided historical and projected activities in the Upper Colorado River Basin. The historical water uses are from the Department of Interior's Consumptive Uses and Losses Reports, and the projected water demands are from various studies the water plans of Utah and Wyoming (Utah State Water Plan – Southeast Colorado River Basin, Utah State Water Plan – West Colorado River Basin; Utah State Water Plan – Uinta Basin; Utah's Water Resources: Planning for the Future, various technical memorandums of Wyoming's Green River Basin), and the Statewide Water Supply Initiative of Colorado. These reports are recognized by state and federal governments. The list of cited documents can be found in the footnote under Table 3.4.1-2 and the reference list at the end of Chapter 3.

Water uses for oil shale development are based on our knowledge about oil shale development technologies. Actual water requirements for the development is unknown as it depends on many critical factors that remain uncertain, such as the technologies to be used for commercial production, the scale of the development, the future economy, and the specific hydrologic settings of potential project sites. The evaluation of actual water requirements is more appropriately addressed in project-specific NEPA documents. Lessees would have to obtain and use water rights pursuant to state law. If water rights were not available, then there might be no bidders for an oil shale lease or no development on a lease. That is one reason why the number of locations of oil shale or tar sands operations can be no more than speculative at this time.

The magnitude of converting water from agricultural uses to industrial uses depends on many factors, including the scale of oil shale and/or tar sands development. The common impacts of transferring water from agricultural uses to

industrial uses have been added to the text in Section 4.5.1. Specific impacts would be evaluated at the project levels at which the scale of oil shale and/or tar sands development is specified.

00079-025: Calculation of water availability in the Upper Colorado River Basin depends on the undepleted flow (or natural flow) at Lees Ferry, where the Upper and Lower Colorado River Basins are divided. The Colorado River Compact and the Upper Colorado River Basin Compact are also based on the assumed flow at Lees Ferry to determine the amount of water allocations for the seven basin states.

This PEIS assumes that 6,000 thousand ac-ft per year are available for use in the Upper Colorado River Basin. The same amount was used in Colorado's Statewide Water Supply Initiatives study (CWCB 2004). It was based on long-term historical hydrologic data with a mean undepleted flow at Lees Ferry of about 15,000 thousand ac-ft/year and was confirmed by another CWCB study (2007). The data were collected from 1906 to 2005, within which wet and drought years existed. Other studies (Kuhn 2005; Tipton 1965) suggested that a mean undepleted flow of 13,500 thousand ac-ft/year be used. The Tipton study was based on historical data from 1930 to 1964. A tree-ring study supported the 13,500 thousand ac-ft/year figure (Kuhn 2005).

To evaluate the water supply of the Colorado River Basin, the BLM prefers the use of long-term historical data over relatively short-term data. We learned that short-term historical data fluctuate and are less reliable than long-term data, resulting in biased assumptions. That happened in the Colorado River Compact of 1922 that assumed a mean flow of 16,400 thousand ac-ft/year (Smerdon et al. 2007). Similarly, if we select the data from the drought years of the early 2000s for our evaluation, we would likely produce another kind of biased results.

The use of tree-ring data to reconstruct past river flows is not a direct measurement of stream flow and must rely on interpretation. The credibility of the interpreted results is less than that of the historical hydrologic data. Therefore, the long-term historical data are used in the evaluation presented in the PEIS. However, the BLM is aware of possible prolonged or severe drought that can affect water availability in our evaluation (see Section 4.5.2).

Proposed water projects could be accepted, modified, and rejected and would take time to resolve, as do the pending legal issues and unclaimed Tribal water rights. The outcomes of all of these issues are uncertain and are difficult to speculate about. Instead, this PEIS uses the latest data available and avoids making these speculative assumptions for the evaluation to enhance the reliability of the conclusion.

Responses to any "call" or other water shortages would be governed by state law. The comment does not provide enough information to speculate about the priority of any lessee in relation to that of any other water user. The commentor on the

one hand wants the BLM to make a decision based on the opinions of its selected experts, and on the other hand wants the BLM to await Colorado's water availability study, which is in its early stage. This PEIS is considering the available information, which is sufficient for amending the land use plans.

00079-026: The amount of water needed for future oil shale or tar sands development depends on many factors, including the scale of development, the technologies used in the development, the national agricultural economy, and the locations and hydrologic conditions of project sites. The water needs would be evaluated at the project level when many currently unknown factors are better defined. The results would be presented in project-specific NEPA documents.

The three types of technologies allow for qualitative analysis. They are not proposed as a quantitative prediction of maximum development. Estimates of water requirements for commercial oil shale or tar sands operations vary significantly. If the amount of water required by the lessee were not available physically or under state law, the lessee could not operate.

00079-027: See response to Comments 00079-024 and 00079-025. The commentor does not cite any projections that it believes to be more realistic.

00079-028: The water use assumptions for retort processes and for power generation used in the PEIS are based on the best information available at this preliminary stage of development. The water requirements associated with a power plant could change drastically depending on the type of technology (e.g., coal-fired, nuclear, hydropower); the amount and type of power that will be used for oil shale and tar sands development is not known at this time. Similarly, a range of estimated water requirements for retort processes was used in the PEIS analysis (see Appendix A); these estimates would be refined for future NEPA analyses for leasing and plans of development when more accurate information would be available. The proposed action for this PEIS is a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the water quality or quantity. Therefore, the programmatic analysis provided is adequate to support the proposed action. The commentor does not cite any projections that it believes to be more realistic.

00079-029: The text of the document describes the possibilities of groundwater-surface water interaction, changes to groundwater and surface water flow systems, etc. Determining water availability for potential developments is beyond the scope of this programmatic document, as are water rights issues, which are handled by state law. Site-specific assessment of groundwater–surface water interaction and impacts would be addressed in a site-specific NEPA analysis of any proposed development. Impacts to and protections for aquifers are among the issues being studied in several of the RD&D projects. That information might be important for leasing or plans of development but it is not critical for amending the RMPs.

00079-030: Potential impacts on water resources of untested in-situ retort technologies for oil shale development are considered speculative and are not addressed in the PEIS. Such impact evaluations would have to use uncertain assumptions and would likely produce unreliable results. One of the R&D projects is to test a retort technology.

The PEIS uses the latest information available. Historical data are used to estimate water supply and demand. Any pending studies of the water supply and demand of the Colorado River Basin have not been considered in this PEIS, but could potentially be available for future NEPA analyses.

In the semi-arid and arid environment of the western states, resource development (including oil shale and tar sands development) foreseeably requires water. The interdependence of energy and water resources has existed for a long time. The degree of this interdependence has gained increased recognition because of population growth, the droughts of the early 2000s, and globally increasing energy demands. The PEIS addresses the water resources accordingly.

The issue of greenhouse gases emissions caused by oil shale and/or tar sands development would be evaluated in project- and site-specific NEPA documents. Table 6.1.5-3 lists estimated CO_2 equivalent emissions from power plants. There is no accepted scientific model that can correlate emissions from any particular source or sources to impacts to or from climate change. Site-specific water supplies and water rights in a water basin also would be addressed in project- and site-specific NEPA documents.

The impacts of water transfer from agricultural use to oil shale development use have been added to the text in Section 4.5. Lessees may acquire water rights from existing water uses only in compliance with state law. If water rights are not available, the lessee cannot operate.

00079-031: At future stages of environmental evaluation (i.e., leasing and/or plan of development), a landscape-level analysis will be performed, if appropriate. The scope of the analysis in subsequent NEPA documents would be dependent upon the number of applications received and the type and size of operations proposed by the applicant. This could result in a statewide, regional, basinwide, or site-specific analysis. Issues such as the presence of wildlife, wildlife habitat, and wildlife habitat fragmentation will be considered, as appropriate. As stated previously, the PEIS is in full compliance with the provisions of the FLPMA and NEPA.

00079-032: In developing the PEIS, the BLM used the best available information regarding existing oil shale and tar sands technologies and environmental resource characteristics in the most geologically prospective portions of oil shale basins and STSAs. It is expected that the existing RD&D program will provide additional information on the impacts of different technologies and the

effectiveness of different mitigation strategies, as well as the information needed to improve extraction and refinement processes. A full evaluation of future development impacts will be conducted on a project-specific basis using, among other things, the information gained in the RD&D program. These project-specific evaluations also will include evaluations of cumulative impacts, including the impacts of past, present, and reasonably foreseeable future oil shale and tar sands projects.

The BLM believes that it is unlikely that all of the surface of any oil shale or tar sands lease would be disturbed at one time, but that is a possibility. Chapter 3 describes the present condition of the resource management areas. This PEIS also analyzes impacts to wildlife habitat and potential mitigation measures. This PEIS does not conclude that there will be no impacts to wildlife from commercial oil shale or tar sands leasing development, but it does set out adequate mitigation measures.

00079-033: Additional information pertaining to the occurrence and distribution of fish species (especially sensitive native fish species) within the Piceance Oil Shale Basin has been added to Sections 3.7.1 and 3.7.1.1.4 of the PEIS, including information about roundtail chub, bluehead sucker, flannelmouth sucker, and mountain sucker. Information about mussel species within the basin has also been added.

The potential for development of oil shale and tar sands to affect loadings of sediment, salts, and other waterborne constituents is addressed in Sections 4.5 and 5.5 of the PEIS, and the potential impacts of such water quality changes on aquatic resources are identified in Sections 4.8.1.1 and 5.8.1.1 of the PEIS.

Because the number and specific characteristics of potential projects are not known at this time, the PEIS evaluates potential impacts in a relatively generic fashion appropriate for a programmatic EIS and sufficient to make decisions regarding land use allocations. In addition to the discussion of the types of impacts to aquatic resources that would be common to all the oil shale alternatives (Section 4.8.1.1), the impacts on aquatic resources associated with oil shale Alternative A are discussed in Section 6.1.1.7.1; those associated with Alternative B are discussed in Section 6.1.2.7.1; and those associated with Alternative C are discussed in Section. 6.1.3.7.1. The impacts of alternatives on threatened and endangered species are compared in Section 6.1.4.7.1.

A cumulative analysis for the PEIS is presented to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there are no impacts to aquatic species. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not

be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, and the local communities, when considered with other reasonably foreseeable actions.

00079-034: Text discussing potential increases in nutrient loading associated with oil shale and tar sands development and the potential for impacts on aquatic resources has been added to Sections 4.8.1.1 and 5.8.1.1.

00079-035: The comments provided by John Woodling are addressed separately. Please refer to the responses for Comment Document 52779.

00079-036: The proposed action does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the threatened or endangered species. However, potential future direct and indirect impacts on species dependent on shale-derived soils are discussed in Section 4.8.1.2, 4.8.1.4, 5.8.1.4, 6.1.1.7.4, 6.1.2.7.4, 6.1.3.7.4, 6.2.1.7.4, 6.2.2.7.4, and 6.2.3.7.4 of the PEIS. Cumulative impacts on these species are discussed in Section 6.1.5.3.7 and 6.2.5.3.7. As stated in the PEIS, each alternative would require adherence to BLM policy on the protection of sensitive species and project-specific ESA Section 7 consultation with the USFWS. These consultations must include a consideration of cumulative effects.

00079-037: See response to Comment 00079-31.

At this time, it is not possible to provide a quantitative landscape-level analysis of impacts as requested in the comment. There are many uncertainties regarding the amount of development that is reasonably foreseeable, the types of technologies that might be deployed, and the locations of potential projects. Impacts on threatened and endangered species are discussed in the PEIS but cannot be analyzed in detail without more detailed project-specific information and analysis. Future leasing and development decisions will consider impacts on sensitive and threatened and endangered species and will include consultations with the USFWS. These consultations must consider each project in the context of other factors affecting each species within its range.

00079-038: Text on Section 7 consultation in Chapters 4, 6, and 7 of the PEIS has been revised for consistency. Section 6.3 presents the Section 7 requirements.

The federal action at issue here is the amendment of land use plans to identify lands that are available for commercial leases for oil shale or tar sands development. The amendment makes no decision to authorize, fund, or issue any lease. The BLM has examined the potential effects on listed species and designated critical habitat of amending land use plans to identify lands as

available for application for commercial leases for oil shale or tar sands development. The BLM also examined the recent direction and analysis provided by the USFWS regarding compliance with Section 7, concerning emissions of greenhouse gases, and any effects they may cause to listed species and designated critical habitats, in particular the polar bear (Caswell 2008; Hall 2008). As a result of those examinations, the BLM has determined that its proposed action of amending land use plans would have no effect on these species or on critical habitat and therefore Section 7 consultation, whether formal or informal, is not necessary. This determination is based on the following:

1) The amendment of land use plans to identify lands as available for application for commercial leasing for oil shale or tar sands development would have no impact on the environment. The amendments do not commit the BLM to a particular course of action, or authorize any ground-disturbing activity; they merely allow BLM to consider granting leases—in the future—for oil shale or tar sands development, nor do land use plan amendments result in future implementation actions that may cause emission of greenhouse gases (Caswell 2008).

2) The amendment of land use plans for such a purpose does not create any legal right that would allow ground- disturbing activities without further agency decision making and compliance with applicable statutes, including ESA and NEPA.

3) An application for a commercial lease in areas that may be identified as available for such application as a result of the proposed land use plan amendments, or an application for approval of any ground-disturbing activities that may occur in these areas in the future, is subject to full policy and legal review at the time it is filed and may be denied by the BLM.

Early coordination with the U.S. Fish and Wildlife Service has been occurring during development of the PEIS. Not only is the USFWS a cooperating agency, the BLM and USFWS have met on several occasions and developed the list of conservation measures that may be applied to address species conservation following the next level(s) of NEPA analysis.

00079-039: Appendix E of the PEIS has been modified to correct the errors identified in the comment.

00079-040: Section 3.7.4.1 of the PEIS has been revised to include recent USFWS findings for the Uinta Basin hookless cactus complex.

00079-041: Text regarding oil-shale endemic species has been added to Sections 3.7.2. 4.8.1.2, and 5.8.1.2., 6.1.1.7.2, 6.1.2.7.2, 6.1.3.7.2, 6.1.4.7.2, 6.2.2.7.2, 6.2.3.7.2, and 6.2.4.7.2.

00079-042: Text regarding oil-shale endemic species has been added to Sections 3.7.2. 4.8.1.2, and 5.8.1.2., 6.1.1.7.2, 6.1.2.7.2, 6.1.3.7.2, 6.1.4.7.2, 6.2.2.7.2, 6.2.3.7.2, and 6.2.4.7.2.

00079-043: Section 3.5.1.2 states "The assessment of GHG emissions and climate change is in its formative phase, and it is not yet possible to know with confidence the net impact on climate." In addition, the Final PEIS has been modified to include the following text: "The lack of scientific tools designed to predict climate change on regional or local scales limits the ability to quantify potential future impacts. However, potential impacts to air quality due to climate change are likely to be varied. For example, if global climate change results in a warmer and drier climate, increased particulate matter impacts could occur due to increased wind blown dust from drier and less stable soils. Cool season plant species' spatial ranges are predicted to move north and to higher elevations, and extinction of endemic threatened/endangered plants may be accelerated. Due to loss of habitat, or due to competition from other species whose ranges may shift northward, the population of some animal species may be reduced. Less snow at lower elevations would be likely to impact the timing and quantity of snowmelt, which, in turn, could impact aquatic species."

See also response to Comment 00079-005.

00079-044: See response to Comment 00079-043.

00079-045: See response to Comment 00079-005.

Congress has declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sand resources among other unconventional fuels, if it can be done in an environmentally sound manner. In the PEIS the BLM presents an analysis based on the nature and scope of the proposed allocation decisions and on available nonspeculative information, including general information on the subject of climate change. At this time, largely because of the lack of reliable information on developing commercial technologies, there is not enough information to make reasoned decisions on the potential effects of the technologies on climate change. As new information is developed, and if future applications for commercial leases are filed, the issue will be revisited in the site-specific NEPA analyses considering these future applications. The PEIS describes the requirement for additional site-specific NEPA analyses prior to issuance of commercial leases and approval of proposed exploration or development projects. In addition, the FEIS text has been modified to address climate change as required under Secretarial Order 3226. There is no science available to correlate emissions from oil shale or tar sands operations to climate change that might be experienced in the region. The BLM is in compliance with all applicable statutes and regulations.

00079-046: Please see responses to Comments 00079-032 and -045. The analyses of alternative energy sources to oil shale and tar sands are outside the scope of the PEIS and the mandate from Congress. The commentor does not cite any scientifically acceptable model that could correlate CO_2 equivalent emissions to changes in climate. Although the BLM believes that a large percentage of the products from an oil shale or tar sands lease would be used for combustion, we do not know what percentage would be used for chemical feedstocks.

00079-047: The proposed action is a land allocation decision that does not commit any resources or authorize any BLM action that, with the exception of possible impacts on property values, would result in direct, indirect, or cumulative environmental impacts.

As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00079-048: See response to Comment 00079-047.

00079-049: The BLM provides for compliance with the Clean Air Act (CAA) by requiring lessees to operate pursuant to all required state air permits and regulations. The BLM does not have regulatory authority under the CAA, and FLPMA does not preempt state authority under CAA. The BLM agrees with the need for scientific integrity, which is why the PEIS does not engage in gross speculation about impacts from future technologies.

Potential air quality impacts were adequately analyzed under NEPA documents previously prepared for the oil shale RD&D projects. The BLM will not conduct or authorize activities which would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process.

00079-050: See previous response to Comment 00079-049. The EGL project is beyond the scope of the PEIS. If a lessee cannot obtain an emissions permit from the appropriate state agency for lack of increments or for any other reason, operation on that lease could not continue.

00079-051: See response to Comment 00079-047.

00079-052: Text has been added to Section 4.11 of the PEIS covering the importance of amenities to economic development in rural areas and the potential conflict with energy development.

00079-053: See response to Comment 00079-052. The BLM acknowledges the commentor's reason for preferring less-developed public land and has not dismissed the potential impacts from commercial oil shale leasing, but rather has taken a hard look at them.

00079-054: While it may be the case that community development programs, with participation from energy resource developers, and local, state, and federal governments, will be implemented in each ROI at various stages of the oil shale and tar sands development process, the nature, extent, level of participation, and timing of these programs are not known at this time. Sections 4.11.1.2 and 5.11.1.2 of the PEIS note that revenues from oil and gas severance taxes are currently distributed by state authorities to local communities to support local public service and infrastructure development using a range of different mechanisms, while payments in lieu-of-taxes are often made by federal agencies to support local community responses to energy developments on public land. Royalty bonus payments have also been provided to local communities with the leasing of public lands for energy development. The analysis undertaken for the PEIS provides information on impacts in each ROI in the absence of additional mitigation measures.

A series of potential mitigation measures related to the provision of direct and indirect employee housing and related services, and to the development of socioeconomic monitoring, vocational training, and outreach programs is provided, in order to reduce the initial impact of construction and operations activities in each ROI, particularly with regard to the impact on housing markets, local public services and infrastructure, social disruption, and wholesale and retail price inflation.

Additional impact mitigation strategies could be designed and implemented at the local and state level, notably market-based mitigation strategies to coordinate ecosystem management practices, and rotational schedules for direct workers once the location, timing, and magnitude of impacts of specific projects are known. The role of tax revenues in attempts to diversify local economies and reduce dependency on natural resource extraction industries, thereby reducing the susceptibility of local communities to the boom-and-bust economic cycle associated with energy development in rural areas, could also be considered.

00079-055: Responses to Catherine Keske's comments can be viewed at Document 52669; responses to specific comments in the document pertaining to the issues in this comment are listed below.

For a response to the comment on the use of the IMPLAN modeling program, please see responses to Comments 52669-007 and 52669-013.

For a response to the comment on economic costs to recreation, agricultural production, and agri-tourism, please see responses to Comments 52669-008 and 52669-014.

For a response to the comment on nonmarket values, please see responses to Comments 52669-009 and 52669-015.

For a response to the comment on the limitation on the comments for the socioeconomic section, please see responses to Comments 52669-010 and 52669-016.

For a response to the comment on the dynamics of a mineral economy, please see responses to Comments 52669-011 and 52669-017.

For a response to the comment on market-based incentives to mitigate loss of ecosystem services, please see responses to Comments 52669-012 and 52669-018.

For a response to the comment on TABOR, please see the response to Comment 52669-014.

00079-056: The limitations of input-output models such as IMPLAN, particularly with regard to their static nature, and consequently the difficulties involved in providing accurate estimates of impacts in future time periods following periods of rapid growth and structural change, are, as the commentor suggests, well understood. Despite these difficulties, the IMPLAN model was assessed to be an appropriate framework for estimating the economic impacts of oil shale and tar sands developments in the PEIS, including estimates of the direct and indirect impacts of these developments in each ROI.

The intention of the analysis undertaken for the PEIS was to provide reasonable estimates of the regional economic impacts of oil shale and tar sands extraction technologies in each ROI. Assumptions used in the analysis using IMPLAN, outlined in Section 4.11, relating to direct and indirect worker and population in-migration, local spending of wages, and equipment and material procurement, reflect the fact that even with a long period of development of oil and gas resources in each ROI, the relevant occupational workforce and sectors in each area would likely not be able to fully meet additional demands from oil shale and tar sands developments. In addition, the analysis discusses the impacts to local landowners and communities and impacts to public services and infrastructure. If commercial-scale resource development occurs, additional NEPA analyses would be undertaken to analyze in detail the extent of regional economic impacts, incorporating project-specific data on ROI spending of wages and salaries and the extent of local procurement of equipment and supplies, to provide detailed estimates of the impact of oil shale and tar sands development on local industries and on the economy of each ROI. Impacts of large-scale oil shale and tar sands development on agriculture, recreation, and retirement spending could also be assessed in detail at that time.

00079-057: On the basis of input from the cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM analyzes the environmental consequences of land use allocation decisions that do not commit any resources or grant any lease rights. It does not analyze a leasing or development decision that requires compliance with Section 106 prior to issuing the ROD for this PEIS. Prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with and appropriate consultation as required by the NHPA and other authorities specific to Native American concerns. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. If significant cultural resources are present or found to be present during requisite surveys and consultations, this specific analysis may include

mitigation such as use of BMPs, specific protections, or avoidance to mitigate or eliminate adverse effects to historic properties.

There is no guarantee within this PEIS that lands within the areas identified under the alternatives as open to application will be leased or developed if significant cultural resources are present. Similarly, it is premature at this stage to completely deny access to particular lands without sufficient knowledge of the technologies to be applied or the specific physical area of potential effect. The data provided in Section 3.9 are a general overview of regional cultural resources to indicate that there are many types of sites present in the areas under consideration and likewise that there are many areas requiring survey and sites needing evaluation. It is recognized that these data will be continuously updated as surveys and evaluations are completed in the various areas. By the time a lease is applied for or a development project proposed, a complete and thorough investigation beyond what is presented generally in the PEIS will be necessary to collect and evaluate the best available information, including the possibility of conducting field surveys and site evaluations, as appropriate. The BLM acknowledges the commentor's desire that historic values be given greater weight in BLM's decision making. During subsequent NEPA analysis, full consideration will be given to the protection of cultural resources in full compliance with existing BLM policies and pertinent laws and regulations.

The analysis presented in the PEIS is an appropriate level of analysis for a land use allocation decision. The PEIS does address the potential impacts of oil shale and tar sands leasing and development in Chapters 4 and 5 to disclose the possible types of impacts that would have to be evaluated in future site-specific NEPA analyses, if leases are applied for and plans of development are submitted. Sections 4.10 and 5.10 specifically address the potential impacts that could occur on cultural resources, but impacts would be site-specific and depend on a number of factors, as discussed above. The level of survey and analysis that would need to be undertaken if a lease or project were proposed would be determined according to BLM policy, in compliance with the numerous federal regulations regarding the protection of cultural resources, and in consultation with the appropriate SHPOs and affected Native American Tribes.

Conflicts between resource uses are not new, and resolutions to such conflicts are not decided by the land use planning decisions analyzed in this PEIS. The amendments to the RMPs will only close certain areas, and open other areas to consideration for future leasing of oil shale and tar sands. The Secretary of the Interior retains discretion over leasing decisions. The NEPA analysis for future leasing decisions will analyze resource uses compatibility and conflicts.

See also response to Comment 00079-002.

00079-058: Identification and protection of cultural properties are highly specific actions normally accomplished at the local land use planning or even activity planning

level. The BLM does have wide discretion in accomplishing this protection. However, the BLM is currently preparing a programmatic document that is reviewing, at a high level, the designation of lands available for future application for future leasing, not leasing itself. Although proposing to make a large amount of area available for application, the BLM is implementing a "staged" or "phased" approach to the commercial leasing proceeding from the land use plan level to consideration of leasing and to the plan of development stage. This provides an opportunity to build on the scientific, governmental, or industry research, including findings from the existing RD&D leases. Any new information and/or circumstances will be taken into consideration when preparing future NEPA analysis. Future analysis will consider a full range of alternatives, as well as specific mitigation measures, such as BMPs or stipulations to avoid or mitigate short- term or long-term adverse impacts to the environment, public safety, wildlife, and local communities. Cultural and historic resources will be specifically addressed at this next level of analysis as is required by NHPA and related cultural and historic resource protection statutes.

00079-059: As stated in the Energy Policy Act, the development of oil shale, tar sands, and other strategic unconventional fuels, for research and commercial development, should be conducted in an environmentally sound manner, using practices that minimize impacts. The BLM believes that analyzing an allocation decision provides the opportunity to build on scientific, governmental or industry research in order to analyze, in a general way, the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale exploration and development, further analysis will be carried out and documented in accordance with NEPA, to support any decisions in this regard. That NEPA analysis will evaluate the environmental impacts of the oil shale exploration and development, and develop specific measures to mitigate or eliminate the identified impacts. The BLM believes that such a phased approach ensures that commercial oil shale development programs meet the intent of Congress and take advantage of the best available practices to minimize impacts and offers the opportunity for states, local communities, and the public to participate in the process. While uncertainty is an inherent part of planning in accordance with FLPMA's multiple-use mandate, and delays are possible in bringing any new resource into commercial development, the BLM is committed to manage the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases, or result from research or studies from other sources. Specific

mitigation measures, management prescriptions, and the best available practices to minimize impacts, will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the State, local communities and the public throughout the NEPA processes.

The analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents will analyze the direct, indirect and cumulative effects of the proposed action.

00079-060: The baseline information is a description of the types of resources generally present in the study area. The PEIS does not go into specific details for any area. Because the alternatives in this PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. In the event that an area is proposed for leasing or development, a review of the paleontological resources in that area would have to be conducted. As outlined in the BLM Handbook 8270-1, any areas identified as having the potential for containing significant fossil deposits would require that a survey be conducted to establish the likelihood of fossils being present. If it is established that there is a potential for significant paleontological resources to be present, a mitigation and monitoring plan would be developed to consider these significant resources.

Possible impacts to paleontological resources are described in Sections 4.4 and 5.4 of the PEIS regarding oil shale and tar sands leasing and development, respectively. The magnitude of any impacts would be determined during site-specific NEPA analyses. Mitigation would also be determined specific to the project proposed.

00079-061: The proposed action is a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on public or worker health. When actual exposure doses due to a process are known or can be estimated, it is possible to conduct quantitative health risk assessments that estimate the probability of health effects such as cancer, or provide an indicator of the likelihood of other types of health effects. Because the locations of residences and populations with respect to future OSTS development are unknown, and the type and quantitiy of emissions to air and water from future facilities are also unknown, such a quantitative risk assessment is not possible as a part of this PEIS, which supports amending land use plans to allow certain lands to be considered for future leasing. Quantitative risk assessment would likely be possible as a part of NEPA analyses conducted for site- and technology-specific plans of development.

00079-062: The proposal analyzed in the Draft PEIS (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development would not result in the emissions of any climate change-related (or other) air pollutants. Speculation regarding "potential health impacts from increases in global warming" is beyond the scope of this programmatic analysis. See also response to 00079-043.

00079-063: Due to the early stage of development, a general overview of potential health impacts associated with future oil shale and tar sands development was provided in the PEIS. Process-specific information on specific contaminants, emissions, and exposure levels is needed to characterize health risks. The BLM, during the public scoping process, invited interested state and local governmental agencies to provide comments on the scope and objectives of the PEIS and to identify issues to be addressed in the planning process. However, to address specific health issues associated with a plan of development or a particular technology, consultation with appropriate health agencies would be more appropriate at future stages of development when site- and technology-specific data would be available to allow exposure and risk evaluation.

As stated in Section 5.1, the data available from ongoing oil sands development in Canada are not applicable to Utah tar sands because of the different chemical characteristics of the resource (i.e., the Canadian oil sands have an aqueous layer between the sand and the bitumen, making separation easier). Processing of those sands would involve different chemicals and procedures, and thus would be associated with different health risks.

00079-064: The BLM worked closely with 14 cooperating agencies, including the State of Wyoming, to determine the scope of the PEIS. Each agency brought an important local perspective and expertise to the process, resulting in the modification of the scope of the PEIS from a leasing decision to an allocation decision. This new allocation decision does nothing more than to remove an administrative barrier preventing the BLM from accepting applications. The amendment of the land use plans does not authorize any ground-disturbing activities and is not an irreversible of irretrievable commitment of resources under NEPA. Moreover, the amendment does not constitute the granting of any property right. In this respect, the allocation decision does not conflict with any State plan or designation. However, the BLM looks forward to the participation of the State of Wyoming providing information about state important designations during subsequent NEPA analysis when specific technical and environmental information is available for analysis. At that time, conflicts with the Wyoming Environmental Quality Council's decisions and/or Adobe Town designation can be addressed.

00079-065: As described in Chapter 2 of the PEIS, only designated wilderness areas and WSAs are excluded from application for leasing. "Areas recognized as having wilderness characteristics" (WCAs) have no official status that removes them

from consideration for leasing. WCAs are areas that are not officially identified as "wilderness" under the meaning of the Wilderness Act of 1964, nor are they "wilderness study areas" (WSAs) that were identified by BLM inventories in the 1970s and 1980s under the authority of FLPMA. Any non-WSA lands found either to have or be likely to have wilderness characteristics will be managed according to management prescriptions established in the appropriate land use plan. Unlike WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the BLM Field Offices will consider all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed in the appropriate RMP actions.

00079-066: Only ACECs that are currently open for mineral development would be made available for lease application for oil shale and tar sands development under Alternative B. Any applicant that applied for a lease in these areas would be required to propose a plan of development that would be compatible with other resource values in these ACECs, including those for which the ACECs originally were identified. The applicant would be required to demonstrate that it would be able to develop the oil shale or tar sands resource while mitigating impacts to resources of concern. Under Alternative C, all ACECs would be considered unavailable for lease application.

00079-067: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. The BLM anticipates that oil shale development would proceed in a three-step decisionmaking process. The PEIS deals with the first stage, identifying lands that would be open to application for commercial leasing. The second stage would be a leasing decision where additional NEPA analysis will be required to analyze the environmental consequences associated with offering parcels of land for lease. The environmental analysis would consider alternatives, stipulations, or other measures, which would mitigate or eliminate adverse impact to sensitive resources or special land classifications. The final stage would be approval of a plan of development on a lease which would also be subject to NEPA analysis, including development of mitigation measures.

The Flaming Gorge NRA is excluded from the PEIS because it is managed by the USFS. Additional areas in Wyoming are excluded from consideration for application for leasing as described in Section 2.3.3. Excluded areas include the Monument Valley Management Area, Management Area 3 of the Jack Morrow Hills Planning Area, and the expansion areas around Rock Springs and Green River.

The Heart of the West conservation plan was considered. However, it was determined that the conservation plan's site-specific recommendations as potential alternatives would be more appropriate at the leasing stage.

The protection of historic trails is considered in Section 4.10.2 of the PEIS. Eligible properties are considered as part of the Section 106 process and would not require an additional alternative to adequately protect these resources.

00079-068: In Section 369 of the Energy Policy Act of 2005, Congress directed the Secretary of the Interior to complete a PEIS for commercial leasing on public lands with an emphasis on the most geologically prospective lands in the States of Colorado, Utah, and Wyoming. There are differences in the quality of the oil shale resource between the three States, so to meet Congress' direction to look at all three States, a different standard was used for Wyoming.

00079-069: Please see the response to comment 00079-031 regarding the nature of decisions in the PEIS and compliance with the provisions of the FLPMA and NEPA. In addition, the BLM does acknowledge in the PEIS that potential impacts could occur as a result of displacement of other resource uses.

00079-070: See response to Comment 00079-066.

00079-071: See response to Comment 00079-066.

00079-072: See response to Comment 00079-066.

00079-073: The commentor seeks to amend the boundaries of the Trapper/Northwater Creek ACEC and is welcome to present a proposed boundary revision to the BLM Field Office; however, the comment is beyond the scope of this PEIS.

00079-074: The proposed action does not authorize the leasing of public lands for commercial oil shale development, but rather it makes them available for future application for leasing. These lease applications and associated plans of development will be subject to project-specific NEPA evaluations that will consider the types of resources and concerns addressed in the comment. These project-specific evaluations will also identify mitigation measures, developed in consultation with federal and state authorities, to protect the resources and values identified in the comment.

As described in the PEIS in Section 2.2.3, a river or river section may be designated as a Wild and Scenic River (WSR) by Congress or the Secretary of the Interior under the authority of the Wild and Scenic Rivers Act of 1968. WSR boundaries are established to include a corridor of land along either side of the river as determined to be appropriate for protection of the river's values. The law recognizes three classes of rivers: wild, scenic, and recreational. It is the BLM's policy to manage potentially eligible and suitable WSRs in a manner to prevent

impairment of the river's suitability for WSR designation until Congress or the Secretary makes a final determination regarding the river's status. During this interim period, a corridor extending at least 0.25 mi from the "high water" mark on each bank of the river is established.

Segments of rivers that have been found to be unsuitable as part of the RMP process will no longer receive the interim protections afforded them during the period of their consideration for suitability. After the unsuitability decision, the lands adjoining the river segment may be managed just as are other public lands consistent with whatever management prescription is adopted through the land use planning process.

00079-075: In the Roan Plateau RMP and EIS process, the BLM considered managing 19,322 acres of lands identified as having wilderness characteristics located in three areas within the planning unit, including the East Fork of Parachute Creek. In the two RODs for the RMP, the BLM documented its decision to not manage these lands specifically to protect wilderness characteristics, but some or all of the lands in the three areas were identified for special management, including some that were designated as ACECs. Portions of the East Fork of Parachute Creek have been designated as an ACEC and will be managed to protect the values for which it was designated.

00079-076: The proposed action does not authorize the leasing of public lands for commercial oil shale development, but rather it makes them available for future application for leasing. These lease applications and associated plans of development will be subject to project-specific NEPA evaluations that will consider the direct, indirect, and cumulative impacts on the resources identified in the comment. These project-specific evaluations will also identify mitigation measures, developed in consultation with federal and state agencies that will reduce these impacts.

00079-077: Section 3.5.3 lists the Prevention of Significant Deterioration (PSD) Class I areas (Table 3.5.3-3) and describes the significance for their designation, as well as identifying the four Class I areas closest to the oil shale and tar sands resources. The Draft PEIS also indicates that most of the study area is designated PSD Class II, which "allow for moderate emission growth." A map of all mandatory federal PSD Class I areas is available online at: http://www.nature.nps.gov/air/Maps/images/ClassIAreas.jpg

Section 3.5.3 also describes applicable regulations and monitoring programs to address potential visibility and atmospheric deposition impacts. Oil shale operations must comply with applicable state laws.

See also response to Comment 00079-047.

00079-078: Alberta oil sands are fundamentally different from the tar sands in Utah, so it is far from evident that Alberta oil sands operations will be the model for

environmental protection for any tar sands development in Utah. Oil shale and tar sands operations on BLM lands will have to comply with all applicable federal and state environmental laws. The BLM acknowledges the importance and value of natural and cultural resources in the STSAs and the most geologically prospective oil shale areas. These resources are described in Chapter 3 of the PEIS. The proposed action is a land use allocation and does not commit any resources or authorize any BLM action that would have any direct or indirect impacts on sensitive natural or cultural resources. Subsequent project-specific NEPA analyses will be required at the project-specific level to determine the direct and indirect impacts of oil shale and tar sands development on these resources.

References:

CWCB (Colorado Conservation Board), 2004, *Statewide Water Supply Initiative*, Colorado Department of Natural Resources, Denver, Colo., Nov.

CWCB (Colorado Conservation Board), 2007, *Statewide Water Supply Initiative—Phase 2*, Colorado Department of Natural Resources, Denver, Colo., Nov.

Kuhn, E., 2005. "Science and the Future of Colorado River Policy and Compact Issues." Powerpoint slideshow presented at the 2005 USGS Drought Workshop. Available at co.water.usgs.gov/drought/workshop200501/pdf/Eric_Kuhn.pdf.

Smerdon, E.T., 2007, *Colorado River Basin Water Management: Evaluating and Adjusting to Hydroclimatic Variability*, The National Academies, Feb

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The 60 Plus Association

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Kill the Death Tax. Protect Social Security. Energy Security.

James L. Martin
President

Rep. Roger Zion (R-IN, 1967-75)
Honorary Chairman

Pat Boone
National Spokesman

March 13, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Responsible Development of National Oil Shale and Tar Sands Resources

Dear Sherri Thompson:

I would like to express my strong support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, especially senior citizens on fixed incomes, and industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed for leasing have enough oil to meet America's gasoline demand for more than 18 years.

With today's technology, this enhanced development can be conducted in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

80-001

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example:

- In spite of significant conservation efforts, world energy demand is projected to increase by 50% during the next 20 years and could double in 50 years.
- Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
- The United States military currently uses approximately 500,000 barrels of oil daily – over 75% of

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which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will produce a strong workforce and will support the local and regional economies of Utah, Colorado and Wyoming.

The utilization of oil shale and tar sands from these leasing areas will offer significant benefits to the local communities and will strengthen our national energy security while bringing the necessary supplies of oil into the markets to offset increased global demand. I encourage developing these areas while protecting the environment, local communities and other economic interests.

80-001 (cont.)

Sincerely,

James L. Martin
President

jmartin@60plus.org

The 60 Plus Association is a 15-year-old nonpartisan organization working for death tax repeal, saving Social Security, affordable prescription drugs, lowering energy costs and other issues featuring a less government, less taxes approach. 60 Plus calls on support from nearly 4.5 million citizen activists. 60 Plus publishes a magazine, SENIOR VOICE, and a Scorecard, bestowing awards on lawmakers of both parties who vote "pro-senior." 60 Plus has been called "an increasingly influential senior citizen's group."

Response for Document 00080

00080-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00081

Bureau of Land Management
Attn: Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Re: Oil Shale and Tar Sands Draft Programmatic EIS

Dear BLM Officials:

I am concerned with our country's reliance on conventional fuels, particularly because these fuels are provided by politically and economically unstable countries.

I support the BLM's Oil Shale/Tar Sands Draft Programmatic Environmental Impact Statement (OSTS PEIS) because these resources are important for supporting domestic energy. 81-001

I agree that renewable energy resources are important, but I do not think we should neglect the potential opportunities that oil shale and tar sands development could offer. Not only would these resources bolster our domestic energy supply – they would diversify our country's energy portfolio.

In addition to addressing our country's energy needs, I support development because it would benefit numerous communities in Colorado, Wyoming and Utah. I respectfully ask that you consider these impacts as well as you proceed in the planning process. 81-002

Thank you for your time,

Rodney Long

Responses for Document 00081

00081-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

00081-002: Estimates of the economic impacts of oil shale and tar sands power plant and coal mine facility development on direct and indirect employment and income in each ROI indicate that oil shale, tar sands, and ancillary facility development would provide substantial employment and income in each ROI, together with higher wages for some occupations. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities.

OSTS_00082

United States Department of the Interior

U. S. GEOLOGICAL SURVEY
Reston, VA 20192

In Reply Refer To:
Mail Stop 423

MAR 20 2008

Bureau of Land Management
Oil Shale and Tar Sands Resources
Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming, and Draft Programmatic Environmental Impact Statement (DES 07-60)

The U.S. Geological Survey has reviewed the subject draft resource management plan and programmatic environmental impact statement and submits the enclosed comments for your consideration. If you have any questions concerning our comments, please contact Lloyd Woosley, Chief of the USGS Environmental Affairs Program, at (703) 648-5028 or at lwoosley@usgs.gov.

Sincerely,

James F. Devine
Senior Advisor for Science Applications

Enclosure

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DRAFT OIL SHALE AND TAR SANDS RESOURCE MANAGEMENT PLAN AMENDMENTS TO ADDRESS LAND USE ALLOCATIONS IN COLORADO, UTAH, AND WYOMING AND PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT (DES 07-60, DECEMBER 2007)

COMMENTS OF THE U.S. GEOLOGICAL SURVEY MARCH 20, 2008

GENERAL COMMENTS

Overall, it is difficult to evaluate the general impacts outlined in the Draft Programmatic Environmental Impact Statement (DPEIS). The potential impacts of Alternatives B and C are provided in very general terms and therefore difficult to compare the information that is provided. 82-001

In addition, enhanced analysis of the cumulative effects of this project is recommended, particularly for priority species. For example, available maps of critical habitats (e.g., critical winter range, migratory routes, leks) or potential habitat (e.g., for species of concern such as mountain plover or pygmy rabbit) in relation to the three alternatives as well as other energy projects (e.g., current wells and roads) would be very helpful. This would require additional maps that extend beyond to project areas. 82-002

Finally, assessment and monitoring efforts have been criticized for focusing at the individual lease level (Falise et al. 2005), which makes it particularly difficult to evaluate cumulative effects. Because the DPEIS leaves more in-depth analysis to the NEPA process for future leases, adequate evaluation of cumulative impacts that results from a lease-level focus is likely to be a concern. 82-003

In addition, the final PEIS would be enhanced if further justification for the preferred Alternative B as compared to Alternative C could be provided as explicitly as possible given the potential for much greater impacts on areas of critical environmental concern in Alternative B. 82-004

Although the areas of critical environmental concern that will be available for development in Alternative B currently lack restrictions on oil and gas development, there may be additional threats posed by differences in oil shale/tar sands extraction methods that should be evaluated before opening up more sensitive areas for development. Additionally, cumulative impacts of oil shale, in addition to oil and gas, could be better evaluated within these sensitive areas. Without better information about the impacts of oil shale and tar sands development in comparison to oil and gas development, it is difficult for the public to evaluate potential benefits from opening up sensitive areas to development relative to the potential ecological effects. It may be prudent to begin energy development in less sensitive areas, and conduct research and monitoring to better quantify impacts, before opening more sensitive habitat areas to new development. 82-005

Decision makers and the public would also benefit from the preparation of a retrospective analysis of "all" available data for the major resource topics covered in the DPEIS. Such a supplemental document would support the PDEIS as well as future NEPA assessments. 82-006

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For example, water-resources data cited in the document usually does not represent the entire period of record available for analysis. In addition, some data have not been included in the analyses. The depth and breadth of historical data available as well as data being collected at existing networks could provide a much improved understanding of baseline conditions, the effects of past and current land use, and natural variability of indicators. A retrospective analysis would help to define the data gaps in the areas potentially identified for oil-shale and tar sands development. Examples of this type of analysis can be found in Taylor (1982 and 1987). 82-007

Finally, the DPEIS would benefit from more specific information about planned monitoring activities to provide the scientific data essential for assessing the effectiveness of mitigative measures and supporting the assessment of near-term and cumulative effects as supplemental NEPA documents are prepared on a lease-level basis. The retrospective analysis mentioned above would provide the understanding needed for the development of monitoring networks, at least on a regional scale, that would provide information for future NEPA assessments of proposed oil-shale and tar-sands development. 82-008

SPECIFIC COMMENTS

Executive Summary, Table ES-1 (and related discussion in Appendix A), page ES-4

The numbers for "potential oil shale resource present" for Alternatives B and C are extremely low and no rationale is offered here other than "These are minimum estimates intended to show the potential magnitude of the resource within the geologically prospective areas in each state." There is no relation between the Alternative B-Colorado 16 B bbl estimate and any values given in Appendix A. The Alternative B-Utah estimate of 28 B bbl is between values reported herein (pages A-8 and A-9) and originally given by Cashion (1967) and Truedell et al. (1973). It is not clear where the Alternative B-Wyoming estimate of 17 B bbl comes from as no similar number is seen in the text for the two basins (pages A-10 and A-11) in Appendix A.

The numbers reported here do not seem reasonable. In Appendix A (page A-4), the authors qualify the "most geological prospective area" by grade and thickness. For Colorado and Utah, areas underlain by deposits 25 feet thick or more and yielding 25 gal/ton qualify, and for Wyoming, areas underlain by deposits 15 feet thick or more and yielding 15 gal/ton qualify. But the estimate of resources does not refer to these thickness and grade limits. The use of thickness and grade limits to define oil shale resources was based on the idea that surface or underground mining would be necessary to recover the resource and that certain minimum combination of thickness and grade would be needed to mine economically. However, with in-situ recovery technologies, sections of as much as 1,000 feet of oil shale have been proposed for processing and recovery of hydrocarbons. It seems likely in most scenarios that sections much thicker than 25 feet would be treated at any given time with the potential of eventually recovering much of the in-place resource. Resource estimates showing the "potential magnitude of the resource" should thus reflect numbers much closer to the "in-place" 82-009

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resource, perhaps several 100 B bbls out of 1 T bbl (Pitman et al, 1989) for the Piceance Basin and lower but substantial numbers for the other two states. In any case, the rationale for numbers used in Table ES-1 should be presented in Appendix A. 82-009 (cont.)

Section 2.2.1 Existing Relevant Statutory Requirements, page 2-2 to 2-6

This section discusses the major laws, Executive Orders (EOs), and policies relevant to environmental protection and compliance for oil shale or tar sands development projects on public lands. The Endangered Species Act of 1973 (ESA) is only briefly mentioned in paragraph three and other applicable statutes and regulations of potential concern, such as the Migratory Bird Treaty Act and other conservation statutes, are not specifically mentioned. On page 2-3 through 2-5, the listing of general categories omits species addressed under ESA, including proposed, candidate, threatened, and endangered species. The inventory of applicable environmental protection and compliance laws and regulations should be expanded to address these omissions. Additionally, the discussion under "Wildlife and Plants" should be expanded to include fish and other aquatic species. 82-010

Section 2.3.3.1 Alternative B for a Commercial Oil Shale Leasing Program, Figure 2.3.3-3 and later figures, page 2-26

A statement of the origin of the checkerboard pattern would be helpful. It is unclear if the 1-mile checkerboard pattern for much of these two Wyoming basins effectively excludes development of oil shale in these areas. From a business perspective is it unlikely that a company would want to operate on isolated 1-mile parcels where they would have to leapfrog their operations across unavailable land. A similar argument holds for the isolated parcels under Alternative C (Figures 2.3.3- 4 and 2.3.3- 6). 82-011

Section 3.4.1.2 Basin Salinity and Surface Water Quality, page 3-61, last paragraph

Estimates for the sources of salinity are provided. However, evaporation from reservoirs in the Colorado River Basin also contributes to increases in salinity concentrations. Additionally, water storage associated with the development of oil shale would be expected to add to the effect of increasing salinity concentrations. See the reference to reservoir evaporation on page 3-72. 82-012

Section 3.4.1.2 Basin Salinity and Surface Water Quality, page 3-62, second paragraph

The reference to the "water-source inventory" for the identification of saline springs would benefit from some explanation of how the identification of saline springs will be interfaced with understanding of the ground-water source of the spring. Coordination of these types of data with a conceptual model of ground-water flow paths would be useful. 82-013

Section 3.4.2.1 Groundwater Resources, pages 3-74 to 3-77

Most of what is reported on hydrogeology is from Colorado Ground-Water Atlases (Czyzewski (2000) and Topper et al. (2003)). Whereas these are useful references for 82-014

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broad overviews, they are not suitable for understanding in detail the hydrogeology of these basins. It is recommended that the authors read the original reports upon which the overviews by Czyzewski and Topper are based. In particular, Topper relies heavily on the work of Glover et al. (1998). 82-014 (cont.)

The DPEIS also relies upon data that in some cases may be outdated. For example, the Mahogany Zone is identified as being the primary confining layer that separates the upper and lower bedrock aquifers. More recent work conducted in support of the Shell Frontier Oil and Gas Oil Shale Research, Development, and Demonstration Pilot Project, which is published in BLM's Environmental Assessment (CO-110-2006-117-EA), indicates that the R5 zone may actually be a more effective confining layer than the Mahogany Zone. Discussion of the confining layers is on pages 59 and 60 of the EA. The URL for the EA is http://www.blm.gov/pgdata/etc/medialib/blm/co/field_offices/white_river_field/oil_shale/shell_frontier_oil.Par.55536.File.dat/FinalVersionShellEA110106.pdf 82-015

The text also would benefit from incorporating information on the quantity and quality of water from the alluvial, upper, and lower aquifers found in Weeks and others (1974). If other water-quality data are available from more recent studies, they likewise should be summarized.

Given the difference in depth and areal extent between bedrock aquifers and alluvial aquifers, it is unlikely that alluvial aquifers are the principle aquifers in the Piceance Basin. The case may be able to be made that alluvial aquifers are the principle aquifer supplying domestic uses. 82-016

3.4.2.2 Surface Water Resources, page 3-77

In the first paragraph the statement is made that the White River and Colorado River are administered by two different water districts. However, in the State of Colorado water administration is the responsibility of the Colorado State Engineer. 82-017

3.4.2.2 Surface Water Resources, page 3-79

In the first paragraph on page 3-79, average streamflow for the White River near Meeker is based on data through 1968. There is a long-term, active streamflow gaging station at the White River near Meeker (USGS station number 09304500). For the period 1910 through 2006 the mean daily stream flow at this site is 620 cubic feet per second (http://wdr.water.usgs.gov/wy2006/pdfs/09304500.2006.pdf). 82-018

In the third paragraph the DPEIS states, "Several tributaries of the Colorado River drain the Piceance Basin between the towns of Rifle and Meeker. From east to west, they are Parachute Creek, Roan Creek, Plateau Creek, Big Salt Wash, East Salt Wash, and West Salt Wash (figure 3.4.2-1). A major reservoir, the Vegas Reservoir, is present along Plateau Creek." The town of Meeker is about 39 miles north of Rifle. Big Salt Wash, East Salt Wash, and West Salt Wash are streams located on the Western end of the Grand 82-019

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Valley near Grand Junction, Colorado. These streams do not drain the Piceance Basin. Of the streams listed, only Parachute and Roan Creeks can be found on figure 3.4.2-1 The reservoir in the headwaters of Plateau Creek is named Vega Reservoir not Vegas Reservoir. 82-019 (cont.)

In the fourth paragraph the period of record of 1970-1993 is used to characterize the mean annual streamflow at the USGS streamflow station number 09095500, Colorado River near Cameo, CO. The period of streamflow record available for this site is 1933 through 2007. It is suggested that the entire period of record be used to characterize streamflow at this site. 82-020

In the sixth paragraph it is stated that "Large amounts of dissolved salts and sediment erode into this segment of the Colorado River…" It is not clear which river segment is being discussed. Warner and others (1985) characterize ground-water inputs into the Colorado River. Between Glenwood Springs, Colorado and the Colorado River near Cameo an estimated 88 percent of the salt loading is derived from ground-water inflows. Much is known about salt loading in this reach of the Colorado River. For more information please contact Ken Leib at the USGS Colorado Water Science Center at (970) 245-5257 (ext 29) or at kjleib@usgs.gov. 82-021

3.4.5.1 Groundwater Resources, Table 3.4.5-1, page 3-90

No dates are listed in the table. 82-022

Section 3.5.1.2 Global Climate Change, pages 3-95 to 3-98

This section should address the potential effects of the development of oil-shale resources on water resources of the western U.S. in the 21st century. The work by Milly et al. (2005 and 2008) indicates that streamflow in the western U.S. could be reduced by 10-30 percent by the middle of the 21st century. One question to consider is what impact would such a reduction in water availability have on development plans for oil shale? 82-023

Section 3.7 Ecological Resources, pages 3-107 to 3-176, and Section 4.8 Ecological Resources, pages 4-61 to 4-108

The DPEIS contains several statements of fact without supporting scientific citations. The final PEIS would be enhanced if it included citations supporting such statements of fact and listed these citations in the list of references. Examples include, but are not limited to the following: 82-024

- "The fish community in Flaming Gorge Reservoir consists primarily of introduced species…It also supports small numbers of native fish species, including flannelmouth sucker, mountain whitefish, and the mottled sculpin." (page 3-117, 3rd full paragraph)

- "Rainbow trout have been annually stocked in Flaming Gorge Reservoir since it was filled, and this species provides the bulk of the angler harvest…Lake trout

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entered Flaming Gorge Reservoir from the upper Green River drainage and have also become established as a wild population." (page 3-117, 4th full paragraph)

- "The portions of the Green River and the White River within and adjacent to the Uinta Oil Shale Basin are predominantly inhabited by warmwater native and non-native fishes. Fish species likely to be present within these two rivers and associated tributaries belong to families…and *Ictaluridae* (catfishes)." (page 3-118, 4th full paragraph) 82-024 (cont.)

- "Many of the bird species identified from the three states are seasonal residents within individual states and exhibit seasonal migrations." (page 3-139, 2nd full paragraph)

- "Populations of greater sage-grouse can vary from nonmigratory to migratory and can occupy an area that exceeds 1,040 mi^2 on an annual basis." (page 3-141, last paragraph) 82-025

- "The primary cause of the black-footed ferret population decline was the reduction in prairie dogs during the nineteenth century. Widespread poisoning of prairie dogs to improve livestock forage, loss of habitat by conversion to agriculture, and disease greatly reduced prairie dog populations. Other threats to black-footed ferrets included predator-control programs and diseases such as canine distemper and plague." (page 3-156, 5th paragraph).

- "The primary habitat of the Canada lynx for denning and shelter in western states is mature mesic coniferous forest, primarily composed of spruce and fir, with downed logs and windfalls, particularly those at montane and subalpine elevations." (page 3-158, 5th paragraph) 82-026

- "The primary habitat of the spotted owl in Utah is steep rocky canyons, although forested areas are also important habitat in Utah and elsewhere in the spotted owl's range. The spotted owl occupies closed canopy forests in steep canyons with uneven-aged tree stands with high basal area, with an abundance of snags and downed logs." (page 3-163, last paragraph)

- "Electromagnetic field exposure can potentially alter the behavior, physiology, endocrine system, and the immune function of birds, which, in theory, could result in negative repercussions on their reproduction or development." (page 4-77, 3rd full paragraph). 82-027

Section 3.7.3.2.2 Neotropical Migrants, page 3-141

The statement "Neotropical migrants (also referred to as songbirds, passerines, or perching birds) of the order Passeriformes…" is incorrect. Neotropical migrants include passerines, as well as other orders of birds (e.g., raptors, hummingbirds). Furthermore, not all passerines are neotropical migrants. In the third paragraph on page 3-141, "Neotropical migrants common to the area include…" incorrectly includes species such 82-028

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as pinyon jay and American crow, which are non-migratory or only short-distance migrants. 82-028 (cont.)

Section 3.7.3.2.3 Upland Game Birds, page 3-142

The assessment should be updated to include a discussion regarding the status of the greater sage-grouse under the ESA. The species is currently undergoing a public comment period on its status review under ESA (Fish and Wildlife Service, press release, 2-26-08). Additional recommended citations for sage grouse include Wirth and Pyke (2003) and Sedgwick (2004). 82-029

Note that a geospatial database for Sage Grouse and Shrubsteppe Management in the Intermountain West (SAGEMAP), which is the most frequently used and updated resource on sage-grouse and sagebrush habitat, is available on the Internet at http://sagemap.wr.usgs.gov/.

Section 3.7.3.3.1 Big Game, pages 3-143 to 3-144

The discussion concerning mule deer, including that on page 3-190, would be enhanced by including a more extensive discussion of migratory corridors, for example, for the Piceance Basin mule deer population. These and other wildlife issues were addressed in depth for proposed oil shale extraction in the Piceance Basin and Book Cliffs areas in the early 1980's and these historical studies should be referenced, including White and Garrott (1983), Alley (1983), and Rubenson and Pei (1983). 82-030

Section 3.7.4.1.4 Black-Footed Ferret, page 3-156

The authors may want to review the information found in Biggins et al (2006). 82-031

Section 3.7.4.1.25 Whooping Crane, page 3-170

The DPEIS makes statements referencing sandhill cranes. It is suggested that the discussion be clarified to minimize any confusion as to which of the two species is being addressed. For instance, in the last paragraph it is stated that, "Subsequent experiments to reintroduce whooping cranes involved the use of ultralight aircraft. In 1996, researchers successfully led imprinted sandhill cranes from their summer breeding habitat in southern Ontario to wintering grounds in Virginia. In 1997, sandhill cranes from Idaho that were imprinted on an ultralight aircraft and four whooping cranes flew to the Bosque del Apache National Wildlife Refuge. The whooping cranes survived the winter and returned on their own to Idaho the following spring (Whooping Crane Conservation Association 2006)." 82-032

Section 3.7.4.4 Other Species of Concern, page 3-175

Discussion of the Pygmy rabbit, a BLM sensitive species and currently under review for proposed threatened and endangered (T&E) species status may be warranted. 82-033

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Section 3.12 References, page 3-259

The complete citation for Lincoln et al. (1998) is:

Lincoln, F.C., Peterson, S.R., and Zimmerman, J.L., 1998, Migration of birds. U.S. Department of the Interior, U.S. Fish and Wildlife Service, Washington, D.C. Circular 16. Jamestown, ND: Northern Prairie Wildlife Research Center Online. http://www.npwrc.usgs.gov/resource/birds/migratio/index.htm (Version 02APR2002). 82-034

Section 4.1.3 In Situ Retort Projects, page 4-10

The DPEIS states that, "It is assumed that 1 to 3 bbl of water would be required for production of 1 bbl of shale oil (Bartis et al. 2005) using in situ technologies." The sources of uncertainty in this estimate should be provided. 82-035

It also is unclear if chemicals, such as CO2, mercury, and ammonia, will need to be removed from the product stream because the oil-shale deposits contain relatively large concentrations of carbonate, mercury, and nitrogen. 82-036

4.5.1 Common Impacts, page 4-29 to 31

Another impact that may warrant consideration is the long-term cumulative effect of the possible accumulation of volatile organic compounds associated with oil-shale development in shallow ground water.

On page 4-31, the last sentence in the fourth full paragraph states "The intensity of the impact would decrease with increasing distance between disturbed areas and surface-water bodies." The propagation of impacts over time may result in a cumulative impact that could be more severe than any initial shorter term impacts. Over time the intensity of impacts may propagate downstream resulting in more severe impact to surface-water bodies. For example, the construction of roads and the paving or compaction of work sites may result in increased unit runoff that may increase the headcutting of slopes and in-channel bank erosion. Over time this type of impact would tend to propagate downstream or away from the impacted area. Increases in sediment yield and loads of water-quality constituents associated with native rock and soils may result. 82-037

4.5.1.2 Water Use, page 4-32, last sentence

A reference is needed to support the statement that some of the deeper groundwater is the source for springs and seeps in the region. 82-038

4.5.1.4 Alteration of the Hydrologic Flow Systems, pages 4-35 to 4-36

Consideration should be given to adding discussion of the potential cumulative effects of road construction associated with oil-shale development. 82-039

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In the fifth paragraph on page 4-36 the discussion of the effects of the modification or rerouting of stream channels on streamflow should be expanded to also address the erosion and resulting sediment transport associated with these activities. 82-040

Section 4.5.2 Water Budget for Individual Oil Shale Projects, pages 4-36 to 4-41

Ground-water recharge and storage are large components of the water budget; however, both water budget components are poorly defined in the study area. 82-041

It is incorrectly stated on page 4-36 that Wyoming is within the Upper Colorado River watershed.

Section 4.5.2.1 Colorado, page 4-41

The DPEIS states that, "The remaining available water from the Colorado River in Colorado is projected to be 340,000 ac-ft/yr in 2000 and in the range of 268,000 to 412,000 ac-ft/yr in 2030." It is unclear if this estimate accounts for predicted reductions in streamflow in the western U.S. (see Milly et al., 2005 and 2008). 82-042

Section 4.8.1.3 Wildlife, Table 4.8.1-1, page 4-67

The table is difficult to evaluate for several reasons. First, the project area is not defined. As a result, the PEIS cannot be used to compare the potential effects of the three alternative plans. Second, the "local population" is not defined, but appears to be related only to the footprint and adjacent areas affected by the project. However, by focusing on the local population, the cumulative impacts of energy development (including oil and gas) are not assessed. The fragmenting effects of roads can be considerable and the impacts potentially could exceed that expected based only on the disturbance footprint (e.g., Rowland et al. 2006, Kotliar et al. 2007). Spatial analyses of road densities based on existing energy infrastructure would be useful to determine baseline conditions and the potential for increasing fragmentation in the project area. Finally, for some taxa, the responses of individual species may vary considerably. For example, the impacts to shorebirds are rated as low, presumably due to restrictions on wetland alteration. However, the mountain plover is a shorebird associated with upland habitats. As a result, mountain plovers cannot be lumped with other shorebirds, and indeed may be negatively affected by energy development in the area. This species is on the 2008 update of the BLM sensitive species list (J. Carroll, T&E Species Coordinator, BLM; pers. comm.) and consequently may warrant further assessment. Finally, it was assumed that changing forested wetlands to shrubby or emergent wetlands is a beneficial outcome of the development projects for waterfowl, but the basis for this statement is not provided and may be questionable. 82-043

Providing the public with similar tables that summarize potential impacts on aquatic resources and plant communities discussed in Section 4.8.1.1, Aquatic Resources and Section 4.8.1.2, Plant Communities and Habitats, would be beneficial. 82-044

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Section 4.8.1.3 Wildlife, page 4-68

The document provides numerous examples of how disturbance from road use can affect species at various distances. An important statement is that indirect habitat loss (resulting from a decrease in habitat quality adjacent to roads and other disturbance footprints) can exceed direct habitat losses. This statement in the second paragraph on page 4-68 perhaps should be featured more prominently (e.g., in a summary or introductory sentence or paragraph). 82-045

Section 4.8.1.4 Threatened and Endangered Species, Tables 4.8.1-3, and -4, pages 4-86 to 4-99

Table 4.8.1-3 indicates that all but two of the species have "potential for negative impact" from proposed activities. Table 4.8.1-4 indicates that all but two of the species will have "potential adverse affect". It would be helpful for the tables to maintain consistent terminology or define whether these two terms have different meanings. 82-046

Section 4.8.1.4 Threatened and Endangered Species, Table 4.8.1-3, pages 4-86 to 4-98

The impacts to wildlife are reported in very general terms and are not summarized with regard to the proposed alternatives. Furthermore, the assessments by broad taxonomic groups are qualitative and information is not provided for how the level of potential impacts was determined, particularly for potentially diverse taxa. 82-047

Section 4.8.2 Mitigation Measures for Ecological Resources, pages 4-101 to 4-107

Many of the mitigation measures are recommendations (i.e., "where possible"), and there does not appear to be provisions for how compliance and effectiveness monitoring will be established to ensure that potential impacts to greater sage-grouse and other species of concern will be mitigated. 82-048

Section 4.8.2.1 Aquatic Resources, page 4-102

The first bullet discusses the protection of wetlands, springs, seeps and other sites through avoidance or mitigation. The surface disruption that may be associated with oil-shale development may not be the only impact to sites that are supplied water from ground-water sources. This is an opportunity to integrate the understanding of the conceptual ground-water flow system and how surface expressions of ground water, e.g. springs and seeps, are supported by regional ground-water flow. Essentially oil-shale development up-gradient in the system, may dewater springs and seeps before surface disturbance occurs. 82-049

Section 6.1.1.4 Water Resources, page 6-7

It is stated that, "Groundwater injection has the opposite effect on hydrologically connected surface water bodies, if underground injection is used to dispose of formation 82-050

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water or wastewater. Injection will raise the groundwater level of the recharged aquifer near recharge wells and thus increase the flows of the seeps and springs or create new seeps and springs in valleys that are hydrologically connected to the affected aquifer." This depends on whether the injection is deep-well injection to dispose of poor-quality waters (most likely) or injection of better quality waters into a shallow unit hydrologically connected to the surface.

It also is stated that, "The surface water quality near an injection well may be adversely affected if the injection zone is hydraulically connected to a surface water body. During the dewatering operations, water from the lower aquifer will be mixed with the water from the upper aquifer. Because the water quality of the deeper aquifer is typically lower than that of the upper aquifer, the mixed water will result in decreased water quality compared with the water of the upper aquifer as well as the surface water bodies. The reinjection could, therefore, decrease the quality of hydraulically connected surface water through groundwater discharge at seeps and springs." Sparse data presented in Weeks and others (1974) suggest that in many cases the water quality in the upper aquifer is better than the alluvial aquifer. 82-050 (cont.)

Section 6.1.2.4 Water Resources, page 6-43

The DPEIS states that, "The inability to predict specific locations for potential future commercial development and the lack of information regarding the type of technology that might be employed make it impossible to predict the specific impacts on water resources that could occur with commercial development. Quantification of such impacts would depend on the specific location of the lease area being developed, as well as the design of the project and associated infrastructure." Quantification of impacts from commercial development also will depend on climatic conditions at the time of development and how they might affect water resources. 82-051

Section 6.1.2.4 Water Resources, pages 6-43 to 6-51

On page 6-44, the list of potential impacts on water resources should include accidental chemical spills that could occur in an industrialized landscape. 82-052

Whenever the checkerboard pattern is shown on a figure, such as on figures 6.1.2-1, 6.1.2-2, and 6.1.2-3, it should be defined.

Section 6.1.2.7.3 Wildlife, pages 6-48 to 6-52

It is difficult to compare the alternatives because Tables 6.1.2-5 and 6.1.3-2 (page 6-78) are based on different data sources (state vs. BLM). Consequently, Utah has a greater area of sage-grouse habitat (435,714 ac) present in Alternative C than in Alternative B (599 ac), despite the much larger project area of Alternative B. Likewise, big game are lumped in Table 6.1.2-5 but mule deer and elk are separated in Table 6.1.3-2. To allow better comparisons of the alternatives, the same data sources should be presented in a similar fashion. Although just such a comparison is provided later in the DPEIS in 82-053

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section 6.1.4, it would be better to include the complete information in this section as well (or refer to Tables 6.1.4-5 and -6). 82-053 (cont.)

Section 6.1.2.7.3 Wildlife, pages 6-48 to 6-52, and Section 6.1.3.7.3 Wildlife, pages 6-74 to 6-78

Figures 6.1.2 and 6.1.3 show the overlap between habitat for sage-grouse, elk, and wild horses with areas proposed for development under each alternative. The sage-grouse maps (Figs. 6.1.2-1 and 6.1.3-1) in particular show that a larger number of leks and brood areas will potentially be impacted in Alternative B compared to C. It would be useful to document how much sage-grouse habitat (and other sensitive species) may be impacted by other energy development projects (e.g., oil and gas) to improve the assessment of the cumulative effects of energy development on this and other species of concern. 82-054

Section 6.1.4.4 Water Resources, page 6-93

The second paragraph addresses possible effects of the alternatives on perennial streams. The assessment likewise should address the potential effects of the alternatives on ground-water resources. For example, between the three scenarios there is likely to be a wide variation in the potential effects on ground water associated with dewatering and re-injection activities. 82-055

There are several math errors in table 6.1.4-2.

Section 6.1.4.7.4 Threatened and Endangered Species, page 6-98

Table 6.1.4-5 compares wildlife habitat identified in BLM land use plans for Alternative B and C. However, there is no context for what percent of the potential habitat this represents, by state, and how much of the habitat is available for oil and gas development. Thus, further analysis of the implications of the differences between Alternatives B and C may be warranted. 82-056

6.1.5.1.1 Oil and Gas Development, page 6-108

The public may benefit from some discussion about possible long-term effects of drilling tens of thousands of wells in areas identified for possible oil-shale development. For example, the discussion could address potential effects of dewatering and depressurization of deeper aquifers on regional ground-water flow and potential effects of geologic fracking on aquifer properties. 82-057

Section 6.1.5.3.1 Land Use, Table 6.1.5-9, page 6-148

Table 6.1.5-9 summarizes the total area that may be impacted in the next 20 years by energy development, including oil shale, but the total area indicated for oil shale is per project ("up to 14,000 ac/project"), whereas for other energy development the total numbers are estimated. It may be more useful to estimate the total expected for oil shale 82-058

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(even a range of values would be useful) rather than a per project estimate to be consistent with the rest of the table. 82-058 (cont.)

Section 6.1.5.3.7 Ecological Resources, page 6-159 to 6-160

Cumulative impacts to wildlife are presented in general terms and not related to a particular alternative. Spatial analysis of the cumulative impacts to species of concern (e.g., sage-grouse) would be more useful. 82-059

6.2.2.4 Water Resources, page 6-184

Another possible generic impact is the long-term cumulative effect of the possible accumulation of volatile organic compounds associated with oil-shale development in shallow ground water. 82-060

Section 6.4 References, page 6-299

The citation for Dahl (1990) should be updated as follows:

Dahl, Thomas E., 1990, Wetlands losses in the United States 1780's to 1980's. U.S. Department of the Interior, Fish and Wildlife Service, Washington, D.C. Jamestown, ND: Northern Prairie Wildlife Research Center Online. http://www.npwrc.usgs.gov/resource/wetlands/wetloss/index.htm (Version 16JUL97). 82-061

Appendix A

Section A.1.2 Piceance Basin, Colorado, page A-8, first paragraph

It is the USGS's understanding that this solution mining of nahcolite is not presently (February 2008) occurring. 82-062

Section A.5.1 Shell Oil Mahogany Ridge Project, Tables A-6 and A-7, pages A-51 and A-52

The tables do not report the units of measure. 82-063

Section A.5.3.1.2 Produced Shale Oil and Gas, page A-60

The volume of production seems extremely low. 82-064

Section A.5.3.3 Shell Frontier Oil and Gas, page A-65

Some discussion of the thermal decomposition of nahcolite to sodium carbonate, water, and carbon dioxide may be needed. Laboratory studies show that thermal decomposition starts at temperatures well below retort temperatures. If this is expected under 82-065

operational temperature and pressure conditions, the consequences should be addressed in the assessment. 82-065 (cont.)

Section A.5.3.3 Shell Frontier Oil and Gas, Site 2 Technology: Two-Step ICP, pages A-67 to A-70

On page A-67, the first paragraph under the heading suggests that removal of the nahcolite is a simple dissolution process and notes the benefits of nahcolite removal. However, the next paragraph states, "The hot water used for nahcolite decomposition could be heated by using waste heat from previous areas where ICP had been implemented. Solution mining would preheat the oil shale in the mined zone to at least 250°F using otherwise wasted heat." Nahcolite decomposition is not mentioned in the previous paragraph. In the laboratory it decomposes to sodium carbonate, carbon dioxide and water at temperatures starting about 100°C, somewhat below the 250°F solution temperatures noted in the quoted paragraph. If this decomposition were to occur under formation temperatures and pressures during dissolution of the nahcolite, what would be the consequences to recovery of nahcolite? Would CO_2 form a separate phase that would create problems? Does the lessee have evidence that nahcolite does not decompose under the in-situ conditions? On page A-70 in the Nahcolite Recovery (Site 2) section, the text notes, after describing the physical process of nahcolite recovery, that "CO_2 would be used to make a final product (sodium bicarbonate)." This seems to be an acknowledgement that nahcolite would decompose and have to be reconstituted by adding back the CO_2. No mention of adding back water is noted. A more thorough discussion of nahcolite decomposition and what problems the in-situ water and carbon dioxide generation may create is warranted. If this is not well understood at this point, that should be acknowledged as well as what can be learned from the solution mining of nahcolite that has taken place in the basin (see page A-8). 82-066

Section A.5.3.3 Shell Frontier Oil and Gas, Site 2 Technology: Two-Step ICP, page A-68

The one sentence paragraph stating that, "The Colorado State University revegetation test plot (approximately 50 acres) would remain fenced and undisturbed" appears to be misplaced. 82-067

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Responses for Document 00082

00082-001: In this PEIS, the BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. Since this is a land use allocation it does not commit any resources or authorize any BLM action that, with the exception of potential impact on property values, would have any direct or indirect impacts on sensitive resources. The BLM believes the information presented characterizes the effects of the alternatives in sufficient detail to allow decision makers to make a reasoned choice between the alternatives. Tables 2.6-1 and 2.6-2 contain a convenient side-by-side comparison of the findings by alternative from the PEIS.

00082-002: The PEIS does provide maps of critical habitats in relation to potential oil shale and tar sands development (see Sections 6.1.1–6.1.3, 6.2.2, and 6.2.3). The cumulative impacts analysis was conducted to the extent possible, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). The consideration of more specific resource mapping would be more appropriate prior to a leasing or development decision when specific technical and environmental information is available. As required by NEPA, all subsequent NEPA documents will analyze the cumulative effects from past, present, and reasonably foreseeable actions relevant to affected resources.

00082-003: The BLM agrees that an adequate evaluation of cumulative impacts is necessary but must be based on the scope and nature of the proposed action. The cumulative analysis for amending the RMPs was presented to the extent possible. The BLM is engaged in the first step of a multistep environmental impact assessment process. This first step—assessment for RMP amendment to allow BLM to consider applications for leasing—may be followed by the subsequent steps of assessment for leasing and plans of development. These later steps are too speculative at this point, however, to be reasonably analyzed and will require their own distinct decision-making process. As required by NEPA, all subsequent documents will analyze the cumulative effects from past, present, and other reasonably foreseeable future actions based on the nature and interconnection of the proposed action.

00082-004: The commentor’s concern is well taken. Anticipating the precise impacts from future commercially viable oil shale or tar sands development is difficult to speculate. The BLM is mindful of the resource values of ACECs that are open to mineral development. Accordingly, we believe that it will be challenging for the industry to propose operating plans that will sufficiently protect and mitigate those resource values on those ACECs. The comparison of alternatives, however, is in many cases qualitative because of the limits of foreseeing future commercial technologies.

00082-005: The cumulative analysis in the PEIS is based on the characteristics of the proposed action, its location, and potential to affect the environment. This analysis presents the incremental contribution of the PEIS's alternatives when added to past, present, and reasonably foreseeable federal and nonfederal actions, which includes oil and gas development within Wyoming, Colorado, and Utah.

The environmental impact-producing factors of oil and gas development are summarized in Section 6.1.5.1.1, for comparison with such factors for oil shale and tar sands development presented in Sections 4.1 and 5.1. Additionally, projected levels of oil and gas development over 20 years (see Tables 6.1.5-4 through 6.1.5-6) were included in the cumulative impact assessment presented in Section 6.1.5.3. Because this is an allocation decision, subsequent NEPA analysis will be required prior to leasing, which will also include a cumulative analysis. The BLM initiated the RD&D leasing process to provide important information that can be used to develop strategies for managing any environmental effects, including protecting or conserving sensitive habitats.

The commentor's idea of first developing less sensitive areas is well taken. The BLM anticipates that the "sensitivity" of a potential lease tract will be one of many considerations in deciding when and where to issue commercial leases, using the discretion provided by federal statutes. The RMP amendments do not commit the BLM to offer all open lands for oil shale or tar sands leasing at once. The BLM does not yet have a prioritization or schedule for offering commercial leases for oil shale or tar sands. Although beyond the scope of this PEIS, such a schedule or sequence would be formed only after promulgation of regulations and consultation with the governors, as required by Section 369(e) of the Energy Policy Act of 2005. The sensitivity of the lands could be a factor in sequencing commercial lease offerings, along with the importance declared by Congress of developing unconventional fuels.

00082-006: Although the BLM will have the discretion to prepare a supplement to the PEIS in the future, such a supplement will not be required. NEPA compliance documents at the leasing and plan of development stages are anticipated to be sufficient and will review the applicable and reliable studies and data.

00082-007: Data have been replaced with more current data with the entire period of record available.

00082-008: This PEIS focuses on land allocation decisions to open or close lands to application for commercial leasing of oil shale and tar sands resources. Specific monitoring requirements to evaluate environmental consequences are more suited at the leasing and/or plan of development stage. Although specific monitoring plans are not included, examples of potential types of mitigation measures to protect wildlife, plants, and habitat resources are provided for consideration at subsequent stages of NEPA analysis (see Sections 4.8.2 and 5.8.2).

The PEIS outlines the process for making subsequent decisions regarding both leasing and development. For example, see Chapter 1 and Chapter 2 (Sections 2.3.3 and 2.4.3).

00082-009: The number in question was calculated for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The number was developed with the understanding that the number underestimates the actual in-place resource. The number was developed using the values that described the minimum quality and thickness that was deemed to be economic. Those values are a minimum 25 ft thickness and a minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming, the values used were 15 ft thick and 15 gallons per ton. These values, coupled with the acreage in each of the alternatives, generated the numbers in question. It is true that using more exact isopachs and quality data, if available, would have provided much higher values for each of the alternatives, but the alternatives would remain comparable.

00082-010: The BLM agrees with your observation that the "Wildlife and Plants" heading in Section 2.2.1 is too narrowly focused. We have changed the heading to "Ecological Resources" to address your concern and more appropriately match the paragraph content.

00082-011: Much of the "checkerboard" referenced in the comment resulted from Congressional grants of alternate sections (square mile segments) of vacant public lands to railroad companies to encourage them to develop rail lines through the area to provide transportation capacity in the West. The alternate sections are private lands. While it is not clear what the effect of the checkerboard on eventual development of oil shale or other minerals is, it could be an impediment as identified in the comment, or it could be a nonissue if private owners would be willing to allow development of their mineral estate under their private lands along with public lands. Another consideration is Section 369(n) of the Energy Policy Act of 2005, which directs the Secretary of the Interior to give priority to land exchanges that might facilitate development of oil shale or tar sands resources through creation of manageable blocks of lands. This could essentially remove the checkerboard ownership pattern in areas of interest for development.

00082-012: Reservoir evaporation would contribute to increases in salinity. Therefore, water storage associated with oil shale development would also contribute to increases in salinity. Section 4.5.1 has been revised to remove the qualifier "temporarily."

00082-013: This reference to a spring inventory was supplied for background information pertaining to salinity issues. Information and decisions at the scale of individual springs and details of the local groundwater flow systems are local factors appropriate to a site-specific NEPA analysis of a development. Conceptual models of springs and their source water are not factors for discussion in a programmatic-level EIS. Any proposed future development would involve a

detailed, site-specific NEPA analysis which would address springs and groundwater flow systems in the vicinity of the proposed development.

00082-014: The regional-level analysis of basin hydrogeology is suitable for a programmatic-level EIS.

The commentor's recommendation for more detailed references is appropriate for future site-specific NEPA analyses.

00082-015: The text in Section 3.4.2.1 has been modified.

00082-016: A general description of water quality parameters is included in Section 3.4.2.1 based on recent references. This description is suitable for the regional, programmatic study. Site-specific NEPA analyses for potential developments would involve a more focused analysis of local water quality data.

00082-017: "Water Districts" has been revised to read "water divisions." The Water Right Determination and Administration Act of 1969 created seven water divisions based upon the drainage patterns of various rivers in Colorado. Each water division is staffed with a division engineer, appointed by the state engineer; a water judge, appointed by the Supreme Court; a water referee, appointed by the water judge; and a water clerk, assigned by the district court.

Water judges are district judges appointed by the Supreme Court and have jurisdiction in the determination of water rights, the use and administration of water, and all other water matters within the jurisdiction of the water divisions.

00082-018: Thank you for the information. The flow data have been revised accordingly.

00082-019: The paragraph has been revised as suggested. The figure has been revised to include the towns Grand Junction and Plateau Creek.

00082-020: Thank you for the information. The flow data have been revised as suggested.

00082-021: The referenced text has been revised to clarify the river segment referred to in the comment.

00082-022: The data on well yield, spring flows, and TDS values were compiled in a 1984 study and are not tied to specific dates. They are suitable as a general description of these parameters in this PEIS.

00082-023: In this PEIS, the availability of Colorado River water is assumed to be 12 million ac-ft, by considering the drought conditions of early 2000 (see Section 3.4.1.1). The amount is less than the originally assumed volume of 15 million ac-ft specified in the Colorado River Compact of 1922. Therefore, reductions in streamflow in the western U.S. have been considered. It is possible that prolonged

drought conditions may further reduce streamflow. However, it is difficult to justify additional reduction of water availability when future streamflows remain unknown.

00082-024: Additional citations have been added to Sections 3.7 and 4.8 to further support the information supplied in the PEIS.

00082-025: Except for statements of common knowledge (e.g., some species are migratory), the statements of fact presented in the ecological resources affected environment and common impact factors sections (Sections 3.7, 4.8.1, and 5.8.1) are supported by citations. Where a citation applies to several sentences in a paragraph, the citation was generally only provided after the last appropriate sentence, rather than repeating citations at the end of every sentence.

00082-026: The text in Section 3.7.4.1 has been revised as suggested.

00082-027: See response to Comment 00082-025. For the example presented in the comment, the Fernie and Reynolds (2005) citation provided at the end of the pertinent paragraph of Section 4.8.1.3.4 applies to the sentence referenced in the comment.

00082-028: The discussion of neotropical migrants in Section 3.7.3.2.2 has been modified based on information presented in the comment.

00082-029: Section 3.7.3.2.3 has been updated to discuss the initiation of a status review to consider listing of the greater sage-grouse as either threatened or endangered. Additional factors that have caused the decline of sage grouse, as well as pertinent citations, have also been added to the section.

Subsequent project- or site- specific NEPA documents will be prepared to evaluate specific occurrences of sage grouse, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. Site-specific NEPA analysis would include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to sage grouse from commercial oil shale or tar sands development. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders. Mitigation of impacts to sage grouse would include recommendations included in BLM's national sage grouse habitat conservation strategy, as well as those contained in statewide and regional sage grouse conservation strategies that have been prepared by state agencies.

00082-030: The information presented in the PEIS for mule deer is of sufficient detail for the purposes of the PEIS. The PEIS identifies basic life history and population information, existing threats, and the potential for the species to be affected by

commercial oil shale and tar sands development. Additionally, the PEIS presents graphic overlays of the oil shale basins and STSAs that would be made available for leasing under each alternative with the summer and winter ranges of mule deer. There is sufficient information pertaining to the occurrence of mule deer on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing.

Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. These documents will evaluate specific occurrences of mule deer, analyze the environmental consequences to them from leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. Site-specific NEPA analysis would include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to mule deer and its habitat (including migratory corridors).

00082-031: The referenced Biggins et al. (2006) report provides an overview of black-footed ferret recovery efforts. This report was not available at the time the PEIS was being revised. However, Lockhart et al. (2006), which provides a summary discussion of the history of black-footed ferret recovery, was reviewed, and reference to it has been added to Section 3.7.4.1.

00082-032: The text on whooping cranes in Section 3.7.4.1 is correct as worded. Sandhill cranes were used in the initial experiments to determine the feasibility of using ultralight aircraft to lead imprinted birds to wintering grounds. An explanation regarding the rationale for using sandhill cranes has been added to the PEIS.

00082-033: Information on the pygmy rabbit status review has been added to Section 3.7.4.4 of the PEIS.

00082-034: The citation has been modified to reflect the suggested citation format provided on the web site. However, the citation format used in this PEIS only lists the primary author’s name for publications that have more than two co- authors.

00082-035: The uncertainty resides in the initial quality of the raw shale oil, the overall efficiencies of the refinery’s processing units, and the as-yet-to-be-specified suite of petroleum distillate products that would be produced from each particular barrel of shale oil delivered to the refinery. A footnote has been added.

00082-036: Yes, many contaminants, including the ones you mentioned, may need to be removed during upgrading of raw shale oil at the mine or in-situ site before it will be acceptable to most refineries, or even acceptable to interstate pipeline

operators. Upgrading is discussed in detail in Appendix A. See, especially, Section A.3.3.

00082-037: Section 4.5.1.3 of the PEIS acknowledges the potential for contamination of groundwater with organic substances that could occur with in situ retorting, and it notes some factors that could affect the composition of the contaminated leachate. The text also notes that as groundwater levels rebound and approach their original condition after in situ operations cease, residual hydrocarbons and inorganics in rocks and the chemicals used in the subsurface to enhance shale oil recovery may be contaminant sources in the subsurface. The control of groundwater contamination from in situ processes is one of the concerns being investigated in ongoing RD&D projects and would be considered in future environmental analyses for those projects, in future NEPA analyses for leasing, and especially in plan of development stage NEPA analyses for specific projects and sites (which include cumulative impact analyses).

As stated in the comment, impacts such as increased sedimentation and dissolved solids may occur due to road construction and other activities, and these impacts are of concern (such impacts are discussed in Sections 4.3.1.1, 4.5.1.1, with mitigation measures in 4.3.2 and 4.5.3, and corresponding sections in Chapter 5). While it is true that erosion rates may change over time, especially in response to large rainfall events, it is also true that erosion would generally decrease over time as equilibrium is established. The last sentence is also generally true: The amount of turbidity would decrease with increasing distance from disturbed land as material settles, and the amount of dissolved solids would decrease with increasing distance from disturbed land due to dilution from natural runoff or tributaries.

00082-038: The sentence indicated that some deeper groundwater discharges to springs, which is true over large spatial and time scales. The text in Section 4.5.1.2 has been modified, however, to be more generally suitable.

00082-039: The issue of road construction is mentioned in several places in the geology/soil sections and in the water sections. To be more complete, the issue has been added in Sections 4.5.1, 4.5.1.4, 5.5.1, and 5.5.1.4.

00082-040: A discussion of the impact has been included in Section 4.5.1.4.

00082-041: Water resources components are based on available data. Part of Wyoming, including the Green River, is within the Upper Colorado River watershed.

00082-042: See response to Comment 00082-023.

00082-043: Table 4.8.1-1 in Section 4.8.1.3 provides a generalized overview of the types and degree of impacts that could occur to wildlife, if not mitigated, from oil shale

development. The table was not intended to compare impact differences among the oil shale alternatives or address impacts to specific species or their habitats.

The PEIS is a programmatic-level document that analyzes allocation decisions. These allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, the specific number and locations of projects cannot be identified within the PEIS. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. This will include an evaluation of the specific occurrences of key wildlife habitats, analyses of the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects (including those of other existing or reasonably foreseeable future oil shale and tar sands leases), reasonable alternatives, and mitigation measures to protect wildlife habitats, as well as what level of development may be anticipated. Project-specific NEPA analyses would also include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important wildlife habitats. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders.

00082-044: Tables summarizing potential impacts on aquatic resources and plants have been added to Section 4.8.1.1 and 4.8.1.2.

00082-045: The text has not been reorganized in order to emphasize indirect habitat losses within the PEIS. Any specific evaluation and comparison of indirect and direct habitat losses will be deferred to subsequent project-level planning prior to lease development. As previously stated, the PEIS is a programmatic-level document that analyzes allocation decisions. These allocations do not authorize the immediate leasing of lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared.

00082-046: Tables 4.8.1-3 and 4.8.1-4 identify the federally and state-listed threatened, endangered, and sensitive species that could be affected by commercial oil shale development. The two tables consider separately the impacts on state- listed threatened and endangered species and species of special concern, federal candidates for listing, and BLM-designated sensitive species (Table 4.8.1-3), and on federally listed threatened, endangered, and proposed species (Table 4.8.1-4). For species in Table 4.8.1-3, a determination is made regarding the "potential for negative impact;" for species in Table 4.8.1-4, a similar determination is made, but the terminology follows the ESA Section 7 convention of "adverse effect." "Potential for negative impact" and "potential adverse effect" have the same meaning. The text has been modified to explain the differences in terminology.

00082-047: Table 4.8.1-3 identifies the potential for impact on state-listed threatened and endangered species and species of special concern, federal candidates for listing, and BLM-designated sensitive species. The determination of potential for impact

is based on known or potential occurrences of species in oil shale basins and STSAs being considered in the PEIS. These determinations are not alternative-specific in part because species distributions are usually not sufficiently well known to allow differentiation among alternatives. Sections 6.1.4.7.4 and 6.2.4.7.4 provide comparisons of alternatives in terms of their impacts on threatened and endangered species.

00082-048: The list of potential mitigation measures presented in Chapters 4 and 5, as well as the conservation measures presented in Appendix F, are not meant to be a final list of measures to be employed and would be subject to modification on the basis of consultation with federal, state, and local agencies and interested stakeholders at the project-specific lease and development stages. Mitigation of impacts to sage grouse would include recommendations included in BLM's national sage grouse habitat conservation strategy, as well as those contained in state-wide and regional sage grouse conservation strategies that have been prepared by state agencies. Effects to ESA listed species will require Section 7 consultation with the U.S. Fish and Wildlife Service, and if needed, additional mitigation actions or mandatory terms and conditions will be developed to address any potential incidental take.

00082-049: The concern regarding the potential for disturbance to affect groundwater discharge to springs and seeps is addressed in a different bullet in the list of potential mitigation measures identified in Section 4.2.8.1, and this concern is also discussed in Section 4.5.1.2 of the PEIS.

00082-050: Regarding the first point, the text in Section 6.1.1.4 has been modified accordingly. Regarding the second point, the text describes that mixed deeper and shallower groundwater would typically have lower quality than the shallow bedrock aquifer alone. Stating that reinjection could decrease the quality of surface water remains generally true.

00082-051: A sentence has been added at the end of the paragraph in response to the comment.

00082-052: A bullet has been added in response to the comment.

00082-053: The tables presented in Sections 6.1.1.7.3 (Alternative A [these tables have been added since the publication of the draft]), 6.1.2.7.3 (Alternative B), 6.1.3.7.3 (Alternative C), and 6.1.4.7.3 (comparison of alternatives) are presented as acres currently identified for protection under BLM land use plans and as acres of state-identified wildlife habitat. Thus, Table 6.1.2-6 (page 6-52 in the draft) should be compared to Table 6.1.3-2 in the draft (these are both state-identified wildlife tables), rather than comparing Table 6.1.2-5 (BLM-protected lands) to 6.1.3-2, as mentioned in the comment. Section 6.1.4.7.3 provides a table that compares the state-identified wildlife habitats among the three alternatives and another table

that compares lands currently identified for protection that could be available for development under the various alternatives.

00082-054: As discussed in Section 6.1.5, analysis of cumulative impacts at this time is qualitative due to the limited and highly speculative character of the information available and the limited nature of the decision to be made on the basis of the PEIS. There would be no impacts to ecological resources due to the amendment of land use plans to identify lands available for commercial oil shale leasing.

Therefore, there would be no incremental cumulative impact from Alternatives B and C. Nevertheless, plotting the actual locations of development projects and making assumptions concerning the combined level of activity is too speculative at this time. It would be more appropriate at the leasing stage when specific parcels are identified to evaluate the cumulative effects of multiple energy developments and develop specific mitigation measures or stipulations to protect wildlife species.

00082-055: The text in Section 6.1.4.4 has been modified to address groundwater resources. Table 6.1.4-2 has been corrected.

00082-056: Table 6.1.4-5, which has been modified to include information for Alternative A, compares the acreage of select wildlife habitats that have been identified for protection in BLM land use plans that could be developed under the various alternatives. The table demonstrates that these habitats would not be developed under Alternative C. The acreage of land available for application of leasing under each alternative for each state is provided in the introductory paragraphs of Sections 6.1.1, 6.1.2, and 6.1.3. Tables 6.1.5-4, 6.1.5-5, and 6.1.5-6 of Section 6.1.5.2.1 summarize potential oil and gas development that could occur within the oil shale regions of the three states.

00082-057: The PEIS provides a summary of the extensive ongoing drilling activities in the Piceance Basin and elsewhere in the study area and considers these in its overview of potential cumulative impacts. For completeness, the text in Section 6.1.5.1.1 has been modified to account for the cumulative effects of drilling.

00082-058: As stated in response to Comment 00082-003, the BLM is engaged in a multistep environmental assessment process. To estimate the total expected land area disturbed for oil shale would require an RFDS for oil shale development. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario.

However, an RFDS would be developed at a future step in the assessment process, based on a clear set of supportable assumptions associated with a proposed leasing or development action.

00082-059: In the PEIS, cumulative impacts analysis at a programmatic level has been conducted to the extent possible. Because of the limited character of the decision to be made on the basis of this PEIS (planning/allocation of lands where nominations to lease can be considered), because the locations and magnitude of future oil shale and tar sands development are highly speculative, and because there will be additional NEPA analysis prior to leasing, it is neither required nor possible to present a detailed cumulative effects analysis showing the impacts of leasing and development in this PEIS.

The PEIS does provide maps of critical habitats (including sage grouse) in relation to potential oil shale and tar sands development (see Sections 6.1.1–6.1.3, 6.2.2, and 6.2.3); however, additional specific mapping of those resources in relation to specific oil shale or tar sands development would be more appropriate during subsequent NEPA analysis when more information on the nature and location of potential oil shale and tar sands development is known.

00082-060: Please see response to Comment 00082-037.

00082-061: The text has been changed.

00082-062: There is nahcolite solution mining occurring at the Natural Soda mine. The mine has been continuously operating since 1991.

00082-063: Thank you for your comment. There was an inadvertent omission and the text has been corrected.

00082-064: These data were proposed by the RD&D operator.

00082-065: For the reader's convenience, the discussion included in this section is a representation of the information provided by Shell in the EA for its RD&D lease. If Shell can adequately control formation heating, then nahcolite decomposition should not occur. Further, in one of the Shell RD&D ventures, formation heating will be preceded by solution mining of the nahcolite, reducing, if not eliminating, the potential for its thermal decomposition.

00082-066: The discussion in this section is derived from data submitted by Shell that form the basis of the EA that was produced in support of the Shell RD&D lease. The points raised by the commentor are valid; however, activities occurring under the RD&D lease are outside the scope of this PEIS. It is reasonable to presume, however, that Shell is approaching this venture as a true RD&D investigation and will be exploring the items raised in the comment.

00082-067: Thank you for your comment. The sentence has been removed.

OSTS_00083

March 17, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave
Argonne, IL 60439

To Whom It May Concern:

I appreciate this opportunity to comment on the BLM Oil Shale and Tar Sands Draft Programmatic EIS, hereafter referred to as the PEIS. I request you add my name to the NEPA mailing list to receive any additional information mailed to the public regarding this action.

As a long-time resident of Utah, I am very familiar with many of the areas potentially impacted by future oil shale/tar sands resource development. My family and I have hiked and camped in many of the lands covered by the alternatives considered within the PEIS.

In addition, the construction of new power plants required to make the action alternatives analyzed within the PEIS a reality, probably in the form of coal fired power plants, have consequences for both air quality and climate with direct consequences for those of us living in the region and beyond. These impacts are not adequately considered within the PEIS. 83-001

There are a number of plant and animal species within the region also impacted by possible large scale oil shale and tar sands development. These include, but are by no means limited to: sage grouse, white tailed prairie dog, mule deer, elk, mountain lion and black bear, Wright's fishhook cactus (endangered), last chance townsendia, Flowers penstemon, and Ownbey thistle. The impacts to biodiversity, both direct and indirect, would be staggering if in fact the total land opened to leasing under the preferred alternative for both oil shale and tar sands were ultimately leased and developed. 83-002

The direct and indirect impacts to plant and animal life, soils, cultural resources and air quality can and should be documented. I have no doubt individuals with far more knowledge than I will be submitting detailed comments outlining impacts to various natural and cultural resources in the area. I will leave it to them to point out the foolishness of the proposed action when it comes to the actual and potential harm that will come to specific species, historic sites and other qualities of the affected area. 83-003

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What I wish to address is the profound folly the preparation of this PEIS represents in light of the growing awareness of global climate change. I realize Congress required the BLM to publish regulations establishing an oil shale and tar sands leasing program within the Energy Policy Act of 2005. However, the magnitude of the preferred alternative and alternative C is astonishing given the consequences of development on such a massive scale and to my mind goes far beyond what Congress required of the BLM.

The PEIS estimates there are 28 billion barrels of oil (bbl) locked up in oil shale within Utah alone. The assumption by those in Congress requiring you to go down this road, among oil industry executives frothing at the mouth with oil exceeding $110 a barrel as I write this, and apparently the BLM is that because these reserves do or may exist we should develop them. According to your own analysis, to do so would require the construction of a 1,200-1,500MW power plant for every 100,000 bbl extracted from oil shale. This power plant would likely be coal fired according to the PEIS.

To run the 1,200 – 1,500MW power plant (perhaps larger and more of them) will require a minimum of 8,000 acre feet of water in a region most models indicate will see less precipitation in the future due in large part to power plants like the one described in the PEIS. Should the oil industry require something like a 2,400MW power plant the amount of water needed increases to 13,000 acre feet. This does not include the water needed to cook the oil out of the oil shale in the first place or the water that will be necessary to satisfy the thirst of those brought to the region by the oil shale development. 83-004

I would argue this whole idea is so outrageous it will likely never get off the ground, but with $150 per barrel oil suddenly seeming likely, one should not underestimate either the greed or shortsightedness of those already promoting the notion oil shale and tar sands are the "answer" to our national energy dilemma. One needs look no further than Alberta to see just how far people, governments and industry are willing to go to extract oil from tar sands. There they are talking of nuclear reactors to satisfy the thirst for additional energy this industry demands. With similar talk now circulating in Utah, one can't help but wonder if there is a connection to the "boom" being anticipated should oil shale and tar sands development take off.

You downplay global warming considerably in the PEIS. The notion we sit on more oil than Saudi Arabia has everyone so giddy the implications of extracting yet more oil and burning yet more coal to get it appears lost on the bureaucracy at the BLM. For one thing, everyone

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probably assumes we have so much coal we hardly know what to do with it. Turning to the coal industry to produce energy for the oil industry probably seems perfectly logical.

A March 5, 2008 article in the British paper *The Guardian* states several reports have come out recently indicating a dramatic decline in estimates of global coal reserves. For example, in 2000 the world had an estimated 277 years worth of coal left at 2000 levels of consumption. By 2005 that estimate had fallen to 155 years. This drop was not due to increased demand - though demand had increased significantly, especially in countries like China – but due to years of significant overestimation of global coal reserves by countries around the world. The cost of importing coal into Europe has roughly doubled during this decade as well and rolling black outs are being experienced in South Africa due to shortages of the resource. China temporarily cancelled exports of coal this year due, ironically, to an unusually cold winter. The expectation coal will be there and be affordable as the BLM cooperates with the oil industry and warms the planet that much faster is questionable at best.

Recent reports about Utah's actual recoverable coal reserves have also gotten some press. USGS figures show as of 2006 Utah's operable mines had 305,800,000 short tons of recoverable reserves and mined just over 26 million tons that year. In 2005 the same report shows Utah had just over 311 million tons of recoverable coal at these same mines and mined over 24 million tons out of the ground, making one wonder if the same kind of overestimating is happening at the USGS that recently caused the sudden collapse in estimated reserves around the world. How exactly does one mine 24 million tons from the ground and see the estimated reserve drop by only 6 million tons without significant new discoveries of coal? From 2004 to 2005 the same thing happened with a drop of only 9 million tons in estimated reserves.

83-004 (cont.)

The point here isn't just that coal reserve numbers may be too high, but that in opening up lands to oil shale and tar sands development the BLM is proposing a policy that will tax existing coal reserves even more as well as increase the amount of CO^2 each barrel of oil contributes to the atmosphere. This is foolishness on a grand scale on two fronts. The costs to the climate, local biological, geologic and cultural resources and existing coal reserves is simply too high to justify such a move, the current price of oil notwithstanding.

Finally, while the PEIS focuses primarily on the direct and indirect impacts to the region affected by the proposed action, it continues a trend within US government analyses of ignoring the larger global consequences of its energy policy. In a March 3, 2008 memo to the Council of the European Union the Secretary General/High Representative of that body, Javier Solana, outlined significant potential security and human rights concerns associated with climate change. In short, this memo and multiple other supporting articles, studies and reports

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make abundantly clear that even assuming the United States were to achieve energy independence by developing resources such as oil shale and tar sands our national security would become increasingly threatened by the climate change driven by ongoing significant use of these fuels.

Conflicts driven by changes in rainfall patterns, declines in agricultural productivity in certain areas, competition for energy resources, and environmentally triggered mass migrations are among the consequences of climate change outlined for the EU in the memo. I have little doubt similar analyses of impacts to national/global security have already been prepared by the DOD and other agencies of our own government. Unfortunately, these analyses are being consistently overlooked when it comes to the development of the fuels creating such global instability. This PEIS is no exception. 83-004 (cont.)

Opening up these lands in the name of enabling our ongoing addiction to oil, especially when doing so requires the burning of another fossil fuel to make it feasible, can only be described as morally reprehensible in light of this reality. There is simply no other way to put it. The evidence is in, the Supreme Court has ruled CO^2 can and should be considered a pollutant under the Clean Air Act, and this administration and your agency through this document sticks its head in the sand again. I urge you in the strongest possible terms to pull it out and adopt the no action alternative. 83-005

Sincerely,

Craig Axford

Craig Axford
521 E. Hollywood Ave.
Salt Lake City, UT 84105

Enclosures: The Guardian – Lump Sums, March 5, 2008
USGS tables – Coal Production and Recoverable Reserves in Utah, 2001-2007
Climate Change and International Security – memo to the European Council, March 3, 2008

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The Guardian for America.

guardian.co.uk

Lump sums

Oil production may soon 'peak', but what about coal? David Strahan reports on the recent figures that suggest global reserves may not be nearly as plentiful as the industry and governments have led us to believe

David Strahan
The Guardian, Wednesday March 5 2008

For weeks, South Africa has suffered rolling blackouts caused in part by a shortage of coal. Gripped by unusually bitter snowstorms, China recently banned coal exports for the next two months. And at Newcastle, Australia, the world's largest coal export terminal in the world's largest coal exporting country, the queue of carriers waiting to load has been known to stretch almost to Sydney, 150km to the south.

Coal, for so long the Cinderella of fossil fuels, is suddenly not just in demand but in desperately short supply. The world's biggest producers and exporters are struggling, and the price of imports to Europe has doubled to almost $140 (£70.5) per tonne over the past year. "It's a global crunch," says John Howland, managing editor of the international coal industry magazine McCloskey's Coal Report.

The immediate reasons for the price spike are soaring demand, inadequate infrastructure and bad weather. But now there are also gnawing doubts that global coal production may, within the next few decades, face fundamental geological constraints, or "peak coal". Ask most energy analysts how much coal we have left, and the answer will be a variant on "plenty". The latest "official" statistics from the World Energy Council put global coal reserves at the end of 2006 at a staggering 847bn tonnes. Since world coal production that year was just under 6bn tonnes, the reserves-to-production (R/P) ratio - the theoretical number of years the reserves would last at the current rate of consumption - is well over 100 years.

It is commonly assumed, therefore, that there can be no shortage of coal this century. However, a clutch of recent reports suggest that coal reserves may be hugely inflated - a possibility that has profound implications for global energy supply and climate change.

A report published last year by the EU Institute of Energy pointed out that as demand for coal has soared since the turn of the century - with China famously opening one coal-fired power station per week - the world's reserves have fallen fast. The authors calculated that the R/P ratio had dropped by almost a third, from 277 years in 2000 to just 155 in 2005.

Marginal deposits

Mysteriously, this fall happened despite a sharp rise in the price of coal, which traditional economic theory suggests should increase the level of reserves by making it possible to exploit more marginal deposits. The report warned that "the world could run out of economically recoverable (at current economic and operating conditions) reserves of

coal much earlier than widely anticipated". When the latest data, from 2006, was published last year, the R/P ratio had dropped again to just 144 years.

Energy Watch, a group of scientists led by the German renewable energy consultancy Ludwig Bölkow Systemtechnik, has drawn an even more alarming conclusion. In a report also published last year, the group argues that official coal reserves are likely to be biased on the high side. "As scientists, we were surprised to find that so-called proven reserves were anything but proven," says the report's lead author Werner Zittel. "It is a clear sign that something is seriously wrong."

Energy Watch found that many countries' reserves figures had remained suspiciously unchanged for decades - China's since 1992, despite having mined 20% in the intervening years. But in those countries that had revised their figures, the changes were overwhelmingly negative. For instance Britain, Germany and Botswana had cut their reserves by over 90%, more than could be accounted for by mining alone, suggesting these gloomier updates were based on improved data.

As a result, Energy Watch concluded the current reserves figures are likely to represent the upper limit of available coal, meaning that production will stall far sooner than expected. On the basis of a country-by-country analysis, the group forecasts that although global coal output could rise by about 30% over the next decade, it will peak as early as 2025 and then fall into terminal decline.

Less coal, of course, means less carbon, and a recent analysis by Dave Rutledge, chair of the department of engineering and applied science at the California Institute of Technology, suggests that current forecasts of man-made CO_2 emissions may be far too pessimistic. By analysing the coal production trends in individual countries, using an ingenious technique called Hubbert linearisation, Rutledge's estimate of the total amount of coal that remains to be produced is much lower than the official figures.

Using historical examples such as Britain, where coal output peaked in 1913 and mining is now all but finished, he can demonstrate that the approach is far more accurate than traditional explanations. By this method, the predicted future global coal production will amount to around 450bn tonnes before mining stops - little more than half the current official reserves figure.

The effect on the emissions outlook is dramatic, producing a peak atmospheric CO_2 concentration in 2070 of just 460ppm (parts per million) - fractionally above the 450ppm that many scientists believe is the threshold for runaway climate change, and lower than even the most optimistic of the 40 climate scenarios by the Intergovernmental Panel on Climate Change (IPCC). "In some sense, this is good news," Rutledge says. "We are likely to hit 450ppm without any policy intervention." Therefore, even if governments did nothing, total CO_2 concentration would not surpass the presumed climate change threshold by much.

Dangerously complacent

Neither Energy Watch nor Rutledge could remotely be described as climate-change deniers - quite the opposite - but their findings worry many climate scientists, including Pushker Kharecha, at the Nasa Goddard Institute for Space Studies in New York. He agrees that coal reserves are probably overstated, but insists that curtailment of coal emissions is still essential to combat climate change. "What are the risks if the low-coal people are wrong?" he asks. To pin our hopes on

low coal would be dangerously complacent, he argues, because if it is only marginally wrong the additional emissions could ensure catastrophe.

Rutledge agrees that although his analysis suggests that the fossil fuel reserves assumed in the IPCC model are far too high, it does not mean the problem of climate change is solved. Recent evidence suggests that the climate is more sensitive to carbon emissions than previously thought, and the IPCC model does not yet take account of long-term "positive feedback loops", such as the melting Siberian permafrost or shrinking icecaps, which will accelerate global warming. Jim Hansen, director of the Goddard Institute, has warned that the danger threshold for CO_2 is probably much lower than 450ppm.

What it does mean, however, is that the world's looming energy crisis could be even more severe than anyone imagines. In the International Energy Agency's latest long-term forecast, global coal consumption needs to rise 60% by 2030 to satisfy economic growth, and coal-fired electricity generating capacity has to double. But if Zittel and Rutledge are right, there is little chance of those predictions being fulfilled. And as global oil production goes into terminal decline within the next decade or so, there is even less chance that synthetic coal-to-liquids fuels can make up the crude deficit.

But the good news is that the imperatives of climate change and peak oil are identical. "In the long run, economies that rely on depletable resources are doomed to fail," Zittel warns. "The coal peak makes it even more urgent to switch to renewable energy without delay."

· David Strahan is the author of The Last Oil Shock, published by John Murray Ltd. Details at lastoilshock.com

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Table 2.8a **Coal Production and Recoverable Reserves in Utah by Coal Mine, 2007**
Thousand Short Tons

Company	Mine	County	Coal Field	Production	Estimated Recoverable Reserves Under Lease
UtahAmerican Energy, Inc. - Tower Division	Aberdeen	Carbon	Book Cliffs	1,045	
Canyon Fuel, LLC - Arch Coal, Inc.	Dugout Canyon	Carbon	Book Cliffs	3,826	
	Skyline #3	Carbon	Wasatch Plateau	2,533	
	SUFCO	Sevier	Wasatch Plateau	6,712	
CONSOL Energy	Emery Deep	Emery	Emery	1,026	
C.W. (Co-op) Mining Co.	Bear Canyon #4	Emery	Wasatch Plateau	588	
Energy West Mining Co.	Deer Creek	Emery	Wasatch Plateau	3,685	
GENWAL Resources, Inc. - UtahAmerican Energy, Inc., Intermountain Power Agency	Crandall Canyon	Emery	Wasatch Plateau	402	
Hidden Splendor Resources, Inc.	Horizon	Carbon	Wasatch Plateau	233	
West Ridge Resources, Inc. - UtahAmerican Energy, Inc., Intermountain Power Agency	West Ridge	Carbon	Book Cliffs	4,255	
Total				24,307	na

Source: MSHA

Table 2.8b **Coal Production and Recoverable Reserves in Utah by Coal Mine, 2006**
Thousand Short Tons

Company	Mine	County	Coal Field	Production	Estimated Recoverable Reserves Under Lease
Andalex Resources, Inc.	Aberdeen	Carbon	Book Cliffs	2,103	
	Pinnacle	Carbon	Book Cliffs	8	
Canyon Fuel, LLC - Arch Coal, Inc.	Dugout Canyon	Carbon	Book Cliffs	4,335	
	Skyline #3	Carbon	Wasatch Plateau	1,759	
	SUFCO	Sevier	Wasatch Plateau	7,908	
CONSOL Energy	Emery Deep	Emery	Emery	1,054	
C.W. (Co-op) Mining Co.	Bear Canyon #3	Emery	Wasatch Plateau	27	
	Bear Canyon #4	Emery	Wasatch Plateau	462	
Energy West Mining Co.	Deer Creek	Emery	Wasatch Plateau	3,748	
GENWAL Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	Crandall Canyon	Emery	Wasatch Plateau	613	
	South Crandall Canyon	Emery	Wasatch Plateau	759	
Hidden Splendor Resources, Inc.	Horizon	Carbon	Wasatch Plateau	257	
West Ridge Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	West Ridge	Carbon	Book Cliffs	3,098	
Total				26,131	305,800

Source: UGS coal company questionnaires

Table 2.8c **Coal Production and Recoverable Reserves in Utah by Coal Mine, 2005** OSTS_00083
Thousand Short Tons

Company	Mine	County	Coal Field	Production	Estimated Recoverable Reserves Under Lease
Andalex Resources, Inc.	Aberdeen	Carbon	Book Cliffs	1,519	
	Pinnacle	Carbon	Book Cliffs	189	
Canyon Fuel, LLC - Arch Coal, Inc.	Dugout Canyon	Carbon	Book Cliffs	4,592	
	Skyline #3	Carbon	Wasatch Plateau	405	
	SUFCO	Sevier	Wasatch Plateau	7,567	
CONSOL Energy	Emery Deep	Emery	Emery	1,187	
C.W. (Co-op) Mining Co.	Bear Canyon #3	Emery	Wasatch Plateau	304	
	Bear Canyon #4	Emery	Wasatch Plateau	151	
Energy West Mining Co.	Deer Creek	Emery	Wasatch Plateau	3,910	
GENWAL Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	Crandall Canyon	Emery	Wasatch Plateau	1,593	
	South Crandall Canyon	Emery	Wasatch Plateau	225	
Hidden Splendor Resources, Inc.	Horizon	Carbon	Wasatch Plateau	286	
West Ridge Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	West Ridge	Carbon	Book Cliffs	2,627	
Total				24,556	311,100

Source: UGS coal company questionnaires

Table 2.8d **Coal Production and Recoverable Reserves in Utah by Coal Mine, 2004**
Thousand Short Tons

Company	Mine	County	Coal Field	Production	Estimated Recoverable Reserves Under Lease
Andalex Resources, Inc.	Aberdeen	Carbon	Book Cliffs	1,984	
	Pinnacle	Carbon	Book Cliffs	419	
Canyon Fuel, LLC - Arch Coal, Inc.	Dugout Canyon	Carbon	Book Cliffs	3,811	
	Skyline #3	Emery	Wasatch Plateau	551	
	SUFCO	Sevier	Wasatch Plateau	7,568	
CONSOL Energy	Emery Deep	Emery	Emery	256	
C.W. (Co-op) Mining Co.	Bear Canyon #3	Emery	Wasatch Plateau	227	
	Bear Canyon #4	Emery	Wasatch Plateau	112	
Energy West Mining Co.	Deer Creek	Emery	Wasatch Plateau	3,356	
GENWAL Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	Crandall Canyon	Emery	Wasatch Plateau	872	
	South Crandall Canyon	Emery	Wasatch Plateau	103	
Hidden Splendor Resources, Inc.	Horizon	Carbon	Wasatch Plateau	293	
West Ridge Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	West Ridge	Carbon	Book Cliffs	2,265	
Total				21,818	319,441

Source: UGS coal company questionnaires

Table 2.8e **Coal Production and Recoverable Reserves in Utah by Coal Mine, 2003** OSTS_00083
Thousand Short Tons

Company	Mine	County	Coal Field	Production	Estimated Recoverable Reserves Under Lease
Andalex Resources, Inc.	Aberdeen	Carbon	Book Cliffs	444	
	Pinnacle	Carbon	Book Cliffs	584	
Canyon Fuel, LLC - Arch Coal, Inc.	Dugout Canyon	Carbon	Book Cliffs	2,941	
	Skyline #3	Emery	Wasatch Plateau	2,771	
	SUFCO	Sevier	Wasatch Plateau	7,126	
CONSOL Energy	Emery Deep	Emery	Emery	243	
C.W. (Co-op) Mining Co.	Bear Canyon #1	Emery	Wasatch Plateau	403	
	Bear Canyon #3	Emery	Wasatch Plateau	310	
Energy West Mining Co.	Deer Creek	Emery	Wasatch Plateau	3,938	
GENWAL Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	Crandall Canyon	Emery	Wasatch Plateau	1,161	
	South Crandall Canyon	Emery	Wasatch Plateau	26	
Hidden Splendor Resources, Inc.	Horizon	Carbon	Wasatch Plateau	108	
Lodestar Energy, Inc.	Whisky Creek #1	Carbon	Wasatch Plateau	25	
West Ridge Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	West Ridge	Carbon	Book Cliffs	2,989	
Total				23,069	369,830

Source: UGS coal company questionnaires

Table 2.8f **Coal Production and Recoverable Reserves in Utah by Coal Mine, 2002**
Thousand Short Tons

Company	Mine	County	Coal Field	Production	Estimated Recoverable Reserves Under Lease
Andalex Resources, Inc.	Aberdeen	Carbon	Book Cliffs	37	
	Pinnacle	Carbon	Book Cliffs	662	
Canyon Fuel, LLC - Arch Coal, Inc.	Dugout Canyon	Carbon	Book Cliffs	2,080	
	Skyline #3	Emery	Wasatch Plateau	3,477	
	SUFCO	Sevier	Wasatch Plateau	7,600	
CONSOL Energy	Emery Deep	Emery	Emery	26	
C.W. (Co-op) Mining Co.	Bear Canyon #1	Emery	Wasatch Plateau	953	
	Bear Canyon #3	Emery	Wasatch Plateau	4	
Energy West Mining Co.	Deer Creek	Emery	Wasatch Plateau	3,984	
GENWAL Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	Crandall Canyon	Emery	Wasatch Plateau	3,248	
Hidden Splendor Resources, Inc.	Horizon	Carbon	Wasatch Plateau	110	
Lodestar Energy, Inc.	Whisky Creek #1	Carbon	Wasatch Plateau	278	
West Ridge Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	West Ridge	Carbon	Book Cliffs	2,840	
Total				25,299	337,060

Source: UGS coal company questionnaires

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Table 2.8g **Coal Production in Utah by Coal Mine, 2001**
Thousand Short Tons

Company	Mine	County	Coal Field	Production
Andalex Resources, Inc.	Aberdeen	Carbon	Book Cliffs	531
	Pinnacle	Carbon	Book Cliffs	296
Canyon Fuel, LLC - Arch Coal, Inc.	Dugout Canyon	Carbon	Book Cliffs	1,981
	Skyline #3	Emery	Wasatch Plateau	3,822
	SUFCO	Sevier	Wasatch Plateau	7,001
C.W. (Co-op) Mining Co.	Bear Canyon #1	Emery	Wasatch Plateau	502
	Bear Canyon #2	Emery	Wasatch Plateau	752
Energy West Mining Co.	Deer Creek	Emery	Wasatch Plateau	4,338
	Trail Mountain	Emery	Wasatch Plateau	924
GENWAL Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	Crandall Canyon	Emery	Wasatch Plateau	3,996
Lodestar Energy, Inc.	White Oak #2	Carbon	Wasatch Plateau	560
	Horizon	Carbon	Wasatch Plateau	23
West Ridge Resources, Inc. - Andalex Resources, Inc., Intermountain Power Agency	West Ridge	Carbon	Book Cliffs	2,298
Total				27,024

Source: UGS coal company questionnaires

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COUNCIL OF THE EUROPEAN UNION

Brussels, 3 March 2008

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REPORT

from :	the Commission and the Secretary-General/High Representative
to :	European Council
Subject :	Climate change and international security

Delegations will find attached a joint paper by the Commission and the Secretary-General/High Representative concerning " Climate change and international security ".

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ANNEX

CLIMATE CHANGE AND INTERNATIONAL SECURITY

Paper from the High Representative and the European Commission to the European Council

I INTRODUCTION

The risks posed by climate change are real and its impacts are already taking place. The UN estimates that all but one of its emergency appeals for humanitarian aid in 2007 were climate related. In 2007 the UN Security Council held its first debate on climate change and its implications for international security. The European Council has drawn attention to the impact of climate change on international security and in June 2007 invited the High Representative and the European Commission to present a joint report to the European Council in Spring 2008.

The science of climate change is now better understood. The findings of the Intergovernmental Panel on Climate Change demonstrate that even if by 2050 emissions would be reduced to below half of 1990 levels, a temperature rise of up to 2°C above pre-industrial levels will be difficult to avoid. Such a temperature increase will pose serious security risks that would increase if warming continues. Unmitigated climate change beyond 2°C will lead to unprecedented security scenarios as it is likely to trigger a number of tipping points that would lead to further accelerated, irreversible and largely unpredictable climate changes. Investment in mitigation to avoid such scenarios, as well as ways to adapt to the unavoidable should go hand in hand with addressing the international security threats created by climate change; both should be viewed as part of preventive security policy.

Climate change is best viewed as a threat multiplier which exacerbates existing trends, tensions and instability. The core challenge is that climate change threatens to overburden states and regions which are already fragile and conflict prone. It is important to recognise that the risks are not just of a humanitarian nature; they also include political and security risks that directly affect European interests. Moreover, in line with the concept of human security, it is clear that many issues related to the impact of climate change on international security are interlinked requiring comprehensive policy responses. For example, the attainment of the Millennium Development Goals would be at considerable risk because climate change, if unmitigated, may well wipe out years of development efforts.

This report focuses on the impact of climate change on international security and considers the impact of these international security consequences for Europe's own security, and how the EU should respond.

The EU is in a unique position to respond to the impacts of climate change on international security, given its leading role in development, global climate policy and the wide array of tools and instruments at its disposal. Moreover, the security challenge plays to Europe's strengths, with its comprehensive approach to conflict prevention, crisis management and post-conflict reconstruction, and as a key proponent of effective multilateralism.

The European Security Strategy recognised the link between global warming and competition for natural resources while the Communication "Europe in the World" highlighted the effects of globalisation on external relations.

The report considers how the full range of EU instruments, including Community and CFSP/ESDP action, can be used alongside mitigation and adaptation policies to address the security risks. It also considers the implications for the intensification of political dialogue with third countries. A post-2012 agreement has to be developed by the end of 2009 and all levers of EU foreign relations must work towards this end.

The report concludes that it is in Europe's self interest to address the security implications of climate change with a series of measures: at the level of the EU, in bilateral relations and at the multilateral level, in mutually supportive ways.

Although this report addresses the impact of climate change on international security, the EU's response will be conditioned by the impact of climate change on Europe itself. Climate change will heavily affect Europe's natural environment and nearly all sections of society and the economy.

II. THREATS

The effects of climate change are being felt now: temperatures are rising, icecaps and glaciers are melting and extreme weather events are becoming more frequent and more intense. The following section outlines some of the forms of conflicts driven by climate change which may occur in different regions of the world.

i) Conflict over resources

Reduction of arable land, widespread shortage of water, diminishing food and fish stocks, increased flooding and prolonged droughts are already happening in many parts of the world. Climate change will alter rainfall patterns and further reduce available freshwater by as much as 20 to 30% in certain regions. A drop in agricultural productivity will lead to, or worsen, food-insecurity in least developed countries and an unsustainable increase in food prices across the board. Water shortage in particular has the potential to cause civil unrest and to lead to significant economic losses, even in robust economies. The consequences will be even more intense in areas under strong demographic pressure. The overall effect is that climate change will fuel existing conflicts over depleting resources, especially where access to those resources is politicised.

ii) Economic damage and risk to coastal cities and critical infrastructure

It has been estimated that a business as usual scenario in dealing with climate change could cost the world economy up to 20% of global GDP per year, whereas the cost of effective concerted action can be limited to 1%. Coastal zones are the home of about one fifth of the world's population, a number set to rise in the years ahead. Mega-cities, with their supporting infrastructure, such as port facilities and oil refineries, are often located by the sea or in river deltas. Sea-level rise and the increase in the frequency and intensity of natural disasters pose a serious threat to these regions and their economic prospects. The East coasts of China and India as well as the Caribbean region and Central America would be particularly affected. An increase in disasters and humanitarian crises will lead to immense pressure on the resources of donor countries, including capacities for emergency relief operations.

iii) Loss of territory and border disputes

Scientists project major changes to the landmass during this century. Receding coastlines and submergence of large areas could result in loss of territory, including entire countries such as small island states. More disputes over land and maritime borders and other territorial rights are likely. There might be a need to revisit existing rules of international law, particularly the Law of the Sea, as regards the resolution of territorial and border disputes. A further dimension of competition for energy resources lies in potential conflict over resources in Polar regions which will become exploitable as a consequence of global warming. Desertification could trigger a vicious circle of degradation, migration and conflicts over territory and borders that threatens the political stability of countries and regions.

iv) Environmentally-induced migration

Those parts of the populations that already suffer from poor health conditions, unemployment or social exclusion are rendered more vulnerable to the effects of climate change, which could amplify or trigger migration within and between countries. The UN predicts that there will be millions of "environmental" migrants by 2020 with climate change as one of the major drivers of this phenomenon. Some countries that are extremely vulnerable to climate change are already calling for international recognition of such environmentally-induced migration. Such migration may increase conflicts in transit and destination areas. Europe must expect substantially increased migratory pressure.

v) Situations of fragility and radicalization

Climate change may significantly increase instability in weak or failing states by over-stretching the already limited capacity of governments to respond effectively to the challenges they face. The inability of a government to meet the needs of its population as a whole or to provide protection in the face of climate change-induced hardship could trigger frustration, lead to tensions between different ethnic and religious groups within countries and to political radicalisation. This could destabilise countries and even entire regions.

vi) Tension over energy supply

One of the most significant potential conflicts over resources arises from intensified competition over access to, and control over, energy resources. That in itself is, and will continue to be, a cause of instability. However, because much of the world's hydrocarbon reserves are in regions vulnerable to the impacts of climate change and because many oil and gas producing states already face significant social economic and demographic challenges, instability is likely to increase. This has the potential to feed back into greater energy insecurity and greater competition for resources. A possible wider use of nuclear energy for power generation might raise new concerns about proliferation, in the context of a non-proliferation regime that is already under pressure. As previously inaccessible regions open up due to the effects of climate change, the scramble for resources will intensify.

vii) Pressure on international governance

The multilateral system is at risk if the international community fails to address the threats outlined above. Climate change impacts will fuel the politics of resentment between those most responsible for climate change and those most affected by it. Impacts of climate mitigation policies (or policy failures) will thus drive political tension nationally and internationally. The potential rift not only divides North and South but there will also be a South - South dimension particularly as the Chinese and Indian share of global emissions rises. The already burdened international security architecture will be put under increasing pressure.

III. GEOGRAPHICAL EXAMPLES

In many regions, climate change is fuelling one or more of the threats identified above. The following sections illustrate how climate change is multiplying existing pressures in various regions around the world. Since the EU's neighbours include some of the most vulnerable regions to climate change, e.g. North Africa and the Middle East, migratory pressure at the European Union's borders and political instability and conflicts could increase in the future. This could also have a significant impact on Europe's energy supply routes.

1. Africa:

Africa is one of the continents most vulnerable to climate change because of multiple stresses and low adaptive capacity. In North Africa and the Sahel, increasing drought, water scarcity and land overuse will degrade soils and could lead to a loss of 75% of arable, rain-fed land. The Nile Delta could be at risk from both sea-level rise and salinisation in agricultural areas while 12 to 15% of arable land could be lost through sea-level rise in this century with 5 million people affected by 2050. Already today, climate change is having a major impact on the conflict in and around Darfur. In the Horn of Africa reduced rainfall and increasing temperatures will have a significant negative impact on a region highly vulnerable to conflict. In southern Africa, droughts are contributing to poor harvests, leading to food insecurity in several areas with millions of people expected to face food shortages. Migration in this region, but also migration from other regions through Northern Africa to reach Europe (transit migration) is likely to intensify. In Africa, and elsewhere, climate change is expected to have a negative effect on health, in particular due to the spread of vector-borne diseases further aggravating tensions.

2. Middle East:

Water systems in the Middle East are already under intense stress. Roughly two-thirds of the Arab world depends on sources outside their borders for water. The Jordan and Yarmuk rivers are expected to se considerable reduction in their flows affecting Israel, the Palestinian territories and Jordan. Existing tensions over access to water are almost certain to intensify in this region leading to further political instability with detrimental implications for Europe's energy security and other interests. Water supply in Israel might fall by 60% over this century. Consequently, a significant drop in crop yields is projected for an area that is already largely arid or semi-arid. Significant decreases are expected to hit Turkey, Iraq, Syria and Saudi Arabia and thus affect stability in a vitally strategic region for Europe.

3. South Asia:

Sea-level rise may threaten the habitat of millions of people as 40% of Asia's population (almost 2 billion) lives within 60km from the coastline. Water stress and loss of agricultural productivity will make it difficult for Asia to feed its growing population who will additionally be exposed to an increase of infectious diseases. Changes in the monsoon rains and decrease of melt water from the Himalayas will affect more than 1 billion people. Conflicts over remaining resources and unmanaged migration will lead to instability in a region that is an important economic partner of Europe with factors of production and distribution concentrated along vulnerable coastlines.

4. Central Asia:
Central Asia is another region severely affected by climate change. An increasing shortage of water, which is both a key resource for agriculture and a strategic resource for electricity generation, is already noticeable. The glaciers in Tajikistan lost a third of their area in the second half of the 20th century alone, while Kyrgyzstan has lost over a 1000 glaciers in the last four decades. There is thus considerable additional potential for conflict in a region whose strategic, political and economic developments as well as increasing trans-regional challenges impact directly or indirectly on EU interests.

5. Latin America and the Caribbean:
In drier areas of Latin America climate change will lead to salinisation and desertification of agricultural land and to decreasing productivity of important crops and livestock. This will have adverse consequences for food security. Sea-level rise is projected to cause increased risk of flooding in low-lying areas. Increases in sea surface temperature due to climate change are projected to have adverse effects on coral reefs, and cause shifts in the location of fish stocks. Latin American and Caribbean countries are already subject to the detrimental effects, including many extreme events, associated with the El Niño cycle. Changes in rainfall patterns and the disappearance of glaciers are projected to significantly affect water availability for human consumption, agriculture and energy generation, for example in the Andes region. Countries in the Caribbean and the Gulf of Mexico are already increasingly affected by major hurricanes. This will be further exacerbated by climate change and result in social and political tensions in a region with often weak governance structures.

6. The Arctic:
The rapid melting of the polar ice caps, in particular, the Arctic, is opening up new waterways and international trade routes. In addition, the increased accessibility of the enormous hydrocarbon resources in the Arctic region is changing the geo-strategic dynamics of the region with potential consequences for international stability and European security interests. The resulting new strategic interests are illustrated by the recent planting of the Russian flag under the North Pole. There is an increasing need to address the growing debate over territorial claims and access to new trade routes by different countries which challenge Europe's ability to effectively secure its trade and resource interests in the region and may put pressure on its relations with key partners.

IV. Conclusions and Recommendations

The impact of climate change on international security is not a problem of the future but already of today and one which will stay with us. Even if progress is made in reducing the emissions of greenhouse gases, weather patterns have already changed, global temperatures have already risen and, above all, climate change is already being felt around the globe.

The active role of the EU in the international climate change negotiations is vital and must continue. The EU has demonstrated leadership both in international negotiations, in particular by advocating the 2°C target, and with its far-reaching decisions on domestic climate and energy policies. Yet, the EU cannot act alone. In a changing international political landscape, major emitters and emerging economies will also have to be engaged and commit to an ambitious global climate agreement under the UN framework.

In the EU's response, special consideration needs to be given to the US, China and India and what the implications mean for the EU's long term relations with Russia. The recommendations below should be complemented by further studies and followed up by coherent EU action plans, aiming at addressing the different dimensions of the responses required to address the impact of climate change on international security in a comprehensive and effective manner. The upcoming examination of the implementation of the European Security Strategy, and as appropriate proposals to complement it, should take account of the security dimension of climate change.

Enhancing capacities at the EU level

A first step to address the impact of climate change on international security should be to build up knowledge and assess the EU's own capacities, followed by an improvement in the prevention of, and preparedness for early responses to, disasters and conflicts. Financial implications for such responses should be identified and also be considered in the EU's budget review.

Possible actions that could be developed include:

- Intensify EU capacities for research, analysis, monitoring and early warning and Watch Lists including the Institute for Security Studies, the EU Satellite Centre (EUSC), the EU Joint Situation Centre (SITCEN), the EU Network of Energy Correspondents (NESCO), the Global Monitoring for Environment and Security and Joint Research Centres. Monitoring and early warning needs to include in particular situations of state fragility and political radicalisation, tensions over resources and energy supplies, environmental and socio-economic stresses, threats to critical infrastructures and economic assets, border disputes, impact on human rights and potential migratory movements.

- Further build up EU and Member State planning and capabilities including civil protection and the use of crisis management and disaster response instruments (civil and military) to contribute to the response to the security risks posed by climate change.

- Commission further work to look, region-by-region, in more detail at what the security implications are likely to be and how they will affect EU interests.

EU multilateral leadership to promote global climate security

Climate change is a key element of international relations and will be increasingly so in the coming years, including its security dimension. If recognised, it can even become a positive driver for improving and reforming global governance. As it is a global problem, the EU is advocating a multilateral response. Building on the successful Bali conference in Dec 2007 the EU needs to continue and strengthen its leadership towards an ambitious post-2012 agreement in 2009, including both mitigation and adaptation action by all countries as a key contribution to addressing climate security.

Possible actions that could be developed include:

- Focus attention on the security risks related to climate change in the multilateral arena; in particular within the UN Security Council, the G8 as well as the UN specialised bodies (among others by addressing a possible need to strengthen certain rules of international law, including the Law of the Sea).

- Enhance international cooperation on the detection and monitoring of the security threats related to climate change, and on prevention, preparedness, mitigation and response capacities. Promote the development of regional security scenarios for different levels of climate change and their implications for international security.

- Consider environmentally-triggered additional migratory stress in the further development of a comprehensive European migration policy, in liaison with all relevant international bodies.

Cooperation with third countries
Climate change calls for revisiting and reinforcing EU cooperation and political dialogue instruments, giving more attention to the impact of climate change on security. This could lead to greater prioritisation and enhanced support for climate change mitigation and adaptation, good governance, natural resource management, technology transfer, trans-boundary environmental cooperation (inter alia water and land), institutional strengthening and capacity building for crisis management.

Possible actions that could be developed include:
- Further integrate adaptation and resilience to climate change into EU regional strategies (for example Northern Dimension, European Neighbourhood Policy, EU-Africa Strategy, Barcelona Process, Black Sea Synergy, EU-Central Asia Strategy, Middle East action plan). Special attention should be given to the most vulnerable regions and potential climate security hot spots. The Global Climate Change Alliance between the EU and the most vulnerable developing countries should be built upon.
- Develop an EU Arctic policy based on the evolving geo-strategy of the Arctic region, taking into account i.a. access to resources and the opening of new trade routes.
- Examine the security implications of climate change in dialogue with third countries including through the sharing of analyses.

Responses for Document 00083

00083-001: Power generation requirements are unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support meaningful assumptions and analysis. The type and level of development will define the nature of the proposed action and electrical power requirements. For example, existing sources of electrical power may be sufficient to power the operation, or electrical power may need to be generated on lease using either conventional energy sources like natural gas or renewable energy sources like wind or solar. Other options may include the expansion of existing power plants or the construction of additional power plants (coal, natural gas, and nuclear).

00083-002: The impacts to the species mentioned in the comment are addressed in Sections 4.8 and 5.8 of the PEIS. In the PEIS, the BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on ecological resources.

The impact analysis provided in the PEIS qualitatively indicates the types of impacts that could occur, based on BLM experience with other types of mineral development. At this time, it is not possible to provide a quantitative evaluation of impacts. There are many uncertainties regarding the amount of development that is reasonably foreseeable, the types of technologies that might be deployed, and the locations of potential projects. Cumulative impacts will be evaluated in project-specific NEPA assessments and consultations conducted prior to leasing and development.

00083-003: Thank you for your comment. Many technical comments were provided on the Draft PEIS and are addressed in this comment response portion of the Final PEIS.

00083-004: Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

The decisions analyzed in this PEIS are land allocation decisions and they include no commitment by BLM to either offer for lease or approve development on public lands without additional site-specific NEPA analysis. This additional analysis will consider all site-specific information regarding proposed oil shale or tar sands technologies and any anticipated environmental consequences. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of that site-specific NEPA

evaluation. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA processes.

00083-005: The BLM acknowledges the commentor's preference for Alternative A.

OSTS_00084

SHERRI THOMPSON MARCH 17TH, 2008
BUREAU OF LAND MANAGEMENT
COLORADO STATE OFFICE
2850 YOUNGFIELD STREET
LAKEWOOD, CO 80215
(303) 239-3758

RE: OIL SHALE AND TAR SANDS PROGRAMMATIC EIS

DEAR SHERRI THOMPSON:

ENCLOSED IS OUR INFORMATION ON THE THERMAL ORGANIC REACTIONS PROCESS. MR. WILLIAM E. MEUSER, THE INVENTOR AND PATENTOR OF THE THORE PROCESS HAS SUCCESSFULLY TESTED OIL SHALE AND TAR SANDS. THE TEST WAS IN CONJUNCTION WITH LIVERMORE LABORATORIES IN WHICH THE RANGE OF RECOVERED HEAVY OIL WAS 42 - 44 GALLONS PER TON. THIS TEST WAS DONE OVER 10 YEARS AGO AS WE FORGED AHEAD TO DO HIGH SULFUR COAL. 84-001

THE THERMAL ORGANIC REACTIONS PROCESS WOULD BE A GOOD FIT IN COMMERCIALLY DEVELOPING THE FIELD FOR MAXIMUM YIELD AND WITH LITTLEST ENVIRONMENTAL IMPACT TO AIR, GROUND OR WATER.

Sincerely,
David S. C. Thore
THORE AUTHOR

OSTS_00084

RESEARCH & MANUFACTURING
T·H·O·R·E
Inc.
THERMAL ORGANIC RECYCLING EQUIPMENT

OSTS_00084

From Page 1

MEUSER—

"All the tires, garbage, plastic and everything that's been produced has always been said to be a cost of living," Meuser said. "But where we are at, all that represents energy. The stuff is an asset, a tremendous asset."

Meuser isn't some sci-fi character making big promises in the back pages of a grocery store tabloids. People are taking him seriously.

ABC News did a story on him. Meuser said they checked him and his research out thoroughly with researchers and engineers before doing so. Once it began looking into Meuser's story for Ted Koppel's "Nightline," the network kept bumping the story up the pipeline until it made the cut on Peter Jennings' nightly broadcast.

Japanese engineers want to know how he succeeded where they failed.

Million dollar offers are pouring in from all corners of the continent and the world. Individual investors, corporations, nations, cities are all sending Meuser proposals.

Once a farmer, oilfield worker and a salvageman, Meuser has a firm handshake and wears denim pants and flannel shirts. He keeps track of his proposals in a dog-eared composition book — the kind university students usually keep notes on English lectures in.

Meuser plainly points out that he is not an engineer. As he tells it, one industry man told him since he had never studied engineering he didn't know what he was trying to do couldn't be done.

Meuser's paperwork spans the kitchen table, the dining room table and the pool table of his modest ranch-style house with the important stuff crammed into a fat leather briefcase. On any given day he might be in California, or Dallas or Little Rock negotiating proposals with interested parties.

Presently, he's collecting offers.

His preference would be to build and market the devices. He'd like to build the first production-sized unit here in Arkansas and use it for testing. That, he says, would cost $6 million.

Then he'd like to build a $30 million production line to manufacture various configurations of the thermal-organic reactors, which could then be sold to landfills, municipalities and hospitals.

The way he figures it, he could sell at least 90 machines just to handle disposal of used tires, a commodity that renews itself at the rate of 246 million tires a year. Also he sees hospitals as a lucrative market. A small unit, he said, could safely dispose of hazardous medical waste on site.

But Meuser says he will take the best offer that hits his kitchen table by Thanksgiving. Even if that means, selling the whole kit and kaboodle to a big corporation in a foreign country.

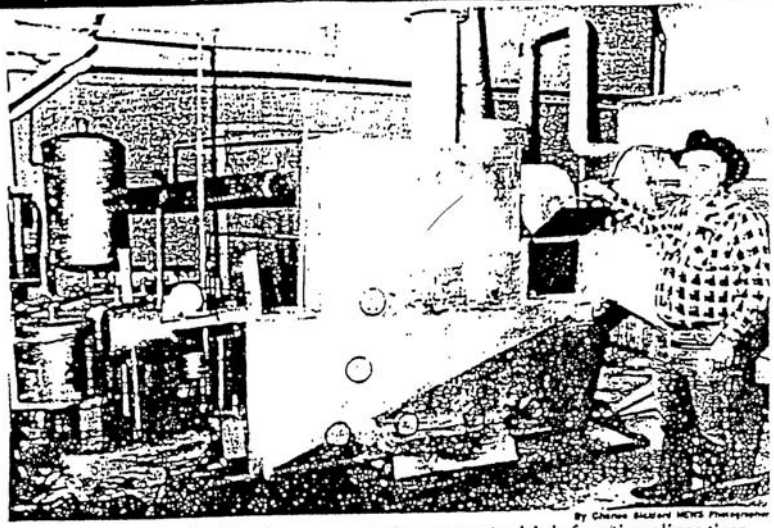
"There's a hell of a lot of money in any end of this you want to tackle," as Meuser summed it up.

And as he explains it, the device is the opposite of an incinerator. "Our process is incineration in reverse. It does just what Mother nature does," Meuser explained. The organic material is put under pressure and heat in an anaerobic environment, causing the material to break down into gases which then condense into petroleum.

While others have been partially successful in "fractionalizing" tires back into the consituent parts, Meuser said the PTO group's thermal-organic reactor incorporates two very important process that make their method more complete and their byproducts a higher grade. Those processes "are the deep, dark secrets."

Using tires, the resulting oil is a heavy grade, Meuser said, of which everything from high-octane gasoline to low-grade fuel oil can be refined.

Meuser said he and his partners have worked approximately three years on the project after a friend had a problem with disposing of tires.



By Charles Bullard NEWS Photographer

Meuser stands beside his 'thermo-organic reactor' which fractionalizes tires

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Executive Summary

What if there was an environmentally safe process that could, in 12 minutes, convert a used tire back into the raw materials it took to build it? According to some of the worlds leading scientists this machine does now exist. With the waste management problems that we have in the world today it is essential that a pilot plan be constructed to demonstrate and implement this process.

The THermal Organic REactor (T.H.O.R.E.) converts waste into reusable energy and useful by-products without generating any environmental hazards. The reactor is totally enclosed. The only flue is on the computer controlled natural gas burners with a temperature emission that is considerable below Environmental Protection Agency requirements.

Waste materials or products that can be reduced or eliminated include used tires, paper, plastics, medical waste, and sewage sludge. There are no emissions from the thermal reactor to contaminate the air, water or ground environments.

Given the growing global environmental problems the introduction of this system should be accelerated. The T.H.O.R.E. system produces energy for electricity or heat, carbon for glass or new rubber products, and a high quality refined oil. These could all come from the billions of used tires that litter and overflow the landfills and which litter thousands of illegal tire dumps throughout the U.S. In addition, the pilot plant will be used to design the delivery systems for processing plastics, paper, sewage sludge, garbage and all organic waste. The thermal organic reactor is capable of processing all of these materials back to usable raw products and energy. The Thermal Organic Reactor is a genuine proven solution to many of the world's waste problems.

ECONOMICS
OF A COMPLETE RECYCLE CENTER

Number One - The sites are not scattered all over the state which would decrease the danger to many communities and be less troublesome for EPA control.

Number Two - It is a fact that you would stop burying and burning waste.

First Cost - elimination of buying land for landfills.
Second Cost - eliminate the purchase of equipment to cover and handle the waste.
Third Cost - eliminate the monitoring of wells.
Fourth Cost - eliminate the need for monitoring leakage forever.

The burning of hydrocarbons, as in tires or polymers is a direct waste of energy. The unit is centrally located where it is needed, and saves the need for drilling of oil, and further production of gas. It stops the destruction of land, transportation of products, and protects against oil spills and accidents. It preserves timber resources, cleans the environment, to include water, air, and soil.

These things are of normal consideration, the real truth of a recycle center is that the processing of one material produces energy to process another which magnifies the amount of useful energy to be freed.

The complete center would have the equipment to pelletize 40% of incoming paper and 40% of the plastics. Government studies claim that the other 60% does not lead to good economics to pelletize, therefore we could process it in the T.H.O.R.E. unit to hydrocarbon products.

The completion of the center in one location, things that have held up recycling, has been the initiative by state and federal government to help R&D projects to find sales and uses for the byproducts and tax incentives for private enterprises to move forward.

The other holdback in recycling organics back into energy has been that industry wants a large volume and guaranteed supply that normally would have come from a large volume operation with a constant supply. For them to invest in new products from recycled materials, the large industries need these guarantees. They also need tax incentives. The state and federal government would easily recover these costs from the environmental savings and the through the reduction of health and hospital costs to the population.

OSTS_00084

Thermal Organic Reactions Process
Environmentally sound economic development
Waste-to-renewable energy concept
Environment, transportation, energy

An introduction:

THermal Organic Recycling Equipment, Inc. (THORE), an Arkansas corporation, has successfully built a working prototype of the thermal organic reactions process. This innovative leading edge technology is not an incinerator but utilizes thermal conduction (heat) in a closed-loop oxygen free self-contained sealed reactor chamber that swiftly decomposes organic waste material into free floating hydrocarbon vapors drawn out of the reactor chamber by vacuum into a fractionator that separates the vapors. The free-floating gas vapors are cooled and condensed into their basic chemical compounds which are distilled light, medium and heavy hydrocarbons. As the process continues the excess gases are captured and further condensed and recirculated to eliminate any air, ground or water contamination. The results of the thermal organic reactions process are low-sulfur gas and oil and recoverable by-products with no environmental impact to the air, ground and water.

Waste-to-energy

The concept of waste-to-energy is that everyday we generate millions of tons of organic waste by our economic activities and by doing so we utilize other sources of energy such as crude oil, natural gas and high sulfur coal to meet that increasing global demand. This relentless global demand is placing a severe burden on our global environmental resources pushing us toward climate change in our pursuit of expanded economic growth.

Our global community has raised its collective consciousness by concluding that our most valuable resources of air, land, and water are not disposable or replaceable. The call to immediate action for a positive solution is to change our way of thinking in that what we manufacture can also be re-manufactured for the present and future benefit of our global community with long lasting emphasis on the environment for which we owe our existence.

The objective now is with positive action from the global community. We have the opportunity to achieve continued global environmentally sound economic development for future generations to come.

Right now, the thermal organic reactions process is within our grasp to process all organic waste material into salable recoverable by-products and low-sulfur renewable energy sources.

Used scrap tires – a valuable renewable energy source

Our first example is used scrap tires, a carbon and sulfur based solid waste problem in huge supply that has potential economic marketability by quantity and quality as a renewable energy source. The purpose of the thermal organic reactions process is to gasify 4" x 6" chunks of used scrap tires thermally destructed back into a gas and

condensed back into hydrocarbon vapors producing low-sulfur gas and oil and recovering useful by-products such as carbon black, sterilized steel, nylon cord and carbon soot. Applying the THORE process to used scrap tires has concluded creating (0.07%) low-sulfur gas and 5 quarts of very low-sulfur (0.11%) unfined light industrial oil (boiler fuel) per 20 lbs. of tires which can be successfully refined at a commercial oil refinery into 92-98 octane gasoline blending stock, diesel fuel and number 6 grade heating oil used to heat homes, large manufacturing and mining concerns and electrical generating power plants.

This process also generates 2 lbs. per 20 lbs. of tires of reclaimed sterilized scrap steel wire which can be remelted in a blast furnace at a steel foundry to produce other useful steel products used in construction or infrastructure. The recovered nylon cord can be reutilized in manufacturing or as a cement binder. The 1% of carbon soot by volume of destructed used scrap tires can be used as road fill binder.

With 300 million used scrap tires inundating our nation every year, the thermal organic reactions process would be a positive solution to this ongoing solid waste problem. This endless supply of reusable and renewable energy from used scrap tire with its large availability of very low-sulfur natural gas (0.07%) which will be used to fuel the operations of the thermal organic reactions process. Along with the high quality of gas and oil, carbon black is produced as a highly valuable commodity in our economic structure. In this process, carbon black is produced in the largest quantity at approximately 9.36 pounds per 20 pound tire.

The carbon black has been tested to an N330 or HAF rating that can be effectively reused in lead acid batter casings, co-polymers, super alloys, water filtration, synthetics, electronic components and glass, as examples.

The environmental problems of sulfur, soot and greenhouse gases

Extensive scientific research has concluded that a certain amount of sulfur is a molecular binding element in hydrocarbon substances such as high sulfur coal, oil shale, natural gas and crude oil. To date, independent laboratory testing of the thermal organic reactions process has achieved very acceptable and positive results in successfully eliminating the sulfur for the oil and gas in the decomposition of used scrap tires through the THORE process from the working prototype. The sulfur in the light hydrocarbon gas is 0.07% and the sulfur content in the heavy oil (tire oil) is at 0.11%, far below the standards set by government regulations.

In the past, used scrap tires were burned for fuel producing black soot and tremendous amount of greenhouse gases that were released into the atmosphere creating climate change. The THORE technology does not create any air, ground or water contamination. The soot created in utilized as a by-product instead of polluting the air. No greenhouse gases are produced because the thermal organic reactions process is a self-contained closed loop system reducing the impact of climate change.

Future expansion

Not just used scrap tires – all organic material.

OSTS_00084

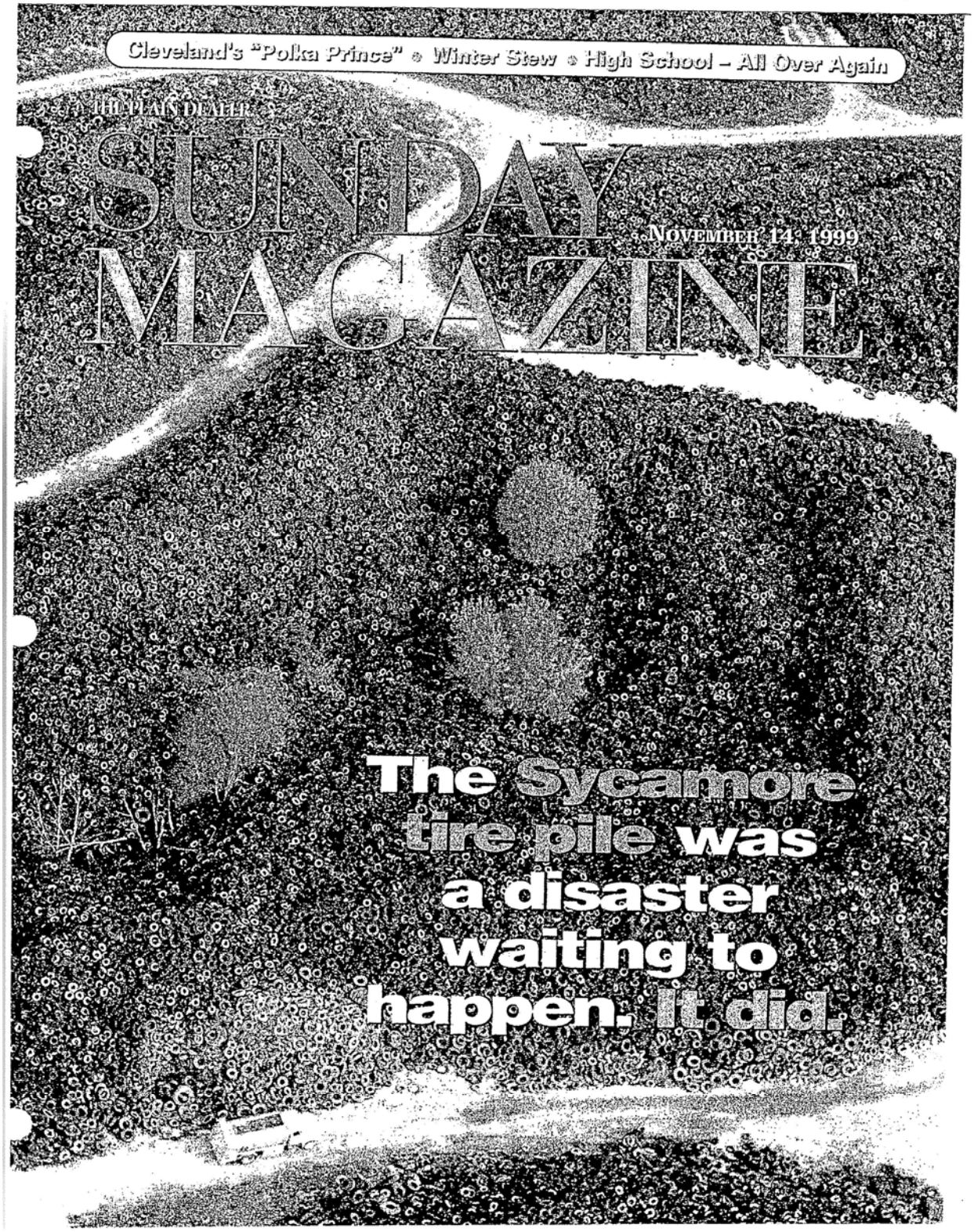
Thermal organic recycling equipment, Inc. (THORE_ has been testing different kinds of organic waster material and with further laboratory research of validating the chemical content can yield substantial gains. Below is a partial list of organic materials that have been processed and extensive expensive laboratory testing will need to be completed on the following:

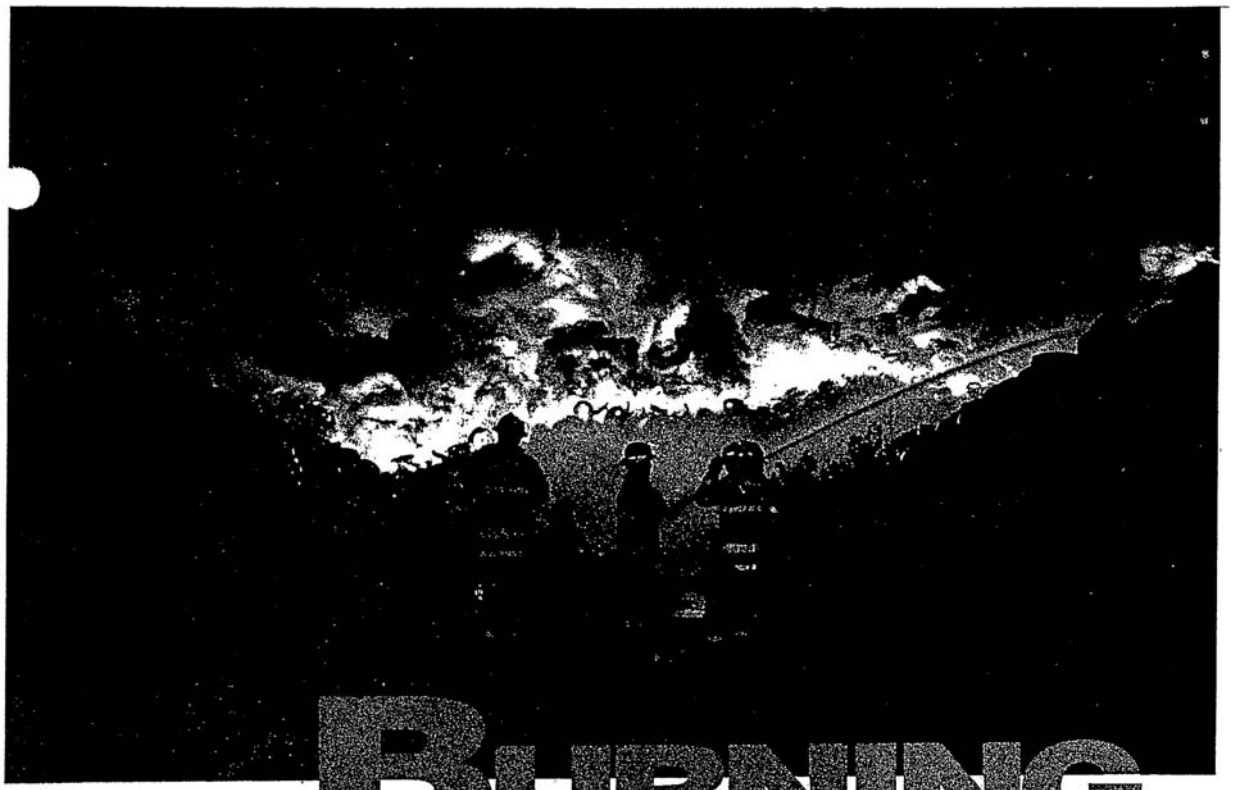
- Used scrap tires (test completed)
- High sulfur coal
- Oil shale/tar sands
- 1-9 plastics and PVC
- Lead acid batteries
- Animal waste/chicken litter
- Auto fluff
- Carpet
- Municipal solid waste
- Landfill reclamation
- Contaminated hydrocarbon fluids
- Marine waste/oil spill recovery
- Styrofoam/styrene
- E-waste – precious metal recovery
- Hospital/medical waste
- Diapers
- Sewer sludge

In final conclusion, the thermal organic reactions process can solve many of our organic waste problems with no environmental impact. With the time, money and commitment of many action-oriented people we can solve our economic and environmental problems for the benefit of the global community.

Sincerely,

William E. Meuser, Inventor and Patentor
David S. C. Koubeck, THORE's author, First Corp VP


Cleveland's "Polka Prince" • Winter Stew • High School – All Over Again
THE PLAIN DEALER
SUNDAY MAGAZINE
NOVEMBER 14, 1999
The Sycamore tire pile was a disaster waiting to happen. It did.



BURNING RUBBER

For most of us, disposing of our autos' old tires is a matter of out of sight, out of mind. Not so for the residents of Sycamore in Northwest Ohio, who have lived with our cast-offs for years and will live with the after-math of their incineration for years to come.

Story by **BRIAN E. ALBRECHT** ■ Photos by **DALE OMORI**

FOR MORE THAN 40 YEARS, RESIDENTS OF THE LITTLE town of Sycamore have lived in the shadow of a black glacier of scrap tires spreading across 120 acres of Northwest Ohio farmland.

They've watched as small mountains of tires, some rising nearly four stories high, slowly grew and multiplied in jumbled stacks of rubber archaeology, from 1950s whitewalls to the latest steel-belted radials.

Nobody knows exactly how many tires are piled on this plot, 150 miles southwest of Cleveland. Estimates have ranged as high as 60 million. The latest official guess is 15-20 million, making the Kirby Tire Recycling site Ohio's biggest scrap-tire dump, and one of the largest in the nation.

But to a generation of Sycamore families, the towering heaps out on Ohio 231 were simply "the tire pile." Everyone knew it was there. Many suspected, as one resident says matter-of-factly, "It was a disaster waiting to happen" ...

And fervently hoped it wouldn't.

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SHORTLY BEFORE 2 A.M. August 21st, an eerie orange "sunrise" spread across the horizon east of town, jolting residents awake in a flurry of frantic phone calls.

Ron and Becky Lust, whose farm lies just north of the tire pile, got their warning call from a neighbor at 2:20 a.m. Looking out their front window toward the pile, Becky Lust could only gasp, "Oh ... my ... goodness!"

She recalls, "You could see the flames over the trees, and the black smoke just rolling, rolling over the flames."

"My first thoughts were how close was it, and whether it was headed our way," Ron Lust says. "We always knew the pile was there, watched it getting bigger and bigger over the years, and prayed the wind would be from the north the day it did catch fire. You almost knew it was inevitable."

Taking no chances that morning, the Lusts and their four daughters hurriedly gathered a few irreplaceable household items – plus assorted livestock including calves, hogs, goats, rabbits and a horse – and headed off; packing rabbits in the car, towing a horse trailer, transferring the load of valuables in two trips to the farm of Ron Lust's father, six miles distant.

Across town, Robert Hosterman was shaken awake by his wife. "You've got a fire," she told him.

"OK," Hosterman said, accustomed to such early morning calls as a veteran Sycamore volunteer fireman. "Where?"

"It's Kirby's," she replied.

Hosterman sighed. "We've been waiting for that call for 40 years."

He recalls, "When I got out there, flames were shooting 200 to 300 feet in the air. I remember thinking, 'Oh my God, it's finally happened.' "

For the next six hours, Hosterman joined more than 200 other firefighters from 21 area departments in battling a blaze that burned nearly 5 million tires and sent a mile-high plume of smoke drifting almost to Columbus, 70 miles away.

In the nearby village of Sycamore, Mayor Steve Walton watched anxiously as a slight breeze pushed the fiery orange-black clouds southward, wondering if he would soon have to order residents to evacuate. Any sudden strengthening and shift of the wind to the west could send a wall of flame racing across the two miles of drought-dry cornfields separating the town from the fire.

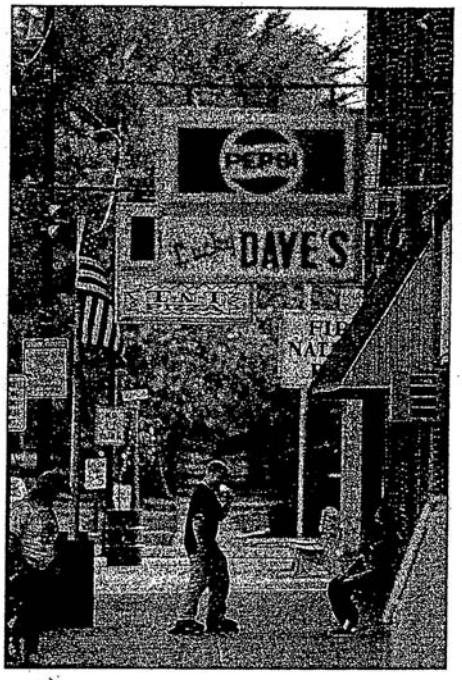
At the blaze, volunteer firefighters were quickly joined by an outpouring of community support, providing bulldozers, tractors, trucks, water tankers and other heavy equipment from local farms, trucking firms and quarries. Residents and the volunteer fire auxiliary delivered bottled water, home-baked cookies, casseroles and other needed supplies.

For Sycamore, it was the best of possible efforts in the worst of possible times.

The blaze, sparked by an unknown arsonist, was contained by 8 a.m. Because of the size of the fire – nearly 19 acres – it took the next five days and 122,000 tons of dirt and clay, dug on-site and hauled from area quarries, for workers under the direction of the U.S. Environmental Protection Agency's Region 5 Emergency Response Branch to smother the blaze and keep it from spreading.

Yet even today, tires continue to burn under that dirt blanket. Occasionally, if the wind is just right, a faint whiff of the disaster barely averted still drifts into Sycamore.

There, too, sentiments slowly cook in rekindled concerns regarding the fire and the tire pile. They simmer just beneath the bucolic veneer of a small town that awoke early one morning to discover what one resident describes as "our worst nightmare come true."



Kids in Sycamore ride their bikes and skate to McDermott's Video & Ice Cream parlor for an after-school treat.

Sycamore is 150 miles southwest of Cleveland and 70 miles north of Columbus.

SYCAMORE IS A SMALL island in a green sea of corn and wheat spreading under a sky so big it takes a good couple of looks to take it all in.

Life in Sycamore, where the population has crept toward 1,000 for the past 70 years, hasn't changed a whole lot since an 1884 Wyandot County history book described it as a community "of slow growth" that "never attained higher than an ordinary country hamlet."

Folks like it that way – a place where everyone knows you, everyone gives a friendly wave, and you can leave your car parked "downtown" on Sycamore Avenue with the keys in the ignition and never give it a second thought.

As Nile Ennis, who has happily lived all of his 82 years in Sycamore, says, "I couldn't live in another town. People wouldn't pay any attention to you."

In Sycamore, houses commonly come with front porches and a garden out back. It is one of many small farm towns in a county ranked ninth in Ohio in wheat production; a place where county fairs, 4-H and the Farm Bureau are still a big part of community life.

Kids ride their bikes to McDermott's Video & Ice Cream parlor for an after-school treat, while their elders shop at the local IGA, get a trim at Owen's barbershop, have a chat at Fillmore Pharmacy's soda fountain, roll a few frames at the six-alley Bowlmor Lanes, or kick back with a brew at Lucky Dave's bar.

There's a self-reliant attitude in this town, which has its own power and phone companies, locally owned bank and a volunteer fire department operating well in the financial black thanks to proceeds from bingo games held at the community center built by the firefighters.

MAP BY ROBERT W. COOKE

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BURNINGRUBBER

People like to take care of their own, and that includes tire-pile blazes – probably the biggest fire story in these parts since American Colonel William Crawford was burned at the stake by hostile Indians in 1782. (Copies of the fire department's video of the tire blaze sell for $5 at the local IGA.)

There's a fiercely independent spirit here; a reflection, perhaps, of Sycamore's origin when Revolutionary War veteran Samuel Harper – an Irish-born patriot wounded at Bunker Hill fighting for his new homeland – became the town's first resident in 1821.

Among the county's earliest founding families were the Kirbys, whose descendants came to include Noble Andrew Kirby, of Sycamore, who saw gold in scrap rubber.

"Andy" Kirby launched several hometown business ventures after a stint in the Navy during World War II, including the tire pile in 1956. He charged scrap-tire haulers a fee for letting them dump their loads on a site once featuring the area's first flour-grinding mill.

Bob Shellhouse, director of the Mohawk Historical Society, attended school with Kirby, who died in 1996 of cancer at age 69. He remembers Kirby as "a rough character, but a good-hearted guy."

As for Kirby's tire pile, "I looked at it for years and never thought much about it," Shellhouse says. "Everyone knew about it. They knew there was a problem, that it just kept growing, kind of like a cancer. But a lot of people here don't like to raise a ruckus, and the Kirbys were well-liked, and very generous to the community."

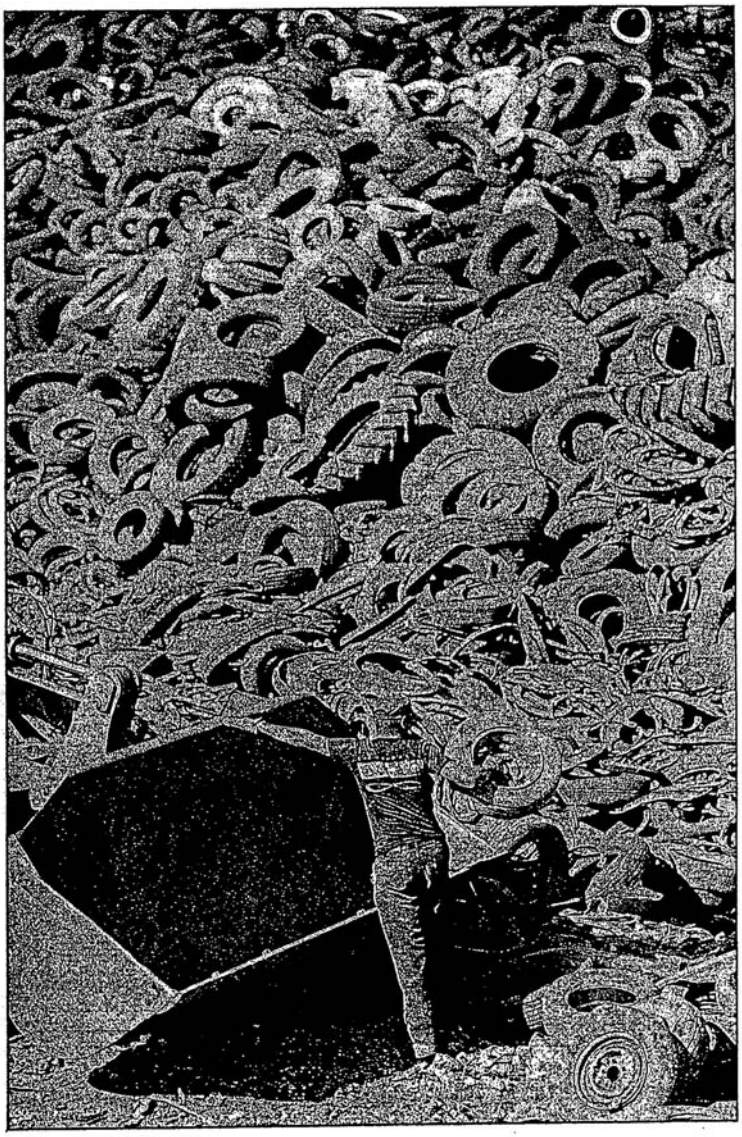
Some locals still regard Andy Kirby as a recycling visionary who was betting that his scrap tires would become a valuable resource someday, just like money in a steel-belted bank.

Bette Snyder, editor of the *Daily Chief-Union* newspaper in nearby Upper Sandusky, speculates, "He probably was a man with good intentions. He came out of World War II, when there was a real need for rubber, and probably figured he'd corner the market."

Others say Kirby just let the tires pile up until things got out of hand.

Like many area residents, Laurie Allen, 28, and Andy Kirby's great-niece, grew up with the pile and says, "It's one of those things you learn to live with out here, I guess. There's something everywhere."

But Allen – whose father owns a local excavating company and was among those jockeying bulldozers around flaming tires that night – still has her misgivings. "I worried for a long time about it



"The **EPA comes in** and says they can't clean up this site in less than 15 years, and yet they gave the Kirbys less than a year to do it. **That's a little crazy.**"

– Becky Lust, who lives north of the tire pile where a worker (above) removes tires for shredding

BURNINGRUBBER

[the pile]. I don't like it, but I can't move it," she says. "I'm related, but it's nothing against them personally."

Few, if any, local people harbor anything personal against Kirby, even if they didn't particularly like his tire pile, because – as Nile Ennis repeats the oft-spoken sentiment – "Everybody liked Andy."

You had to understand him, Ennis says. "He was an entrepreneur, in his own way, and you don't get many of those out of small towns.

"The first time I actually saw the pile, I couldn't believe it," he adds. "I didn't think there were that many tires in the world. But it's kind of sad when your town gets on the map because of a bunch of old tires."

Not everyone, however, regards the tire pile as an inevitable part of living in Sycamore.

Judy Smith, whose property adjoins the Kirby site, waged a decade-long campaign of raising questions and complaints about the tire pile to local newspapers and government officials.

"She was really the only person who spoke out against it, though I'm sure there were others silently plugging for her," says Snyder of the *Daily Chief-Union*. "She can be very aggressive when she has a mission, and she's a woman on a mission."

The Cincinnati-raised Smith came to the county after meeting her future husband, Donald – a Sycamore physician like his father and now his son – at the University of Cincinnati where she was studying to be a dietitian. "I just thought something had to be done, as that tire pile kept getting larger and larger and larger," says the 67-year-old Smith. Having raised three children in Sycamore, Smith (nicknamed "The Tire Lady" by locals) has served on the school board, and volunteers at Wyandot Memorial Hospital when not keeping a wary eye on the Kirby pile.

The community didn't greet her efforts regarding the tire pile with hostility. However, Smith notes, "Nobody ever joined me, either."

Her husband adds, "Some of us were concerned about it, but nobody really did anything about it.

"We all liked Andy. We can't be upset with him. But in a small community like this, there can be a reticence to come down hard on a hometown boy, and I suppose that can be one of the problems of a small community."

But during Smith's campaign – as Ohioans were junking tires at a rate that grew to more than 12 million annually – efforts were being made to trim the Sycamore mounds and establish a statewide system for handling scrap tires. In 1993, the Ohio Legislature passed laws giving the Ohio Environmental Protection Agency (OEPA) new powers to regulate scrap tires and disposal sites. The state enacted a 50-cent tax on every new tire sold by wholesalers in Ohio to fund the program, which included cleaning up the more than 100 million tires already piled around the state and establishing guidelines for disposal of future scrap tires.

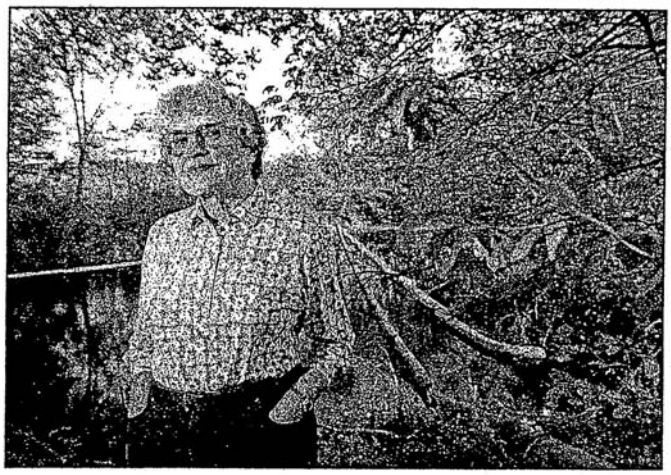
Bob Large, supervisor of the OEPA's scrap-tire management unit, says that before the new state law, the agency had been working with Wyandot County officials in trying to reduce the number of tires at the Kirby site.

"We were aware of the site and trying to get Kirby to voluntarily start cleaning the site up, but he never really did anything," Large says.

The OEPA estimated in 1996 that a dozen tractor-trailer loads of tires (at about 1,500 tires a truck) were being dumped at the site each day. Sycamore residents saw some trucks from Michigan, Pennsylvania and Canada.

In 1997, the county Court of Common Pleas ordered Kirby Tire Recycling to remove 5,000 tires daily, and dispose of any new tires within 72 hours of receiving them. How they accomplished this task was left to Kirby, as long as the tires were disposed of within the law, such as sending them to an authorized tire-disposal site.

A year later, the OEPA said Kirby was not meeting the court-ordered rate of tire removal, and asked the state attorney general to obtain a second court order from the county, forbidding Kirby from accepting any more tires. That order was granted, and the OEPA gave Kirby 120 days (as per the new state law) to remove all tires from the site.



"Something had to be done, as that tire pile kept getting larger and larger and larger."

– Tire-pile opponent Judy Smith, standing next to Sycamore Creek, where pollution booms remain in place

When Kirby did not meet the deadline, OEPA brought in Central Ohio Contractors of Columbus – under a $2.3 million, two-year contract funded by the state's 50-cent-per-tire scrap-tire management fund – to start shredding and removing tires. From July to October, the firm removed 434,000 tires (about 5,000 daily), Large says.

He expects it will take about seven years to create new and wider fire lanes between the bigger piles on the site, and to whittle those piles down to no more than 1 million tires each. He predicts it could take another seven years to clear the site.

Two years ago, OEPA was involved in a similar court-directed cleanup at a 2-million-tire privately owned site in Coshocton County. It also has brought in outside contractors to clear tires at four abandoned tire dumps. OEPA has a cleanup list of 21 tire dumps with 100,000-plus tires, and another 91 sites with 1,000 or more tires. Large says the agency is concentrating on removing large tire piles located closest to population

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centers, including the recent cleanup of a site in Summit County.

The Kirby site now tops the state's priority list, but the tire program's $1.6 million annual cleanup budget also must be directed toward cleanup of other sites such as two million-tire dumps in Portage County, Large says.

The Kirby site continues to be owned by Andy Kirby's widow, Doris, and operated by his daughter, Becky Williams, and her husband, Don Williams. But Becky Williams says she has essentially been put out of business – unable, by court order, to take in new tires, which would provide the income to remove the old tires. She says their only source of business income now comes from assisting the outside contractor in transporting shredded scrap tires from the site, pending appeal of the OEPA's denial of their application for a scrap-tire hauling license.

"They [OEPA] destroyed us, as a company," she says. "This is our livelihood. This is something that is family. You can't begin to fathom what we've been going through. We never took a vacation; we worked Sundays, we sold my Mom's house, our house, our vehicles, just trying to hang on."

Her attorney, Mark Segreti of Dayton, says he has shelved a proposal he'd drafted to the county court before the fire, asking that Williams be allowed to resume control of the site and tire disposal. The plan asked the court to allow Kirby to accept new tires for six months, to build enough capital to pay for efforts to meet the court-ordered rate of tire disposal at the site, Segreti says.

He expects the state and federal EPAs will try to recover the costs of the fire and site cleanup (an estimated $5 million or more), plus civil penalties (fines), and has written to the OEPA, protesting that his client should not be held responsible for the fire, which happened while the site was under state control.

"Right now we're just trying to assess the impact of the fire, and whether or not they can get back on their feet at all," he adds, noting that filing for bankruptcy may be one option.

Yet Segreti also questions the OEPA's action in taking control of the site.

"The regulations that the OEPA is trying to enforce never really contemplated anything the size of this facility," he says. "It's really improper for them to come in and take over the facility just because it violates regulations that didn't exist when this site was created, and operated for years without any problem.

"I don't think the owners were given a realistic opportunity to come into compliance with those regulations," he adds, "and now it appears they may not financially be able to do so."

BEFORE OEPA BECAME a four-letter word around Sycamore, there was an ambitious plan that supposedly would have solved both Kirby's woes and the town's power needs into the next millennium.

In 1995, a Columbus firm proposed building a $1.2 million tire-burning power plant in Sycamore that could draw on Kirby's scrap tires and other sources to provide half the village's electricity.

The proposal was rejected by the village council due to concerns of local residents and private environmental groups about possible air pollution from the burning tires, says Sycamore Mayor Walton.

The 16-year mayor, who also runs the funeral home and grew up on a local family farm, said residents never had a problem with Andy Kirby or his tire pile.

"At first impression, he looked rough and tough, 'cause he was a big guy. But he was a real down-to-earth guy, who'd do anything for you," says Walton. "I remember he always wore a CAT hat, bib overalls and flannel shirt – I think we buried him in them."

As for the tire pile, "people lived with it for years," Walton says. "It was where you took your old tires.

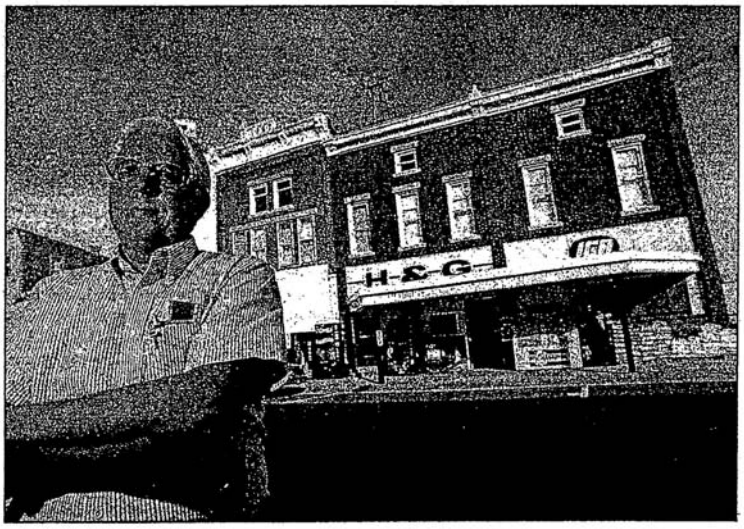
"But it seems like there has been nothing but little troubles ever since the EPA took it over," he adds. "A lot of people are saying if they would've let the Kirbys continue running the place, there wouldn't have been a fire."

His comments are echoed by area residents such as Jim Hurley of Upper Sandusky, a friend of the Kirby family. "People around here are angry at the OEPA. Most of the people I've talked to say it seems awfully damn strange that the state comes in here and suddenly we get a fire."

Hurley says some people wonder why the Kirbys can't be doing the same work that the outside contractors hired by the OEPA are doing.

"What the OEPA did to the Kirbys was wrong," he adds. "They [the OEPA] just wanted to set an example."

Similarly, Ron Lust says, "It seems like



"When I got out there, **flames were shooting** 200 to 300 feet in the air. I remember thinking, 'Oh my God, **it's finally happened.**' "

– Volunteer firefighter and local IGA owner Robert Hosterman

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the EPA tried to make rules they knew Kirby couldn't handle."

His wife, Becky, adds, "The EPA comes in and says they can't clean up this site in less than 15 years, and yet they gave the Kirbys less than a year to do it. That's a little crazy.

"Until the fire, that pile wasn't anything but an eyesore. It wasn't hurting anything, it wasn't polluting anything. It was just there. And if it wasn't there, it'd be somewhere else, in somebody else's back yard."

OEPA officials are well aware they are walking in a minefield of local public opinion.

Beth Brown, OEPA supervisor at the Kirby site, sympathizes with residents – to a degree. "How would you feel if there was a family business in the community, run by people everybody really liked, and the EPA came in and shut them down?

"But they're considering the emotional side, not the potential environmental impact of a hazardous landfill," she adds. "Just because the Kirbys created jobs and were nice people, doesn't mean they should be allowed to continue operating in violation of the law."

OEPA's Bob Large notes, "Many residents have convinced themselves that Kirby was doing something good for everybody else by collecting tires there. But we stressed to them for years that accumulating that many tires in one location is just inviting disaster.

"Yes, they were fortunate in not having any fires before this ... but eventually the odds will catch up to any large tire pile. Whether by accident or arson, a fire is going to occur. When it does, it's really nasty."

And perhaps that final point is one of the few things residents and the OEPA can agree upon – as anyone in Sycamore who ventured out during the early morning hours of August 21st could attest.

THE SKY WAS A billowing ocean of smoke and flame; black clouds boiled upward to blot out the stars, crashing back down in orange-red waves, then rising again, as if the fire itself was breathing while feeding on millions of scrap tires.

Firefighters crouched at the base of blazing tire mounds or tire-lined alleys, sheltering behind steam mists flung back in their faces by white heat powerful enough to blister paint and melt plastic on fire vehicles.

A hulking Ohio Air National Guard foam truck lumbered to one part of the pile and laid down a white chemical blanket, turning the area to simulated winter with flaming "snow" as tires stubbornly flared through the foam.

"They need to concentrate on getting those tires out of there. This is something that **needs a lot more attention** than finding out why tree frogs reproduce."

– Laurie Allen, Kirby's great-niece, on the EPA's efforts (above, testing ground water at the site)

Bulldozers and excavators tore piles of burning tires apart, clearing paths for fire pumpers and then smothering blazing rubber volcanoes under avalanches of dirt.

But these scenes from a video of the fire shot by Sycamore volunteer firefighter Robert Hosterman scarcely captured the feeling of being there.

"It just kept coming at us in a whole wave of flame," says Don Fillmore, Sycamore volunteer fireman and owner of the local pharmacy. "Usually when you throw water at a fire, it slows down. But this one just kept coming and coming at you."

As the blaze grew, the first firefighters on the scene were repeatedly forced to retreat. "That's when I started getting scared. You just couldn't stop it," Fillmore says.

Sycamore Fire Chief Gerald Clinger recalls that when he arrived at 1:47 a.m. and got a close look at that half-mile-wide wall of flames, "I just got sick to my stomach.

"Normally we try to get real aggressive with a fire, try to get it stopped or slowed down," he says. "But this was a defensive fire. We were just trying to keep it from spreading."

At one point, the firefighters were backed to their last line of defense: a dirt lane between tire piles where firefighters battled to keep flames from jumping the gap and igniting the last and only pile separating the fire from cornfields and a potential path straight to the village of Sycamore.

"We drew a line and got it stopped," Hosterman says. "But if it had been a windier night, it might've been a whole different story."

The firefighters had several substantial pieces of good luck: The fire had started on one side of the tire site, not in the middle; there was only a light wind that morning, which blew the towering column of smoke upward and away from the tire pile; and the blaze erupted in a town small enough to care.

Soon after the first firefighters arrived, local residents in convoys of trucks, heavy equipment, water and gasoline tankers joined them. At one point, about 100 trucks an hour were passing through the front gates.

"Everybody pretty much rolled on it right away," says 46-year-old Gene Caudill, a local truck driver who hauled water and sand to the fire. Caudill, who

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has lived most of his life in the area, says he always knew about the pile but figured "there was no sense in worrying about it."

Caudill recalls that when his boss, Larry Danner, of the local trucking firm L&T Danner Enterprises, called that night and said the tire pile was on fire, "I asked, 'What do you need?' He said, 'Can you get them tankers?' I just said, 'I'm on my way,' plain and simple.

"It was kind of amazing how everybody, especially in the middle of the night, pitched in," he says. "Nobody hesitated. We all did what we could do."

The volunteer firefighters auxiliary emptied Hosterman's IGA store of drinking water and cooked loads of sloppy Joes and spaghetti for delivery to the site. Don Fillmore's boys made chocolate chip cookies. Becky Lust walked down to the site with a container of lemonade and glasses, because "it's just one of those things you do in a small town. You help each other."

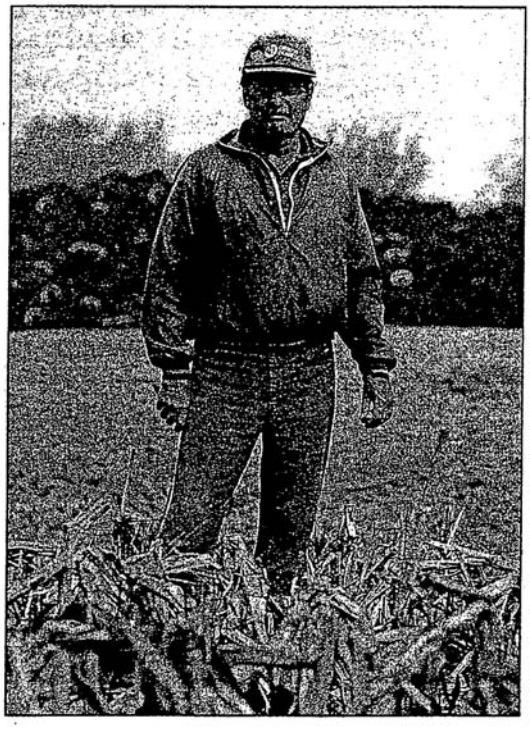
Jim Hurley, who grew up in the area and became a friend of the Kirby family, helped direct heavy-equipment efforts at the scene for 45 straight hours that weekend; he brought his private-industry experience in hazardous-materials spills to bear on a fire that still vividly burns in his memory.

"When you're down between those piles, the fire creates its own weather, and the wind just arcs the flames from one pile to the next, back and forth, swirling all around you. It was like walking through the jaws of hell."

Hurley says the initial task was to separate and isolate the burning piles, to keep the fire from spreading. Then, trenches had to be dug to channel oil runoff produced by melting tires to a collection area, and a blanket of dirt dumped on burning tires to smother them.

"The guys running the equipment, and the firefighters who beat the fire back so these guys could get in close and shove tires and dirt, are the real heroes," Hurley says. "It was a real community effort."

Becky Williams – who says she spent most of that weekend numbed by the shock of watching the family business go up in smoke – also praised the volunteer efforts. "The community came together to deal with this, and did one hell of a job."



"There were **flames coming out of the ground**, and gas explosions below ground. [It was] like something right out of a **horror movie.**"

– Larry Goodman, standing in his cornfield just yards from the tire pile

"I think the 'local yokels' surprised everybody," Ron Lust says. "People got control of the situation and did something about it. The call went out, 'Please help,' and they responded."

After six hours and about 7 million gallons of water, the fire was contained. Burying 19 acres of smoldering tires would continue for the next four days.

LARRY GOODMAN watched the burial from his 100-acre farm adjoining the south side of the tire pile and thought, "This is like something right out of a horror movie."

He recalls, "There were flames coming out of the ground, and gas explosions below ground. As dozens of bulldozers and backhoes moved over the dirt, it'd ripple and vibrate, like a wave."

Results of the fire lingered for weeks ... and some fear for much, much longer.

Oil from melting tires ran into nearby Sycamore Creek, killing thousands of fish from minnows to bass for seven miles along its length as pollutants drained oxygen from the water. Some contamination reached the Sandusky River, which flows into Lake Erie.

Some 62,650 gallons of oil from the burning tires, and 813,245 gallons of water runoff from fire hoses were collected for treatment at the tire site. Dams were erected on Sycamore Creek to siphon and aerate the stream, replenishing the water's depleted oxygen.

The county health department issued advisories the weekend of the fire, warning people within a four-mile radius of the tire pile to stay indoors if they had respiratory problems and to avoid drinking or cooking with water from cisterns. The chief concern was possible contamination by airborne particulates from the fire. Both advisories have since been canceled.

A third caution advises people to avoid contact with the water and sediments of Sycamore Creek.

Subsequent county and OEPA tests of the air and wells in the immediate area of the tire pile found no contamination, though monitoring of both surface and underground water is expected to continue for several years.

OEPA officials believe the intense heat of the fire burned away most of the possible airborne pollutants.

Karla Auker, U.S. EPA on-scene coordinator during the fire control and initial cleanup efforts, said burying the tires was done to stop environmental damage from smoke and to reduce the amount of oil run-off created by the burning tires by not allowing the flames to spread.

Since the fire, new security precautions have been taken at the site to discourage other arson attempts. Such measures include installation of perimeter lights, fencing and cameras.

While the cleanup and environmental testing goes on, tires are still being shredded at the site. They flow into a 366-blade

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shredder, which can hack a tire into 2-x-2-inch pieces in less than two seconds. The OEPA says this shredded-rubber mulch will be used in place of the usual gravel aggregate liner at a privately owned landfill in Wyandot County.

The Ohio Department of Agriculture found no visible evidence of soot damage to livestock feed and area pastures. Samples of field crops also tested negative for contamination, with the exception of visible soot on one cornfield directly south of the tire pile – Larry Goodman's 14-acre cornfield.

Goodman says the crop was not damaged but estimates it will cost $7,000 to replace the field's drain tile damaged by heavy firefighting equipment.

But what really worries Goodman and many other Sycamore residents is possible contamination of the area's underground wells by oil runoff from the fire.

What really worries many Sycamore residents is **possible contamination** of the area's **underground wells** by oil runoff from the fire. ... "Ground water only moves a few feet a year, so it could be years before you'd know if you had a problem. And it wouldn't take much oil to cause a problem."

– Farmer Larry Goodman

"We get our water from three wells, and our concern is whether oil got in the same aquifer, and how long, if ever, that oil would take to reach our drinking water," says Mayor Walton.

Goodman also notes, "Ground water only moves a few feet a year, so it could be years before you'd know if you had a problem. And it wouldn't take much oil to cause a problem."

AS WEEKS PASSED, there were matters other than the tire pile to talk about down at the Fillmore Pharmacy soda fountain. The schools reopened, there was news of local prize winners at the county fair, and the results of harvests after a hard summer of drought to discuss.

But every now and conversational then, the subject resurfaces – just like the increasingly visible piles of tires peeking through gaps in the fall foliage.

Among the Sycamore old-timers who routinely gather at the fountain for their early morning decaf-klatch, one man says he isn't particularly concerned about the pile catching fire again – "Not since I found out they can put it out. So why worry?"

A counter companion adds, "It's always been there. I didn't worry about it then, and don't worry about it now. I worry more about pollution in the water."

Don Fillmore – a pharmacist who traded Parma for Sycamore 17 years ago, seeking and finding a quieter, simpler life – said many local folks now regard the fire as yesterday's news, adopting a fatalistic attitude.

"It's like if it does [catch fire again], it does. If it doesn't, it doesn't," says Fillmore.

It's an attitude not unlike the stoic, so-what're-you-gonna-do? philosophy shared by local farmers over burgers and coffee at Sycamore's Suger and Spice cafe, as they discuss the devastating impact of the summer's drought on crops. In these parts, it seems, you learn to make do, or don't do it at all.

Fillmore's wife and fellow pharmacist, Linda, says, "I don't see anybody moving because of the fire. There really hasn't been any outcry in town about it. But then, the town was never in any jeopardy, and that was just blind luck."

As a volunteer fireman, "I know I don't ever want to go back out there again," Don Fillmore says. "But I don't think the fire upset most other people. They all knew it could happen.

"I do think there is a resolve now, that they need to clean it up. Before, there wasn't that sense that something needed to be done," he adds. "Personally, I'm glad they're doing something about it. We have three children, and I don't know if they're going to live here when they grow up. But if they do, do we want to leave *that* for them?"

Despite the risk of another

your holiday shopping begins on november 21st

On Sunday, November 21st, The Plain Dealer will publish its second annual Holiday Gift Guide. This full color section in the *Sunday Magazine* is filled with the latest gift giving ideas: unique and special gifts from art and jewelry, to food and wine, books, home decor, toys and fabulous fashions

Coming Up

Nov. 21
- Great Ideas for Getting Away From It All

Nov. 28
- We take a holiday break and return

Dec. 3
- The 10 Most Powerful People in Cleveland

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fire, and the chance that the next time the winds may not be as favorable to their farm, Ron and Becky Lust say they have no intention of moving.

"I wouldn't trade living here for living in a big city," Becky Lust says. "The benefits of living in the country far outweigh the disadvantages, even with a tire pile."

Nevertheless, "It's something we won't forget for a long time," she adds. "For a few weeks after it happened, I'd be in bed and hear sirens coming out of Sycamore and think, 'Oh my God, the pile caught fire again.' I even got up and looked out the window, and if I didn't see flames, then I knew it was OK."

The children seemed to have gotten through the incident with no aftereffects, she says, noting, "We've got some pretty levelheaded girls."

Her 18-year-old daughter, Amanda, says, "Before the fire, my dad was always saying if the pile ever caught on fire, we'd be in trouble. Now I'm just hoping it doesn't catch on fire again."

Otherwise, the fire fuss seems to have faded, she says. "The first couple of days at school, it was all anybody could talk about. Now it's kind of died off. People don't seem overly concerned or worried about it."

Some people, however, are more concerned than ever, now that their previous fears have become a flaming reality.

As one Sycamore resident remarks, "I'm hoping that it's safe now, but I'm also hoping someone doesn't come out to finish what they started."

"What happens when the government leaves and we have to live here with the contamination?" asks Laurie Allen, Kirby's great-niece. "The EPA needs to concentrate on getting those tires out of there. This is something that needs a lot more attention than finding out why tree frogs reproduce, or something.

"I think it's more frightening now that you actually know what can happen out there."

"I don't see anybody moving because of the fire. But then, the **town was never in any jeopardy**, and that was just **blind luck.**"

– Linda Fillmore (with husband, Don) at their pharmacy

Scott Weinninger, co-owner of the Wilson Tire Co. in Upper Sandusky, grew up in the area, and got to know the Kirby family from taking scrap tires to their dump over the years.

Weinninger says he wasn't concerned about the pile until the OEPA, in its efforts to warn the public about the site's potential fire hazard, "really started publicizing that the pile is there.

"Before, a lot of people may have heard of it, but they didn't know where it was. Now everybody knows exactly where it is. They told every crackpot in the world," he says.

If there was any good that came of the fire, Weinninger believes it may have been a wake-up call to state legislators, regarding the urgency of dealing with scrap tires. "That smoke couldn't have gone in a better direction [Columbus]," he says.

He bemoans the lost opportunity of turning a scrap negative into an energy positive, such as burning scrap tires to produce electricity.

"Look at the size of that fire, look at the oil runoff, then look at the energy potential, and they're just burying it," he says. "Your kids and my kids are going to be digging these tires up someday and saying how stupid we were."

Weinninger also believes the scrap-tire problem has been passed around for too many years, routinely ignored until a near-disaster such as Sycamore starts another round of pin the blame on somebody else.

"Nobody has any right to point fingers," he says. "If they don't pile the tires at Kirby's, they're going to pile them somewhere else, and then you're going to hear about another fire there.

"This isn't Sycamore's problem or Kirby's problem. Those tires came from Cleveland and Toledo and Sandusky and Columbus. They're *your* tires.

"So what're *you* going to do about it?" ■

Brian E. Albrecht believes the Sycamore tire pile may be a classic case of "what goes around, comes around." He can be reached at balbrecht@plaind.com or 216/999-4853.

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THERMAL ORGANIC REACTIONS PROCESS

WASTE-TO-ENERGY CONCEPT

SOLUTION TO CREATING ENVIRONMENTALLY

SOUND ECONOMIC DEVELOPMENT

Summarizing the waste to energy concept, we have been taught that differenct organic products such as tires, paper, plastics, styrofoam, etc. once used or dirty was considered waste, not reusable or renewable energy. We must change our perspective of "used" organic resources.

In some instances, a form of recycling was done successfully by independent businessman, such as recapping tires, recycling 1 and 2 plastics, some glass-green, brown, clear and composting.

It's a start but its not a realistic solution. How do you recycle the contaminated material and left-over by-products from these processes because we still accumulate far more material than we could possible recycle in this fashion. A quick remedy was to bury all the unrecycled products, "even though they were all energy". This being status quo - more waste was produced so the incinerator was created to burn the material for energy and reduce volume; however, it wasn't many years after this practice until people started getting real sick from polluted air, water, and ground contamination and the story is still continuing.

These circumstances have resulted in the development of the Thermal Organic Reactions process because "there is a better way" and that way includes environmentally sound economic development with emphasis on technology that has a lower cost than burying or burning, especially in alleviating the side-effects from pollution of the air, water and ground contamination.

The first step of the Thermal Organic Recycling Equipment Corporation was to collect, analyse and evaluate information on USED SCRAP TIRES. Why tires? Huge problem - abundant supply - reusable-renewable energy by-products. Chunked tires were processed by the

working protype and created by-products consisting of tire oil, a high octane light oil although not crude oil', methane gas, high quality carbon black, steel and nylon cord. Five by-products were successfully produced - all are reusable and/or renewable energy.

By the Thermal Organic Reactions process, the solid used scrap tire chunks are "gasified" into gas and oil, the carbon and cord is salvaged and one solid waste problem is solved, the illegal dumped tires and tire piles of the world. How did we do that? The Thermal Organic Recycling Equipment Corporation went about building a machine to do this without burning the raw organic materials, no stack exhaust from the reactor chambers at all, totally enclosed, to insure this and help in the system, we created a vacuum inside. The next obstacle to overcome was the sulfur in the gas and oil so when these energies were burned for fuel, they would be EPA approved. After many months, this has been accomplished. The sulphur in the gas is .07 percent and the sulphur in the oil is down to 0.11 percent.

What has been achieved is high quality-low sulphur renewable energy from a solid waste problem not including the potential of the carbon black which also has a large amount of energy on top. The carbon has been tested and is comparable to N330 or HAF rating that can be reused in rubber, glass, and synthetics along with enormous other uses. The carbon black as an energy source has approximately 17,500 BTU's per pound and is exceptionally strong for heating purposes. The results obtained by processing chunked scrap tires into renewable energy by the Thermal Organic Reactions process is as calculated by a twenty pound passenger car tire, one gallon and one quart of tire oil and 9.36 pounds of carbon black. This leaves only the nylon cord and steel cord clean. Both of these come out of the machine just as clean as when they were put into a hand new tire.

While working on the tire problem, we had different companies contact us on other organic materials. The first of these being municipal solid waste. According to a national study, approximately eighty-eight percent of municipal solid waste is organic material. This leaving twelve percent metals, glass, aluminum, etc.

By trial and error, the best way to start was to test one composition material one at a time. The first test was paper. Paper rapidly decomposes leaving moisture and inks. The second was plastics, many different kinds, and finally made the decision to do them all at one time; results, the same. Next we tested styrofoam and it was concluded that there was no need to separate anything. The effect was to combine and shred all the municipal solid waste and process it throughly. Therefore, getting approximately twenty percent heavy oil and polymers. The balance was an aqua solution.

We are now busy testing other organic materials of all kinds. The laboratory is in the process of checking the chemical compositions of tests ran through the THORE machine. It might interest you to know what we have processed and are now doing laboratory work on includes:

tires	sewer sludge	wire insulation
used motor oil	oil shale	styrofoam
chicken litter	tar sands	paper
lead acid batteries	medical waste	plastics
coal	pvc	

Positive benefits have been achieved in our findings and we anticipate that by adding the shredders, feeders or mechanical devices is all that is needed for a thermal organic reactor to handle a mixture of organics. Currently, we are now at the stage where we need to upscale the machines to handle much larger volume to handle 6000 tires per day or 1000 tons of plastic or paper materials.

The commercial model will use approximately two acres of land to set on, plus a working area for material handling. Our organization has spent a tremendous amount of time, money and commitment in solving our environmental and economic problems.

The Thermal Organic Recycling Equipment Corporation is in need of assistance and further cooperation to advance a working pilot demonstration project for upscaling a commerical production unit. With the financial support of politics, state and local governments and private interest, we can solve our environmental and economic problems creating jobs, new opportunities and a clean and safer world where all of us will prosper.

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Our greatest commodity is our air, water and ground, it is our responsibility to preserve it because if we don't take care of it, who will? Travel and Tourism are large industries for federal and states alike, especially Arkansas, since approximately one-half of the population in the United States lives within five or six hundred miles of Springdale, Arkansas. A clean environment is important to our health and wealth.

In the last few years, industries have blossomed as in this Northwest Arkansas region. Many corporate business men and women from China, Japan, Eastern Europe and other parts of the world have seen the working protype in action and are very enthusiatic and interested in the demonstration unit. The challange has been met and is here today to advance globally - environmentally sound economic development. We are on stage and the whole world is watching.

Thermal Organic Recycling Equipment, Inc. is at your service.

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WASTE - TO - ENERGY CONCEPT

Our current need today and for future generations is to advance technology that will supply us with more reusable, renewable, recovery and recyclable by-products. For example, municipal solid waste that is generated daily can be transformed into methane gas considering that 88% of the waste stream can be recovered as renewable energy but taking into account what's organic, let's not stop here but get larger toxic waste problems that exist, such as agriculture waste and sewer sludge which can be converted into useful products - methane and nitrogen.

The challenge to society is "Do we want to advance our mindset to environmentally sound economic development?". For example, considering the United States holds a supply of 300 years of oil in oil shale not including tar sands. This can effectively and efficiently propel us into a prosperous economic future because low-cost abundant energy fuels economic development and by recovering toxic organic waste into useful and usable by-products in quantity and quality, this is a direction needed to be taken. Although tremendous progress has been made in cleaning up our air, water and ground they are still in need of improvement. The Thermal Recycling System can promote positive long-term benefits both environmentally and economically.

Over the past 6 years, The Thermal Organic Recycling Equipment Corporation has successfully decomposed all types and kinds of organic material into either a useful products or energy or both. Many corporations, both large and small, have contacted the THORE Corporation in converting their waste stream into energy and/or useful products to conform to mandated regulations on the environment. All of these companies had not considered these products as waste, but renewable and recoverable energy that can be economically reclaimed for their potential. Also, these companies have concluded that it is not economically feasible to do 1 product at a time but to do many different kinds of products on a large scale, thus, fulfilling the economies of scale benefit.

A full recycling facility center to handle the waste stream would be as follows: See Diagram 5

Step 1 of the recycling facility center would be a 6000 tire per day unit processing waste tires as a renewable and reusable energy source because auto and truck tires consists of hydrocarbons including refined oil that has been applied to a high technology. Also, there is enough gas generated by processing the waste tires to fuel the machine itself running the burners that provide heat energy to the heat carrier. Secondly, the excess gas can be used to operate

additional equipment that supports the Thermal Reactor. Thirdly, the gas can be advanced to other reactor systems such as household waste, auto fluff, and medical waste.

In Step 1, the tire machine in running on the energy furnished by the thermodynamics of gasifying the tires uses very little gas. Step 2 would be to advance the excess gas and operate the municipal solid waste reactor, thus creating more gas and "heavy" oil polymers.

The results created would be more fuel for the co-generators in producing electricity and excess gas and polymers to blend and make more plastics, carpets or many other products. In the process metals are recovered such as aluminum and steel. They need to be sorted by a sorting process but THORE Corporation does not build this equipment but it is available and will be utilized. The recovered sterilized steel can be reused for food cans, manufacture cars, double bottom commercial oil tankers, support our decaying infrastructure, such as bridges. The recovered sterilized aluminum should be smeltered or melted into blocks or bricks on the site for re-sale or possible a galvalume project for metal built on site. Instant market for the reclaimed and recovered materials and metals - sure is a better alternative than landfilling or incineration.

In Step 3, a chicken litter, animal waste and sewer sludge reactor on the site using the energy from the tires and the municipal solid waste machines. The results would be methane gas and a nitrogen solution used in fertilizers for agriculture. The real plus is that more than enough energy is generated to process the medical waste and dioxins at no additional cost for fuel or site construction.

The tire, municipal solid waste, and the animal waste and sewer sludge reactor all process the organic material by gasification in an enclosed vaccum chamber where the thermodynamics process take place. The enclosed environment lets the operator or the unit have the advantage of mixing the gases to get a certain product or neutralizing an unwanted or undesireable product and transforming it into something useful without a negative change to the environment.

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PROJECT DESCRIPTION

This innovative technology is similar to the original creation of petroleum products and crude oil. The present invention is an environmentally safe, totally enclosed process for the extraction of hydrocarbon products from any organic material containing solid, liquid or gaseous hydrocarbons.

The waste is placed under weight, in an oxygen free, controlled range temperature containment chamber with no pressure vessels. Initially, the Thermal Organic Reactions Process was designed to rapidly decompose chunked tires and rubber into renewable energy and recovered by-products in an environmentally safe condition in the most efficient economical way rather than other alternatives such as buring or burying. The objective is to build a full scale continuous flow commercial unit that can process volume, by producing low-sulfur energy or recoverable by-products in quantity and quality to sustain long-term profitable operations.

COST/BENEFIT ANALYSIS

All resources need to be managed. Our main priority is air, water and ground preservation. All waste material is a valuable resource waiting to be utilized as envery or useful by-products. Waste material is a cost to our environment, air, water and landfills. Mr. Meuser's Thermal Organic Reactions Process eliminates this cost. The highest and best use of waste material is to process all of it into energy or useful by-products. This is the least cost to the environment, with the maximum cost benefit serving our energy needs with the highest efficiency in creating low-sulfur methane gas.

If you knew what you were throwing away-you would't do that anymore, you would process it by the Thore System. This is how the Thore System was designed. We combined industry needs with the best concepts of planet earth and included them into the Thore System. Instead of landfilling-what we can achieve is the lowest cost to process, creating new employment opportunities and lowering the cost of goods. Expanding economies need abundant low cost energy to propel forward.

This is the best available technology for closing the look in achieving volume with increasing energy demands to fuel future economic growth. This is a new approach to actually solve the problem.

The potential of the Thermal Organic Reactions Process is to utilize the energy from the process scrap tires to destruct other organic material into more energy or useful by-products. In the long run it is more cost effective to process the waste material today because once it's buried it's

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going to be there for a long time to come and the costs to monitor would be eliminated - period.
(See Exhibit 2 Landfill Cost Closing Sheet OEPA)

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NIST United States Department of Commerce National Institute of Standards and Technology

Advanced Technology Program (ATP)
Administration Building, Room A430
Rt. 270 & Quince Orchard Road
Gaithersburg, MD 20899

Phone: 301-975-2636
Fax: 301-926-9524

Date: 6/23/94

To: William E. Meuser

Organization: The Thore Corporation

Fax: 501/751-1157

Telephone: [redacted] 479-751-0680

From: Linda Beth Schilling

Phone: (301) 975-2887

COMMENTS:

Dear Mr. Meuser, David Koubeck suggested that I send these materials to you so that you might have a better idea as to what information the Advanced Technology Program needs to receive in Focused Program Ideas whitepapers.

Since a focused program is defined to be a 3-8 year effort funded between $20 - $50 million per year we really need the whitepapers to address broader programmatic technical and business goals as opposed to specific project ideas that may fit into a focused program. We received many "project" type whitepapers similar to yours, however, that do have a unifying theme of "pollution prevention". Therefore, I am trying to give some of those authors the opportunity to think more broadly about defining a program area that could address your project ideas but is significantly broader in scope than a specific project idea.

I think that once you review the guide to writing program ideas you will better understand what the program criteria are that must be addressed. As the program manager for chemical process technologies it is my job to try to aggregate complimentary whitepapers and write a focused program recommendation. My recommendation must also follow the format presented in the guide. There are four key criteria: potential for U.S. economic benefit, good/innovative technical ideas, strong industry commitment, and opportunity for ATP funding to make a significant difference.

DSF

SEPARATION TECHNOLOGIES

Process Separations:

(1.) **"On-site Atmospheric Gas Generating Equipment"**; Arbor Research Corp.; B.M. Paterson; 419/536-9199; FAX 419/536-1691; PI940099.

(2.) **"Immobilized Cell Bioreactors for Chemicals Production and Wastewater/Vapor Phase Biotreatment"**; AlliedSignal; S. Lupton; 708/391-3357; FAX 708/391-3750; PI930449; BT.

Environmental Remediation:

(1.) **"Integrated Environmental Process Development"**; Westinghouse Electric Corp.; A.J. Jarabak; 412/256-2881; FAX 412/256-1948; PI930248.

(2.) **"Immobilized Cell Bioreactors for Chemicals Production and Wastewater/Vapor Phase Biotreatment"**; AlliedSignal; S. Lupton; 708/391-3357; FAX 708/391-3750; PI930449; BT.

3. **"Development of Environmentally Responsible Microbiocides for Industrial Water Treatment"**; Great Lakes Chemical Corp.; C.J. Mazac; 317/497-6201; PI930135.

4. **"Developing Tools in Plant Metabolic or Genetic Engineering for Recovery and/or Recycle of Hazardous Wastes"**; PhytoTech; B.D. Ensley; 215/598-3287; PI930070.

5. **"Developing Tools in Plant Metabolic Engineering for Biological Cleanup of Recalcitrant Chemicals in Hazardous Waste"**; Techno[redacted]nent Group; L.R. Meagher; 201/805-9624; PI930099.

6. **"Environmental Biotechnology for the Cost Effective Destruction of Hazardous Wastes"**; Envirogen; R.J. Steffan; 609/936-9300; FAX 609/936-9921; PI930078.

7. **"The Environmental Technology Development Park"**; Malone Technologies Corp.; D.R. Malone, 713/487-6500; Houston Advanced Research Center; J. Margrave, 713/367-1348; PI930387.

(8.) **"Thermal Organic Reactions Process"**; Keywords: waste-to-energy, thermal decomposition of organic material; The Thore Corp; D.S. Koubeck; 216/942-0201; PI940068.

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ADVANCED TECHNOLOGY PROGRAM:

A GUIDE FOR PROGRAM IDEAS

APRIL 1994

NIST U.S. DEPARTMENT OF COMMERCE
TECHNOLOGY ADMINISTRATION
NATIONAL INSTITUTE OF STANDARDS
AND TECHNOLOGY

DSK

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C. CHEMICALS FROM RECYCLABLE AND RENEWABLE FEEDSTOCKS

Recyclable Plastics Recovery and Utilization:

1. **"Reclamation and Compatiblization of Post-Industrial and Post-Consumer Plastic Waste"**, American Commodities, J.K. Whitlock, 313/559-5300, FAX 313/559-0020, PI930214.

2. **"Plastics Recycling and Recovery"**; National Center for Manufacturing Sciences; M. Wixom; 313/995-4910; PI930350.

3. **"Efficient Use of Waste Plastics for the Production of Products"**; Edison Polymer Innovation Corporation (EPIC); N.W. Standish; 216/581-5453; FAX 216/838-1567; PI930116.

(4.) **"Improved Properties in High Volume, Low Cost, Multiphase Fabricated Materials via Morphological Control"**; Dow Chemical; G. Shier, 517/636-1997; PI930249.

5. **"Recycling of Plastics Mixtures from Post-Industrial and Consumer Durable Goods Wastes"**; Michigan Molecular Institute; R.L. Hotchkiss; 517/832-5555; FAX 517/832-5560; PI930131.

Biotechnology Approaches:

(6.) **"Applications of Biotechnology to production of specialty and commodity chemicals"**; AlliedSignal; H. Zemel; 708/391-3357; FAX 708/391-3750; PI930202; BT.

(7.) **"Immobilized Cell Bioreactors for Chemicals Production and Wastewater/Vapor Phase Biotreatment"**; AlliedSignal; S. Lupton; 708/391-3357; FAX 708/391-3750; PI930449; BT.

Industry Focused Next Generation Renewable Technologies:

8. **"Plant Biotechnology: An Advanced Technology Opportunity"**; keywords: feedstocks, chemicals, energy, "pharming", plant-based industry sector; The Consortium for Plant Biotechnology Research, Inc.; D. Schumacher; 317/463-4000; FAX 317/497-3168; PI940002.

Broad Selection of Project Ideas:

9. **"Green Materials"**; keywords: design for reuse, metals, organics, forest products, paper; Allied Signal; L.C. Kravitz; 703/276-2177; FAX 703/276-8671; PI930319.

10. **"Renewable Resource Engineering"**; Keywords: bioengineered adhesives, whey protein, soy protein isolate, coatings, elastic materials, chitosan-based products, cellulose-based products, polysaccharide products;Albert Einstein Medical Center; S. Erhan; 215/456-7215; FAX 215/456-3898; PI930479; BT

11. Untitled, Keywords: **recycle, used automobile tires,** rubber polymer oil recovery; International Tyrecycle Corporation; J.H. Munger; 509/534-6939; FAX 509/535-7244; PI930111.

(12.) **"Thermal Organic Reactions Process"**; Keywords: waste-to-energy, thermal decomposition of organic material; The Thore Corp; D.S. Koubeck; 216/942-0201; PI940068.

13. **"Integrated Materials Recovery and Resource Management"**; American Plastics Council, Society of the Plastics Industry, Chemical Manufacturers Association; M.M. Fischer; 202/371-5356; FAX 202/371-5679; PI930314.

DSK

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DOE/FE-0334

Report to Congress:

Expressions of Interest in Commercial Clean Coal Technology Projects in Foreign Countries

United States Department of Energy
Assistant Secretary for Fossil Energy
Washington, DC 20585

June 1995

OSTS_00084

Proposal No.: 74

Proposer: Thermal Organic Recycling Equipment Inc.

Project/Technology Description: The thermal organic reactions (THOR) process is a closed-loop oxygen-free process that decomposes organic material into hydrocarbon vapors, some of which are condensed into various hydrocarbon liquids similar to distillate and heavy oil. Although many organic materials (plastics, oil shale, sewage sludge, chicken litter, hospital/medical wastes, spilled/waste oil, coal) have been evaluated, a THOR unit to process discarded or waste tires is proposed for commercialization. By-products from tire processing include high-grade carbon black and clean nylon and/or steel cord. A commercial unit would process 6,000 tires per day and could be integrated into a large facility capable of coprocessing municipal solid waste and other wastes, such as animal waste and sewage sludge.

Technology Status: A small pilot reactor of unspecified scale has been operated on a variety of organic materials to develop and validate the THOR process.

Environmental Performance: The THOR process operates as a closed system. Most organics are recovered as valuable products. The remaining waste gases are utilized within the process to generate necessary heat to operate the unit. When processing tires, the nylon and/or steel cords are recovered as clean recyclable by-products.

Economics: Unknown. No specific request for financial assistance was stated.

Market Potential: The worldwide market is potentially very large if the process is technically and economically proven.

COMMITTEE ON TRANSPORTATION
AND INFRASTRUCTURE
RANKING MEMBER, SUBCOMMITTEE ON
COAST GUARD AND MARITIME TRANSPORTATION

OSTS_00084

COMMITTEE ON
FINANCIAL SERVICES

Steven C. LaTourette
Congress of the United States
14th District, Ohio

December 12, 2007

Mr. David Koubeck
6253 Maplewood
Mentor, Ohio 44060

Dear Mr. Koubeck:

Thank you for your call regarding the President's Advanced Energy Initiative. It was good to hear from you.

This initiative was announced in President Bush's 2006 State of the Union Address to Congress. It offers a 22% increase for the U.S. Department of Energy (DOE) research on "clean energy," urges a general diversification of energy sources, and sets a national goal of replacing more than 75% of our oil imports from the Middle East by 2025.

Congress provides this funding to DOE, and I agree our goal has to be energy independence. As you may know, the House-passed Energy and Water Development spending bill for the coming fiscal year would provide $250 million for research and development on biomass and biorefinery systems, $22 million for hydropower research, and $73 million for the clean coal power initiative. The House passed this bill in July by a vote 312 - 112. I supported the legislation, and we are currently working on a final spending bill that can be signed into law.

As outlined in this initiative, I am committed to passing legislation that focuses on investment in our energy future and makes the permitting process easier for domestic refineries to expand production. Since 2004, I have voted on three separate occasions to expand refinery capacity, increase supply and reduce gas prices. I also voted for legislation that increases America's commitment to advanced energy through wind power, solar power and other bio-fuels, and I agree that we should continue to invest in renewable energy to help lessen greenhouse gases and our dependence on foreign sources of energy.

Thanks again for taking the time to contact me. Please feel free to call on me whenever you have questions or concerns about your federal government. I remain

Very truly yours,

Steven C. LaTourette
Member of Congress

SCL/KO

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EARTH CHALLENGE

www.virginearth.com

July 26, 2007

Mr David Koubeck
6256 Maplewood Drive
Mentor
Ohio
44060-2966
USA

Dear David

Thank you for submitting your interest in the Virgin Earth Challenge.

As we hope you'll understand with such a lot at stake, it is important that we protect your and our interests in the process of assessing submissions for the Earth Challenge. The first step in that process is for you to complete and submit an entry form. You'll find a copy, together with the Terms and Conditions, at www.virginearth.com. Please send us a completed copy as soon as you can! We'll then send you a contract to complete and we can get on with considering your submission.

Thanks for taking part in the Earth Challenge. We look forward to hearing from you!

Best of luck,

Yours sincerely

Carey Lyseight
Virgin Earth Challenge Assistant

earth.challenge@virgin.co.uk

[illegible] Limited 120 Camden Hill Road London W8 7AR Registered in England & Wales number 1073929.

Tuesday, October 9, 2007 A9

AEP's penalty to clean plants marks largest in environmental history

Lara Jakes Jordan
Associated Press

WASHINGTON — One of the nation's largest power generators has agreed to end a years-long federal lawsuit by paying $4.6 billion to reduce pollution that has eaten away at Northeast mountain ranges and national landmarks, The Associated Press has learned.

The settlement requires American Electric Power, based in Columbus, to reduce chemical emissions that cause acid rain by at least 69 percent during the next decade.

It also fines AEP an additional $15 million in civil penalties and another $60 million in cleanup and mitigation costs to help heal parkland and waterways that have been hurt by the pollution.

Details of the agreement were provided by two people familiar with its terms who spoke on condition of anonymity Monday because it had not yet been filed in federal court. Spokesmen for AEP declined comment Monday.

The Justice Department and the Environmental Protection Agency also declined comment.

The settlement marks one of the largest government fines in an environmental case. Exxon Mobil Corp. estimates it has paid $3.5 billion in cleanup costs, government settlements, fines and compensation for the 1989 Exxon Valdez oil spill. The company is fighting an additional $2.5 billion in punitive fines.

Eight states, a dozen environmental groups and the EPA brought the lawsuit against AEP in 1999, accusing the energy company of rebuilding coal-fired power plants without installing pollution controls as required under the Clean Air Act.

Environmentalists blame acid rain caused by coal-fired power plants for plaguing the Northeast during the last quarter-century, including damage that has eaten away at the Statue of Liberty and the Adirondacks mountain range in upstate New York. Smog and acid rain have been linked to sulfates and nitrates that are products of coal-fired plants.

AEP has more than 5 million customers in 11 states. It has agreed to clean up 46 coal-fired operations in 16 of the plants in its eastern system — a group likely to include at least nine plants in Ohio, Indiana, Virginia and West Virginia.

The settlement will be filed on the day a six-week trial in federal court in Columbus was expected to begin in front of U.S. District Judge Edmund Sargus. AEP has maintained that the work done in at least some of its plants was routine maintenance that didn't fall under federal requirements for pollution controls.

The settlement requires AEP to:

- Spend $4.6 billion on so-called scrubbers and other pollution controls to reduce emissions of nitrogen oxide and sulfur dioxide, which cause acid rain and smog.
- Cut nitrogen oxide emissions by 69 percent by 2016, and reduce sulfur dioxide emissions by 79 percent by 2018.
- Pay civil fines of $15 million.
- Pay $60 million in mitigation measures. The money includes $21 million to reduce emissions from barges and trucks in the Ohio River Valley; $24 million for projects to conserve energy and produce alternative energy; and $3 million for the Chesapeake Bay, $2 million for Shenandoah National Park and $10 million to acquire ecologically sensitive lands in Appalachia.

Environmentalists said they plan to keep an eye on how quickly AEP starts cleaning up its plants or whether it drags its feet in complying.

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DOE plans to abandon emissions-free power plant

JIM SUHR
Associated Press

1/30/08 DK

ST. LOUIS — The U.S. Department of Energy, frustrated by ballooning costs for an ambitious plan to build a virtually emissions-free power plant, told federal lawmakers Tuesday it plans to pull its support for the $1.8 billion project in Illinois, lawmakers said.

The Energy Department would not publicly divulge its intentions about the plant, dubbed FutureGen, or discuss what was said during the private meeting with lawmakers, saying only that it planned an announcement within days.

But some lawmakers who attended the briefing later insisted that building the coal-fired, 275-megawatt prototype power plant anywhere other than the central Illinois town of Mattoon would be unacceptable — and grounds for a possibly nasty congressional fight.

Sen. Dick Durbin, an Illinois Democrat, accused Energy Secretary Samuel Bodman of "cruel deception" of Illinoisans by "creating false hope in a FutureGen project, which he has no intention of funding or supporting."

Durbin said Illinois' delegation in Congress "is going to make the case for FutureGen directly to the president."

"We will not go down without a fight," he said.

The FutureGen Alliance, a coalition of power and coal companies, last month announced that the plant would be built in Mattoon, under a plan that called for the DOE to cover three-quarters of the cost. The site was chosen over Tuscola, Ill., and two sites in Texas.

Ohio was one of nine early contenders for the project, but it was cut from the running in 2006.

Ohio had submitted two sites, one in Tuscarawas County near New Philadelphia and one in Meigs County. Both were rejected for a variety of reasons, including location.

The DOE had wanted the announcement delayed until the project could be redesigned and the costs reduced. The department also said it wasn't ready to issue its final notice that Mattoon was environmentally acceptable.

Bodman declined to discuss the Energy Department's plans Tuesday with the Associated Press, and a statement issued by his agency Tuesday did not divulge the department's plan for FutureGen.

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209,000 jobs lost in Ohio since 2000

FRANK BENTAYOU
Plain Dealer Reporter

2/21/09 DSZ

The more than 209,000 nonfarm jobs Ohio lost from 2000 to 2007 made up the largest proportionate decline in employment since the Great Depression, a national manufacturing trade group said Wednesday.

Employment dropped by 3.7 percent, the biggest seven-year drop since the period starting in 1939, near the end of the Depression and including the years the U.S. military absorbed millions of American workers to fight World War II.

Moreover, according to the analysis the American Manufacturing Trade Action Coalition commissioned, only Michigan lost a greater proportion of its employment than Ohio during the period — 9.1 percent or 431,000 jobs.

"Our mission, basically, is to preserve and promote domestic manufacturing," said Lloyd Wood, a spokesman for the trade group in Washington, D.C. Part of that, he said, means encouraging policy makers to address cost advantages that overseas competitors have over American industrial companies.

"The industrial composition of Ohio job losses," in part, reflects recent record trade deficits and other national trends, said Charles McMillion, an economics consultant who analyzed Labor Department and other figures for the report.

McMillion, also in Washington, said Ohio lost 23.3 percent of its manufacturing sector jobs, or 236,000 positions, over the recent seven years. Some other sectors gained jobs. It was a period, he said, of markedly lower capital investment in domestic industrial capacity in Ohio and throughout the nation. It was also a period, he said, when American consumers and the government borrowed $10.3 trillion, "what should have been a tremendous stimulus," but it scarcely helped American workers.

To reach this Plain Dealer reporter:
fbentayou@plaind.com, 216-999-4116

CHARITY: Foundations pouring millions into economic development. **C3**

INFLATION: Consumer prices rose even as the economy was slowing. **C6**

Hard hit cities

A report released Wednesday shows that 13 metro areas in Ohio saw manufacturing employment plunge from 2000 to 2007:

Springfield:	-46.9%
Sandusky:	-36.5%
Steubenville-Weirton, W.Va.:	-31.4%
Dayton:	-31.2%
Lima:	-30.7%
Canton:	-30.6%
Youngstown:	-27.3%
Mansfield:	-25.7%
Cleveland:	-25.2% (48,800 jobs)
Columbus:	-24.4%
Toledo:	-22.6%
Cincinnati:	-18.4%
Akron:	-17.5% (10,000 jobs)

SOURCE: American Manufacturing Trade Action Coalition

Response for Document 00084

00084-001: Thank you for sending information on the thermal organic reactions process.

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The Center for Unconventional Fuels

Energy Security from Domestic Resources

THE CENTER FOR UNCONVENTIONAL FUELS

March 14, 2008 Comments on:

BLM'S OIL SHALE and TAR SANDS PROGRAMMATIC EIS

Introduction and Summary

The Oil Shale, Tar Sands, and Other Strategic Unconventional Fuels Act of 2005 declares the following "policy of the United States:"

> United States oil shale, tar sands, and other ***unconventional fuels are strategically important domestic resources that should be developed*** to reduce the growing dependence of the United States on politically and economically unstable sources of foreign oil imports.

Two years later, the Task Force created by Congress to study and implement this policy drew the following conclusions:

> ***The Task Force concurs that the domestic and global fuels supply situation and outlook is urgent***. Increasing global oil demand, declining reserve additions, and our increasing reliance on oil and product imports from unstable foreign sources require the Nation to take ***immediate action*** to catalyze a domestic unconventional fuels industry.

The Center for Unconventional Fuels (CUF), is an organization dedicated to the environmentally sound development of domestic unconventional fuels resources, urges the Bureau of Land Management (BLM) to remain focused on attainment of these goals in developing the Programmatic Environmental Impact Statement (PEIS) for the Oil Shale and Tar Sands Resource Management Plan. The December 2007 draft PEIS would encourage expedited development through selection of Alternative B, which would make the largest amount of resources available for development, as the preferred alternative. 85-001

1666 K Street, NW, Suite 500, Washington, DC, 20006 · (202) 887-1471

However, it would frustrate attainment of this urgent national goal by adding unnecessary and duplicative layers of NEPA review throughout the commercial leasing program. BLM should revert to its original plan to apply the PEIS throughout the entire leasing program, and should expedite development of the program as Congress intended. These points are discussed in detail below.

85-001 (cont.)

Preferred Alternative

The draft PEIS states:

> The BLM has identified Alternative B as the Preferred Alternative for both oil shale and tar sands because it would make the largest amount of potential oil resources available for application for leasing, while still providing for an environmentally sound program, and would provide the greatest flexibility in locating future development. The BLM's current approach is designed to ensure that oil shale technologies can operate at economic and environmentally acceptable levels before the agency authorizes full-scale commercial leasing on public lands (p. ES-3).

As documented in Tables 2.6-1 and 2.6-2 of the draft PEIS, this conclusion is consistent with the underlying impacts analysis. The recommended land use plan amendments would not cause any significant additional impacts. In many cases, the draft PEIS indicates that the potential impacts of commercial leasing activities also are known and are similar to other types of construction or infrastructure projects where potential impacts routinely are mitigated or effectively managed.

Given these findings in the draft PEIS, selection of Alternative B as the preferred alternative is clearly the decision most consistent with the underlying provisions of the Oil Shale, Tar Sands, and Other Strategic Unconventional Fuels Act of 2005. As discussed above, the Act "declares that it is the policy of the United States that-- (1) United States oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed to reduce the growing dependence

of the United States on politically and economically unstable sources of foreign oil imports; (2) the development of oil shale, tar sands, and other strategic unconventional fuels, for research and commercial development, should be conducted in an environmentally sound manner, using practices that minimize impacts; and (3) development of those strategic unconventional fuels should occur, with an emphasis on sustainability, to benefit the United States while taking into account affected States and communities." Each of these policies would best be served by selection of Alternative B.

Selection of Alternative B also is the option that would best effectuate the recommendations of The Task Force on Strategic Unconventional Fuels that was created by the 2005 Act. As discussed above, the Final Report of the Task Force made the following findings:

> The Task Force concurs that the domestic and global fuels supply situation and outlook is urgent. Increasing global oil demand, declining reserve additions, and our increasing reliance on oil and product imports from unstable foreign sources require the Nation to take immediate action to catalyze a domestic unconventional fuels industry. Responsible development of America's oil shale, tar sands, heavy oil, coal, and oil resources amenable to recovery by carbon dioxide injection, to produce liquid fuels could reduce our dependence on imports and provide reliable and secure sources of strategically important liquid fuels. Aggressive development by private industry, and encouraged by government, could supply all of the Department of Defense's domestic fuels demand by 2016, and supply upwards of 7 million barrels per day of domestically produced liquid fuels to domestic markets by 2035. The Task Force has adopted that level as the objective for the Strategic Unconventional Fuels Program.[1]

Previously, the Task Force had made the following recommendation in its initial Report:

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[1] Task Force on Strategic Unconventional Fuels, *America's Strategic Unconventional Fuels, Volume I: Preparation Strategy, Plan and Recommendations*, p. I-i (September 2007).

> Prepare regional resource development plans for oil shale and tar sands. BLM will amend, as needed, existing Resource Management Plans to reflect results of the PEIS being prepared as directed by the Energy Policy Act.[2]

These Task Force findings and recommendations provide additional support for selection of proposed Alternative B as the preferred alternative in the PEIS.

PEIS Scope

In a reversal of the prior BLM position, the draft PEIS now states that it is an initial analysis that would be used only to support amendment of affected land use plans, with further analysis required in support of leasing regulations and site-specific leasing decisions. The stated basis for this position is that some coordinating agencies believe that the potential impacts of commercial leasing activities are unclear as result of uncertainties with respect to specific technologies and related impacts and controls.

CUF urges BLM to return to its original plan of applying the PEIS to development of commercial leasing regulations and to issuance of commercial leases. Given the comprehensive study of these issues over the past two years, the concern with respect to insufficient information is difficult to understand. The draft PEIS includes an entire volume dedicated to description of the current technologies and their potential effects, supported by additional information in detailed appendices discussing the oil shale and tar sands segments. Further detail is provided in the Task Force reports, which we are attaching for BLM review.[3] As documented in Tables 2.6-1 and 2.6-2 of the draft

85-002

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[2] Task Force on Strategic Unconventional Fuels, *Development of America's Strategic Unconventional Fuels Resources: Initial Report to the President and the Congress of the United States*, p. 15 (September 2006).

[3] Task Force on Strategic Unconventional Fuels, *America's Strategic Unconventional Fuels, Volume III: Resource and Technology Profiles* (September 2007); *Secure Fuels from Domestic Resources: The Continuing Evolution of America's Oil Shale and Tar Sands Industries* (June 2007). For example, the *Secure Fuels* report concludes that: (1) environmental monitoring, control, and remediation technologies have become more effective, reliable, and less costly; (2)more efficient in-situ and

PEIS, in most cases the potential impacts of commercial leasing activities are well known and are similar to other types of construction or infrastructure projects where potential impacts routinely are mitigated or effectively managed.

It is true, as in most cases involving substantial development activities, that many questions remain with respect to the site-specific impacts of some technologies in some locations. CUF agrees that it is essential to identify and control site-specific impacts at all potential sites for commercial leasing. However, that is the purpose of the site-specific permitting process, not the PEIS. The approach that BLM is now considering would in effect impose dual and overlapping permitting processes for commercial leasing sites: one pursuant to NEPA, and another pursuant to the permitting statutes and regulations. Such an approach would be inconsistent with the purpose of the NEPA process, the findings of the Task Force and the intent of Congress in enacting the 2005 Act.

85-002 (cont.)

The courts have recognized that "NEPA does not require that any particular substantive action be taken in response to the environmental impact statement. The statute merely requires that the agency consider the statement and that it be made available to legislators, agencies and the public so that environmental concerns will be adequately taken into account." *Foundation on Economic Trends v. Lyng*, 943 F.2d 79,

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surface retorting processes leave less residual carbon behind, both increasing product yield and improving the environmental safety of the spent shale or residual subsurface formations; (3) technologies to reduce water requirements, to use previously unsuitable water resources, and to capture, clean-up, and re-use water have improved dramatically, reducing water demand estimates significantly; (4) technologies to capture, concentrate and use or store produced carbon dioxide are advancing and the locations, opportunities, and strategies for storing produced carbon dioxide are far better understood; and (5) today, more than 30 companies are moving technologies forward toward commercial scale development. These technologies are discussed in detail in the report.

83n.2 (D.C. Cir. 1991). The Supreme Court emphasized this point in *Stryckers Bay Neighborhood v. Karlen*, 444 U.S. 223, 227-28 (1980), relying on its earlier decision in *Vermont Yankee Nuclear Power Corp. v. NRDC*, 435 U.S. 519 (1978):

> In [*Vermont Yankee*], we stated that NEPA, while establishing "significant substantive goals for the Nation," imposes upon agencies duties that are "essentially procedural." As we stressed in that case, NEPA was designed "to ensure a fully informed and well-considered decision," but not necessarily "a decision the judges of the Court of Appeals or this Court would have reached had they been members of the decision-making unit of the agency." *Vermont Yankee* cuts sharply against the Court of Appeals conclusion that an agency, in selecting a course of action, must elevate environmental concerns over other appropriate considerations. On the contrary, once an agency has made a decision subject to NEPA's procedural requirements, the only role for a court is to insure that the agency has considered the environmental consequences . . . (emphasis added).

One court has noted that the conclusions of the EIS are "of little importance" as long as this purpose is satisfied:

> As noted above, the purpose of an EIS is simply to provide information that permits the public and the decision-makers to make informed choices. As long as there is enough information, analysis, and data in the EIS for the public and responsible officials to make intelligent conclusions of their own, the conclusion reached in the EIS itself is of little importance. The focus of inquiry in reviewing an EIS is not on whether its conclusions from the data and analysis are the most appropriate, but on whether the data and analysis are themselves sufficient for others to reach their own informed conclusions. *Sierra Club v. Dept. of Transportation*, 664 F. Supp. 1324, 1338 (N.D. Cal. 1987).

Obviously aware of these principles, Congress included a provision in the 2005 Act that directs expedited preparation of a PEIS for the entire leasing program. Section 369(d) of the Act directs that the Secretary of Interior "shall complete a programmatic environmental impact statement *for a commercial leasing program for oil shale and tar sands resources on public lands*, with an emphasis on the most geologically prospective lands within each of the States of Colorado, Utah, and Wyoming" (emphasis added). The

statute emphasizes the urgency of the matter by requiring completion of the PEIS within 18 months of enactment and adoption of final leasing regulations within 6 months after completion of the PEIS. Subsection (k) then directs the Secretary to "coordinate this Federal authorization and review process with any Indian tribes and State and local agencies responsible for conducting any separate permitting and environmental reviews." It further directs that any regulations necessary to implement this requirement were to have been promulgated within 6 months of enactment.

Far from envisioning a multi-layered NEPA review, as the BLM now proposes, the statute requires an expedited PEIS that applies to the entire leasing program, with additional directions to coordinate with permitting agencies and get the program moving as quickly as possible after the PEIS is completed. This is also consistent with the findings of the Task Force, which "recommended an effort to 'streamline' the permitting process in order to provide a more efficient and predictable permitting process. This recommendation is consistent with provisions of section 369(k) of the Energy Policy Act directing the Department of Interior to undertake efforts to streamline federal permitting processes associated with energy resources."[4]

Ultimately, the Task Force made the following recommendation:

> The Task Force wishes to emphasize that the proposed Oil Shale Program Plan anticipates that no commercial leases for oil shale resources on Federal lands would be finalized until project developers can demonstrate to responsible Federal, state, and local authorities that the proposed technology and project is technically, economically, and environmentally viable and that all other requirements for community acceptance can be met (*id.*).

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[4] Task Force Report, *supra*, Volume I at p. I-iv.

Application of the PEIS throughout the leasing program, with additional detail to be developed in the site-specific permitting processes, clearly is consistent with the Task Force views.

For all of these reasons, BLM should revert to its original approach of applying the PEIS not merely to amendment of land use plans, but also to development of leasing regulations and issuance of commercial leases. If BLM retains the proposed approach, the agency should clarify that any subsequent NEPA reviews should be limited as closely as possible, in accordance with the federal NEPA regulations.[5]

Conclusion

The Task Force on Strategic Unconventional Fuels emphasized that the Energy Policy Act of 2005 requires "an integrated program to *promote and accelerate* the responsible development of the nation's strategic unconventional fuels resource, including but not limited to oil shale and tar sands" (emphasis in original). The statutory deadlines that Congress imposed to effectuate this policy have long since passed, and it is now time for expedited action. Selection of Alternative B as the preferred alternative in the draft PEIS would assist in attaining this goal. However, it would be frustrated by the additional layers of NEPA review that BLM now contemplates. BLM should revert to its

[5] See 40 CFR 15.20 ("whenever a broad environmental impact statement has been prepared (such as a program or policy statement) and a subsequent statement or environmental assessment is then prepared on an action included within the entire program or policy (such as a site specific action) the subsequent statement or environmental assessment need only summarize the issues discussed in the broader statement and incorporate discussions from the broader statement by reference and shall concentrate on the issues specific to the subsequent action").

initial position of using the PEIS as the NEPA analysis for the entire commercial leasing program, as Congress intended, and get on with the business of developing the program.

Respectfully Submitted,

Thomas J. Corcoran,
Managing Director

Responses for Document 00085

00085-001: The BLM acknowledges the commentor's preference for Alternative B.

00085-002: Pursuant to Congress' mandate in Section 369 of the Energy Policy Act of 2005, the original intent of the PEIS was to amend 12 existing BLM land use plans to support commercial oil shale and tar sands leasing. As preparation of the PEIS proceeded, and in consultation with BLM's cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the scope of the PEIS was changed from a leasing decision to an allocation decision. To remain responsive to Congress' direction, the focus of the PEIS was changed to only identify public lands to be opened or closed to application for commercial oil shale and tar sands leasing. The PEIS is not applying site-specific mitigation requirements.

As noted in the comment, many questions remain regarding technical and environmental issues associated with oil shale development. In fact, no commercial applications of newly developing oil shale technologies have yet been proposed. Uncertainties exist regarding the location of projects, resources within project areas and their susceptibility to impact, technologies to be deployed, water and energy needs of projects, and mitigations to be applied. For this reason, the BLM has taken a conservative approach using the best available information about the distribution of resources, technologies as they exist today, the footprint of facilities, and the impacting factors associated with those technologies. In most cases, this conservative approach results in an overstatement of impacts. Subsequent project-specific NEPA reevaluations would base alternatives or mitigation on specific project proposals.

OSTS_00086

3-14-08

BLM Oil Shale & Tar Sands
Draft Programmitic EIS
Argonne National Labratory
9700 S, Cass Ave.
Argonne, IL 60439

Colorado contact: Sherri Thompson

I am opposed to the leasing of Public Lands for oil, gas, mineing, or logging. These public lands are to be preserved for the future. They are not to be raped by greedy humans for profit.

The BLM is supposed to be protecting these Public Lands, not burning and or rapeing them for any reason. There are very little lands left that haven't been damaged and or molested by humans. And what there is left should be preserved and intact. 86-001

YOU ARE RESPONSIBLE FOR THE LAND UNDER YOUR CHARGE!

Sincerely

John M. Hall

JOHN M. HALL
1180 C.R. 285
WESTCLIFFE, CO 81252

Response for Document 00086

00086-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

OSTS_00087

3175 5th
Boulder, CO 80304
14 March 2008

BLM Oil Argonne National Laboratory Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave
Argonne, IL 60439

Dear Sir:

I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for commercial oil shale and tar sands development. I am concerned that this enormous undertaking that will affect three states, Colorado, Wyoming, and Utah, is being planned without adequate information to determine the potential destruction that will inevitably result. It appears this EIS is being forced through without proper information which means that there can be no realistic evaluation. by anyone including the BLM. 87-001

Consider that at a time when global warming and the need for the country to get off of fossil fuels is of paramount interest to this country, and to the world, we are planning for an enormous and destructive project that will put untold quantities of carbon dioxide the atmosphere. 87-002

I suggest the BLM take the eventual carbon dioxide output and the consequences into consideration along with deferring this EIS until there is adequate information to proceed.

Sincerely,
Dan W Bench

Dan W. Bench

Responses for Document 00087

00087-001: Congress articulated in the Energy Policy Act of 2005 that oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed to reduce the reliance of the United States on foreign sources of oil; that these resources should be developed in an environmentally sound manner; and that these resources should be developed with an emphasis on sustainability to benefit the United States while taking into account affected states and communities. The Secretary of the Interior was given the charge to implement this direction from Congress and initiated this PEIS along with other actions to implement that direction.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA processes.

There are many uncertainties regarding the amount of development that is reasonably foreseeable, the types of technologies that might be deployed, and the locations of potential projects. This PEIS does not decide the pace, timing, or intensity of any future commercial leasing program. Rather, this PEIS allocates certain lands for future consideration of applications for commercial leasing and development of oil shale and tar sands resources.

00087-002: Section 3.5.1.2 of the Draft PEIS describes the existing state of knowledge regarding climate change. However, no climate change–related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation,

viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

OSTS_00088

SME
A Member Society of AIME

303-973-9550
Fax: 303-973-3845
E-mail: sme@smenet.org
8307 Shaffer Parkway
Littleton, CO 80127-4102

David L. Kanagy
Executive Director

kanagy@smenet.org
303-948-4210

March 17, 2008

Ms. Sherri Thompson
Bureau of Land Management
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

On behalf of the Society for Mining, Metallurgy and Exploration, Inc., I would like to express our strong support for the development of oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil. Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. The federal government must allow for the thoughtful and appropriate use of these natural energy resources in order to reduce our reliance on foreign energy imports.

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example:

- In spite of significant conservation efforts, world energy demand is projected to increase by 50% during the next 20 years and could double in 50 years.
- Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
- The United States military currently uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

88-001

Finally, development of unconventional fuels will produce a strong workforce and will support the local and regional economies of Utah, Colorado and Wyoming.

The utilization of oil shale and tar sands from these leasing areas will offer significant benefits to the local communities and will strengthen our national energy security while bringing the necessary supplies of oil into the markets to offset increased global demand.

Sincerely,

David L. Kanagy

David L. Kanagy, CAE
Executive Director
Society for Mining, Metallurgy and Exploration, Inc.

Response for Document 00088

00088-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00089

BLM Oil Shale and Tar Sands Draft EIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Dear BLM Office:

I am writing to share my support for the BLM's Oil Shale and Tar Sands Draft Environmental Impact Statement (EIS). This document is an important first step to allow for the development of a domestic energy resource that we need to address our country's energy challenges.

Wyoming, Colorado and Utah are home to some of the most precious natural resources in the United States. It is encouraging to learn that this area may also contain vast amounts of oil shale and tar sands. These unconventional resources can help diversity our country's energy portfolio and can go a long way towards creating a more stable domestic energy supply. 89-001

I am very frustrated with our country's current reliance on foreign oil. The United States government, through the BLM, has an important task to see that domestic energy production increases while maintaining environmental protections. I believe that the above mentioned EIS can accomplish both these goals.

Please include me on your list of supporters for developing these crucial resources.

Sincerely,

Edwin L McCullough
8507 Shea Road
Austin CO 81410

Response for Document 00089

00089-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00090

4550 Hwy 6&50
DeBeque CO 81630

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne, IL 60439

To Whom It May Concern:

I support domestic energy production as a means to reduce or nation's reliance on foreign oil. To that end, I am also a supporter of developing unconventional fuels, such as oil shale and tar sands. The BLM has identified 2.3 million acres in Wyoming, Utah and Colorado where these resources are located. The Oil Shale and Tar Sands PEIS is a reasonable plan to allow for development of these resources in this area. Importantly, the plan still provides for an environmentally sound program.

It is important for the federal government to be supportive of new technological developments that allow us to tap unconventional energy sources, such as oil shale and tar sands. To counterbalance a decrease in traditional oil production, we need to develop other unconventional hydrocarbon resources like oil shale and tar sands. Doing so will reinforce our national energy security. 90-001

Please include my support for commercial development of oil shale and tar sands in the public comment record for the PEIS. A robust and active oil shale program will help strengthen communities and will balance all of the resources in affected areas.

Sincerely,

Ed Adcock

Response for Document 00090

00090-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00091

Tuesday, March 18, 2008

Gene Dodd
PO Box 242
Bellvue, CO 80512

Sherry Thompson, Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Ms. Thompson,

I would like to comment on the BLM's Oil Shale and Tar Sands Draft Programmatic EIS.

I believe that oil shale and tar sands development in Utah, Colorado, and Wyoming will cause serious damage to wildlife habitat, threaten water supplies and aggravate greenhouse gas pollution

91-001

I urge the BLM to choose the "No Action" alternative A, and to halt efforts to develop oil shale and tar sands on public lands. Thank you for the opportunity to comment on the Oil Shale and Tar Sands Draft Programmatic EIS.

Sincerely,

Gene Dodd

Response for Document 00091

00091-001: The BLM acknowledges the commentor's preference for Alternative A.

OSTS_00092

March 18, 2008

Dear BLM Vernal Field Office,

Thank you for giving us the opportunity recently to meet with the authors of the Programmatic EIS. We were able to utilize the PEIS more effectively after meeting with this highly knowledgeable group of people.

Water resources needed for the oil shale and tar sands development, as described in the PEIS, are calculated amounts and do not imply the water is there. Anyone who has lived or studied water in the west knows any additional water allocations depend upon human negotiations (wars) over this cherished resource.

The numbers calculated for water use in Wyoming, Colorado and Utah represent a substantial amount of the remaining allocation of the Upper Colorado River Compact. In section 4.5 of the PEIS, an in situ Colorado site with new power plant is calculated to require 20,000-41,000 acft/yr. The document goes on to extrapolate water requirements for the same in situ operations in Utah and Wyoming in 2010-2050 at 10-20% and 18-50% of the remaining Upper Colorado River Compact water respectively. If drought conditions continue to prevail, any water projections based on historic allocations are likely to be unrealistic. In addition, competition for water due to population growth will only increase. 92-001

We are most concerned about the electricity requirement needed for this technology. A proposed coal-fired power plant in Delta, Utah is being challenged. The federal government has suspended major loan programs for coal-fired plants in rural communities, due to the risk involved pending greenhouse gas legislation. 92-002

Finally, as outdoors people and wilderness advocates, we find the potential for devastation of scenic landscapes and wildlife habitat disturbing. The surface mining technique will provide deficits of our water, air, wildlife and botanical assets of which there can be no mitigation.

Therefore, our comment to BLM is the people of this country cannot afford oil shale and tar sands extraction technology. Our choice is alternative A in the PEIS, which states no oil shale or tar sands development.

The House passed legislation on February 27, 2008 that encourages investment in renewable energy technologies. HR 5351 is pending approval in the Senate. This legislation promotes public transportation, hybrid vehicles, and alternative sources of liquid fuels. 92-003

We have the tools to solve our country's energy problems without sacrificing large portions of Utah, Colorado and Wyoming to unwise development. We urge the BLM to abandon this current administration's mandate to pursue reckless energy development with little regard to the health of our planet. Our future depends upon sound decisions based on knowledge and wise decisions.

Thank you for this opportunity to comment at this crucial step in America's energy quest.

Sincerely,

Diane Ackerman, chair

Uintah Mountain Club
Vernal, Utah
Diane Ackerman, chair
Linda West
Patty McCourt
Brent Hansen
Tom Elder
Mickey Allen

Responses for Document 00092

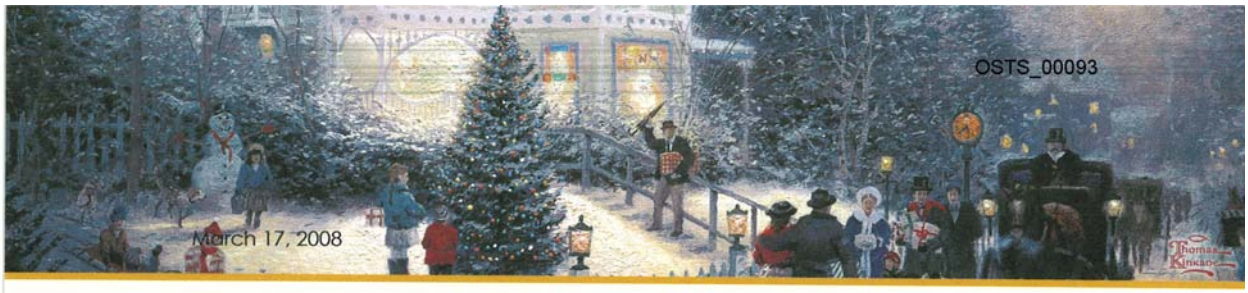
00092-001: Water availability in the PEIS was calculated on the basis of the 1988 Hydrologic Determination study that used long-term hydrologic data from 1906 to 1986. Within that period, wet years and droughts have occurred. Therefore, the water availability results represent long-term average conditions. For projected water uses, results from state water plans were used. The plans have taken regional population growth into consideration.

The BLM recognizes that the Upper Colorado River Basin is experiencing drought conditions. However, wet and dry years are both possible in the future. A prolonged drought condition can reduce water availability, as indicated in Section 4.5 of the PEIS.

The use of this hydrologic data is valid for the purposes of analyzing a land allocation decision. Subsequent NEPA analyses will be required prior to leasing and development. Water depletion due to oil shale development depends on many factors, including project location, technology to be used, and various activities involved in the development. Impacts of water depletion and other surface water and groundwater impacts would be addressed in subsequent project-specific NEPA documents when these factors can be better defined.

00092-002: Thank you for your comment. NEPA analysis, including a cumulative analysis appropriate to that action, will be required prior to any leasing. This cumulative analysis would include analysis of the effects of other Reasonably Foreseeable Future Actions, such as local oil and gas exploration and development and any actions associated with the specific proposed action, including, for instance, the establishment of a source of electrical power generation, if relevant.

00092-003: The BLM acknowledges the commentor’s preference for Alternative A.



BLM Oil Shale and Tar Sands Draft Programmatic
EIS Argonne National Laboratory
9700 So. Cass Avenue Argonne, IL 60439

Dear Bureau of Land Management staff,

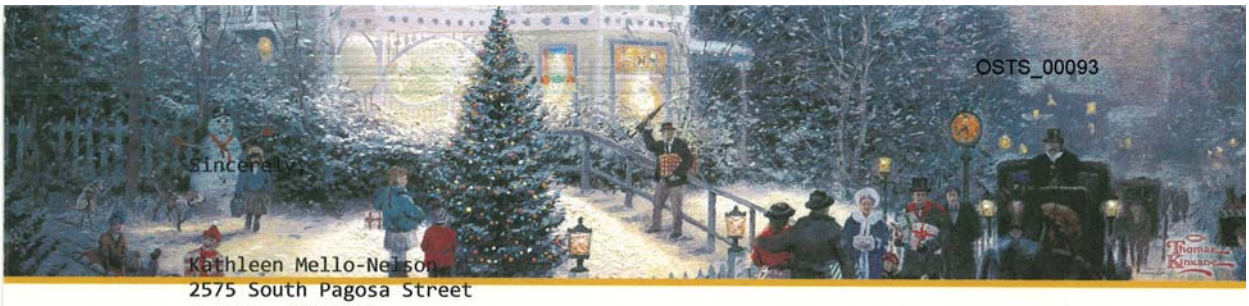
I urge you to protect our public lands from dirty fuels production. Both oil shale and tar sands development could have massive impacts on the environment and local communities -- impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and increase global warming.

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create toxic waste sites that go on for miles, produce more greenhouse gasses than conventional fuel and use enormous amounts of clean water -- a priceless resource in the arid West. 93-001
Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that dirty fuels should be the primary use of public land in order to benefit private companies.

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies.
The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy.

"Victorian Christmas" © 2005 Thomas Kinkade, The Thomas Kinkade Company, Morgan Hill, CA © HMK, LLC



Kathleen Mello-Nelson
2575 South Pagosa Street
Aurora, CO 80013

Kathleen L Mello-Nelson

"Victorian Christmas" © 2005 Thomas Kinkade, The Thomas Kinkade Company, Morgan Hill, CA © HMK, LLC

Response for Document 00093

00093-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

OSTS_00094

UINTAH COUNTY

STATE OF UTAH

Our past is the nation's future

COMMISSIONERS:
Michael J. McKee
David J. Haslem
Darlene R. Burns
ASSESSOR - Rolene Rasmussen
ATTORNEY - JoAnn B. Stringham
CLERK-AUDITOR - Michael W. Wilkins
RECORDER - Randy J. Simmons
TREASURER - Wendy Long
SHERIFF - Jeff Merrell
SURVEYOR - John Slaugh

March 17, 2008

Bureau of Land Management
Oil Shale and Tar Sands Resources PEIS
Argonne National Laboratory EVS/900
9700 South Cass Avenue
Argonne, IL 60439

RE: Programmatic EIS Oil Shale and Tar Sands

Dear Sir/Madam:

Thank you for the opportunity to comment on the Oil Shale and Tar Sands Programmatic EIS. Uintah County has always been interested in the further development of Oil Shale and Tar Sands within the County. Enclosed are the comments we feel should be addressed in the PEIS at this time.

Sincerely,

UINTAH COUNTY COMMISSION

Michael J. McKee

David J. Haslem

Darlene R. Burns

OSTS_00094

General Comments

Of primary concern to Uintah County is how the decisions in this Programmatic Environmental Impact Statement (PEIS) will be incorporated into existing and draft resource management plans of the Bureau of Land Management (BLM).

Appendix C-9 provides all lands within the most geologically prospective oil shale areas that are not excluded from commercial leasing by existing law and regulation, Executive Orders, administrative land use designation, or have not been specifically excluded by the BLM for other reasons, will be available for application for commercial leasing.

The existing and draft RMPs do not analyze oil shale occurrence to the extent that the PEIS does. Thus, decisions that were made may exclude leasing of oil shale and tar sands without full analysis of the decisions. In some cases, the RMP recognized that the decisions in the PEIS would be incorporated at some later date, others did not. As a result, decisions were made that created mineral withdrawals, no surface occupancy rights-of-way exclusion areas, areas with wilderness characteristics and such, which exclude these areas from mineral development and thus commercial leasing of oil shale and tar sands. Some of these areas overlap some of the most accessible and high quality oil shale and tar sand resources. 94-001

As a result, some areas identified in the PEIS as available for commercial leasing will be closed by management decisions contained in the RMP without adequate analysis or disclosure of impacts.

It is Uintah County's position that the BLM must remain focused on developing a PEIS for an Oil Shale and Tar Sands Resource Management Plan. Failure to development this will greatly delay attainment of identified national concerns. Two of the most critical are:

United States oil shale, tar sands, and other *unconventional fuels are strategically important domestic resources that should be developed* to reduce the growing dependence of the United States on politically and economically unstable sources of foreign oil imports.

The Task Force concurs that the domestic and global fuels supply situation and outlook is urgent. Increasing global oil demand, declining reserve additions, and our increasing reliance on oil and product imports from unstable foreign sources require the Nation to take *immediate action* to catalyze a domestic unconventional fuels industry. 94-002

BLM should revert to its original plan to apply the PEIS throughout the entire leasing program, and should use all available methods to expedite development of the program as Congress intended.

The PEIS focuses too narrowly on oil sand operations intended to produce Crude Oil Refinery feedstock (a.k.a. Crude Oil), and comes to the conclusion that since the economics of producing crude oil aren't very good, it doesn't make sense to despoil BLM lands for the slim economic margins of such productions. The quality of the bitcmuch of the sands in the Uintah Basin would be of greater value when refined into higher value asphalt products. 94-003

Specific Comments

Page 1-8, 2-39&5

Individual projects should be considered based on site specific analysis and technology specific to the proposed action. Lands should not be eliminated for development based solely on failure to be included in this PEIS. Wording should be added to clearly define how additional lands could be made available should additional lands be feasible and should new data prove development to be feasible. 94-004

Page 5-109

The impacts of temporary construction workforce are inconsistent with facility size anticipated in the project area, which is likely to consist of modules constructed off site. 94-005

Page 5-110

Workforce estimates should be recalculated, as they are based on operations much larger than those anticipated in the project area. After this analysis has been accomplished, other dependent analysis should be adjusted accordingly. 94-006

Page 6-202

Discussion of impacts on recreation. See previous comment. 94-007

OSTS_00094

Section A.4. Spent Shale Management, Page A-48

2nd Paragraph

Underground disposal of spent shale back into underground mines should not be discounted on its face just because leaching of constituents from spent shale may occur. It predisposes that mitigating measures can be taken to overcome the problem and meet regulatory requirements. The disposal of spent shale, either underground or as in the case of Uintah County, in abandoned gilsonite trenches, would resolve open trench issues. Underground disposal reduces reclamation and visual issues. These opportunities must be fully considered and analyzed. 94-008

3rd Paragraph

Eliminate the term "Popcorn Effect" here and later in the text. Any solid material that is reduced in size as a result of crushing or grinding will create void space between particles and the density will decrease, and the volume of a given mass will increase. Even when compacted, the density cannot reach the original density that the rock had in its original solid condition. This is not an issue specific to spent shale and is a myth that should not be formally perpetuated. 94-009

Section A.5. Ongoing and Expected Future Oil Shale Development Technologies, Page A-50

A.5.3 Future R&D Projects on BLM Administered Lands

2nd Paragraph

The Energy Security Act of 2005 authorizes expansion of the R,D&D leases to up to 5,760 acres, or 640 acres more than cited. 94-010

5-3

It appears that impact analysis was based on production methods having the greatest environmental impacts resulting in impacts that are highly unlikely to occur at the predicted methods of development in the project area. Project analysis would address development impacts should they exceed impacts considered in the PEIS. Impacts should be based on the type of development and technology likely to be used in the project area. 94-011

This section should be reanalyzed to insure that a lease allotment of 5760 acres is adequate to support 20,000 bbl/day of production. If not changed, analysis should be developed to support this assumption.

OSTS_00094

Preferred Alternative

Selection of Alternative B as the preferred alternative is clearly the decision most consistent with the underlying provisions of the Oil Shale, Tar Sands, and Other Strategic Unconventional Fuels Act of 2005.

The Act "declares that it is the policy of the United States that-- (1) United States oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed to reduce the growing dependence of the United States on politically and economically unstable sources of foreign oil imports; (2) the development of oil shale, tar sands, and other strategic unconventional fuels, for research and commercial development, should be conducted in an environmentally sound manner, using practices that minimize impacts; and (3) development of those strategic unconventional fuels should occur, with an emphasis on sustainability, to benefit the United States while taking into account affected states and communities." Alternative B is the most responsive to this direction. Alternative B also is the most responsive to the recommendations of The Task Force on Strategic Unconventional Fuels that was created by the 2005 Act.

94-012

Responses for Document 00094

00094-001: All decisions related to land use planning for oil shale and tar sands resources in the ongoing RMPs will be made in the ROD for this PEIS. The ROD will amend the existing plans (MFP or RMP or ongoing RMP if the PEIS is completed first) by making land use planning decisions on whether or not lands will be available for application for future leasing and development of oil shale or tar sands on public lands for those areas where the resource is present. Additional site-specific NEPA analysis will be completed on any future lease application before any leases would be issued. If, as part of this preleasing NEPA analysis, the BLM determines that leasing and subsequent development of the oil shale or tar sands resources would cause significant impacts, the BLM can require the applicant to: 1) mitigate the impact so that it is no longer significant, 2) move the proposed lease location, or if neither of these options resolves the anticipated conflicts, 3) the BLM can decide that development of the oil shale or tar sands resources outweighs protection of the on-site resources and approve the application. This preleasing NEPA analysis would include opportunities for public involvement and comment that are part of the PEIS process and every other planning and NEPA process the BLM undertakes.

00094-002: The BLM is taking a staged approach to comply with the mandates set forth by Congress. Because of the identified uncertainties in analyzing impacts associated with leasing decisions, it is not possible to meet the requirements of NEPA to support leasing at this time. The BLM believes that the identification of lands open to oil shale and tar sands leasing is the first step in securing the role of oil shale and tar sands as a viable domestic energy source. Each subsequent step (leasing decisions and plan of development decisions) will bring oil shale and tar sands closer to reducing U.S. dependence on foreign oil.

00094-003: Thank you for your comments. The BLM has made no conclusions regarding the economics of oil shale development. The PEIS examines alternatives for making lands available for future commercial leasing of both oil shale and tar sands resources.

00094-004: Although excluded from consideration under decisions in this PEIS, should industry come forward with an economically and environmentally sound proposal outside of the most geologically prospective area identified in the PEIS, the Secretary of the Interior and the BLM have the authority to consider commercial development proposals in a new NEPA analysis that could further amend local land use plans to allow for such a development.

00094-005: Given the programmatic nature of the PEIS, the purpose of the analysis of socioeconomic impacts is to provide an overview of the type and magnitude of impacts that would likely occur with the construction and operation of representative oil shale and tar sands facilities. As the technologies, scale of development, and project locations associated with oil shale and tar sands

resources and ancillary development are not known, the analysis described in the PEIS was based on a series of assumptions regarding project production levels, direct project employment, direct and indirect population (workers and their families) in-migration rates, and the provision and location of direct and indirect worker housing during both construction and operations phases. These assumptions, described in Section 4.11 of the PEIS, were based on publicly available NEPA reviews, past BLM experience with oil shale and tar sands and other energy-related projects, and industry data on power generation and coal mining. These assumptions are reasonable for a programmatic review of potential socioeconomic impacts.

Assumptions regarding the retention of wages associated with housing construction and OSTS and ancillary facility construction and operation are presented in Section 4.11 of the PEIS.

00094-006: See response to Comment 00094-005.

00094-007: The meaning of this comment is not clear, however, the potential impacts to recreation and travel activities are generally discussed in Sections 3.10.3, 4.2.1.4, and 5.2.1.3 of the PEIS. General impacts on recreation and travel management and on areas that might be used by recreationists by alternative are included in the Land Use sections in Sections 6.1 and 6.2. The economics of recreation activities are discussed in Sections 4.11.1.5 and 5.11.1.3.

The discussions that relate to both recreation and travel activities conclude that areas that are undergoing development for oil shale or tar sands would not be available for recreational uses. It is also pointed out that areas that may currently be available for OHV use may be closed if an area is leased for commercial development. The PEIS contains scenarios that describe the economic effect of hypothetical decreases in recreation employment. The overall assessment is that the potential impacts on recreation and travel visitation and the recreation-based economy are not identifiable based on current information and the potential impacts of each of the alternatives are not clear at this time. Impacts to recreation and travel will be highly specific and would be included in any site-specific analysis on a proposed commercial lease. The PEIS is not making any travel-related decisions.

00094-008: Thank you for your comment. The discussion does not discount in-mine disposal of spent shale. Rather, it is intended to point out both the advantages and potential disadvantages of such a disposal strategy. Future lease applications must include a detailed plan of development that would involve characterizing all wastes and identifying proper management strategies that conform to all applicable regulations.

00094-009: The BLM agrees that the bulk density of oil shale will decrease upon crushing and sizing in preparation for retorting. There is conflicting data in the open literature

as to whether additional volume and density changes occur during retorting. The text in Section A.4 has been modified to remove the term "popcorn effect." From an environmental perspective, the volumetric increase, together with the accompanying reduction in bulk density, may increase the potential both for erosion and for leaching of hazardous constituents and thus is an important consideration in the design of disposal strategies for spent shale from technologies employing AGR.

00094-010: The RD&D leases were issued pursuant to a *Federal Register* Notice that predated the enactment of the Energy Policy Act of 2005. The 5,120 acres is the maximum lease acreage designated in the Mineral Leasing Act of 1920, prior to its amendment by the Energy Policy Act of 2005, which changed the maximum lease size to 5,760 acres. The conversion lease size for those RD&D leases is correct.

00094-011: In the PEIS the BLM analyzes the environmental consequences of an allocation decision, and assumptions in the PEIS are for programmatic analysis purposes only. If commercial applications to lease are received in the future, there will be a subsequent level of NEPA analysis of specific parcels that may be offered for lease, as well as additional land use planning, if necessary, and issues such as the amount of surface disturbance will be considered at that time. The lease size mentioned is statutorily set, but whether that acreage would support a 20,000 bbl/day operation would have to be considered at the site-specific level.

00094-012: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00095

ATP SERVICES, LLC

8 Gamba Drive
Glenwood Springs, CO 81602

Phone: 970-389-0879
Fax: 970-945-2423
E-mail: atpv@comcast.net

March 18, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Ave
Argonne 60439

Gentlemen/Ladies;

Here are comments on the Draft OSTS PEIS

BLM PEIS Scoping Process

BLM has indicated that the scope of the subject PEIS is only to support amendments to affected BLM Land Management Plans, with additional analysis required to support leasing regulations and site specific leasing decisions. BLM apparently changed the initial scope of the PEIS, during the process, because it judged there was insufficient information available about potential impacts from commercial technologies. The delay this decision will cause in commercializing an oil shale project is immense, and is believed to be inconsistent with the intent of the Energy Security Act of 2005. If oil shale is to play any role in reducing our dependence on the importation of foreign petroleum, then all unnecessary steps in the regulatory process need to be eliminated. 95-001

There is an extensive mass of technical and environmental information and data on oil shale that could have, or can be used, to "bound" the potential impacts from either above ground or insitu oil shale processing. This bounding analysis will be adequate to support commercial leasing regulations and site specific leasing regulations, and avoid another round or two of time consuming environmental analysis that could be covered by this PEIS.

Thank you for your consideration.

Sincerely,

R Glenn Vawter
Manager

Response for Document 00095

00095-001: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

The BLM is complying with the intent of Congress. Congress, in the Energy Policy Act of 2005, mandates the Secretary to complete the PEIS for oil shale and tar sands resources with emphasis on the most geologically prospective lands within Colorado, Utah, and Wyoming, which encompasses the acreage under Alternative B. Alternative C excludes lands based on existing land use plan decisions that require surface-disturbance restrictions or seasonal limitations on activities to protect a specific resource.

In addition, the BLM is taking a measured approach to oil shale development. The BLM believes that analyzing an allocation decision provides the opportunity to build on the scientific, governmental, or industry research in order to analyze, in a general way, the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale exploration and development, further analysis will be carried out and documented in accordance with NEPA, to support any decisions made in this regard. That NEPA analysis will evaluate the environmental impacts of the oil shale exploration and development and develop specific measures to mitigate or eliminate the identified impacts. The BLM believes that such a phased approach ensures that commercial oil shale development programs will be based on the best available practices to minimize impacts and to offer opportunities for state, local communities, and the public to participate in the process.

OSTS_00096

Argonne National Laboratory
Bureau of Land Management
9700 South Cass
Argonne, Illinois 60439

Subject: OSTS PEIS

To Whom It May Concern:

Alternative C of the Oil Shale Tar Sands Programmatic Environmental Impact Statement ("OSTS PEIS") does not allow for sound or efficient management of the program and should be rejected. These resources need to be managed in a way that allows for maximum resource recovery. The BLM has identified areas where these resources are most likely present. These areas should be open for exploration and leasing.

The BLM has set forth a plan to develop these sub-surface resources in a way that is environmentally responsible. Oil shale development CAN occur while protecting other land uses. 96-001

Oil shale and tar sands are essential for helping our country better achieve energy independence.

I support our national policy to develop unconventional fuels, such as oil shale and tar sands, and ask that the BLM move forward to see that this policy is put into place. As such, please reject Alternative C, which does little to address our domestic energy needs.

Thanks,

Nick Gorsach
494 Forrelle St
Clifton CO 81520

Response for Document 00096

00096-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands, and the preference for BLM to not select Alternative C.

OSTS_00097

BLM Oil Shale/Tar Sands Preliminary EIS
Argonne National Laboratory
9700 S Cass Av.
Argonne IL 60439

To whom it may concern:

I support the BLM's commercial leasing program to develop oil shale/tar sands in Wyoming, Colorado and Utah. I respectfully ask that you include this letter in the public comment record.

The Preliminary Environmental Impact Statement (EIS) sets forth an environmentally sensitive way to prudently develop these important subsurface resources. Since the passage of environmental laws, such as the National Environmental Policy Act of 1969, we have developed energy resources in a much more responsible, environmentally conscious way. I appreciate the BLM's hard work in developing a thorough Preliminary EIS and support development of oil shale/tar sands as a means to increase our nation's domestic energy supply and to reduce our reliance on foreign energy sources (particularly from the Middle East). 97-001

While I also support renewable energy, these resources still need time to expand before becoming significant enough to contribute to our domestic energy supply. Although oil shale/tar sands are unconventional resources, they are still important to develop as a means of addressing our nation's energy needs.

Please know that I appreciate the BLM's review of this letter and for moving forward with a plan to develop oil shale/tar sands.

Thank you,

Robert Segers
422 Pintail Ave
Grand Junction CO 81504

Response for Document 00097

00097-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00098

BLM – Argonne National Laboratory
OSTS PEIS Draft
9700 S. Cass Ave.
Argonne, IL 60439

Dear BLM Officials,

Our country's energy policy requires that oil shale, tar sands and other unconventional fuels be developed. The OSTS PEIS would amend twelve land use plans to meet this objective. Oil shale development is compatible with other land uses and should be supported.

Your office has done a good job in identifying the most geologically prospective areas of the Green River Formation where these resources may be located. It is important to allow for exploration in as many of these areas as possible. Further, these resources are subsurface and can be developed in an environmentally responsible manner. I do not support Alternative C because it does not allow for full recovery of oil shale and tar sands. It also does not allow for efficient management of the program.

98-001

In short, I support the BLM's OSTS PEIS. These resources are necessary for supporting domestic energy production and will strengthen local communities in affected areas.

Respectfully,

Ted Hansen
674 Polaris Ct
Fruita CO 81521

Response for Document 00098

00098-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands, and the preference for BLM to not select Alternative C.

OSTS_00099

Bureau of Land Management
Argonne National Laboratory
9700 South Cass
Argonne, Illinois 60439

Dear Bureau of Land Managers,

First, I would like to commend your office for all your work in developing a thorough and comprehensive draft programmatic environmental impact statement regarding potential oil shale and tar sands development in Wyoming, Colorado and Utah. These resources can go a long way towards addressing our nation's energy needs. I support development because these resources can be developed in an environmentally sensitive manner.

Second, I ask that this letter be included in the public record in opposition of alternative C. This alternative places too many additional restrictions on development, which would result in discouraging capital investments and other potential technological advances. Development is important for increasing our domestic supply of energy. However, too many restrictions would make development financially unfeasible. If we are serious about developing these resources, your office must move forward with a plan that makes development financially viable for industry. 99-001

In conclusion, I would like to reiterate my appreciation for all your hard work. Please support alternative B over alternative C.

Sincerely,

Todd Smith

Todd Smith
PO Box 102
Clifton CO 81520

Response for Document 00099

00099-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00100

Bureau of Land Management
Argonne National Laboratory
OSTS PEIS Draft
9700 South Cass Avenue
Argonne, Illinois 60439

Subject: Draft Oil Shale Tar Sands
Programmatic Environmental Impact Statement

Dear Bureau of Land Management:

I am writing to respectfully ask that your office revise the economic impact section with greater scrutiny to include the benefits that would be realized if development of oil shale and tar sands were permitted. As you know, your office has posted the Draft Oil Shale Tar Sands Programmatic Environmental Impact Statement – a plan which would allow for commercial development of these important resources throughout areas of Utah, Colorado and Wyoming. I support development of these resources as a means to bolstering our nation's domestic energy supply and as a means to support local economies in the West.

In my opinion, it is unfortunate that socioeconomic impacts are not fully explained in environmental planning documents. The impacts on towns and local economies should not be ignored. The jobs created by oil shale and tar sands typically include benefits packages, such as retirement options and medical insurance. Not only would development create good paying jobs in the energy industry, development also creates economic opportunities for small businesses and generates revenue for state and local governments. This revenue can help fund education, health care and transportation needs. These benefits should be fully explained in the Draft Oil Shale Tar Sands Programmatic Environmental Impact Statement. 100-001

I appreciate your willingness to revise the economic impact section to discuss these benefits. It is important to people like me who live and work in the West.

Cordially,

Loyd Brath
207 Plateau Ave.
Colbran Colorado

Response for Document 00100

00100-001: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

OSTS_00101

284 W Parkview Dr
Grand Junction CO 81501

BLM Argonne National Laboratory
Oil Shale & Tar Sands PEIS
9700 South Cass Avenue
Argonne, Illinois 60439

Dear BLM Officials,

I am writing this letter as a submission of comments regarding the Oil Shale & Tar Sands PEIS. I will begin by commending the BLM for its careful review of environmental impacts in the PEIS.

I support renewable energy, such as wind and solar. However, I also believe that we cannot entirely count on renewable energy at this time to meet all of our future energy needs. The technologies for these resources still need time to mature until they can significantly contribute to our domestic energy supply. That said, unconventional energy resources, such as oil shale and tar sands, can help bridge the gap between existing conventional energy resources and renewable energy resources. 101-001

As you know, the BLM has already devoted a great deal of time and effort to identifying the most geologically prospective areas where oil shale and tar sands are present. In general, many of these lands are capable of supporting an active oil shale and tar sands program. Please keep up the good work to see that these areas will be open for application for commercial leasing, exploration and development.

Thank you for including this letter as a submission to the public record regarding the Oil Shale & Tar Sands PEIS.

Sincerely,

Robert Shelton

Response for Document 00101

00101-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00102

BLM Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

RE: Oil Shale Tar Sands Programmatic Environmental Impact Statement

TO: BLM Argonne National Laboratory

THANK YOU for making available to the public the Oil Shale Tar Sands Programmatic Environmental Impact Statement, or OSTS PEIS. After reviewing this document, I wanted to let you know that I support development of these resources. HOWEVER, I do not support Alternative C, which would place too many restrictions on development.

For too long, this country has relied too heavily on foreign oil. I support increasing our country's energy supply by developing energy DOMESTICALLY. The OSTS PEIS is a step in the right direction and I appreciate the BLM's work so far. I think it's important to keep in mind that the purpose of the OSTS PEIS is to open applications for commercial leasing, exploration and development of the LARGEST amount of potential oil resources, while still providing for the GREATEST flexibility in locating future development. Alternative C's restrictions conflict with this purpose and would also DISCOURAGE potential technological advances and capital investments. 102-001

I would also add that I care a great deal about making sure that development occurs in a way that is ENVIRONMENTALLY RESPONSIBLE. In my view, Alternative B is environmentally sound and should be supported.

THANK YOU for your time and have a nice day.

SINCERELY,

G W Smith

Gary Smith
2409 Hwy 348
Delta CO 81416

Response for Document 00102

00102-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00103

BLM – Argonne National Laboratory
Oil Shale/Tar Sands PEIS Draft
9700 South Cass
Argonne, Illinois 60439

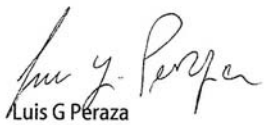
Dear Sirs and Madams,

I am writing this letter for the public comment record on the Oil Shale/Tar Sands PEIS draft. I want you to know that I am a supporter of energy development projects that are environmentally responsible. I support commercial development of oil shale and tar sands in the Green River Formation (located in CO, UT and WY). The PEIS is a good first step in setting forth a plan to allow for development. Oil shale and tar sands can help address our country's energy needs. 103-001

The primary reason for writing to you today is to express my support for local communities in CO, UT and WY that would be affected by development. Specifically, I hope the BLM would be willing to go back and revise the economic impact section with greater scrutiny. This section needs to elaborate on the benefits that would be gained by development, through increased jobs, taxes and energy independence. Energy workers would also be eligible to receive health care and retirement benefits that are usually provided with this type of work. The Oil Shale/Tar Sands PEIS Draft would be a more thorough document if these benefits were better explained in the economic impact section. I appreciate your consideration of revising this section. 103-002

I know your office has probably received comments from people throughout the country who either favor or disfavor development. While everyone is entitled to their opinion, I hope your office considers more carefully the positive impacts that development would have on local people. Thank you.

Sincerely,



Luis G Peraza
536 28 Road
Grand Junction CO 81501

Responses for Document 00103

00103-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

00103-002: Estimates of the economic impacts of oil shale and tar sands power plant and coal mine facility development on direct and indirect employment and income in each ROI indicate that oil shale, tar sands, and ancillary facility development would provide substantial employment and income in each ROI, together with higher wages for some occupations. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities.

When commercial-scale oil shale or tar sands resource development occurs, additional NEPA analyses would be undertaken to analyze in detail the extent of regional economic impacts, including impacts on local wholesale and retail price inflation, housing markets, recreation, and agriculture. Site-specific reviews would take into account actual worker residential locations by county, the extent of wage and salary spending, and equipment material and service procurement patterns in each county by oil shale and tar sands resource developers and operators when these details are known.

OSTS_00104

BLM – Argonne National Laboratory
Oil Shale & Tar Sands Programmatic EIS
9700 S. Cass Ave.
Argonne, Ill. 60439

Dear BLM Officials,

I support the BLM's Oil Shale & Tar Sands Programmatic EIS. This is necessary if we are to increase the stability of our nation's domestic energy supply. Please do not support our nation's energy status quo, which relies far too much on foreign sources of oil (particularly from countries that are hostile toward the United States).

Renewable energy sources and unconventional fuels area critical for stabilizing our nation's domestic energy supply. The EIS is an important document that would allow for development of oil shale and tar sands in the Green River Formation, an area located in parts of Colorado, Utah and Wyoming. A large majority of current and conventional energy resources are developed in this area. Developing oil shale and tar sands can certainly become a part of a balanced energy plan in these states. 104-001

I appreciate the BLM's commitment to see that all energy resources are developed in a way that is environmentally sound. Please keep up your efforts to see that oil shale and tar sands are developed in this manner without being overly and unnecessarily restrictive.

Respectfully submitted,

Jacob Valdez
3884 G Road
Palisade CO 81526

Response for Document 00104

00104-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00105

Argonne National Laboratory
BLM Oil Shale and Tar Sands
Draft Programmatic EIS
9700 S. Cass Ave.
Argonne, IL 60439

To Whom It May Concern:

I write to express my support for the BLM's Oil Shale and Tar Sands Draft Programmatic EIS for commercial oil shale and tar sands development. These resources are critical for bolstering our domestic supply of energy. I strongly urge the BLM to move forward with a plan that will allow for the greatest amount of access for exploration and development. As such, I do not support Alternative C, which is too restrictive and will stifle development.

Although Alternative B and Alternative C are similar, Alternative C contains additional restrictions that are unnecessary and may dissuade potential technological advances and capital investments. The BLM should be working proactively with industry to see that development of oil sands and tar sands is economical - not working against industry so that these resources are never developed.

105-001

I am concerned about our country's reliance on foreign oil - particularly from politically unstable countries. A balanced energy portfolio should include unconventional fuels, such as oil shale and tar sands. Please move forward with the Preferred Alternative and not Alternative C.

Thank you,

Kevin Valentine
608 Ronlin Drive
Grand Junction CO 81504

Response for Document 00105

00105-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00106

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To Whom It May Concern:

I would like to submit comments regarding the Oil Shale and Tar Sands Draft Programmatic Environmental Impact Statement (PEIS). I would like to go on record saying that I support oil shale and tar sands development as a means to improving our domestic energy supply.

I would like to commend the BLM for its work over the past several years in drafting the current PEIS. It is clear that the BLM is taking to hear the mandate that Congress set forth for unconventional fuels, such as oil shale and tar sands. Unconventional energy resources like oil shale and tar sands should be developed to help transition between our fuel consumption today and our renewable-based energy use of tomorrow.

106-001

Thanks,

Frank Spirz
432 ½ Devon Ct
Grand Junction CO 81504

Response for Document 00106

00106-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00107

TO: Bureau of Land Management – Argonne National Laboratory
9700 South Cass Avenue, Argonne, Illinois 60439
FROM: Wayne Oste – 2963 Parkway Dr, Grand Junction Colorado 81504
RE: Oil Shale and Tar Sands Draft PEIS

Dear Bureau of Land Management:

I am writing this letter to share my support for development of oil shale and tar sands throughout various parts of Colorado, Utah and Wyoming. I have reviewed the Oil Shale and Tar Sands Draft Programmatic Environmental Impact Statement ("PEIS") and want to commend the Bureau of Land Management for developing a plan to tap these resources. This document will develop an active oil shale and tar sands program using respected, site-specific NEPA processes that will ensure on- and off-site mitigation.

I know there are critics of domestic energy production who argue that development causes irreparable environmental harms. I disagree. This alarmist attitude would result in the United States becoming more reliant on foreign oil – something which I am greatly concerned about. The Bureau of Land Management has an important responsibility to see that development is done in an environmentally responsible way. In my view, the PEIS is an important foundation that will allow for development of oil shale and tar sands in an environmentally sound manner. Further, the Bureau of Land Management should look at environmental benefits gleaned from in-situ methods. 107-001

I do not normally write federal agencies to share my opinions, but feel very strongly in the need to support production of oil shale and tar sands as a means to diversifying our country's energy portfolio. Please support a plan that will allow for that development.

Sincerely,

Wayne Oste

Response for Document 00107

00107-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00108

Bureau of Land Management
Oil Shale and Tar Sands PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

Dear Bureau of Land Management,

I write to share my thoughts on the proposed Oil Shale and Tar Sands PEIS, a preliminary plan to begin developing these unconventional resources throughout parts of Colorado, Utah and Wyoming. I support commercial development as a means to ensure our country's energy independence. It is important for us to continue to develop new technologies, such as those we are developing to tap resources like oil shale and tar sands. We cannot take for granted that these resources are available to us domestically and can help address our nation's energy needs.

With the rising cost of energy, American families are feeling the pinch of a tight energy supply. I would prefer to address our nation's energy needs by developing energy resources domestically, as we require environmental protections with any proposed project on federal lands. Relying on foreign energy resources, by contrast, does little to ensure that development is environmentally responsible. I highly doubt countries in the Middle East have the kinds of environmental protection laws we enjoy in the United States. Oil shale and tar sands development is critical to decreasing our dependence on foreign oil and for strengthening our energy security. There is a strong need to develop these resources in the United States to compensate for declining production of more conventional resources. 108-001

Please support reasonable and responsible of development of oil shale and tar sands in the West.

Sincerely,

Dean Davidson
2558 Dewey Pl
Grand Junction CO 81505

Response for Document 00108

00108-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00109

1258 Inverness Way
Fruita CO 81521

Argonne National Laboratory
Bureau of Land Management
9700 South Cass
Argonne, Illinois 60439

Subject: OSTS PEIS

To Whom It May Concern:

I do not support Alternative C of the Oil Shale Tar Sands Programmatic Environmental Impact Statement ("OSTS PEIS"). These resources need to be managed in a way that allows for maximum resource recovery. The BLM has identified areas where these resources are most likely present. These areas should be open for exploration and leasing. Alternative C does not allow for sound or efficient management of the program and should be rejected.

The BLM has set forth a plan to develop these sub-surface resources in a way that is environmentally responsible. Oil shale development CAN occur while protecting other land uses. I commend the BLM for its careful review of environmental impacts and for its commitment to working with numerous cooperating agencies and the U.S. Environmental Protection Agency.

109-001

Oil shale and tar sands are essential for helping our country better achieve energy independence. I am deeply displeased with our reliance on foreign oil, particularly from places that have a hostile attitude toward the United States. I support our national policy to develop unconventional fuels, such as oil shale and tar sands, and ask that the BLM move forward to see that this policy is put into place. As such, please reject Alternative C, which does little to address our domestic energy needs.

Thanks,

Clint Corgatelli

Response for Document 00109

00109-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands, and the preference for BLM to not select Alternative C.

OSTS_00110

BLM -- Oil Shale and Tar Sands
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To whom it may concern,

This letter is in regards to the Oil Shale and Tar Sands Programmatic Environmental Impact Statement. The current draft of this document includes several alternatives for developing oil shale and tar sands. I want you to know that I do not support Alternative C.

Our country should be supporting development of unconventional fuels, such as oil shale. The BLM has developed several alternatives that will allow for responsible development of these resources. Any plan that allows for the largest amount of potential resources should be supported. I do not support Alternative C because it does not allow for full recovery of oil shale and tar sands resources. Alternative C also does not provide for sound or efficient management of an extraction program. 110-001

Domestic energy development is not only important for increasing our domestic supply - it also benefits local economies and communities.

Thank you for your time and consideration.

Sincerely,

Thomas G. Baum
1118 22 Rd
Grand Junction CO 81515

Response for Document 00110

00110-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands, and the preference for BLM to not select Alternative C.

OSTS_00111

Southeast Energy Alliance

March 20, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

The Southeast Energy Alliance (SEA) is pleased to submit comments expressing strong support for the environmentally-responsible development of our nation's oil shale and tar sands resources in Utah, Colorado, and Wyoming, as outlined by the Bureau of Land Management (BLM) in the Draft Programmatic EIS.

SEA is made up of businesses, trade associations and non-profit organizations – including Farm Bureaus, Electric Cooperative Associations, Chambers of Commerce and Manufacturing Associations - across the Southeast that recognize the importance of a balanced energy policy that will both ensure that our families and businesses have access to affordable and reliable energy.

With crude oil surpassing $110 per barrel, diesel prices over $4.00 per gallon and analysts predicting that gasoline will cost more than $4.00 per gallon this summer, Americans are facing an energy crisis of historical proportions. We currently import more than 60% of the oil that we use to make gasoline and diesel – for which we pay more than a $1 billion a day to countries such as Venezuela and Iran. It is imperative that Americans do more to develop safe and secure domestic energy. We cannot continue to pay more than we can afford – to sworn enemies of the United States – to power our vehicles and run our homes and businesses. 111-001

In order to help lower gasoline and diesel prices and strengthen our national energy security, the U.S. needs to expand access to its domestic energy sources. National reserves of oil shale and tar sands are vital sources of energy. An enormous domestic supply of oil shale and tar sands can be responsibly and efficiently produced on federal lands in the United States. In fact, the United States has enough oil shale to keep America driving for at least 225 years and, according to government estimates, oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil.

From the options provided in the BLM's Draft Programmatic EIS (PEIS), it appears that Alternative B most successfully promotes energy production by balancing a robust and active oil shale program with comprehensive environmental protections.

120 Summer Breeze Lane, Fredericksburg, VA, 22406 · (202) 674-1750

OSTS_00111

If the BLM adopts Alternative A, the U.S. will be turning its back on an important domestic energy source, which will continue to increase our dependence on imported oil driving up gasoline and diesel prices. Further, Alternative C does not allow for full recovery of oil shale and tar sands resources, nor does it provide for the sound and efficient management of the program.

SEA believes that the BLM will be able to develop these vital national energy resources while protecting other resources found on these lands and minimizing the impacts on local communities. Alternative B of the PEIS strikes the most reasonable balance between protecting the precious natural environment of Utah, Colorado, and Wyoming while ensuring that consumers and businesses throughout the nation receive an adequate supply of oil. There is a great need to develop these domestic fuel resources, and it is possible for oil shale development to occur while protecting other land uses.

111-001 (cont.)

Thank you for allowing the Southeast Energy Alliance this opportunity to comment.

Sincerely,

Michael Whatley
Executive Director

120 Summer Breeze Lane, Fredericksburg, VA, 22406 · (202) 674-1750

Response for Document 00111

00111-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00112

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Thank you for the opportunity to comment on the Oil Shale and Tar Sands Draft PEIS. Since oil shale has thus far been the focus of the most commercial interest and has also received the more extensive analysis in the PEIS, my comments and concerns apply mainly to it, but many are also applicable to tar sands.

Energy-related concerns

Section 4.1.6 of the PEIS reveals some of the many uncertainties associated with oil shale development. This section states that "definitive information about the power requirements of commercial oil shale development is not available," but does go on to extrapolate some potential new power needs based on what is thus far known about technologies being evaluated in the current RD&D program. This section's estimate of 2,400 MW of additional electrical generation capacity would appear to provide for about 200,000 bbl of shale oil production, perhaps more if some of that production utilized nonelectric heating technologies. It is interesting to note that the discussion of refinery markets for shale oil on the very next page offers a figure of 1,000,000 bbl/day, *just in Colorado and just during "early adoption and local market penetration."* That would seem to extrapolate into a need for at least 12,000 MW of additional generation (with unspecified additional levels of shale oil production in Utah and Wyoming potentially offsetting lesser electrical needs if other technologies are used). 112-001

Whatever the actual technologies and their ultimate electrical needs might prove to be, the PEIS projects that conventional coal-fired power plants would be the source of this energy. A useful comparison for those of us in the Uinta Basin would be about 5 new plants of approximately the same size as the existing Deseret G&T plant at Bonanza, just for the 2,400 MW estimated to reach commercial production levels.

Concern about coal power's contribution to climate change has already led several major investment banks to announce that stricter carbon-emissions standards must be met before they will finance coal-fired power plants; more recently, the USDA's Rural Utilities Service has suspended its loan program for such plants in rural areas, citing both climate concerns and financial risks associated with rising construction costs. This financial climate alone lends considerable doubt to the prospects for generating enough power to support large-scale shale oil production. Further limitations may well be imposed by stricter federal regulations on emissions, and even local downwind communities are beginning to challenge new plants. 112-002

While Section 4.6.1 briefly discusses a number of potential impacts on air quality from direct oil shale processing and product transport, it gives only a single sentence to the similar and potentially even more widespread impacts resulting from such a large expansion of coal-fired power generation in the region. Section 6.1.5 addresses these somewhat more, but Table 6.1.5-3 has serious gaps of unavailable information on CO_2 and some other emissions, and mercury (which is of increasing concern in regional fisheries) is not considered. 112-003

Finally, because of the multiple and so far largely unproven technologies involved, the PEIS can not adequately address the broader issue of net energy gain from oil shale development. Besides the direct consumption of large quantities of electricity (or other forms of energy) to extract oil from shale, further energy inputs all along the line (in the mining and transport of coal for power plants; the probable need for extensive pumping of water utilized in power generation and shale processing; and the transport, by truck or through extensive new pipeline construction, of shale oil to distant refineries; to list a few) raise serious doubts as to how much, 112-004

OSTS_00112

to facilitate commercial oil shale and tar sands leasing is premature and, I feel, irresponsible in light of the many uncertainties that are freely acknowledged in the PEIS. Furthermore, conventional oil/gas leasing is already demonstrating that *even the process of accepting and reviewing lease applications does have an impact on the public lands:* the process ties up BLM personnel and budgets and leaves the agency's other resource management responsibilities underfunded, understaffed, back-burnered, or abandoned. 112-004 (cont.) 112-005

On a national scale, the pursuit of oil shale/tar sands development only serves to divert America's attention and resources from focusing on a sound, long-term energy policy with a primary emphasis on efficient use of existing fuels and full development of renewables.

If the BLM is truly to fulfill its mission to manage public lands and resources "in a manner that best serves the needs of the American people" including future generations and "based upon the principles of multiple use and sustained yield," it should choose Alternative A, No Action. 112-006

Sincerely,

Linda L. West

Linda L. West
2574 South 500 East
Vernal, UT 84078

March 19, 2008

Responses for Document 00112

00112-001: Thank you for your comment. Evaluation of the complete impacts of power requirements for oil shale or tar sands development is considered to be too speculative for analysis at this time. The impacts of power requirements are very speculative because the amount of power required varies with the technology to be implemented and because the source of the power (and therefore the impacts) is unknown.

Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed.

00112-002: Thank you for your comment.

00112-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA

analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

The potential emissions of any air pollutant (including mercury) would not result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

00112-004: The experimental nature of the oil shale and tar sand industries does not allow this PEIS to include site-specific information or assumptions to support the issuance of a lease. At this time, it would be impossible to project the location, type of technologies, power consumption, and energy equivalent produced to support an analysis of net energy production. However, under the auspices of the RD&D program, the BLM believes the effort will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on electrical power and water needs, environmental consequences, and potential mitigation measures.

00112-005: Thank you for your comment. Possessing adequate staffing to accomplish the many complex and often conflicting goals in public land management is beyond the scope of this PEIS.

00112-006: The BLM acknowledges the commentor’s preference for Alternative A.

utah petroleum association

OSTS_00113

LEE J. PEACOCK
PRESIDENT

March 20, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Avenue
Argonne IL 60439

RE: Utah Petroleum Association Comments – Oil Shale and Tar Sand Programmatic EIS

Dear Sir/Madam:

The Utah Petroleum Association (UPA) appreciates the opportunity to make comment regarding BLM's Programmatic Environmental Impact Statement (PEIS) for Oil Shale and Tar Sands. Specifically, **we support and are asking for BLM's approval of Alternative B in the PEIS**. UPA represents companies involved in all aspects of the oil and natural gas industry doing business in Utah. We believe the success of the oil shale and tar sands industry and the wise use of these critical natural resources will be paramount to the energy and economic well being of the citizens of Utah and the nation as a whole. We encourage your wise and thorough review of the many issues surrounding oil shale and tar sands development and then your approval to move this industry forward. Utah, as well as the entire United States, critically needs the energy that is contained within these resources. 113-001

UPA supports the wise and prudent development of all types of energy resources in Utah and across the country. We believe it is critical that BLM recognize and promote that unconventional energy resources are, and will be for decades into the future, a vital part of meeting our state and nation's growing energy needs. This PEIS is extremely important as it will consider how much of this resource will be available for commercial leasing. The PEIS will play a critical role in moving towards a commercial leasing program and allowing and encouraging companies to plan for future investments in this important energy arena. While we support thorough analysis, we are concerned that the multiple NEPA processes contained within the PEIS will prove cumbersome and inefficient in terms of time and resources required and will be problematic for operators who have made significant investments in proprietary technology. Provisions contained within the PEIS may likely result in an extremely long and complex leasing process which would possibly force operators into disclosing expensive proprietary technology before they actually have received a lease. UPA believes strongly that BLM should remove these requirements and allow companies who have invested enormous capital in developing new and innovative technologies to assume the benefits of such investments without fear of losing such an advantage due to bureaucratic or other roadblocks. 113-002

UPA expresses concern that the PEIS outlines a large number of very broad mitigation and conservation measures that are not appropriate for the programmatic EIS stage and are better decided once specific projects are proposed and a site-specific NEPA review is conducted. This will allow both BLM and operators to understand and mitigate actual concerns rather than a "one size fits all" approach in the PEIS. We believe both BLM and 113-003

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OSTS_00113

industry would be better served by such an approach. While we applaud the thorough analysis of potential impacts caused by oil shale and tar sands development, we are concerned the PEIS may overstate such impacts without considering the extensive and broad universe of existing local, state and federal regulatory and permitting programs. UPA believes it unwise to stack regulations on top of each other, causing unnecessary compliance costs and time delays in the development of these resources. We are also concerned that the PEIS is inconsistent in its recognition of valid conversion rights for the RD&D leases previously granted by the BLM. 113-003

The oil shale resources in Utah, Colorado and Wyoming are conservatively estimated at over a trillion barrels. The magnitude of the impact to these three states and the nation as a whole cannot be overstated. The wise and prudent development of these resources will provide much needed energy and help reduce America's reliance on less stable sources. This domestic energy resource will create jobs and beneficial economic activities in mostly rural areas of these states where economic development is critically needed. The revenues derived from development will help fund local, state and federal budgets, reducing the need to increase taxes in other areas and helping fuel growth and development of these rapidly growing states. Most importantly, development of these resources will provide our nation with a domestic energy source that will be a critical component in allowing us to retain a quality of life and level of economic well being that is so important to our citizens. 113-001 (cont.)

In summary, UPA supports Alternative B in the PEIS. It is the only alternative that realistically provides an opportunity for oil shale and tar sands development. Alternative C is overly restrictive and would allow development only on small non-contiguous parcels. Alternative A obviously is the "no action" alternative and would not provide for oil shale or tar sands leasing on federal lands. UPA and its member companies support the development of oil shale and tar sands resources within the scope of the PEIS. We believe such development can be accomplished in an environmentally responsible and socially sustainable fashion.

Again, we thank BLM for the opportunity to comment and look forward to moving development of critical resources forward.

Sincerely,

Lee J. Peacock
President
Utah Petroleum Association

Cc: Selma Sierra, Utah State BLM Director
Utah's Congressional Delegation

Responses for Document 00113

00113-001: The BLM acknowledges the commentor's preference for Alternative B.

00113-002: As stated in the Energy Policy Act, the development of oil shale, tar sands, and other strategic unconventional fuels for research and commercial development should be conducted in an environmentally sound manner, using practices that minimize impacts. The BLM believes that analyzing an allocation decision provides the opportunity to build on scientific, governmental, or industry research in order to analyze, in a general way, the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale exploration and development, further analysis will be carried out and documented in accordance with NEPA, to support any decisions in this regard. That NEPA analysis will evaluate the environmental impacts of the oil shale exploration and development, and develop specific mitigation measures to mitigate or eliminate the identified impacts. The BLM believes that such a phased approach ensures that commercial oil shale development programs meet the intent of Congress and take advantage of the best available practices to minimize impacts and offers opportunities to the state, local communities, and the public participate in the process. While uncertainty is an inherent part of planning in accordance with FLPMA's multiple-use mandate, and delays are possible in bringing any new resource into commercial development, the BLM is committed to managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

00113-003: The potential mitigation measures included in Chapters 4 and 5 of the PEIS are not being applied to future development as part of this PEIS. They are offered as possible mitigation for the types of impacts identified in the two chapters. These measures may serve as a starting point for consideration of site-specific needs to eliminate, minimize, or mitigate impacts identified as part of future NEPA analysis considering leasing or development actions. However, the mitigation measures that are actually applied will be developed based on the NEPA analysis conducted on the proposed action being considered at the time.

OSTS_00114

Rifle
Area Chamber of Commerce

March 13, 2008

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To Whom It May Concern:

This letter is in reference to the Bureau of Land Management's ("BLM") Programmatic Environmental Impact Statement ("PEIS") for oil shale and tar sands resources in Colorado, Utah and Wyoming. The Rifle Chamber of Commerce ("Chamber") supports the work of the BLM to move forward with a national oil shale leasing program and urges the BLM to ensure that existing social, economic and environmental values will not be compromised by a national oil shale leasing program. 114-001

The Rifle Chamber of Commerce implores the BLM to include the following into a national oil shale strategy: 114-002

1. It is imperative that areas directly impacted by oil shale development receive appropriate monies to ensure upkeep of social infrastructure and maintain quality of municipal services;

2. Because water is so instrumental to the life of the West, we therefore ask the BLM to collaborate with State agencies such as Department of Natural Resources, Department of Health, and the Water Quality Control Division and local municipal governments to ensure water issues are clearly resolved before oil shale leases are issued. 114-003

Energy is a major provider of our economic well-being but it is not the only contributor. We humbly ask the BLM to take into account other land uses and ensure that the highest degree of environmental stewardship is utilized whilst developing this important unconventional resource. 114-004

In short, the Rifle Chamber of Commerce supports an oil shale leasing program that is environmentally sensitive, economically viable and socially sustainable. 114-001 (cont.)

Sincerely,

Mark Fergen
Chamber Board President

cc: Bill Ritter, Colorado Governor

Rifle Area Chamber of Commerce
200 Lions Park Circle / Rifle / CO 81650
Telephone: 970.625.2085 / Toll Free 800.842.2085 / Fax: 970.625.4757
E-mail: Mail@RifleChamber.com / Web Site: RifleChamber.com

Responses for Document 00114

00114-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

00114-002: This has been identified as one of many issues that may accompany oil shale and tar sands development. However, since the PEIS is analyzing land allocation decisions regarding lands that will be available for application for commercial leasing, this comment is outside the scope of this PEIS.

00114-003: The BLM expects to continue to partner closely with all levels of government in the study area as consideration of commercial oil shale development continues.

00114-004: The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

OSTS_00115

BLM – Argonne National Laboratory
9700 S. Cass Avenue
Argonne IL 60439

RE: Draft Oil Shale & Tar Sands PEIS

Dear BLM Argonne National Laboratory,

Please include this letter as my comments to the Draft Oil Shale & Tar Sands PEIS. I support development of oil shale and tar sands as a way of addressing our nation's energy needs and believe that development can be done in an environmentally conscious way.

With rising energy prices and an extremely unhealthy reliance on foreign oil, the BLM should remain committed to developing resources domestically. I support a balanced energy portfolio, which should include conventional fuels, renewable energy and unconventional fuels, such as oil shale and tar sands. These resources can go a long way toward helping address our energy needs.

For this reason, I cannot support Alternative C. This plan would neither allow for full oil shale and tar sand recovery, nor provide for efficient management. Development of oil shale is not all or nothing – it can be developed while protecting other land uses. Lands administered by the BLM in the prospective areas – Colorado, Utah and Wyoming – already support multiple land uses. Oil shale and tar sands development should be included in those plans, particularly because development will address our nation's energy needs.

115-001

In conclusion, I would reiterate my support for responsible oil shale and tar sands development and would ask that the BLM not move forward under Alternative C.

Respectfully,

Tomasita Bustos

Tomasita Bustos
3114 Covey Ave
Grand Junction CO 81504

Response for Document 00115

00115-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands, and the preference for BLM to not select Alternative C.

OSTS_00116

U.S. Bureau of Land Management
Argonne National Laboratory
9700 S. Cass Avenue
Argonne, IL 60439

Subject: Oil Shale and Tar Sands PEIS

To Whom It May Concern:

Before I begin, I would please ask that you keep my personal information private.

The PEIS for oil shale and tar sand is a sensible plan to develop these important resources. The document would amend twelve land-use plans in Colorado, Utah and Wyoming, where oil shale and tar sands resources are present. Because oil shale and tar sands are subsurface resources, the vast majority of these lands should be open for application for commercial leasing, exploration and development.

I support development of these resources because I am concerned about our nation's reliance on foreign oil, particularly from politically and economically unstable foreign sources. 116-001

Please move forward with a plan that will make the largest amount of these potential resources available for leasing, while still providing for an environmentally sound program.

Best regards,

Response for Document 00116

00116-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00117

BLM – Oil Shale & Tar Sands PEIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne, IL 60439

Dear BLM Office:

Please accept this letter in support of Alternative B for the Oil Shale & Tar Sands PEIS. I do not support Alternative C, which is too restrictive and will dissuade potential technological advancements and capital investments.

Our nation has developed an unhealthy reliance on foreign oil to meet our domestic energy needs. It is time for the United States to rely less on foreign oil by producing more energy domestically. Oil shale & tar sands have great potential to increase our country's domestic energy supply and I support its development.

117-001

To that end, the Oil Shale & Tar Sands PEIS was created to identify and open the most geologically prospective areas in the Green River Formation for exploration and development. Placing limits and restrictions within the plan at this time is a deterrence for development, at a time when we need development the most.

Thank you for making the Oil Shale & Tar Sands PEIS available to the public for comment. I hope you will consider my comments as you move forward.

Cordially,

Glen Shannon
PO Box 1111
Clifton CO 81520

Response for Document 00117

00117-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00118

Oil Shale and Tar Sands Programmatic EIS
Bureau of Land Management – Argonne Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

Dear Sirs and Madams,

This correspondence is a submission to the public record regarding the Oil Shale and Tar Sands Programmatic Environmental Impact Statement (EIS). I support development of these unconventional fuels as a necessary step in developing domestic energy resources. Consequently, I support Alternative B more than Alternative C. Alternative C would place too many unnecessary restrictions on development. These restrictions would do little to encourage technological advancements and capital investments in future development projects. I do not support any restrictions that would stifle development of these important resources.

As you know, Congress made clear in the "Oil Shale, Tar Sands, and Other Strategic Unconventional Fuels Act of 2005" (later included in the Energy Policy Act) that the Secretary of the Interior (through the Bureau of Land Management) create a plan to develop these resources. We are lucky in the United States to have energy resources available domestically. I do not support meeting our energy needs by increasing our reliance on foreign oil (particularly from politically unstable countries in the Middle East). 118-001

Please do not move forward with Alternative C in the EIS. Thanks for your time.

Sincerely,

Danny Samples

Danny Samples
3238 D ¼ Rd #B
Clifton CO 81502

Response for Document 00118

00118-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00119

2881 Presley Ave.
Grand Junction CO 81501

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To Whom It May Concern:

I am writing to submit comments regarding the Oil Shale and Tar Sands Draft Programmatic Environmental Impact Statement, also referred to as the "PEIS." I support oil shale and tar sands development as a means to improving our domestic energy supply.

First I would like to commend the BLM for its work over the past several years in drafting the current PEIS. Through the BLM's scoping process, numerous cooperating agencies and thousands of people participated in voicing a variety of concerns. I cannot imagine that it is easy to review, compile and address all of these concerns and commend the BLM for its work thus far.

119-001

Second, I think it is also important to keep in mind that Congress has set forth a clear policy to see that unconventional fuels, such as oil shale and tar sands, are developed. While I favor seeing renewable energy more in the future, technologies need to mature before these resources can be relied on to contribute significantly to our domestic energy needs. Until then, unconventional energy resources like oil shale and tar sands should be developed to help bridge the gap between our energy needs of today and the future.

Please keep up the good work. I appreciate you including this letter in the PEIS record.

Respectfully submitted,

Chuck Kahn

Response for Document 00119

00119-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00120

BLM – Argonne National Laboratory
9700 S. Cass Avenue
Argonne IL 60439

RE: Draft Oil Shale & Tar Sands PEIS

Dear BLM,

I support development of oil shale and tar sands as a way of addressing our nation's energy needs and believe that development can be done in an environmentally conscious way.

I support a balanced energy portfolio, which should include conventional fuels, renewable energy and unconventional fuels, such as oil shale and tar sands. These resources can go a long way toward helping address our energy needs.

I cannot support Alternative C: It would neither allow for full oil shale and tar sand recovery, nor provide for efficient management. Development of oil shale is not all or nothing – it can be developed while protecting other land uses. 120-001

Lands administered by the BLM in the prospective areas – Colorado, Utah and Wyoming – already support multiple land uses. Oil shale and tar sands development should be included in those plans, particularly because development will address our nation's energy needs.

In conclusion, I would reiterate my support for responsible oil shale and tar sands development and would ask that the BLM <u>not</u> move forward under Alternative C.

Respectfully,

Richard Gonzales
2990 B Road
Grand Junction CO 81503

Response for Document 00120

00120-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands, and the preference for BLM to not select Alternative C.

OSTS_00121

GRAND JUNCTION economic PARTNERSHIP

March 17, 2008

BLM Oil Shale and Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To Whom It May Concern:

This letter is in reference to the Bureau of Land Management's ("BLM") Programmatic Environmental Impact Statement ("PEIS") for oil shale and tar sands resources in Colorado, Utah and Wyoming. The Grand Junction Economic Partnership ("GJEP") supports the work of the BLM to implement a national oil shale leasing program as a means to enhance our already strong economy spurred by diverse energy development.

GJEP is a private non-profit economic development corporation whose mission is to enhance the economic conditions and economic base of Mesa County. The strength and sustainability of our local economy is of critical import to our organization and to the citizens of our area who rely on local industry to provide them with jobs.

121-001

The development of the Western Slope's energy resources has had a positive and significant impact on our local economy through increased tax revenues, payrolls, local vendor purchases and the creation of quality jobs. An oil shale development program will help bring in new job and business opportunities to our area through quality economic growth.

GJEP supports responsible development of energy resources with consideration given to the strength and stability of local economies as well as the environment, health and public safety.

Sincerely,

Ann Driggers, President and CEO
Grand Junction Economic Partnership

122 North 6th Street, Grand Junction, CO 81501
P: 970.245.4332 / 800.621.6683 F: 970.245.4346 gjep@gjep.org www.gjep.org

Response for Document 00121

00121-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00122

Ron Cody Winfrey
3048 Stoneybrook Lane
Grand Junction CO 81504

Bureau of Land Management – Argonne National Lab
Oil Shale and Tar Sands Programmatic EIS
9700 S. Cass Ave.
Argonne IL 60439

Dear Bureau of Land Management Office:

My comment is regarding the Programmatic EIS for oil shale and tar sand. The BLM has identified a few million acres where these subsurface resources are present and I believe that these areas should be open for a commercial leasing.

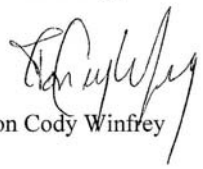
The BLM, through the Programmatic EIS, lays out a prudent plan to develop these important resources in a manner that is environmentally responsible.

122-001

With our growing reliance on foreign oil, it is more important than ever to promote development of renewable and unconventional fuels, in addition to supporting responsible development of conventional fuels.

I urge the BLM to advance a Programmatic EIS that allows for a commercial leasing program that will yield the largest amount of oil shale and tar sands.

Sincerely,



Ron Cody Winfrey

Response for Document 00122

00122-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00123

BLM Oil Shale & Tar Sands Draft PEIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne Illinois 60439

Dear BLM Staff:

I am a supporter of developing oil shale and tar sands as a way to increase our country's domestic energy supply. After reviewing the Oil Shale & Tar Sands Draft PEIS, I wanted to write to you to share my support for this document. The PEIS leads the way for helping develop an active oil shale and tar sands program through a time-tested, site-specific NEPA process which helps mitigate potential on and off site environmental effects.

As you know, this country relies heavily on conventional sources of energy. Sadly, politically and economically unstable countries provide a great deal of this energy to the United States. Rather than increasing our reliance on foreign oil, I would prefer to see more environmentally sound programs developed in the United States to bolster our domestic energy supply. By tapping unconventional fuels, such as tar sands and oil shale, that we have here at home, we will create a more stable domestic energy supply. 123-001

In conclusion, I would also add that development has many positive effects for communities located near development areas. For dozens of towns in rural Colorado, Utah and Wyoming, the economic benefits should not be ignored. 123-002

Thank you,

James P Young
2713 B ½ Trailer B 10
Grand Junction CO 81503

Responses for Document 00123

00123-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

00123-002: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

OSTS_00124

BLM – Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To Whom It May Concern:

I support commercial development of oil shale and tar sands. Such development is essential for our country to move toward energy independence. I am tired of our country relying on foreign countries (particularly countries that have a hostile attitude toward the United States) for oil. Oil shale and tar sands can go along way towards helping us become more independent.

124-001

In addition to fulfilling this important need, the real purpose of my letter is also to ask the BLM to revise the economic impact section of the Draft Programmatic EIS. Development of oil shale and tar sands will create numerous benefits for local communities throughout Colorado, Utah and Wyoming. These benefits include, but aren't limited to, increased jobs and tax revenue available for state and local governments. Further, the jobs created by development of oil shale and tar sands tend to include important benefits for workers, such as health care coverage and retirement packages. These are good jobs that help local economies – their important impact should be included in the Draft Programmatic EIS.

124-002

In conclusion, I would also like to thank the BLM for their work in drafting the Programmatic EIS. It is a step in the right direction. Please include this letter of support in the public record.

124-001 (cont.)

Respectfully submitted,

Earl Abeyta
4550 6&50
Debeque CO 81630

Responses for Document 00124

00124-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

00124-002: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

OSTS_00125

Argonne National Laboratory
Bureau of Land Management
ATTN: Oil Shale-Tar Sands PEIS
9700 S. Cass Avenue
Argonne, IL 60439

To whom it may concern:

Thanks to the Bureau of Land Management for drafting a plan to develop commercial oil shale and tar sands! In addition to conventional fuels and renewable sources, these resources are also greatly needed to support a balanced energy portfolio for the United States.

After reviewing Alternatives B and C – both of which are intended to facilitate the establishment of a long-term program of commercial leasing – I want to lend my support for Alternative B. Alternative C places too many additional restrictions on development. Of note, Alternative C greatly reduces the number of acres open for exploration and future leasing. These types of restrictions do little to promote development. Rather, these restrictions serve as a deterrent. We cannot afford to rely on foreign countries to provide for our country's energy needs – we should be doing more to support domestic energy production. 125-001

In addition to supporting domestic energy production, I also would add that development is good for local communities and economies. Please consider these impacts as well as you proceed throughout the planning process.

Thanks for your review of my letter and of my concerns. Support Alternative C.

Sincerely,

Ted Salazar
409 Virgo Way
Fruita Colorado

Response for Document 00125

00125-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00126

DAVE FREUDENTHAL
GOVERNOR

THE STATE OF WYOMING

STATE CAPITOL
CHEYENNE, WY 82002

Office of the Governor

March 19, 2008

BLM Oil Shale and Tar Sands
Attn: Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

To Whom It May Concern:

Thank you for the opportunity to comment on the Oil Shale and Tar Sands Programmatic Environmental Impact Statement (PEIS). Because I believe a careful, research-driven approach is the key to unlocking the energy potential of western oil shale, I support the "No Action" Alternative A at this time. 126-001

The technologies that may one day be used for large-scale, economical production of synfuels from oil shale are unproven and still unknown. Based on this lack of technological information, it is not feasible to make long-term policy decisions to manage this industry. Potential technologies and their impacts must be understood before oil shale leasing, lease-land allocations and Resource Management Plan modifications move forward. 126-002

The Energy Policy Act and current RD&D projects

Following the enactment of section 369 of the 2005 Energy Policy Act, the U.S. Congress charged the BLM with publishing final regulations for commercial oil shale leasing. Since then, noticeably less emphasis has been placed on oil shale commercialization, and a restriction has been put on Interior Department appropriations preventing the preparation or issuance of final oil shale commercial leasing regulations in fiscal year 2008. The state of Wyoming interprets these signals from Congress as an invitation to take a more deliberate, circumspect approach to oil shale – one which will allow private industry to continue research and development, and provide adequate time for public understanding of what future developments might entail. 126-003

TTY: 777-7860 PHONE: (307) 777-7434 FAX: (307) 632-3909

The five Research, Development and Demonstration (RD&D) projects currently underway will serve as the foundation from which to identify technological hurdles, gauge economic viability, and assess socioeconomic and environmental impacts. Only if one or more of these 160-acre projects are proven economically and environmentally viable should the ramping up to commercial-scale operations be considered. Finally, the promulgation of regulations should await completion of the RD&D phase, in order to give states the necessary data and time to completely understand the risks. 126-003 (cont.)

Advantages of Alternative A over Alternatives B and C

Oil shale development has had a checkered past, and, if not undertaken cautiously and correctly this time, efforts at commercial development could be impeded for years to come. The state of Wyoming remembers well the results of the "Colony Project" and "Black Sunday" in the Colorado's western slope communities. Between 1969 and 1979, the U.S. Department of Energy funded an in-situ fracturing and retort operation near Rock Springs. Efforts to remediate that operation are still ongoing.

Alternative A defers action, but it also does something very important for future oil shale development. It provides adequate time to identify a reserve, the synfuel that theoretically could be contained within the oil shale resource. Alternative A does this without attempting to describe the synfuel reserve. The PEIS has identified a tremendous oil shale resource in Wyoming and estimated billions of barrels of synfuel, but the reserve is governed by unknown technological, environmental, geological, socioeconomic, and economic constraints. Before a reserve is identified and quantified, potential impacts must be assessed. It would seem a peculiar use of time and money to allocate lands available for commercial leasing for an unknown synfuel reserve, especially when there is no known technology to recover the energy reserves. 126-004

Alternatives B and C both intersect with Adobe Town, an area in south central Wyoming that was recently designated by the Wyoming Environmental Quality Council (EQC) as "Very Rare or Uncommon." Once this designation is finalized under Wyoming Statute 35-11-112 (a) (v) and Chapter 7 of the Rules of Practice and Procedure rules by the Environmental Quality Council, development in the Adobe Town area for oil shale and gravel development will be subject to state regulation. Specifically, non-coal mining will be limited by the Director of the Department of Environmental Quality under Wyoming Statute 35-11-406 (m) (iv) if the proposed mining operation would irreparably harm, destroy, or materially impair Adobe Town. 126-005

Conclusion

I appreciate your consideration of these comments and urge the selection of Alternative A in the PEIS. I firmly believe that it is the best option for both the state and the future of oil shale development. It is worth underscoring once again that Alternative A would still allow the five RD&D leases to operate, which if any of the projects prove 126-001 (cont.)

OSTS_00126

viable, could result in both commercial-scale development and data sets that would clarify the still-uncertain impacts. 126-001 (cont.)

Best regards,

Dave Freudenthal
Governor

DF:pjb

c: Senator Mike Enzi
Senator John Barrasso
Representative Barbara Cubin
Governor Bill Ritter, Colorado
Governor Jon Huntsman, Utah

Responses for Document 00126

00126-001: The BLM acknowledges the commentor's preference for Alternative A.

00126-002: Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sand resources, among other unconventional fuels, in an environmentally sound manner. As required by that Act, the BLM initiated this PEIS intending to provide the environmental analysis for issuance of commercial leases that would convey development rights to lease holders. As discussed in the Draft PEIS, because of various uncertainties regarding location of developments, technologies to be employed, and the lack of knowledge of specific impacts on various resources, the BLM decided not to analyze the environmental impacts of issuing particular leases at this time and instead decided to analyze amendments of land use plans. Amending those plans is necessary, but not sufficient, to proceed to commercial development of federal oil shale resources.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA processes.

00126-003: In the Energy Policy Act of 2005, Congress set a deadline for the BLM to complete this PEIS, and that direction has not been rescinded. While the original Congressional deadline has been exceeded, that does not allow the BLM to postpone this PEIS.

The Energy Policy Act of 2005 directed the Secretary of the Interior to (1) complete a PEIS for a commercial leasing program for oil shale and tar sands resources on public lands, and (2) publish a final regulation reestablishing such a program. The BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedures to implement a commercial leasing program. The BLM published a proposed rule for the management of a commercial oil shale leasing program in the *Federal Register* on July 23, 2008. As mentioned in the comment, Congress has provided direction to not finalize the regulations in FY08, but they have not removed the original requirement.

00126-004: The BLM is complying with the intent of Congress. In the Energy Policy Act of 2005, Congress mandates the Secretary to complete the PEIS for oil shale and tar sands resources with emphasis on the most geologically prospective lands within

Wyoming. The purpose of the delineation of these areas is to provide a starting place for the amendment of land use plans and for consideration of commercial development. New sources of energy take a great amount of time and private capital to develop and bring on line. Therefore, it is important to provide a framework for the development of a viable oil shale industry to meet the Nation's future energy needs. This would include a systematic process for the exploration, development, and production of the oil shale resources. The PEIS stipulates that site-specific NEPA analysis will be required prior to any leasing or development decision.

00126-005: The BLM worked closely with 14 cooperating agencies, including the State of Wyoming, to determine the scope of the PEIS. Each agency brought an important local perspective and expertise to the process, resulting in the modification of the PEIS's scope from a leasing decision to an allocation decision. This new allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications to lease oil shale or tar sands resources. The amendment of land use plans does not authorize any ground-disturbing activities and is not an irreversible or irretrievable commitment of resources under NEPA. Moreover, the amendment does not constitute the granting of any property right. In this respect, the allocation decision does not conflict with any State plan or designation. However, the BLM looks forward to the State of Wyoming providing information about the State important designations during subsequent NEPA analysis when specific technical and environmental information is available for analysis. At that time, conflicts with the Wyoming Environmental Quality Council's decisions and/or Adobe Town designation can be addressed.

OSTS_00127

4550 Hwy 6 and 50
DeBaque CO 81630

Argonne National Laboratory
Bureau of Land Management
9700 Cass Avenue
Argonne, Illinois 60439

RE: Oil Shale & Tar Sands

TO: Bureau of Land Management Team

I hope your office will revise the economic impact section of the Oil Shale & Tar Sands Draft Programmatic Environmental Impact Statement. This section should better explain the many benefits that would be realized through development of these resources. For starters, development directly translates into more quality jobs. These jobs not only pay well, but they also provide medical and retirement benefits to employees. Additionally, development helps support communities located near development areas. As you know, the proposed plan to develop oil shale and tar sands spreads throughout Colorado, Wyoming and Utah. For more rural towns in these areas, development of energy resources provides economic development opportunities. Small businesses certainly benefit by having more consumers who require their goods and services. Development of oil shale and tar sands would also support small businesses and local economies in these rural areas. 127-001

I not only support commercial shale and tar sands development because of economic benefits – I also believe it is of paramount importance to develop more energy resources domestically, rather than rely on politically unstable foreign countries. With the rising cost of energy taking a toll on American families, the Bureau of Land Management has important work to do to ensure that our country's energy demands are being met. 127-002

I appreciate your hard work and consideration of my request.

Sincerely,

Paul Forral

Responses for Document 00127

00127-001: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

00127-002: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00128

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 South Case Ave.
Argonne IL 60439

Please adopt the No Action alternative for oil shale and tar sands until the oil industry proves that oil shale can be produced without unacceptable impacts to our lands, waters, and air quality on a commercial scale. 128-001

Do not move forward with commercial-scale oil shale leasing until results from the experimental Research Development pilot projects become available.

Thank you,

F. Earline Hittel
36 Begonia
Casper WY 82604-3854

F. Earline Hittel

Response for Document 00128

00128-001: The BLM acknowledges the commentor's preference for Alternative A.

OSTS_00129

STTI

ENVIRONMENTAL AND ENGINEERING CONSULTANTS

March 18, 2008

BLM Oil Shale & Tar Sands PEIS
Argonne National Lab. EVS/900
970-0 S. Cass Avenue
Argonne, IL 60439

Comments on DES-07-60 Draft EIS, Oil Shale & Tar Sands

Dear Sirs:

As a former Director of Projects and Planning with Occidental Oil Shale, I think the emphasis on only in-situ technology is misguided. The cleanup of in-situ retorts is going to be a nearly insurmountable problem unless the resource can be considered an oil field where it is permissible to leave hydrocarbons in place. 129-001

The surface mining depth constraints arbitrarily imposed of 500 feet of overburden eliminates the potential to recover almost 100 % of the shale and other mineral resources in the Basin. Stripping rations of 1 are highly economic for mineral mining. This is too large a resource to waste by just recovering just one zone in the resource. 129-002

The rest of the world processing oil shale is utilizing above ground retorting and burning oil shale for use in cement. This impact statement minimizes the discussion on the history, successes and potential applications of aboveground retorting. The Brazilians have been operating a modified Paraho retorting process for over 30 years which can be used on this shale resource. Tests by Occidental under the DOE program in 1990 proved that the shale could be burned in Circulating Fluid Bed Boilers to remove all leachable hydrocarbons and producing a dry powder that when wetted sets up like a weak cement. The burned shale could used in reclaiming the surface mining operation. 129-003

As an engineer involved in synthetic fuel development since 1968 with a variety of companies on coal and oil shale, I think the emphasis on the R & D technologies as the best commercial technology is wrong. We need to walk with proven technology before we try to run with unproven in-situ technology. 129-004

Yours truly,

Roger E. Moore

Roger E. Moore, P.E.

1048 INDEPENDENT AVENUE, A-106 • GRAND JUNCTION, CO 81505
TELEPHONE 970/243-1642 • TOLL FREE 888/214-5195 • FAX 970/243-1959 • E-MAIL stti@acsol.net

Responses for Document 00129

00129-001: The BLM is making no decisions regarding technologies that may be used to develop oil shale resources. The purpose of the RD&D program is to gather new information on the technologies and any anticipated environmental consequences. As part of the RD&D program, the BLM did approve one underground/surface retort project in Utah and approved five in situ RD&D projects in Colorado, which are exploring different approaches and technologies. The results of the RD&D program will help provide additional information on future oil shale leasing, exploration, and development.

00129-002: As stated in Section 2.3.1 and Table C-1 of Appendix C, surface mining will only be allowed in areas where the overburden is 0 to 500 ft thick, because 500 ft is assumed to be the maximum amount of overburden where surface mining can occur economically, using today's technologies. Other considerations for the decision to limit the analysis include the amount of surface area needed to dispose of the waste material and material re-handle and equipment capabilities. Within the most geologically prospective oil shale area defined in the Piceance Basin in Colorado, the areas where the overburden is 0 to 500 ft thick are very limited, and it would be difficult to assemble a logical mining unit.

However, should industry come forward with an economically and environmentally sound proposal for a surface mining that would involve depths of overburden of greater than 500 feet, the BLM and the Secretary of the Interior have the authority to undertake additional NEPA analysis that would consider additional modification of land use plans to allow leasing for such a proposal.

00129-003: Thank you for your comment. Future oil shale development on federal lands will be conducted in an environmentally sound manner, using practices that minimize impacts. Applicants for leases are free to select their technological path, as long as it meets this requirement, ostensibly from a fully informed position regarding the historical worldwide record of oil shale processing.

00129-004: The PEIS includes consideration of surface and underground mining technologies as well as in situ processes for the recovery of oil shale resources. One of the RD&D leases is utilizing underground methods. The PEIS specifically did not attempt to compare the technologies other than to describe the likely impacts associated with their use. There is no technology preference expressed in the PEIS.

OSTS_00130

Kenneth Osgood, M.D., M.P.H.
(702) 228-2569 *8213 Point View Court • Las Vegas, Nevada 89128*

March 20, 2008

Sherry Thompson, Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Avenue
Argonne IL 60439

Dear Ms. Thompson,

I am writing to comment on the Bureau of Land Management's Oil Shale and Tar Sands Draft Programmatic EIS. I strongly oppose Alternative B, the "Preferred Alternative" and support Alternative A, the "No Action" alternative in the PEIS.

It is clear that the "Preferred Alternative" B is almost certain to cause massive, irreversible damage to large areas of Utah, Colorado, and Wyoming. This includes devastating the land and water, endangering wildlife and their habitats, harming the people in local communities, and generating massive greenhouse gas pollution that would add to global climate change. Moreover, the BLM admits that more research is needed before we know the true impacts of the technology or if it is even commercially feasible. 130-001

At a time when we need to be moving away from fossil fuels and the damage they cause, this proposal would continue our dependence on them. The PEIS fails to adequately address any of these issues, or to consider a reasonable range of alternatives, including the potential for increased energy conservation and efficiency. This is contrary to agency regulations and the law. 130-002

I have lived continuously in the southwest beginning the mid 1960s, first in northern Arizona working as a physician on the Navajo Reservation, then in New Mexico and now in southern Nevada. Northern Arizona, Utah and western Colorado have been my recreation home for more than 40 years. During that time I have seen the quality of the land deteriorate, air pollution increase, pristine canyons submerge with the expansion of the Powell reservoir and the illness burden of my people in the area increase as a result of the increased mining of fossil fuels. 130-001 (cont.)

I urge the BLM to choose the "No Action" alternative A, and to halt efforts to develop oil shale and tar sands on public lands. Thank you for the opportunity to comment on the Oil Shale and Tar Sands Draft Programmatic EIS.

Sincerely,

Kenneth Osgood, MD

Responses for Document 00130

00130-001: The BLM acknowledges the commentor's preference for Alternative A.

00130-002: Oil shale has a tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable environmentally sound manner. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The inter-disciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

OSTS_00131

Doug Morris
Group Director
Upstream and Industry Operations

1220 L Street, NW
Washington, DC 20005-4070
USA
Telephone 202-682-8089
Fax 202-682-8426
Email morrisd@api.org
www.api.org

VIA U.S.MAIL AND E-MAIL

March 19, 2008

BLM Oil Shale and Tar Sands Resources Draft Programmatic EIS Comments
Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Ladies and Gentlemen:

API appreciates this opportunity to provide written comments on the draft Oil Shale and Tar Sands Resource Management Plan Amendments that address land use allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS) as provided in the December 21, 2007 Federal Register Notice.

API is a trade association representing nearly 400 member companies involved in all aspects of the oil and natural gas industry. A number of our members are actively pursuing technology to develop oil shale resources impacted by this rulemaking.

Resource estimates for the oil shale resource in the Colorado, Utah, and Wyoming is estimated at between 1.2 and 1.8 trillion barrels of oil in place and as much as 500 billion to 1.1 trillion barrels of that oil is considered potentially recoverable. These domestic reserves resources will be needed by our country in the future to meet our growing demand needs and could potentially reduce our reliance on foreign imports.

This PEIS plays a critical role in moving the U.S. towards a commercial leasing program and also provides for environmentally sound development of unconventional energy resources. As such, API strongly supports Alternative B as the only realistic opportunity for the development of oil shale resources. Alternative A is a no action alternative and would result in no development of a significant strategic energy resource. Alternative C is overly restrictive and would not allow for the efficient, economic management of the program in a manner that would optimize responsible development of the oil shale resource. Therefore, we view Alternative C as a non-development alternative. 131-001

An equal opportunity employer

OSTS_00131

energy API

Oil shale represents a significant domestic resource that has the potential to increase supplies, jobs, and economic activity while being developed in an environmentally responsible and socially sustainable manner. We appreciate the opportunity to comment on the draft PEIS and encourage the agency to strongly consider our recommendations as well as those of our members and allied trade associations. 131-001 (cont.)

Should you have any questions regarding these comments please contact Andy Radford at 202-682-8584 or radforda@api.org.

Sincerely,

Doug Morris

Response for Document 00131

00131-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00132

U.S. Bureau of Land Management
Argonne National Laboratory
9700 S. Cass Avenue
Argonne, IL 60439

Subject: Oil Shale and Tar Sands PEIS

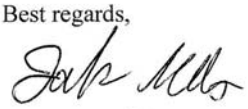
To Whom It May Concern:

In 2005, Congress set forth a clear policy objective through the "Oil Shale, Tar Sands, and Other Strategic Unconventional Fuels Act" to promote development of important domestic energy resources. This Act was in response to efforts to reduce the nation's growing dependence on foreign oil. I was pleased to see the BLM's draft Oil Shale and Tar Sands PEIS, which identifies the most geographically prospective areas for development. I support development of these resources because, like Congress, I am concerned about our nation's reliance on foreign oil, particularly from politically and economically unstable foreign sources.

The PEIS is a sensible plan to develop these resources. This document would amend twelve land-use plans in Colorado, Utah and Wyoming, where oil shale and tar sands resources are present. Because oil shale and tar sands are subsurface resources, the vast majority of these lands should be open for application for commercial leasing, exploration and development. Please move forward with a plan that will make the largest amount of these potential resources available for leasing, while still providing for an environmentally sound program. 132-001

These unconventional resources are essential to helping our nation reduce its dependence on foreign oil. I support the BLM's commercial leasing program and ask that you include this letter as my comments for the public record.

Best regards,



Jacob Paterniti
139 Victoria Dr
Palisade CO 81526

Response for Document 00132

00132-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00133

U.S. Department of the Interior
Bureau of Land Management
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 50439

Subject: OSTS PEIS Draft

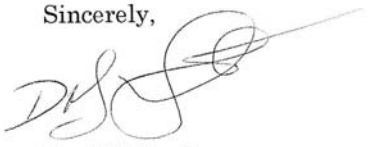
To Whom It May Concern:

This letter is my submission of comments regarding the OSTS PEIS Draft (Oil Shale Tar Sands Programmatic Environmental Impact Statement).

I support the OSTS PEIS as the beginning of developing unconventional resources to help meet our country's energy needs. With the rising cost of energy and the growing dependence on oil from politically and economically unstable foreign sources, it is imperative to think outside the box to develop more energy domestically. Renewable energy sources and unconventional fuels -- like oil shale and tar sands -- can diversify our country's energy portfolio. Over 2 million acres located in Colorado, Utah and Wyoming are included in the OSTS PEIS study area. These lands administered by the BLM are identified as the most geologically prospective areas for oil shale and tar sands. The BLM has an important task to see that these lands are open for exploration and to develop a leasing program that also provides for environmental protection. I support the BLM in this effort and hope that BLM will continue to move forward with allowing for development. I do not support efforts to halt development. 133-001

Thank you for listening to my thoughts on this very important matter.

Sincerely,



David Holland
4550 Hwy 6&24
DeBeque CO 81630

Response for Document 00133

00133-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00134

Bureau of Land Management
Argonne National Laboratory
RE: oil shale and tar sands draft PEIS
9700 S. Cass Ave.
Argonne, IL 60439

To Whom It May Concern:

I write this letter as a submission of comments regarding the oil shale and tar sands draft Programmatic Environmental Impact Statement or "PEIS". I support domestic energy production as a means of diversifying our country's energy portfolio. I don't like our reliance on politically unstable foreign countries for oil.

In 2005, Congress took important action in supporting an energy policy that recognizes the crucial role that unconventional fuels can play in helping address our energy challenges. I support the "Oil Shale and Tar Sands" section of the Energy Policy Act as a means to develop strategically important domestic resources. These resources, along with renewable energy sources, create a stable domestic energy supply. 134-001

Please do not be derailed by environmental fanatics who do not support domestic energy production. The PEIS is a reasonable and responsible plan to develop oil shale and tar sands in a way that is environmentally responsible.

Thank you for your time and consideration of my comments.

Cordially,

John Stafford
385 Firewillow St.
Grand Junction CO 81504

Response for Document 00134

00134-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00135

3199 D Road
Grand Junction CO 81504

Bureau of Land Management
Attention: Draft OSTS PEIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne, IL 60439

To Whom It May Concern:

I would like to take this time to voice my concern with Alternative C in the Draft OSTS PEIS (Oil Shale-Tar Sands Programmatic Environmental Impact Statement).

I do not support Alternative C, which appears to restrict development and make it less efficient.

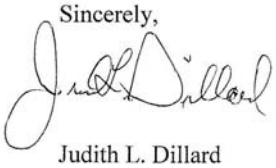
We should develop oil shale and tar sands to ensure domestic energy resources. We rely too heavily on foreign oil. Such reliance is unwise, particularly when we have energy resources available right here at home.

The BLM has identified about 2 million acres across Colorado, Utah and Wyoming where oil shale and tar sands might be present. These lands should be open for exploration and commercial leasing. Development of these unconventional fuels is good for local economies and can help bolster our domestic energy supply. 135-001

Critics of development may argue that oil shale and tar sands development conflicts with existing land uses. No so: Oil shale development can occur in conjunction with other land uses.

In summation, Alternative C is a bad choice for the future of oil shale and tar sands development in the United States.

Sincerely,



Judith L. Dillard

Response for Document 00135

00135-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands, and the preference for BLM to not select Alternative C.

OSTS_00136

BLM -- Oil Shale and Tar Sands
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To whom it may concern,

Let me begin by saying that I do not support Alternative C in the Oil Shale and Tar Sands Programmatic Environmental Impact Statement.

Our country should be supporting development of unconventional fuels, such as oil shale. The BLM has developed several alternatives that will allow for responsible development of these resources. Any plan that allows for the largest amount of potential resources should be supported.

136-001

I do not support Alternative C because it does not allow for full recovery of oil shale and tar sands resources. Alternative C also does not provide for sound or efficient management of an extraction program.

Domestic energy development is not only important for increasing our domestic supply – it also benefits local economies and communities.

Sincerely,

Carl Geertz
PO Box 3498
Grand Junction CO 81501

Response for Document 00136

00136-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands, and the preference for BLM to not select Alternative C.

OSTS_00137

BLM Argonne National Laboratory
9700 S. Cass Ave.
Argonne, IL 60439

Subject: Oil shale and tar sands

To Whom It May Concern:

I write to request that the BLM revise the Draft Programmatic Environmental Impact Statement regarding potential oil shale and tar sands development to strengthen the "Economic Impact" section. The jobs created by oil shale and tar sands generally include retirement packages, health care benefits, etc. These are good paying jobs, particularly for many small communities throughout the West where people struggle to find work that pays well. 137-001

I care about the environment and believe that development of oil shale and tar sands can be done in a way that is environmentally responsible. I also think development is necessary to address our nation's energy demand. In addition to these concerns, I also care about the people who live and work in towns located near development areas. 137-002

Energy development has already brought economic development to a lot of these areas. The revenues generated by development have given local and state government funds to address infrastructural needs and to provide other important services such as health care and education. Developing oil shale and tar sands can further enhance economic development opportunities. I would hope that the BLM elaborates on these points in the Draft Programmatic Environmental Impact Statement. 137-001 (cont.)

Sincerely,

Harland Ratliff

Harland Ratliff
4550 Hwy 6&24
DeBeque CO 81630

Responses for Document 00137

00137-001: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

00137-002: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00138

BLM – Argonne National Laboratory
OSTS PEIS Draft
9700 S. Cass Ave.
Argonne, IL 60439

Dear BLM Officials,

I write today to share my thoughts and support for the BLM's OSTS PEIS Draft (Oil Shale & Tar Sands Programmatic Environmental Impact Statement). These resources are necessary for supporting domestic energy production and will strengthen local communities in affected areas.

Your office has done a good job in identifying the most geologically prospective areas of the Green River Formation where these resources may be located. It is important to allow for exploration in as many of these areas as possible. Further, these resources are subsurface and can be developed in an environmentally responsible manner. I do not support Alternative C because it does not allow for full recovery of oil shale and tar sands. It also does not allow for efficient management of the program. 138-001

Our country's energy policy requires that oil shale, tar sands and other unconventional fuels be developed. The OSTS PEIS would amend twelve land use plans to meet this objective. Oil shale development is compatible with other land uses and should be supported.

Thank you for your time and review of my comments.

Respectfully,

Steve DeMerritt
3158 E. Eider Ct
Grand Junction CO 81504

Response for Document 00138

00138-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00139

March 19, 2008

BLM Oil Shale & Tar Sands PEIS
Argonne National Lab. EVS/900
970-0 S. Cass Avenue
Argonne, ILL 60439

RE: DES-07-60, Draft EIS, Oil Shale & Tar Sands

To Whom It May Concern:

I appreciate the opportunity to comment on this EIS, a document which could set the stage for development of a truly vital part of our nations future oil supply. Many of my comments address this long-term aspect of oil shale.

My comments are mostly limited to the Piceance Basin, to the "Preferred Alternative", and to the subjects of resource recovery, hydrologic effects, and land reclamation. They are in the spirit of Mr. Nedd's request (Cover Letter Vol I). However, as to his last sentences (page 2, par 2), I no doubt have included a few professional "opinions", based on years of experience in oil shale beginning in the 70's. After all, there are several "opinions" presented in the text. I have "repeated" some comments, because their importance applies across a variety of subjects discussed

Sincerely yours,

Glen A. Miller
1048 Independent Avenue, Suite A106
Grand Junction, Colorado 81505

GAM/lr

cc: Senator Salazar, per request

OSTS_00139

GENERAL COMMENTS:

The document does not adequately set forth the enormous size and importance of the deposit, and the need to promote much-needed research, (in part via leasing), to improve resource recovery and to minimize unwanted environmental effects, for the sake of far-future generations. As currently proposed, the BLM program may prematurely be setting a course whereby a Lessee (under the criteria for commercial leasing of "Economic Production" in an "Environmentally Acceptable" way), could profitably recover only a small percent of the total leased resource, and (typically, from an historic mining perspective) leave the remainder in a difficult, expensive, or near-impossible condition for recovery by oil-short future generations. This is not likely to be acceptable to the public. 139-001

The plan to "ban" surface mining (Vol 3, p C-7, Par. 3) in Piceance Basin is considered by many as preposterous , or at least an unusually odd management plan, because of the overall low resource recovery (40-60%) by all other current proposals, and because surface mining is the only present technology that can potentially recover 100% of the resource (1.2 trillion bbl, federal oil shale). Excluding this method of recovery basin-wide, likely could cost our economy 100's of trillions of dollars in resource use, and reduce Federal/State royalties by many trillion dollars. Because of "recovery" issues alone, the need for R&D leasing for surface mining appears to be more justifiable than for some of the other proposed recovery methods. To most tax payers, "mineral economics" deserve equal time with "socio-economics" in this EIS. For all potential recovery methods, there is a pressing need for a large and lengthy R&D effort prior to commercial leasing. The current policy/system appears to allow R&D needs and locations to be almost wholly the option of the Lessee. Unfortunately, the individual lessees research goals and needs do not always mesh with long-term public interests. 139-002

The apparent lack of interest by BLM in recovering the very large Aluminum resources (Dawsonite) needs a clear explanation to the public. 139-003

OSTS_00139

My major concerns are summarized as follows:

1. Resource Recovery: Basin wide, the Federally owned oil shale resource is equivalent to about 100 Prudhoe Bay fields (Alaska 10-15 billion bbl), and minimizing "waste of resource" is extremely important. At current oil prices the basin-wide Federal shale resource (as oil), is worth about 120 trillion dollars, with perhaps 10-20 trillion dollars in royalties. All of the described recovery proposals will typically recover only about one-half of the on-lease resources. Long-term and large-scale, this is unacceptably low. Basin-wide, "wasting" will amount to about one "Prudhoe Bay" for each percent of recovery lost. By any logical standards, this is not in the public interest. 139-004

2. The enormous Aluminum resource (as Dawsonite) in the oil shale beds is not adequately addressed. The "Multi Mineral Zone" (WR RMP 1997) appears to include an area that would "protect" only about ½ of the Dawsonite resource. Some current R&D leases are in areas where Aluminum-bearing Dawsonite occurs in oil shale beds as much as 500 feet thick, and commercial leases would contain 60-80 million tons of Dawsonite per square mile. On a single commercial lease, this potential loss could total ½ billion tons. Both laboratory/and batch-scale Alumina recovery methods from Dawsonite have been demonstrated, and some recovery methods have been patented. The prospect for Dawsonite recovery by the proposed In-situ methods appear to be slim to none. Light weight metals are apt to be in greater importance in the nation's future, and recovery of this resource is important 139-003 (cont.)

3. Hydrology: All of the proposed recovery methods are almost certain to result in degradation of water, especially of the ground water resource. The water requirements/use factors may be of less long-term concern than the effects on water quality. In-situ retort residuals pose a huge water quality problem. The proposed control/remediation methods need much R&D. They also need independent review/monitoring to properly evaluate them. 139-005

4. Subsidence: All of the current R & D recovery methods will result in land subsidence, which will adversely affect both surface reclamation and aquifers. The richer zones are particularly susceptible to subsidence. Kerogen and Nahcolite are a significant part of the pre-recovery rock volume, they cannot be simply "removed" without subsidence occurring. 139-006

5. Environmental Monitoring: Monitoring is addressed only in a very general way. BLM must assure that monitoring methods, 1) can establish a valid baseline, 2) detect changes, 3) be used to evaluate all significant effects, and 4) can judge the efficacy of any needed remediation. Some level of independent competent oversight will be necessary. (Historically, mineral/oil gas operators are not always effective at collecting unwelcome data.) The 1970's - '80's Interior Department Prototype Oil Shale Leasing Program developed a wealth of information, at a cost of many million dollars, on monitoring methodology, as well as a bank of solid "baseline" data. This data base will be of great value both to BLM and to Lessees. (See BLM Files). There is little or no mention of this existing environmental information. 139-007

OSTS_00139

The following Detailed Comments are keyed to volume-page-section-paragraph

VOLUME I

V-1, P ES-4 Table ES-1

Preferred Alternative: The EIS needs to discuss implications of what apparently is very low resource recovery. The "Potential oil shale resource present" is not correct, unless "resource" really means "reserve" (recoverable). But, if this is true, then most of the 16 Billion bbl "resource" noted in Colorado is present under each one of the proposed commercial tracts. Or, does it imply that only 16 Billion bbl can be recovered from more than a trillion bbl of Federal Oil Shale in Piceance? Resource recovery of less than 2 percent can be interpreted from this. These numbers need clarification. Footnote "b" (ES-5) doesn't clarify the problem. 139-008

V-1, P 1-3, 1.2, Par 2

The different grade-thickness criteria established for "ore" in Utah, Wyoming and Colorado is unusual, and is not logical, unless some undescribed State-specific regulatory or incentive features apply. The "economics" of determining "ore" are fairly rigorous; if 15 feet of 15gpt rock is not "ore" in Colorado, how can it be "ore" in other states? Does this imply that a Colorado Lessee will not be required to recover oil from 24gpt rock?? For example, on a 5120 acre lease, 15 feet of 15gpt shale contains about 90 million bbl, while 24 feet of 25 gpt shale contains about 210 million bbl. Basin-wide, public resources worth trillions of dollars are affected by this determination. It needs a clear explanation and justification. 139-009

V-1, P 2-15, Par 2

Areas in Piceance Basin with 500 feet or less overburden are in fact somewhat limited. However, the "assumption" that this is a valid limit in surface mining is not consistent with the modern mining industry. Donnell (1987 15th Oil Shale Symposium figs 19-20 and USGS Professional Paper 1310, Fig 19) show a large area of public land/public mineral with less then 500' of overburden in areas underlain by about 1 million bbl/acre. The "stripping ratio" in the entire Piceance Basin is typically 1:1 or less. The "off-limits" status for surface mining leases is contrary to the overall public interest in recovering a large percent of the resources. Donnell outlined a large logical surface mining area in T 1-3 S R 99-100 W. Much of the area is private mineral, but there are several 10's of 1000 acres of Federal land. Also, Lappi and others (15th Oil Shale symposium, p. 231) described (hypothetically) a potentially large surface mine (10 miles by 4 miles by about 2000 feet deep) in mid-basin, with overburden from less than 500 feet to more than 1000 feet. World-wide, there are surface mines, some with thick overburden, operating in excess of 2,000-3,000 ft depth. However, because of waste storage, this 500' limit may apply to a single, conventionally shaped lease in thick ore (e.g. history of Federal tract C-a. See BLM files). 139-010

V-1, P 2-21, Par 3

The "Multi-Mineral Zone" designation is confusing. Several of the proposed leases (Fig 2, 3, 3-1) not in this zone are in areas containing 60-80 million tons of Dawsonite per mi^2. A single commercial oil shale lease there could contain 500-or more million tons of Dawsonite (100 ± million tons of AL_2O_3 - current market price $500 ± /ton, or 50 ± billion dollars). The 139-011

OSTS_00139

EIS needs to explain this omission and the potential loss of such important resource and royalties to the public. As shown, the "multi-mineral zone" "protects" only about half of the Dawsonite resource. The four proposed changes: does this PEIS, if adopted as written, constitute a revision in the W.R. RMP? The V-3, C-9 proposed "ban" on surface mining can readily be interpreted as an ill-conceived policy, considering the many 10's of trillions of dollars at stake and the resource recovery advantages of surface mining. The 1997 RMP "leasing map" (map 2-6) shows many square miles as "available for oil shale surface mining leasing". This area corresponds with the south and west area described by Donnell (USGS Professional paper 1310, P 24 and fig 19) as potentially suitable for surface mining. Overburden in the area range from near zero to 1000'. What is BLM's basis for now limiting it to 500 feet? The public deserves a thorough explanation of the basis for such a seemingly arbitrary, "opinion based"(?) approach to surface mining, especially with trillion dollar "consequences".

139-011 (cont.)

139-012

V-1, P 2-50, 2.5.1

According to the text, the decision on "no surface mining" was made without "adequate information"! The "ban" would remove from public review future surface mining. Such actions do not enhance "Government" credibility. This "ban" is unacceptable, if our nation needs the resource. The general comparison of extraction methods are somewhat qualitative and incomplete. For most proposed methods, a near-100% surface disturbance will occur; Subsidence, with accompanying aquifer and ground surface affects, will occur. Spent shale is a major water quality problem. Many experienced "Shalers" are of the opinion that a long, slot-like "open pit" mine, starting near the northwest rim (in the above-noted area described by Donnell) and moving eastward could: recover nearly 100% of the resource (including Dawsonite and Nahcolite). The reconstructed aquifer would hold more ground water storage. Spent shale would be placed below the "aquifer", and thus would provide isolation from groundwater; surface reclamation following mining can allow superior land and water reclamation.

139-013

V-1, 3-4, - Water Resource pp 3-59/3-79

This necessarily general discussion should include the fact that within the Piceance Basin, mine inflow water plus surface outflow at the mouth of Piceance and Yellow creek (downstream of all irrigated land) would provide adequate water for a very large oil shale industry for centuries.

139-014

V-1, P 3-76, Par 7

The note on "mined" groundwater is somewhat misleading and needs clarification; very little of the estimated 46,000 af/yr groundwater is being drawn from the 25 million ac-ft stored in the oil shale aquifer in the Piceance Creek drainage basin. The text should make clear that necessary "mine dewatering" could supply much of the water needed for an oil shale industry for perhaps 100's of years.

139-015

OSTS_00139

VOLUME II

V-2, P 4-3, Surface Mining
Again, the rationale for the 500' overburden limit for surface mining is not clear. 139-010 (cont.)

V-2, P 4-9, Underground mining, last "bullet"
This is misleading. A resource recovery of 60% for underground mining is considered feasible only in a "single" layer deposit, not in the thick oil shale of most of the Federal resource. Recovery in multi-layered thick deposits by room and pillar is typically in the 30-40% range. The "single layer" (typically Mahogany Zone) areas contain a small percent of the total resource, mostly as privately owned minerals. 139-016

V-2, P. 4-15, Par. 5, Phase 3.
The "2 million bpd" production scenario: Considerable improvements in air emissions controls will be needed at this level, per EPA. The upcoming R&D operation must be monitored adequately to allow accurate evaluation of projected commercial emissions. 139-017

V-2, P. 4-17, 4.2.1.1 Other Minerals:
Oil & Gas fields typically have a "life" of 50-100 years. A commercial lease of oil shale in mid-basin (2-3 million bbl/acre or 10-15 Billion bbl "resource" per lease), producing at 100,000 BPD and only 50% recovery, would last about 50-100 years. With proper planning, this appears to be adequate time to recover O&G ahead of Oil Shale. This reviewer did not see any reference to deeper underlying resources that may , (but not very likely), be affected, e.g. coal (60 billion tons), and Uranium-Vanadium (mined out deposit near Rifle indicates likely deposits here at depth). 139-018

V-2 P 4-17, 4.2.1.1, 4.3.1.2, P 4-25, 4.3.1.2, Par 3, Sentence # 3 & 4 on P. 4, appear to be somewhat contradictory?
This PEIS needs to explain to the public the rationale, in view of obvious very large Dawsonite deposits in the area of proposed commercial leasing, for no requirement to consider recovery of Dawsonite/Alumina. The Aluminum resource is very significant. Assuming a 50,000 BPD Oil production, requiring retorting of 100,000 tpd of ore, from a commercial lease with Dawsonite recovery as Alumina, it's value could be in the range of $1 million/day, with potentially a $25-50 million/yr royalty stream to the Federal Government (current split about 50/50 w/Colorado). The mineral Norstrandite $Al(OH_3)$ commonly occurs with Dawsonite, it would significantly add to the product stream. One of the mid-basin commercial leases could produce some 500 million tons of Alumina (50 ± Billion dollars at current market, plus royalties). 139-019

OSTS_00139

V-2, P 4-21, 4.2.1.7

The impression given in this section almost certainly underestimates the major problems of impacts, e.g.:

A. All currently proposed in-situ methods will leave retorted shale in place (most or all of it in an aquifer). The spent shale composition may range from partly to completely calcined carbonates (readily soluble materials), along with organic compounds. The effectiveness of proposed reclamation methods are uncertain, and no doubt will be expensive and time -and water consuming. This uncertainty also applies to surface disposal of spent shale. Careful monitoring of the R&D lease "reclamation and remediation" results, along with independent verification, will be needed for a long period of time. Satisfactory management of "spent" shale is a given "must" to qualify for a commercial lease. 139-020

B. Land subsidence under the proposed plans is a certainty. The noted backfill of underground mines with spent shale could reduce subsidence, but will add a very large, long-term exposure of spent shale to ground water.

The certainty of the above 2 problems are solidly based, on both laboratory and field studies, and on past field cases [e.g. : Tract C-a (BLM files)], and many land subsidence events in mining areas worldwide. The "mitigation measures" (4.2.2), are somewhat general in nature, and do not address these concerns.

V-2, P. 4-29 top of page

Fossils are important scientifically, and are abundant in the Uinta and Green River formations, especially in certain strata. However, the "rule" in Par 1, p 4-29, if rigidly enforced, will result in frequent and expensive halting of work. Guidelines are needed to address unusual fossil occurrences. Several fossil bearing beds in the Parachute Creek member (ore zone) will of necessity be destroyed by recovery of oil. 139-021

V-2, P 4-31, Par. 3

All proposed methods of surface disposal of spent shale will result in a very long term source of degradation to water resources. Reclaimed materials do eventually erode. 139-022

V-2, P 4-35, 4.5.1.4

Par. 1 Some types of spent shale can readily be converted to a cement of very low permeability. This would greatly reduce leachability in "disposal" areas. Commercial cement sales could "recover" the cost of much of the thermal energy of retorting.

This section is silent on the subject of post-operation subsidence. Subsidence typically enhances vertical permeability (by inter-aquifer connection), and will disrupt ground water, surface drainage, and surface reclamation. Post-operation subsidence could be in the range of several 10's of feet. Some subsidence is likely to occur during some of the commercial operations. 139-023

OSTS_00139

V-2, P 4-41, Par 4.5.2.1 Colorado Water Resources:
I understand that this is only an overview on water sources. However, the combined flows downstream of irrigated areas, in Piceance/Yellow creeks alone could support a large oil shale industry there. Additionally mine dewatering flows are available. 139-024

V-2, P 4-42, Par 1
What is the source of the "2.5 million ac-ft" storage number? It doesn't "fit" with any available data. 139-025

P4-43, 4.5.3
Good survey, but no mention of subsidence-related problems 139-026

VOLUME 3

V-3, P A-4, Par 2, Last Sentence, Surface Mining
This conclusion may well lead to lease operations of low resource recovery, and "wasting" of literally many billions of bbl of resource and loss of trillions of dollars. Areas in west Piceance Basin contain a large shale resource with less then 500' overburden. Donnell (1987, figs 19-20) show several thousand acres with less than 500' of overburden. In the opinions of many mining professionals, this 500' limit by BLM is arbitrary and not realistic. In most of Piceance the "stripping ratio" (overburden-to-ore) is much less then 1:1, which commonly is considered a very favorable ratio. 139-027

V.3, P A7-8
The estimated Basin-wide Nahcolite resource is 29 billion tons and Dawsonite is 17 Billion tons; the size and recovery, or non-recovery, of these resource needs to be discussed. About ½ of the Dawsonite is not in the "protected" "multi-mineral zone". 139-028

V-3, P A 13, last paragraph, The text needs to note that research publications include several Alumina recovery methods, with patents on some. 139-029

V-3, P A-17, Par 1 Re: Lurgi Retorts:
I can find no source or person who will verify the "...on stream in 1983", status on C-a of such retorts. What is the source of this information? What were the production and environmental findings of this operation? 139-030

V-3, P A 22 - A.3.1.1 "500' Overburden limits". See prior comments. 139-010 (cont.)

V-3, P A 23, Par 4, Reference to Nawocki (1981)
The stated benefits of surface mining strangely omit the most important one for Piceance oil shale, namely, the potential for 100% resource recovery. Each 1% "wasted" basin wide in Piceance Basin is a trillion ± dollar loss, and is about equal to a "Prudhoe Bay". This benefit, or lack thereof, must be added to the list and it's impacts discussed. The public stake in this is in the many trillions of royalty dollars, and much more in mineral/oil value to our economy. 139-031

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V-3, P A 24, Par 2
The continued references here to the "infeasibility" of surface mining are misleading. Besides total overburden thickness, stripping ratio is a major factor. As stated earlier, this ratio in most of Piceance Basin is typically1:1 or less. The tacit assumption here is that surface mining would not be feasible in this overburden area. There are many surface mines worldwide with thick overburden: some with more than 1,000' of total overburden. Interestingly, the raw "ore" gross value of oil shale (e.g. 21 gpt rock is" 50 dollar rock", at $100 bb/crude oil) is typically significantly greater than a variety of other mineral raw "ore" values at many mines. 139-032

V-3, P A 24, Par 3
The reference to 75% resource recovery for Room & Pillar is misleading. This rate of recovery is typically only achieved in, "single bed" ore zones. In thick ore areas typical of Federal land in Piceance basin, the strength requirements of support pillars and sills typically result in only 30-40% recovery. 139-033

V-3, P A 25, Par 1
In-mine disposal of spent shale can be result in a very long term ground water quality problem, as well as well as reduced aquifer storativity. 139-034

V-3, P A-27, Par. 3
The "containment" of high pressure CO_2 is unlikely in expected existing conditions of rock fracture in Piceance Basin. R & D is needed, as well as careful monitoring. Can CO_2 in fact "...remove additional kerogen not recoverable...?" or, is CO_2 only effective on removing oil? (See also P. A-29, Par 1) 139-035

V-3, PA 27, Last Par
According to past studies a great deal of research will be needed to develop an effective "solvent" for kerogen. Typical solvents effect less then 25% recovery. However, this method has great promise to reduce both energy needs and environmental problems. R&D lessees should be encouraged to do research on this subject. 139-036

V-3, P A-29, Par 2 "CO_2 sequestration":
The "carbonation" process is a promising spent shale/water pollution control method, and BLM should encourage research on the subject. 139-037

V-3, A 40 3rd and last bullet
These statements are literally true, however, the spent shale left after in-situ processing below the water table presents a much greater potential problem for water quality than "reclaimed" above-ground waste. All groundwater in the basin eventually enters streams. 139-038

V-3, A 41, Par 1
All bullets noted except the last one can be most likely answered, ***Yes***. Unless lengthy and expensive control measures are taken. 139-039

OSTS_00139

V-3, A 45, Par 1

The text should note that the OOSI (Occidental) retorts are above the water table, and thus subject only to a very limited, intermittent exposure to infiltrated recharge water. For a more realistic example, this discussion needs to include a detailed analyses of the remediation experience at the post - burn test-size MIS retorts at former Federal lease tract C-a (see BLM files). Reportedly, more than a decade of leaching was required to satisfactorily treat the problem. 139-040

V-3, P A-48, A 4, Par 4

Reference the "low grade cement":

(1) At the 2007 Oil Shale Symposium at Colorado School of Mines, all reports on oil shale from several foreign countries included references to producing a "cement" by-product from spent shale. This could happen here, but the expected volumes would be very large. However, commercial cement production could "recover" the cost of some of the heat energy expended in retorting. Cement of very low permeability (and thus low leachablity) has been produced from Piceance Basin spent shale. 139-041

(2) Developing a spent shale cement of very low permeability and long term chemical stability is needed for effective disposal.

V-3, P A 53-54, Bullet Bottom P. 53

This conclusion by Shell should be qualified in this PEIS. There is little doubt that after their proposed method of extraction; the following will occur:

1. Surface subsidence
2. Disruption of aquifers
3. The retorted area may provide a long term supply of contaminates to ground water. Their proposed, "clean up" methods are not proven, especially as to economics and long-term effectiveness. Careful, long-term monitoring with independent oversight will be needed for their evaluation. 139-042
4. The resource recovery will still be low. The expected low recovery of 30-60%, applied basin-wide, results in 100's of billion of barrels of "wasted" resource, and loss of many trillion dollars.

V-3, P A 63, A 5.3.2.1, Par 3

Based on the experience at tract C-a and many non-oil shale ground-water cleanups, this "pump and treat" project will be expensive and truly long-term, unless regulatory standards are changed, or more effective techniques are developed. 139-043

V-3, P A 121

In the opinion of many "oil shale" veteran researchers, the most valued future use for Green River shale oil could be for aircraft jet fuel and for petrochemical feed stocks. Our current petrochemical use of 2 million Bpd could be supplied for two millennia from Piceance Basin. 139-044

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V-3, P 97-104

Perhaps I overlooked in the text an obvious market-use. Reportedly, the chemical make-up of Piceance shale oil is superior to many crude oils as a petrochemical industry feed stock. This is likely to be an important market/use and should be discussed. 139-045

V-3, P C-3, C-7 (Par 3)

Per the Proposed "RMP" changes:

The phrase "...would be amended" is not clear in reference to par1, p C3. Would the "amendment" C-7, Par 3, ("banning" surface mining) be in effect upon final acceptance of this EIS? Or does amending the 1997 WR RMP require a separate action? Whatever the case, not allowing the only current technology capable of 100% resource recovery is not a rational decision for managing such a large and important public resource. 139-046

V-3, P C-7, C-9, Par 3

Worldwide, there are surface mines with more then 500' of overburden. At least one surface mine is 2600' deep, about the same as the deepest ore in the basin. The Bingham Canyon Copper Pit in Utah is about 3/4 of a mile deep. An elongated surface mine in Piceance, beginning at the west basin edge, could start with very little overburden and readily move into the deeper part of the basin. We must all recognize that, using current technology and reasonable expectations of improvements in the many extraction methods available, that surface mining is the only method now available to assure recovery of almost all of the Piceance Basin Resource. The nation cannot afford to "lose" much of this deposit, where a 1% loss is equal to the original total resource in the Prudhoe Bay Field (12-15 Billion bbl). 139-047

Also in Colorado, the "multi mineral area" must be examined carefully, in view of the potential to "lose" a several a hundred year supply of our Alumina, as well as billions of dollars in value and in royalties. 139-048

Responses for Document 00139

00139-001: The description of the potential resource by basin in Appendix A is based on the best current assessment of the size of the oil shale deposits. Please see Section A.1 of the Appendix. The scope and nature of the PEIS is limited to the identification of lands suitable for future consideration of oil shale leasing. The points raised in the comment are more applicable to the RD&D program, where industry is being given an opportunity to research ways to maximize resource recovery and to minimize unwanted environmental effects.

00139-002: As stated in Section 2.3.1 and Table C-1 of Appendix C, surface mining will only be allowed in areas where the overburden is 0 to 500 ft thick, because 500 ft is assumed to be the maximum amount of overburden where surface mining can occur economically, using today's technologies. Other considerations for the decision to limit the analysis include the amount of surface area needed to dispose of the waste material and material re-handle and equipment capabilities. Within the most geologically prospective oil shale area defined in the Piceance Basin in Colorado, the areas where the overburden is 0 to 500 ft thick are very limited, and it would be difficult to assemble a logical mining unit.

However, should industry come forward with an economically and environmentally sound proposal for a surface mining that would involve depths of overburden of greater than 500 feet, the BLM and the Secretary of the Interior have the authority to undertake additional NEPA analysis that would consider additional modification of land use plans to allow leasing for such a proposal.

00139-003: The PEIS notes that lands within the Multimineral Zone identified in the White River RMP (BLM 1997b) would be made available for application for commercial lease only if the applicant can demonstrate that it would use technologies that allow recovery of oil shale resources without preventing the recovery of or otherwise destroying other minerals (i.e., nahcolite and dawsonite). This approach could be applied in other areas where similar minerals are found, and, depending on the particular situation, this may be an issue that is considered in future NEPA analysis considering oil shale leasing applications. This may also ultimately be a regulatory issue which could be addressed in the BLM oil shale regulations. These regulations are being developed in a separate process with its own environmental analysis and are outside the scope of this PEIS.

00139-004: Please see Comment 00139-001. Also, oil shale technologies are still in the "infant" stage, and recovery rates will undoubtedly rise as technologies progress. Consideration of the capabilities of a proposed technology and expected recovery rates would need to be considered at the site-specific level.

00139-005: Water use and water quality issues are both important and are both discussed in the PEIS. It is expected that monitoring results from the RD&D projects will

provide information on the degree of impact and mitigation measures for any proposed future developments, which will require site-specific NEPA analyses.

00139-006: Subsidence during and following in-situ methods for oil shale and tar sands is mentioned in the appendices as a possible outcome of operations. Text in Chapters 4 and 5 has been modified to bring out this possibility in the main portion of the document. The subsidence issue would be addressed in greater detail in site-specific NEPA analysis of any future operation, with experience drawn from the RD&Ds and other pilot studies.

00139-007: Specific monitoring requirements to evaluate environmental consequences are more suited at the leasing and/or plan of development stage. Although specific monitoring plans are not included in the PEIS, examples of potential types of mitigation measures to protect affected resources are provided for consideration at subsequent stages of NEPA analysis.

00139-008: The numbers in question were created for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The numbers were developed with the understanding that they underestimate the actual in-place resource. The numbers were developed using the values that described the minimum quality and thickness that was deemed to be economic. Those values are a minimum 25 ft thickness and a minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming, the values used were 15 ft thick and 15 gallons per ton. These values, coupled with the acreage in each of the alternatives, created the numbers in question. It is true that the use of more exact isopachs and quality data, had they been available, would have provided much higher values for each of the alternatives, but the relative comparison of the alternatives would have changed little.

00139-009: The standards developed by the USGS Conservation Division, and subsequently adopted by the BLM, use 15 gallons per ton and 15 ft thick as the prospectively valuable classification standard for oil shale resources. The USGS further defined oil shale leasing area criteria on a regional basis as 25 gallons per ton and 25 ft thick.

The intent of using these definitions in the PEIS is to establish an area inside of which applications for leases can be accepted. Industry can make its own determinations on what target it may want to pursue within that area.

00139-010: Development of a surface oil shale operation would most likely resemble an open pit operation with material handling and storage issues that would need to be addressed. Within Colorado's geologically prospective area, BLM's determination was that there was not enough developable acreage with less than 500 ft of overburden to support surface mining operations. Other factors affecting BLM's decision were projected economics, material re-handle, and equipment capabilities.

Although excluded from consideration under decisions in this PEIS, should industry come forward with an economically and environmentally sound proposal, the Secretary of the Interior and the BLM have the authority to consider surface mining in Colorado or in areas of more than 500 feet of overburden in a new NEPA analysis that could further amend local land use plans to allow for such a development.

00139-011: We assume the comment is referring to the existing RD&D leases and the PRLAs that are associated with those leases. One of the RD&Ds in this area is specifically exploring how to recover both oil shale and nahcolite resources. The Multimineral Zone is an existing designation in the White River RMP, established through the local land use planning process. In particular, the PEIS notes that lands within the Multimineral Zone identified in the White River RMP (BLM 1997b) would be made available for application for commercial lease only if the applicant can demonstrate that it would use technologies that allow recovery of oil shale resources without preventing the recovery of or otherwise destroying other minerals (i.e., nahcolite and dawsonite) (see Section 3.1.1.3). However any area outside of the Multimineral Zone that contain significant resources will have to be addressed in subsequent NEPA analysis either associated with the PRLAs issuance or a leasing decision.

The PEIS does, however, recognize the commercial oil shale development is largely incompatible with other mineral development activities and will likely preclude other resource development.

00139-012: Yes, the PEIS amends 12 RMPs in the study area including the White River RMP. RMPs typically are developed with a 20-year time frame. Amendments to RMPs can be undertaken any time new information becomes available that could cause existing decisions to be placed in question or new direction is needed.

See also response to Comment 00139-010.

00139-013: As stated above in the response to Comment 00139-010, development of a surface oil shale operation would most likely resemble an open pit operation with far greater material handling and storage issues than a strip mine operation. Within Colorado’s geologically prospective area, the determination was that there was not enough developable acreage with less than 500 ft of overburden to support surface mining operations. Other factors affecting the decision were projected economics and material re-handle and equipment capabilities.

In the immediate future, should industry come forward with an economically and environmentally sound proposal for a surface mining in Utah or Wyoming that would involve depths of overburden of greater than 500 feet, BLM and the Secretary of the Interior have the authority to undertake another EIS that would consider additional modification of land use plans to allow leasing for such a proposal.

00139-014: The potential use of mine inflow water as a water resource for the oil shale industry is speculative at this point in time and would be addressed in project-specific NEPA documents for oil shale development.

00139-015: "Mining" in that discussion refers to overwithdrawal of groundwater through pumping for various uses. Dewatering for surface mining or underground mining would supply water for some purposes, but it is beyond the scope of the PEIS to determine how much water would be dewatered for a mining project, as this is a site-specific issue. In addition, the water quality of groundwater from particular aquifers may be of low quality and therefore may restrict its use.

00139-016: Thank you for your comment. A text change has been made to reflect your comment.

00139-017: Thank you for your comment.

00139-018: Because of the lack of definitive information regarding the oil shale and tar sands technologies that may be used and when industry may be prepared to move forward with development, at this time it is difficult to assess the possible timing and overlap of development scenarios between different mineral resources. It is likely that depending upon the relative resource values involved, the marketplace will settle the issue of how development may proceed.

00139-019: The PEIS does recognize that commercial oil shale development is largely incompatible with other mineral development activities and will likely preclude other mineral resource development. Lands within the Multimineral Zone identified in the White River RMP (BLM 1997b) would be made available for application for commercial lease only if the applicant can demonstrate that it would use technologies that allow recovery of oil shale resources without preventing the recovery of or otherwise destroying other minerals (i.e., nahcolite and dawsonite) (see Section 3.1.1.3). Because this is an allocation decision, subsequent leasing decisions will be made at the Field Office level and will take into account the issue of incompatible mineral development. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00139-020: The information on page 4-21 of the Draft PEIS is aimed at effects that might affect wildlife populations. The potential mitigation measures starting on the same page do the same. The intent of the sections is to identify differences between technologies that could affect wildlife.

Groundwater contamination from in situ retorting is a key concern identified in the Draft PEIS. Section 4.5.1.3 of the report contains a discussion of the organic and inorganic contaminants that are possible from in situ processes and mining. It is expected that groundwater monitoring at the RD&D sites will provide information at a pilot scale on the degree of impact from in situ technologies, and that this information would be used to determine mitigation measures and also decisions regarding possible future developments.

Whether subsidence would result from in-situ retorting is still one of the many unanswered questions regarding the in situ technologies as indicated in Section A.3.2.2 in Appendix A of the PEIS. Should subsidence be expected to be an issue, necessary permits would be required to be secured, including mine reclamation and restoration permits as required, that would address subsidence to the extent that local conditions warrant.

00139-021: As stated on pages 4-1 and 5-1 of the Draft PEIS, the PEIS provides examples of mitigation measures that the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final or comprehensive list of required stipulations or management prescriptions.

In the event that an area is proposed for leasing or development, a review of the paleontological resources in that area would have to be conducted. As outlined in the BLM Handbook 8270-1, any areas identified as having the potential for containing significant fossil deposits would require that a survey be conducted to establish the likelihood of fossils being present. If it is established that there is a potential for significant paleontological resources to be present, a mitigation and monitoring plan would be developed to consider these significant resources.

00139-022: Spent shale piles and mine tailings might be sources of contamination of salts, metals, and hydrocarbons for both surface water and groundwater. This is described in Appendix A, Section A.4 of the PEIS.

00139-023: Regarding the conversion of spent shale to a cement, the potential uses of spent shale are discussed in Appendix A, Section A.4. Regarding subsidence, please see response to Comment 00139-006.

00139-024: The location of a project site and its production capacity need to be known before mine inflow water can be determined and whether the flow of Piceance and Yellow Creek could support a large oil shale industry with an acceptable level of impact. This should be evaluated at the project-specific level.

00139-025: As described in Section 3.4.2.1, Czyzewski (2000) is the source of the estimate.

00139-026: Please see response to Comment 00139-006.

00139-027: Please see response to Comment 00139-010.

00139-028: See the response to Comment 00139-019. Also, outside the MultiMineral Zone, the NEPA analysis considering a lease proposal to develop minerals would need to review the effect on all minerals present.

00139-029: Thank you for your comment. The section provides an overview on the development of the oil shale industry. Providing an exhaustive listing of the various patents that accompanied that development is beyond the scope of this PEIS.

00139-030: The statement referred to in the comment has been deleted.

00139-031: Thank you for your comment. The text has been modified to capture the point of the comment.

00139-032: Please see response to Comment 00139-010.

00139-033: Thank you for your comment. As the comment implies, the recoverable portion is very much dependent on the physical characteristics of the individual formation in question and the mining method used.

00139-034: Spent shale is described in the PEIS as a concern for groundwater quality. The placement of spent shale in underground mines or surface mines would be expected to be able to store more than the rock in its natural state.

00139-035: The discussion was intended to introduce technologies that have been successful in enhanced recovery of crude oils and that may also have applicability to oil shale development. The comment also revealed an error in the text that has been corrected. High-pressure CO_2 flooding would not displace kerogen (as stated in the text), but rather would be applied after in situ heating of the formation pyrolyzes the solid kerogen, creating a mixture of flammable hydrocarbon gases and organic liquids. Those are materials that would be displaced and therefore more easily and more completely extracted from the formation. BLM agrees that, in theory, CO_2 flooding may work in much the same manner as it does for enhanced conventional crude oil recovery but that additional research is needed before this technology can be proven.

00139-036: To clarify, solvent flooding is intended to dissolve the hydrocarbon gases and organic liquids that result from kerogen pyrolysis. It is not expected that the solvent selected will dissolve the solid kerogen to any great degree.

00139-037: Although BLM cannot cause such research to occur, it can facilitate the development of this and other technologies that are proposed in properly structured future lease applications.

00139-038: It is correct that spent shale remaining after in situ formation heating can be a source of groundwater contamination, and it is also correct that groundwater present in uppermost aquifers in the basin can eventually break out into surface streams. The potential for groundwater contamination, including leaching from spent shale resulting from in situ retorting, is addressed in Appendix A and in Section 4.1. Any lease application proposing in situ pyrolysis of kerogen must address groundwater contamination both from heavy metals leached from spent shale and from unrecovered organic kerogen decomposition products.

00139-039: Future lease applicants proposing in situ pyrolysis of kerogen must address these and other questions regarding long-term impacts.

00139-040: BLM already recognizes the potential for groundwater contamination from any in situ retorting technology and has addressed this issue in Section 4.1 and Appendix A. The section referred to in the comment is titled the "Occidental Oil Shale MIS Retort Technology," and the bullets on page A-45 of the Draft PEIS are just reporting the results that appeared in the cited report; consequently, it would not be appropriate to change the bullet in question to discuss what happened at the Ca tract.

00139-041: The potential for spent shale to behave as cement is discussed in Section A.4. BLM encourages the identification and pursuit of recycling or beneficial use options for all waste streams in preference to their disposal. Future lease applicants proposing a retorting technology that will produce spent shale will be required to include a detailed disposal/disposition strategy for that spent shale in their plan of operation.

00139-042: The description of the Shell RD&D venture is provided here for the reader's convenience. However, the Shell activity itself, as well as the other ongoing RD&D projects, is outside the scope of this PEIS. However, the results of those studies may be useful in evaluating the potential impacts of future oil shale development proposals. Congress has directed that any commercial development proceed in an environmentally sound manner.

00139-043: It may indeed be the case that groundwater cleanup may need to be ongoing for some time until acceptable levels of water quality are reached. EGL has committed to undertake all necessary groundwater treatment actions as part of its RD&D lease application.

00139-044: Thank you for your comment. In fact, past research into oil shale processing was successful in producing high-quality aircraft fuels. Also, Section 369 of the Energy Policy Act directs the Secretary of Defense to identify sources of military fuels derived from coal, shale oil, and tar sands.

00139-045: The "market" for shale oil is very much dependent on the initial quality of the shale oil, the extent of mine-site upgrading, and the suite of products the receiving

refinery is configured to produce. Shale oil marketers can be expected to seek out refineries whose processing equipment most closely aligns with the critical parameters of their shale oil. Likewise, refineries will be most interested in receiving shale oil that can be processed with little to no reconfiguration of their processing trains to produce the products that they principally deal in. A more detailed discussion of possible market penetration by shale oil is included in Attachment A-1 to Appendix A.

00139-046: Yes, the intent is to not permit surface mining for oil shale in Colorado at this time. Also, please refer to the response to Comment 00139-002 for the rationale for the decision.

00139-047: Please see response to Comment 00139-010.

00139-048: See the response to Comment 00139-028.

References:

BLM, 1997, *White River Record of Decision and Approved Resource Management Plan*, White River Resource Area, Colo., Craig District, Meeker, Colo., July.

Czyzewski, G., 2000, "The Piceance Creek Basin," pp. 63–66 in *Colorado Ground-Water Atlas: Colorado Ground-Water Association*, A. Aikin et al. (editors), Lakewood, Colo.

OSTS_00140

Marvin Poulson
3631 Carolyn Street
Salt Lake City, UT 84106

March 14, 2008

DOI-BLM
CO STATE OFFICE
2008 MAR 17 AM 11:08

Sherri Thompson
Bureau of Land Management
Colorado State Office
2850 Youngfield Street
Lakewood, CO 80215

Dear Ms. Thompson:

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

As a life-long resident of the Intermountain Area, and intimately familiar with the land and resources, I am afraid that BLM is ignoring the breadth and depth of impacts and is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM must gather much more information before any through determination can be made. The agency must wait until more is known about just how this program would be carried out before completing a programmatic EIS. 140-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, the document fails present most of the foreseeable cumulative impacts. Air and water quality will suffer catastrophic degradation in a region of important air shed for the country and water shed already over allocated and suffering from increasing pollution resulting from diminished natural flows and human returns with increasing contamination levels for a growing downstream population to deal with. 140-002

The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 140-003

OSTS_00140

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. Further, the loss of pristine water shed in a region with little water shed, threatens to overwhelm natural flows with sediment runoff from project impacted lands. 140-004

We cannot sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. And that such development can be done with less impact or cost than alternative energy sources, including wind, solar, and geothermal. Therefore, I demand the agency delay completing its PEIS process until the agency can provide much more definitive information. 140-001 (cont.)

Sincerely,

Marvin Poulson

DOI-BLM
CO STATE OFFICE
2008 MAR 17 AM 11:09

Responses for Document 00140

00140-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00140-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00140-003: In the PEIS, cumulative impacts analysis at a programmatic level has been conducted to the extent possible. The analysis summarizes the extensive current and planned other activities (e.g., oil and gas development, coal mining, minerals development) for the study area and offers a preliminary qualitative assessment of the impacts of those activities, combined with possible future oil shale and tar sands development, including but not limited to air, water, wildlife, and communities in the study area. Because of the limited character of the decision to be made on the basis of this PEIS (planning/allocation of lands where nominations to lease can be considered), because the locations and magnitude of

future oil shale and tar sands development are highly speculative, and because there will be additional NEPA analysis prior to leasing, in this PEIS it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. This point has been clarified in the introduction to the cumulative impacts sections (Sections 6.1.5 and 6.2.5).

None of the alternatives in this PEIS, including the preferred alternative, projects a specific future level of production (e.g., production of one million barrels of oil shale per day is not forecasted). For the purposes of illustrating potential impacts, the PEIS does provide estimated impacts for individual oil shale and tar sands projects producing from 50,000 bbl/d to 200,000 bbl/d (see Chapters 4 and 5 of the PEIS).

The NEPA analysis at the leasing and development stages will consider effects from RFFA (40 CFR 1508.7). If the proposed action would affect a particular resource that one or more RFFAs would also affect, the impacts of those RFFAs would be included in the cumulative effects analysis for the proposed action. At the leasing or development stage, the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects.

00140-004: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

OSTS_00141

March 18, 2008

Sherry Thompson, Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Avenue
Argonne IL 60439

Re: BLM Oil Shale and Tar Sands Draft Programmatic EIS

Dear Ms. Thompson,

I support Alternative A, the "No Action" alternative in the PEIS.

The "Preferred Alternative" B is likely to cause substantial damage to large areas of Utah, Colorado, and Wyoming that will render eventual restoration all but impossible. All one has to do is look at what has happening at the Athabasca (Canada) tar sands project to see the damage this type of mining causes to water resources and wildlife habitats, to say nothing of the associated greenhouse gas pollution.

We need to know a lot more about this type of mining before we allow it on a large scale. Moreover, the United States needs to move away from dependence on fossil fuels, and not begin large environmentally damaging projects that extend our oil dependence. Renewable energy and increased energy efficiency should be our focus, along with development of alternative fuels. 141-001

I urge the Bureau to select the "No Action" alternative A, at least until the impacts from this type of mining are better understood.

Thank you for your consideration of these comments.

Sincerely,

Ron Bottorff

Ron Bottorff
660 Randy Drive
Newbury Park, CA 91320

Response for Document 00141

00141-001: The BLM acknowledges the commentor's preference for Alternative A.

OSTS_00142

Bureau of Land Management
Argonne National Laboratory
9700 South Cass Ave.
Argonne, Illinois 60439

Attention: Oil shale and tar sands draft programmatic environmental impact statement

To Whom It May Concern:

Please accept this letter as my comments regarding potential oil shale and tar sands development in Utah, Colorado and Wyoming. I support developing these important resources, which would have the effect of diversifying our nation's energy portfolio.

Like most Americans, I realize that our country relies heavily on conventional fuels to meet our energy needs. However, the time for relying so heavily on these fuels is up. Renewable energy AND unconventional fuels, like oil shale and tar sands, can reduce this heavy reliance. Their development can create a stable domestic energy supply – something that is important to me and my family. 142-001

With the rising cost of energy, we cannot afford to pass up on opportunities to bolster our nation's domestic energy supply. Development of oil shale and tar sands can be done in a way that minimizes impacts on the environment. Further, development has many positive effects for communities near the proposed development areas. Please support development as you proceed in developing the environmental impact statement.

I greatly appreciate your consideration of my comments.

Sincerely,

Brandon Childress
2989 Bret Drive
Grand Junction CO 81504

Response for Document 00142

00142-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00143

JOSEPH A. BRAUN, PH.D.

March 18, 2008

Sherry Thompson, Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Ms. Thompson,

I am writing to comment on the Bureau of Land Management's Oil Shale and Tar Sands Draft Programmatic EIS. I strongly oppose Alternative B, the "Preferred Alternative" and support Alternative A, the "No Action" alternative in the PEIS.

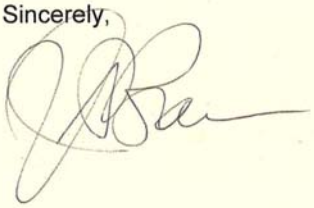
It is clear that the "Preferred Alternative" B is almost certain to cause massive, irreversible damage to large areas of Utah, Colorado, and Wyoming. This includes devastating the land and water, endangering wildlife and their habitats, harming the people in local communities, and generating massive greenhouse gas pollution that would add to global climate change. Moreover, the BLM admits that more research is needed before we know the true impacts of the technology or if it is even commercially feasible. 143-001

At a time when we need to be moving away from fossil fuels and the damage they cause, this proposal would continue our dependence on them. The PEIS fails to adequately address any of these issues, or to consider a reasonable range of alternatives, including the potential for increased energy conservation and efficiency. This is contrary to agency regulations and the law. 143-002

I have traveled extensively in these areas of our West, especially in the vicinity of Glen Canyon National Recreation area. These lands are unique in the world for their pristine beauty. I feel it is our and your duty to preserve them as part of our heritage to future generations of Americans. 143-001 (cont.)

I urge the BLM to choose the "No Action" alternative A, and to halt efforts to develop oil shale and tar sands on public lands. Thank you for the opportunity to comment on the Oil Shale and Tar Sands Draft Programmatic EIS.

Sincerely,



SIX SPRING VALLEY ROAD PARK RIDGE, NEW JERSEY 07656 TELEPHONE (201) 573-0739

Responses for Document 00143

00143-001: The BLM acknowledges the commentor's preference for Alternative A.

00143-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

The preparation of the PEIS is not contrary to agency regulations or laws. Preparing the PEIS is in full compliance with the principles of the FLPMA of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals.

OSTS_00144

To BLM and anyone who might care.

I have serious concerns about the proposed Oil Shake plan for the Roan Plateau. I hope this is not another "land grab" by oil companies. You allowed that to happen once before and hope you don't plan on doing it again. Look at all the land north of Parachute that the oil companies grabbed up and now have sold for millions of dollars!
Since that land is not being utilized for what it was intended it should be returned to the public. If the oil companies want to do more oil shale work let them use the land they already have, if it's not enough for them too bad. If the land they already have isn't what or where they want maybe a land swap would be better. 144-001

Oil shale is not an environmentally safe practice, no matter what they tell us. I know first hand I worked for Union Oil for several years and have first hand knowledge of how they dumped hazardous materials in East Fork of Parachute Creek. Sure they said it was safe, but if it came into contact with your skin it left a burn!! I'm sure it was safe after all they said it was. I hear similar stories from guys working on gas rigs now, spills and blow outs, and no accountability. Look at the one in Garden Gulch right now. Did they notify you or did you just happen to find out before they could cover it up? 144-002

One other idea I have is instead of just letting the gas companies expand drilling why not make a deal to have Encana return all the land they got from Unocal to the public for more drilling on public land? I'm sure they won't like that idea because then we could all see the mess they have created on that land, and we could see what they would like to do to the rest of our public land. If they don't take care of what is their's how can we trust them with our lands? 144-003

I still believe though that a land swap for drilling rights would silence a lot of critics since we would all be benefiting directly from such an arrangement. We the people who are locals would benefit the most, and since we are the most affected by the drilling it would be fairer.

Please remember once the land is gone it will be taken away from us forever. Please do not just give it away for the short term financial boon. Consider the long term effects, and remember to look at these gas drillers past records especially Encana and what they have done in the past in Canada! All these companies are the same all they really care about is their bottom line, not us the land or the environment. 144-004

Responses for Document 00144

00144-001: Thank you for your comment.

00144-002: Thank you for your comment; it has been forwarded to the appropriate field office. Inspections are conducted on oil and gas operations to ensure compliance with applicable statutes, regulations, Onshore Orders, Notices to Lessees, lease terms, approved permits, Conditions of Approval, and Orders of the authorized officer. The BLM-certified inspectors have broad responsibilities and authority to conduct inspections and ensure compliance. If a violation is discovered or reported, enforcement actions may include, but are not limited to, issuing incidence of noncompliance, imposing assessments or civil penalties, ordering shutdown of operations, and initiating the process for lease cancellation. However, resolution of the issue you raised is more appropriately addressed at the local field office level and is outside of the scope of the PEIS.

00144-003: Thank you for your comment.

00144-004: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00145

Bureau of Land Management – Argonne National Lab
Oil Shale and Tar Sands Programmatic EIS
9700 S. Cass Ave.
Argonne IL 60439

Dear Bureau of Land Management Office:

I do not normally submit these kinds of letters, but wanted to express my support for oil shale and tar sands development in Colorado, Wyoming and Utah. The BLM has identified a few million acres where these subsurface resources are present and I believe that these areas should be open for exploration and commercial leasing.

The BLM, through the Programmatic EIS, lays out a prudent plan to develop these important resources in a manner that is environmentally responsible. With our growing reliance on foreign oil, it is more important than ever to promote development of renewable and unconventional fuels, in addition to supporting responsible development of conventional fuels. I urge the BLM to advance a Programmatic EIS that allows for a commercial leasing program that will yield the largest amount of oil shale and tar sands. 145-001

I would also add that while renewable energy (i.e. solar and wind) is desirable, at this point they cannot solely be relied on to meet our energy demands. Unconventional fuels, such oil shale and tar sands, should also be developed to help meet this demand.

Thanks for listening.

Sincerely,

Curtis Katzer
Mesa County Resident

Response for Document 00145

00145-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00146

RE: BLM Oil Shale and Tar Sands Resources Draft PEIS Comments

U.S. Bureau of Land Management,
Office of Public Affairs
1849 C Street, Room 406-LS
Washington, DC 20240

March 13, 2008

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 146-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 146-002

OSTS_00146

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming.

146-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information.

David W Hamilton

Sincerely

David W Hamilton

3725 N Rosecrest Circle

Las Vegas, NV 89121

Responses for Document 00146

00146-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00146-002: In the PEIS, cumulative impacts analysis at a programmatic level has been conducted to the extent possible. The analysis summarizes the extensive current and planned other activities (e.g., oil and gas development, coal mining, minerals development) for the study area and offers a preliminary qualitative assessment of the impacts of those activities, combined with possible future oil shale and tar sands development, including but not limited to air, water, wildlife, and communities in the study area. Because of the limited character of the decision to be made on the basis of this PEIS (planning/allocation of lands where nominations to lease can be considered), because the locations and magnitude of future oil shale and tar sands development are highly speculative, and because there will be additional NEPA analysis prior to leasing, in this PEIS it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. This point has been clarified in the introduction to the cumulative impacts sections (Sections 6.1.5 and 6.2.5).

None of the alternatives in this PEIS, including the preferred alternative, projects a specific future level of production (e.g., production of one million barrels of oil shale per day is not forecasted). For the purposes of illustrating potential impacts, the PEIS does provide estimated impacts for individual oil shale and tar sands projects producing from 50,000 bbl/d to 200,000 bbl/d (see Chapters 4 and 5 of the PEIS).

The NEPA analysis at the leasing and development stages will consider effects from RFFA (40 CFR 1508.7). If the proposed action would affect a particular

resource that one or more RFFAs would also affect, the impacts of those RFFAs would be included in the cumulative effects analysis for the proposed action. At the leasing or development stage, the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects.

00146-003: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

3/11/2008 2:58:20 PM OSTS_00147

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Please reply to

I strongly support the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS). A robust and active oil shale program conducted in an environmentally sensitive manner as proposed by BLM will strengthen communities, add to our nation's energy portfolio and help reduce energy prices for consumers.

With rising energy costs and increasingly volatile supplies, it is more important now than ever that the United States pursue balanced energy solutions and alternative energy sources like oil shale and tar sands. Consumers, industries and businesses throughout the nation face rising energy prices, ever-tighter supplies and increased dependence on imports, often from politically unstable areas. Oil shale can help address the nation's energy challenges.

Further, production of domestic oil shale and oil shale technology will have a positive impact on America's energy security. For example:

- In spite of significant conservation efforts, world energy demand is projected to increase by 50% over the next 20 years and could double in 50 years.

147-001

- Oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil. No nation has more oil shale than the United States.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner.

Finally, development of unconventional fuels will create a vibrant workforce and will strengthen the local and regional economies of Utah, Colorado and Wyoming. Development of oil shale and tar sands in these communities would provide tremendous local and national benefits that will help to strengthen our national energy security and bring much-needed supplies of oil into the markets to offset increased demand in China and India.

For these reasons, we urge BLM to adopt Alternative B of the PEIS. BLM should also investigate and analyze the positive impacts to the American public that would result in developing this valuable resource.

Sincerely,

Response for Document 00147

00147-001: The BLM acknowledges the commentor's preference for Alternative B.

2/28/2008 12:29:32 PM OSTS_00148

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Please reply to

I strongly support the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS). A robust and active oil shale program conducted in an environmentally sensitive manner as proposed by BLM will strengthen communities, add to our nation's energy portfolio and help reduce energy prices for consumers.

With rising energy costs and increasingly volatile supplies, it is more important now than ever that the United States pursue balanced energy solutions and alternative energy sources like oil shale and tar sands. Consumers, industries and businesses throughout the nation face rising energy prices, ever-tighter supplies and increased dependence on imports, often from politically unstable areas. Oil shale can help address the nation's energy challenges.

Further, production of domestic oil shale and oil shale technology will have a positive impact on America's energy security. For example:

- In spite of significant conservation efforts, world energy demand is projected to increase by 50% over the next 20 years and could double in 50 years.

148-001

- Oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil. No nation has more oil shale than the United States.

- The lands that BLM is proposing to develop would yield enough gasoline to keep America driving for at least 18 years.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner.

Finally, development of unconventional fuels will create a vibrant workforce and will strengthen the local and regional economies of Utah, Colorado and Wyoming. Development of oil shale and tar sands in these communities would provide tremendous local and national benefits that will help to strengthen our national energy security and bring much-needed supplies of oil into the markets to offset increased demand in China and India.

For these reasons, we urge BLM to adopt Alternative B of the PEIS. BLM should also investigate and analyze the positive impacts to the American public that would result in developing this valuable resource.

Sincerely,

Response for Document 00148

00148-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00149

3/11/2008 2:13:40 PM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Please reply to

Consumers, industry and businesses across the country are struggling with rising energy prices, tighter supplies and increased dependence on foreign imports. The federal government must allow for the thoughtful and appropriate use of our nation's oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community. The development of unconventional fuels in Utah, Colorado and Wyoming will produce a strong workforce and will support their local economies.

149-001

I support the development of unconventional fuels in these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Response for Document 00149

00149-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00150

2/15/2008 3:20:09 PM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Responsible Development of National Oil Shale and Tar Sands Resources

Please reply to

I would like to express my strong support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed for leasing have enough oil to meet America's gasoline demand for more than 18 years.

With today's technology, this enhanced development can be conducted in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example:

150-001

. In spite of significant conservation efforts, world energy demand is projected to increase by 50% during the next 20 years and could double in 50 years.
. Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
. The United States military currently uses approximately 500,000 barrels of oil daily - over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will produce a strong workforce and will support the local and regional economies of Utah, Colorado and Wyoming.

The utilization of oil shale and tar sands from these leasing areas will offer significant benefits to the local communities and will strengthen our national energy security while bringing the necessary supplies of oil into the markets to offset increased global demand. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Response for Document 00150

00150-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00151

2/26/2008 2:29:47 PM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Please reply to

With global demand for energy on the rise, it is vital that the U.S. government allow thoughtful and appropriate use of our nation's natural energy resources, such as oil shale and tar sands, in order to reduce our reliance on foreign energy imports.
The Draft Programmatic EIS (PEIS) proposed by the Bureau of Land Management (BLM) offers a plan for exploration and development of these unconventional fuels in an environmentally-conscious manner. Development of these resources will offer significant benefits to local, state and national economies and will strengthen national energy security.
Government estimates conclude that portions of Colorado, Utah, and Wyoming, contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil. Development of these resources would help meet our nation's growing energy needs and relieve the high cost of energy for consumers.
I support the BLM's PEIS proposing the exploration and development of our nation's oil shale and tar sands resources.

151-001

Sincerely,

Response for Document 00151

00151-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00152

2/26/2008 2:45:44 PM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Please reply to

I support the development of our nation's oil shale and tar sands resources as outlined in the Draft Programmatic EIS proposed by the Bureau of Land Management. Consumers and businesses can no longer afford the high cost of energy, and our nation's dependence on foreign sources of oil is a threat to domestic security. We must allow access to energy sources, such as oil shale and tar sands, found here in the United States.

The government estimates that the Green River Formation, which covers portions of Colorado, Utah, and Wyoming, contains at least 800 billion barrels of recoverable oil from oil shale. Present U.S. demand for petroleum products is about 20 million barrels per day. If we used oil shale to meet a quarter of that demand, these resources would last for more than 400 years. Development of these resources and access to the 12 to 19 billion barrels of tar sands oil located in Eastern Utah would help meet our nation's growing energy needs and relieve the high cost of energy for consumers. 152-001

Access to oil shale and tar sands from these leasing areas will offer significant benefits to the local, state and national economies and will strengthen national energy security. I support environmentally-conscious access to these important energy sources.

Sincerely,

Response for Document 00152

00152-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00153

2/26/2008 2:36:32 PM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Please reply to

Access to oil shale and tar sands from the leasing areas outlined in the Draft Programmatic EIS proposed by the Bureau of Land Management would offer significant benefits to the United States, as it would enhance the economy and decrease dependence on foreign sources of oil.
The government estimates that the Green River Formation, which covers portions of Colorado, Utah, and Wyoming, contains at least 800 billion barrels of recoverable oil from oil shale. Present U.S. demand for petroleum products is about 20 million barrels per day. If we used oil shale to meet a quarter of that demand, these resources would last for more than 400 years. Development of these resources and access to the 12 to 19 billion barrels of tar sands oil located in Eastern Utah would help meet our nation's growing energy needs and relieve the high cost of energy for consumers.
As energy demands increase, consumers and businesses are forced bear the burden of high energy costs. I support access to oil shale and tar sands to help relieve this burden by providing a domestic source of oil for the United States.

153-001

Sincerely,

Response for Document 00153

00153-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00154

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

In Reply Refer To:
FWS/DHRC/BCPA/DCN035616

MAR 21 2008

Memorandum

To: Director, Bureau of Land Management

From: Acting Deputy Director, Fish and Wildlife Service Rowan W. Gould

Subject: Comments on the *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to address Land Use Allocation in Colorado, Utah, and Wyoming Programmatic Environmental Impact Statement*

The U.S. Fish and Wildlife Service has reviewed the Bureau of Land Management's (BLM) *Draft Oil Shale and Tar Sands Resource Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement* (draft PEIS) and has prepared the enclosed detailed comments pursuant to the: (1) Fish and Wildlife Coordination Act; (2) Endangered Species Act; (3) Migratory Bird Treaty Act; (4) Bald and Golden Eagle Protection Act; (5) the Clean Water Act; (6) National Wildlife Refuge System Administration Act of 1966; (7) Section 369 of the Energy Policy Act of 2005 (EPAct), and other applicable Executive Orders, regulations and policies.

The Service appreciates the considerable task before BLM in meeting the requirements of Section 369 of the EPAct while also meeting the requirements of the National Environmental Policy Act (NEPA) and we acknowledge Section 369 requires the Department of the Interior to undertake a series of steps leading to the commercial leasing of BLM-administered lands. The draft PEIS analyzes the effects of amending 12 land use plans in Colorado, Utah, and Wyoming to include areas of oil shale and tar sands resources for commercial leasing, exploration, and development. The draft PEIS presents Alternative A, the No Action Plan, that would not amend current land use plans but would continue six Research, Development and Demonstration (RDD) projects; BLM's Preferred Alternative, Alternative B, which would amend land use plans to make approximately 2 million acres of land containing oil shale and about 430,000 acres of tar sands available for leasing; and Alternative C, which would amend land use plans to make approximately 830,000 acres of oil shale resources and 230,000 acres of tar sands available for commercial leasing.

A programmatic environmental impact statement addresses a group of similar or related actions as a whole, and thus is a powerful tool in assessing broad, cumulative issues and impacts (Service NEPA Procedures, 550 FW 2). The Service's primary concern with the draft PEIS is the lack of

154-001

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information about the potential mining technologies to be employed, to the extent that identifying and mitigating cumulative impacts is extremely difficult. BLM identified this problem in the draft PEIS: "Because commercial oil shale development technologies are still largely in a research and development phase, many details regarding the specific technologies that would be used in the future to produce oil from oil shale are unknown" (page 2-12, draft PEIS).

To remedy this concern, it is our understanding that once viable technologies are identified through the RDD program, the BLM will conduct additional NEPA analysis to evaluate the large-scale, cumulative effects of a leasing program, including specific areas to be leased and the conditions and stipulations under which leases will be sold. The Service supports this approach.

154-001 (cont.)

The Service recommends Alternative C be selected as the agency preferred alternative.

154-002

We have provided General Comments in Attachment 1 and Specific Technical Comments in Attachment 2 to assist the BLM in preparation of a final PEIS. We appreciate the opportunity to provide comments and recognize the BLM for their efforts to coordinate with the Service. Please contact Mr. Gary Frazer, Assistant Director - Fisheries and Habitat Conservation at (202) 208-6394, or Nancy Lee, Chief, Branch of Conservation Planning Assistance at (703) 358-2440, if you have any questions or need further information.

Attachments

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Attachment 1

Fish and Wildlife Service (Service) Comments on the Bureau of Land Management's *Draft Oil Shale and Tar Sands Resource Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement* (draft PEIS)

GENERAL COMMENTS

The Bureau of Land Management (BLM) proposes to amend 12 land use plans to designate lands available for commercial leasing of oil shale and tar sands and has determined it would have no impact on the environment (p.ES-5, draft PEIS). This conclusion is based on a project description proposing only the *designation* of lands that would be available for leasing. Actual decisions on specific leasing proposals would occur in the future and require additional National Environmental Policy Act (NEPA) compliance. However, the draft PEIS clearly states that BLM intends to establish a commercial leasing program to facilitate future development. Accordingly, the draft PEIS addresses the potential large-scale impacts of mining by evaluating "impact-producing factors" (water used, land disturbed, etc.) and information currently available on mining technologies.

The Service appreciates BLM's considerable task of meeting the requirements of both Section 369 of the Energy Policy Act of 2005 (EPAct) and NEPA. We acknowledge Section 369 requires the Department of the Interior to take steps leading to commercial leasing of BLM-administered lands in Colorado, Utah and Wyoming. The Service also appreciates the stepwise fashion in which BLM has approached the development of a commercial leasing program. It is our understanding that once viable technologies are identified through the Research, Development and Demonstration (RDD) program, BLM will conduct additional NEPA analysis evaluating the large-scale impacts of a leasing program, including specific areas offered for lease and the conditions and stipulations under which leases will be sold. Depending on the scope of actual development actions, and to address the cumulative effects of a commercial leasing program, a separate PEIS may be necessary.

The draft PEIS strives to assess the broad implications of designating lands that could be made available for commercial leasing, but the task is particularly difficult without identifying viable mining technologies to be employed. The draft PEIS notes that additional NEPA analysis will be required prior to commercial leasing, but it is not clear at what level the analysis will take place. The Service believes further NEPA analysis will be needed at the programmatic level to address the cumulative effects of a defined leasing program. Without this level of analysis once technologies are identified and better understood, the Service is concerned that large-scale leasing may have significant impacts to listed and non-listed species. 154-003

The Service recommends Alternative C be selected as the agency preferred alternative (with the modifications provided below), assuming a separate programmatic evaluation is 154-004

conducted once mining technologies and the details of the leasing program are defined. The Service believes Alternative B suggests a commitment to oil shale and tar sands development that is too large to be sustainable and may threaten the existence of a number of species.

General Modifications to Alternative C

The Service recommends that all designated and proposed critical habitat for threatened, endangered and candidate species be excluded from designated lease sale areas. In addition, we recommend that the BLM:

1) Exclude watersheds occupied by the Colorado River cutthroat trout (*Oncorhynchus clarki pleuriticus*) from designated lease sale areas.

2) Include larger no-lease buffers around designated critical habitat for endangered Colorado River fish. The Service recommends a buffer of at least 500 feet from the stream or river banks (Castelle et al 1992, and USFWS 2001). These larger buffers would also more effectively conserve non-listed species (waterfowl, migratory birds, native fish, etc.) that depend on these river corridors.

3) Include no-lease buffers surrounding Mexican spotted owl critical habitat that is at least one-half mile from canyon rims.

4) Exclude all sage-grouse leks, brood areas, and winter range from lease sale areas. Many of these use-sites have been mapped, but for those not yet identified, an exclusion radius from leks like those described in Christiansen and Bohne (2008) (e.g., 3 to 4 miles, with 0.6 m no surface-occupancy (NSO)) would be appropriate. Additionally, a number of small lease sale parcels (<1 square mile each) may be located within important sage-grouse habitats. We recommend the BLM coordinate the determination of these exclusion areas with our Ecological Services Field Offices in Utah, Wyoming, and Colorado.

5) Exclude from leasing the three Areas of Critical Environmental Concern (ACEC) in the Piceance Basin of Colorado (Duck Creek, Ryan Gulch, and Dudley Bluffs) which have been established to protect known populations of Dudley Bluffs twinpod and Dudley Bluffs bladderpod. We recommend that the ACECs not be available for oil shale leasing to avoid the destruction of plant resources for which these ACECs were designated.

154-004 (cont.)

Threatened and Endangered Species Consultation

The Service commends BLM for including a discussion of known listed species and critical habitat locations that are likely to be encountered by future oil shale and tar sands development projects within the draft PEIS. We also recognize the efforts of the BLM to coordinate with the Service in the development of measures to support the conservation of federally listed threatened and endangered species presented in Appendix F. However,

154-005

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the Service remains concerned about the lack of information available on mining technologies and the potential for cumulative impacts to listed species. With particular regard to the potential need for Colorado River water, the unknown effects of area-wide oil shale and tar sands development could threaten listed species within the Colorado River basin. We encourage BLM to further develop and incorporate conservation measures for listed species in the final PEIS and into future NEPA documents associated with specific leasing and development actions. NEPA analyses should include specific conservation guidelines for special-status species that will be applied to site-specific NEPA, consultation, and implementation documents of all future proposed projects. We recommend you contact our Field Offices for assistance in the development of these guidelines. The inclusion of guidelines at this level of NEPA review would set standards to direct the future planning and implementation of oil shale projects and ensure that special-status species are considered for future site-specific projects within the PEIS study area.

154-005 (cont.)

The BLM is proposing to conduct Section 7 consultations during supplemental Environmental Assessments associated with future lease sales and projects. We have concerns regarding a fragmented consultation process and the ability to conduct a cumulative effects analysis using this approach, not only for oil shale and tar sands development but also for other land development in the project area. The Service recommends using a landscape level evaluation approach for several select species in the area once viable technologies and program details are identified. Species that should have landscape level plans based on land use and future oil shale tar sand development include the four endangered fish of the Colorado River and tributaries, the black-footed ferret, white-tailed prairie dog, and the greater sage-grouse. Consultation provides better outcomes for listed species when it occurs early in the process and effects to the species are considered on the larger, landscape scale necessary for recovery.

154-006

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Attachment 2

Fish and Wildlife Service (Service) Comments on the Bureau of Land Management's *Draft Oil Shale and Tar Sands Resource Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement* (draft PEIS)

SPECIFIC TECHNICAL COMMENTS

Table ES-2, p. ES-6 and Table 2.3.2-1, p. 2-17 and 2-18: The Service recommends elaborating on how the Bureau of Land Management (BLM) would monitor and evaluate both indirect and cumulative impacts of extensive leasing, of oil shale and tar sands development and production activities. The draft PEIS is unclear how determinations for new leases and expanded development would be made, and if necessary curtailed, at levels that would effectively protect wildlife, plant, and habitat resources of project areas from indirect and cumulative impacts. 154-007

Section 2.3.3, p. 2-22, lines 1-4: Please clarify the relationship of the draft PEIS to other simultaneous or future administrative action taken by BLM field offices. For example, the Price, Utah, BLM Field Office, has distributed a draft RMP in which the Preferred Alternative removes Areas of Critical Environmental Concern (ACEC) designations. Withdrawal of ACEC designation would seem to conflict with the draft PEIS Alternative B (avoid leasing in existing ACECs closed to mineral development). Please clarify whether ACECs withdrawn by the field office draft RMP implies that those areas would now be open for lease applications, or whether they would lose ACEC designation but remain excluded from oil shale and tar sands development by virtue of the draft PEIS protective measures. 154-008

Table 2.3.3.-3, p. 2-33: This table lists "Resources Covered by Stipulations and Restrictions in Place for Oil and Gas Leasing" for the individual states of Utah, Colorado, and Wyoming not available for application for leasing for commercial oil shale and tar sands development. We believe it would be helpful to maintain a single consistent list of resources not state by state lists. 154-009

Table 2.6-1, p. 2-63, and Table 2.6-2, p. 2-78:
(1) These two tables summarize the potential impacts of the alternatives. The tables include "wildlife" and "threatened and endangered species" resources but do not specifically address BLM-designated sensitive species. Sensitive species are discussed under Alternative C at page 2-33 and page 2-49. The Service recommends including BLM-designated sensitive species impacts in the summaries presented in these tables. 154-010

(2) These two tables identify raptor habitat of only 147,000 and 13,000 acres, respectively. We recommend reevaluating raptor habitat acres identified. Raptor habitat should include nesting territories, concentration and wintering areas, foraging habitats, and migration corridors. The acres of raptor habitat in Table 6.1.2-5, p. 6-48 and Table 6.2.2-5, p. 6-189 also appear to be low. 154-011

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Figure 3.1.1-15, p. 3-37: The Service manages three facilities located within or near BLM-administered lands. Areas with the most geological prospective oil shale resources overlay the boundaries of Seedskadee National Wildlife Refuge, located north of Green River, Wyoming. Ouray National Fish Hatchery and Ouray National Wildlife Refuge are located along the Green River south of Vernal, Utah and are in close proximity to areas designated as the most geologically prospective oil shale resource and Special Tar Sand Area (STSA).

We recommend that the three Service facilities be delineated on the final PEIS maps of the potential impacts of oil shale and tar sands development. The Service can provide geospatial data for these areas and other Service resources to the BLM for their inclusion on the official maps. We also recommend that the potential effects of oil shale and tar sands development on Service facilities be discussed in the final PEIS. The Service is concerned that the potential impacts from future oil shale and tar sands development in these areas could affect the facilities, and in turn our ability to successfully fulfill responsibilities for endangered species recovery (i.e., support for the private-public partnership Colorado River Endangered Fishes Recovery Program) and fish and wildlife conservation. Among the factors that could potentially impact the facilities are diminished water supply, water quality, blasting and other noise, establishment and spread of invasive species, increased vehicular traffic, and fragmentation of habitat buffers. We encourage the BLM to coordinate with the Service to ensure that appropriate measures are included in the BLM land use plans to comply with the compatible use of the National Wildlife Refuges and the integrity of the National Fish Hatchery. 154-012

Table 3.1.2-1, p. 3-43: We recommend that you recheck state recreation areas identified for Utah within the 50-mile radius, as some areas appear to be missing (e.g., Mallard Springs and Stewart Lake Wildlife Management Areas). 154-013

Section 3.4.1.2, p. 3-60; Section 3.4.1.3 p. 3-62; and Section 3.4.3.2, p. 3-84, line 9: In addition to salinity (TDS), selenium is a significant water quality issue in western Colorado and eastern Utah. The potential for increased selenium concentrations in surface waters and the effect on aquatic resources should be considered as a potential project impact. The Service recommends selenium be addressed in the document. Also, at Table 2.6-2, p. 2-78, changes in water quality (increased concentrations of selenium and total dissolved solids) resulting from surface disturbance or water storage/application on top of Mancos shale formations are extremely likely. 154-014

Section 3.4.1.4, p. 3-65: Recovery of ESA-listed fishes in the Upper Colorado River Basin depends in part upon adequate instream flows in the Colorado River and the tributaries used by these fishes. Much work has been done by the Colorado River Endangered Fishes Recovery Program and the Service to evaluate the flow requirements for these fish. We suggest that Tables 3.4.1-2 to 3.4.1-4 include these instream uses and flow requirements for the listed fish. We also recommend that estimates of the water depletions from oil shale and tar sand development be determined, and that these be used to identify the impacts to river flows and to the listed fish. Please contact the Service's 154-015

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Utah and Colorado Ecological Services Field Offices for further information on instream flows. 154-015 (cont.)

Table 3.4.1-3, p. 3-68: The projected "water surplus" is based on water "legally available," which is, in turn, based on an assumption of 6 million acre-feet for the upper basin per year. Water allocations are divided among upper and lower basin and are different than identified here. Please indicate how the amount was calculated. Also, because "legally available" water may exceed what is actually available, another metric (such as actual water available over the last 10 years) could be useful in characterizing water availability. 154-016

The text in Section 3.4.1.4, p. 3-72, lines 43-46, states that the demand for water was greater than the available supply of water. This seems to contradict numbers in table 3.4.1-3 which we interpret as showing a water surplus. Please clarify short-term and long-term water usage and consequent impacts to aquatic resources.

Section 3.4.3.1, p. 3-79, entire section: We recommend that this section also identify the possible impacts of groundwater and surface water development on springs and seeps. 154-017

Section 3.7.1, p. 3-108, line 21-33, and Table 3.7.1-1, p. 3-109 to 3-111: This text discussion and the table information should include the roundtail chub, and the flannelmouth and bluehead suckers. These three species have all experienced population declines in recent years due to habitat loss through water development and the introduction of nonnative species, and are listed by the State of Utah as "sensitive species." We recommend that the table identify the species as "rare to common" rather than "common to abundant."

In the draft PEIS evaluation of these species, it may be useful to indicate that these three species are managed under interagency "Conservation Agreements" (CA), and identify the conservation measures specified in the Agreements. References for the conservation agreements are: 154-018

Utah Department of Natural Resources, Division of Wildlife Resources. 2006. Conservation and Management Plan for Three Fish Species in Utah: Addressing needs for Roundtail Chub (*Gila robusta*), Bluehead Sucker (*Catostomus discobolus*), and Flannelmouth Sucker (*Catostomus latipinnis*).

Utah Department of Natural Resources, Division of Wildlife Resources. 2006. Range-Wide Conservation Agreement and Strategy for Roundtail Chub (*Gila robusta*), Bluehead Sucker (*Catostomus discobolus*), and Flannelmouth Sucker (*Catostomus latipinnis*). Prepared for Colorado River Fish and Wildlife Council. Publication Number 06-18.

The Colorado River cutthroat trout is also managed under interagency Conservation Agreements. We recommend that: (a) this species be listed as such in Table 3.7.1-1; (b) 154-019

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the text indicate that the species is managed under an interagency Conservation Agreement; and (c) the CA conservation measures be specified. References are:

CRCT Conservation Team. 2006. Conservation agreement for Colorado River cutthroat trout (*Oncorhynchus clarkii pleuriticus*) in the States of Colorado, Utah, and Wyoming.
Colorado Division of Wildlife, Fort Collins. 10 p.

Lentch, L.D., and Y. Converse. 1997. Conservation Agreement and Strategy for Colorado River cutthroat trout in the State of Utah. State of Utah Publication Number 97-20. Utah Division of Wildlife Resources, Salt Lake City Utah.

154-019 (cont.)

Section 3.7.2, Plant Communities and Habitats: The draft PEIS only briefly mentions that the Green River shale barrens support a plant community comprised of several species endemic to the Green River formation (p. 3-123). This entire plant community is vulnerable to oil shale and tar sand resource development. Within the Uinta Basin in Utah, this community is most prominent along the southern margin of the oil shale lease area. Figure 2.3-1, at page 2-112, illustrates that this area lies within an area delineated in the draft PEIS as potentially surface mineable (i.e., Area Where Overburden is <500 ft).

The endemic species of this community include the following:

Dragon milkvetch (*Astragalus lutosus*)
oil shale columbine (*Aquiliegia barnebyi*)
Barney's thistle (*Cirsium barnebyi*)
oil shale catseye (*Cryptantha barnebyi*)
Graham's catseye (*Cryptantha grahamii*)
Ephedra wild-buckwheat (*Eriogonum ephedroides*)
Shrubby reed-mustard (*Glaucocarpum suffrutescens*)
Graham's beardtongue (*Penstemon grahamii*)
White River penstemon (*Penstemon scariosus albifluvis*)

154-020

Additional endemic species of this community occur in Colorado and Wyoming. Because these species are not protected as federally listed endangered or threatened species, and given the potential impacts associated with oil shale development, the Service recommends that they be designated as BLM special status species. Care should be taken to preserve the best representations of this community, because that community structure would be a desirable end-state for a significant portion of the rehabilitated and re-vegetated sites of oil shale and tar sand development projects.

Section 3.7.4.1.10, p. 3-160: The habitat for Dudley Bluffs bladderpod (*Lesquerella congesta*) should be corrected to state that it is restricted to the Thirteenmile Creek Tongue of the Green River Formation.

154-021

Section 3.7.4.1.16, p. 3-163, line 43 and Section 4.8.1.4, p. 4-101, line 6: : For clarification, closed canopy forests are not a requirement for Mexican spotted owls in

154-022

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Utah's canyons. The owl has been found to nest in and use sparsely vegetated canyon habitats. Please update this section accordingly. 154-022 (cont.)

Section 3.7.4.1.21, p. 3-167, line 40 and Section 4.8.1.4, page 4-101, line 13: For clarification, southwestern willow flycatchers have been documented along the White River of the Uinta
Basin. However, at this time, the subspecies has not been determined for this locality. 154-023

Section 3.7.4.1.22, pp. 3-167 and 3-168, Uinta Basin Hookless Cactus: For clarification, the Service recently published a Federal Register notice (72 FR 53211, September 18, 2007) proposing to recognize three separate species of *Sclerocactus* for the taxonomic entity *Sclerocactus glaucus* originally listed in 1979 (44 FR 58868, October 11, 1979). These three species are: *Sclerocactus glaucus*, now restricted to western Colorado in lowlands in the Colorado and Gunnison River valleys; *Sclerocactus brevispinus* (Pariette cactus), restricted to the Pariette Dray drainage in the Uinta Basin in northeastern Utah; and *Sclerocactus wetlandicus* (Uinta Basin hookless cactus), restricted to lowlands above the current flood plains of the Green River from Ouray National Wildlife Refuge to Nine-mile creek in extreme northeastern Carbon County Utah and along the lower reaches of the Duchesne and White Rivers. The range of *Sclerocactus brevispinus* includes portions of the Uinta Basin oil shale area and the Pariette STSA. The range of *Sclerocactus wetlandicus* includes portions of the Uinta Basin oil shale area and the Pariette, Argyle Canyon, and Hill Creek STSAs. 154-024

Section 3.7.4.1.23, p. 3-168, lines 34-36: For clarification, the Utah prairie dog is not confined to level mountain valleys. The Utah prairie dog is the only prairie dog species to occur in southwestern Utah and has the most limited range of all the prairie dog species. However, it is one of three species that occur in the State of Utah along with the white-tailed prairie dog and the Gunnison's prairie dog. 154-025

At page 3-169, line 13, please note that the Utah prairie dog is listed as threatened rather than endangered. The Service recently completed a 90-day finding and concluded that a petition to uplist the species from threatened to endangered was not substantially supported. The Service's 5-year status review describes the status of the species.

Section 3.7.4.4, p. 3-175, Other species of concern: As stated in the draft PEIS, Graham's beardtongue (*Penstemon grahamii*) was proposed for threatened status and designated critical habitat under the ESA in January 2006 (71 FR 3158). A principal reason for that proposal was the threat of potential extensive habitat destruction of its limited habitat as a consequence of oil shale development, especially surface mining. Graham's beardtongue is strictly endemic to oil shale barrens of the Green River formation and most are closely associated with the kerogen rich shales of the Mahogany Ledge. 154-026

The Service later withdrew that proposal (71 FR 76303, December 19, 2006), in part because the Service was assured by the BLM that surface mining was an unlikely development scenario for oil shale development:

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> "*P. grahamii* occurs within a very limited portion (0.035 percent of the land area) of broad geological basins in Colorado and Utah underlain by oil shale, and in fact, the plant depends on oil shale rock outcrops for its habitat. However, our information clearly demonstrates that the location of potential future oil shale research projects and subsequent, foreseeable commercial development operations do not overlap with proposed critical habitat for *P. grahamii*. The facts do not support a conclusion that because this plant only grows directly on the surface of rich oil shale bearing strata it will be extirpated or even impacted by future development. Presently, there is no industry interest in surface mining the Mahogany outcrops. Further, there is no evidence that potential, foreseeable oil shale development would occur in the vicinity of the Mahogany ledge outcrops. Industry's demonstrated future interests in oil shale development are not in surface mining the Mahogany ledge. In fact, the greatest industry interest is clearly centered nearly 30 miles east of the nearest *P. grahamii* proposed critical habitat[1]."

In addition, the BLM committed to retaining Graham's beardtongue as a sensitive species e.g.:

> "…If the FWS finds the protections of the ESA are not warranted, this species will remain a BLM special status species and will be afforded continued protection under our existing regulatory authorities, policies and land use planning decisions[2]."

154-026 (cont.)

The Service relied on these assurances in our decision to withdraw the proposed listing of Graham's beardtongue. However, the draft PEIS delineation of the "Area Where Overburden is < 500 ft" (Fig. 2.3-1, p. 2-11) includes over 90 percent of the area that the Service had formerly proposed as critical habitat units for Graham's beardtongue, and includes nearly the entire occupied habitat of the species. Also, at pages 2-14, 2-15, 2-25 and Table 2.3.2-1 (p. 2-17) the draft PEIS sets forth in the preferred alternative (Alternative B) leasing for an oil shale surface mine and an associated retort within that area cited above and thus within the occupied range of Graham's beardtongue. The same leasing proposals are also included within Alternative C, however, Alternative C would provide for the avoidance of a portion of the habitat of Graham's beardtongue (p. 2-27 and maps at figure 2.3.3-2 (p. 2-24) and figure 2.3.3-5 (p. 2-30).

The draft PEIS does not recognize Graham's beardtongue as a BLM sensitive species (3-174 and 4-86 to 4-92, Appendix E). It does, however, provide a discussion of the species as "Other Species of Concern" (p. 3-175). The species does occur in the Uinta Basin Oil

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[1] Page 6 The Bureau of Land Management; Formal Response to the U.S. Fish and Wildlife Service, Proposed Threatened Status for *Penstemon grahamii* (Graham's beardtongue) With Critical Habitat, May 11, 2006

[2] Kathleen Clarke, Director, Bureau of Land Management, cover letter to: The Bureau of Land Management; Formal Response to the U.S. Fish and Wildlife Service, Proposed Threatened Status for *Penstemon grahamii* (Graham's beardtongue) With Critical Habitat, May 11, 2006

Shale area in Utah and in the Hill Creek and P.R. Spring STSAs. The Service recommends at Section 3.7.4.4, p. 3-176, lines 1-10, or other sections of the draft PEIS identify the interagency Graham's beardtongue Conservation Agreement (CA).

We recommend that Graham's beardtongue (*Penstemon grahamii*) be designated by BLM as a special status species in both Colorado and Utah. The Service also recommends that the BLM avoid oil shale or tar sands lands and any land exchanges within the "Area Where Overburden is < 500ft." (Fig. 2.3-1, p.2-11) until the conservation measures envisioned in the draft conservation plan for the species are implemented. 154-026 (cont.)

Section 3.7.4.4, p. 3-175, line 18: As a clarification, please note that the bald eagle is still protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. 154-027

Section 3.7.4.4, p. 3-175, entire section: As clarification, we recommend that this section also include a discussion of the white-tailed prairie dog and the Gunnison prairie dog. 154-028

Section 4.1.1, p. 4-3, line 42: In describing the assumptions of oil shale surface mining, the text states, "Topsoil and subsoil removed as overburden would be separately stockpiled and vegetated to mitigate or eliminate erosion." We recommend adding that stockpiles should be vegetated with native species only, especially in or near areas of rare endemics plants. 154-029

Section 4.8.1.2, p. 4-64, line 6: Because reclaiming an area with native vegetation (especially mature shrubs) will take up to 20 years, we recommend that the restoration and monitoring plan be established for a similar time period to ensure vegetation and habitat restoration is completed and meets established goals, rather than a short commitment of 3-5 years as identified in the text. 154-030

Section 4.8.1.3.1, p. 4-68, line 19: Depending on type of disturbance activity and avian species (e.g., some raptors), disturbance to bird nesting could occur at distances significantly greater than 0.25 mile. The Service recommends expanding the discussion of habitat disturbance to bird nesting to include more specific information.

Studies have indicated that wildlife are disturbed over surprisingly long distances from rural roads and highway corridors. Disturbance to wildlife has generally been inferred from relative densities of a species or group of animals at varying distances from a road. For instance, Van der Zande et al. (1980) confirmed earlier conclusions of Veen (1973) and showed that lapwings and godwits were disturbed to distances up to 1.24 miles from a highway located in the Netherlands. Similarly, plant, bird, and herptile species richness was observed to diminish with increasing density of paved roads, out to a distance of again at least 1.24 miles from the road (Findlay and Houlahan 1996). Based on their statistical models, a 2m/ha increase in total paved road density was assumed to have the same impact on herptile and mammal species richness as the loss of 50% of the wetland proper. In forested habitats, road noise reduced bird population density and breeding 154-031

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success within 0.3 to 0.6 miles of roadways. Breeding dispersal patterns were indicative that roadside areas provided lower quality habitats (Reijnen and Foppen 1994, Foppen and Reijnen 1994, Reijnen et al. 1995). 154-031 (cont.)

Table 4.8.1-2, p. 4-84: Please include water depletions as an Impact Category in this Table. 154-032

Table 4.8.1-2, p. 4-84: The Service recommends the following changes to characterizations of the impacts:

1) Habitat Fragmentation/Terrestrial Amphibians and Reptiles -- change to "Large" – because these species have smaller home ranges, habitat fragmentation could affect more than 50 percent of a local population, resulting in a large measurable change in carrying capacity; 154-033

2) Habitat Fragmentation/Terrestrial Birds -- change to "Large" -- there is substantial research/literature regarding the effects of habitat fragmentation (particularly roads) on bird populations; 154-034

3) Habitat Fragmentation/Terrestrial Mammals -- change to "Large" -- it is likely that mammal populations will be measurably affected or eliminated in project areas due to the high degree of habitat loss, habitat fragmentation, and human disturbance; 154-035

4) Alteration of Topography/Terrestrial Invertebrates -- change to "Large" -- small population sizes or small home ranges of many invertebrates could result in measurable effects from topography changes; 154-036

5) Alteration of Topography/Terrestrial Amphibians and Reptiles -- change to "Large" -- small population sizes or small home ranges of many amphibians and vertebrates could result in measurable population level effects from topography changes; 154-037

6) Changes in Drainage Patterns/Terrestrial Amphibians and Reptiles -- change to "Large" -- small population sizes or small home ranges of many amphibian and reptile species could result in measurable population level effects from drainage alterations; 154-038

7) Changes in Drainage Patterns/Terrestrial Mammals -- change to "Large" -- significant changes in drainage pattern can impact burrowing animals such as prairie dogs which are a primary food source for black-footed ferret; 154-039

8) Human Collection/Upland Plants -- change to "Large" -- the Service is aware of numerous instances of collectors poaching endangered plant species, particularly in areas that are more open to access due to roads; 154-040

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9) Human Collection/Wetland and Riparian Plants -- change to "Large" -- the Service is aware of numerous instances of collectors poaching endangered plant species, particularly in areas that are more open to access due to roads; 154-041

10) Human Disturbance/Harassment/Terrestrial Amphibians and Reptiles -- change to "Moderate" -- at a minimum, there is evidence of individual reptile and amphibian displacement from human presence, and it is likely that continuous human presence would result in a population level effect; 154-042

11) Increased Human Access/Upland Plants -- change to "Large" -- the Service is aware of numerous instances of collectors poaching endangered plant species, particularly in areas that are more open to access due to roads; 154-043

12) Increased Human Access/Wetland and Riparian Plants – change to "Large" the Service is aware of numerous instances of collectors poaching endangered plant species, particularly in areas that are more open to access due to roads; 154-044

13) Increase in Predation Rates/Aquatic and Wetland Animals -- change to "Moderate" – it is unclear why the determination is "None;" 154-045

14) Increase in Predation Rates/Terrestrial Invertebrates -- change to "Moderate" -- it is unclear why the determination is "None;" 154-046

15) Spread of Invasive Species/Terrestrial Amphibians and Reptiles/Terrestrial Birds/Terrestrial Mammals -- change to "Moderate" or "Large" -- invasive species occur at large, landscape-level scales with effects to entire ecosystems; 154-047

16) Temperature Increase in Water Bodies/Wetland and Riparian Plants -- change to "Moderate." 154-048

Pages 4-85, 6-38, 6-39: Chapter 4 and Chapter 6 appear to present contradictory information. Page 4-85 referring to all alternatives states, "Three ACECs in the Piceance Basin of Colorado (Duck Creek, Ryan Gulch, and Dudley Bluffs) were established to protect known populations of the Dudley Bluffs twinpod and Dudley Bluffs bladderpod. These areas would not be available for leasing, and, therefore, would be protected from the direct effects of oil shale development." However, pages 6-38 and 6-39 indicate that ACECs that are not closed to mineral leasing include Duck Creek, Ryan Gulch, and Dudley Bluffs ACECs. Please clarify this apparent discrepancy. 154-049

Table 4.8.1-3, p. 4-86: The Service recommends listing the type of effect (e.g., collection, habitat fragmentation, water depletion, etc.) in the Potential Effect column. 154-050

Section 4.8.1.4, p. 4-101, lines 13-14: The text reads, "Direct impacts on these habitats are not anticipated because they occur within designated ACECs…" It is the 154-051

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understanding of the Service that areas located within an ACEC are not necessarily precluded from energy development. Please clarify. 154-051 (cont.)

Section 4.8.2.1, p. 4-102 and Section 5.8.2.1, p. 5-90, line 16: Previous BLM Resource Management Plans have committed to conserving and recovering all special status species and the ecosystems on which they depend. The Service agrees with this management direction and commends the BLM for placing high importance on special status species, including listed fish species.

With these conservation goals in mind, the Service is concerned by the threats presented by oil shale and tar sands development within the 100-year floodplain. We recommend that avoidance of oil shale and tar sands development in the 100-year floodplain be listed as a commitment of the Aquatic Resources Mitigation Measures. Avoidance of oil shale and tar sands extraction activities in the floodplain of the Colorado River and its tributaries would lessen the threats posed by toxicant or contaminant spills or leaks in areas with sensitive fish species. 154-052

We also recommend that water quality monitoring be conducted to establish a baseline prior to site-specific project activity, during the life of the project, and be continued for a sufficient period beyond the termination of active operations to ensure the project site does not pose a threat to the river aquatic system.

Table 5.1.1-1, p. 5-4:
(1) The draft PEIS indicates that during surface mining, a typical retort or solvent extraction facility would use between 40,000 and 90,000 barrels of water per day and that most of the water ends up in tailing ponds even with recycling. The draft PEIS does not indicate whether there is a sufficient water supply to support this type of mining. We recommend a thorough assessment of water needs, sources, and impacts to aquatic resources. 154-053

(2) The text indicates for the production area 73-88 dBA at 500 ft is considered unacceptable for human residential use. Some further description of affects of noise on wildlife may be appropriate. 154-054

Section 5.8.2.3, p. 5-92, line 12: Pertaining to the discussion of waste-water lagoons, the Service recommends that creation of open surface water bodies be avoided because open wastewater pits have the potential to contaminate groundwater, leach selenium, provide vectors for West Nile Virus, and serve as an attraction to migratory birds. Waste pits, especially those with oil or surfactants on the surface of the water, have proven to be a significant source of mortality to migratory birds. 154-055

Section 6.1.1.7.3, p. 6-13, line 18: In this section, discussion of the impacts of Alternative A on wildlife appears to be limited to the changes in acres of vegetation or habitat removed due to the 'footprint' occupied by well pads, roads, and associated facilities. The footprint acreage is only one aspect of the wildlife impact. Disturbance of wildlife use areas for brooding, foraging, migration, and over-wintering can also occur 154-056

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due to increased vehicular traffic, noise, physical structures, increased human presence, alteration of water flow, and fragmentation of habitat. The Service recommends augmenting the text with discussion of these additional types of impacts. 154-056 (cont.)

Section 6.1.2.7, p. 6-46, and Section 6.2.2.7.3, p. 6-188 (entire sections): The wildlife sections do not discuss migratory birds other than raptors (and discusses raptors only briefly). The discussion of the effects of this Alternative on wildlife should include impacts on migratory birds in general. The corresponding sections of the other Alternatives also should include discussions of the impacts on migratory birds. 154-057

Table 6.1.4-5, p. 6-98: The table presents the acres of wildlife habitats identified for protection in the BLM land use plan that could be impacted by commercial oil shale development under each action alternative. The way that the information is presented can be interpreted to suggest that no sage-grouse, raptor, or big game habitats would be lost under Alternative C. This representation is inaccurate or at least presented in a way that may be misinterpreted. Please revise or clarify to reflect that the important habitats for these species are located within the areas open for lease applications under Alternative C. 154-058

Table 6.1.4-7, p. 6-100: This table indicates that no black-footed ferret habitat is included in land available for leasing under Alternative C. We believe this is incorrect. Alternative C appears to overlap a substantial portion of the range for reintroduced ferrets in Coyote Basin. Please contact our Utah, Ecological Services Field Office for clarification of the range of ferret reintroduction. 154-059

Table 6.1.4-7 can also be misinterpreted to imply that no threatened or endangered plant species are found on lands that would be available for leasing under Alternative C. This too would be incorrect. Service maps indicate that Dudley Bluffs bladderpod lie within the Alternative C boundaries, as does other potential habitat for the bladderpod and the Dudley Bluffs twinpod. Please clarify this in the final PEIS. 154-060

Table 6.2.4-3, p. 6-236: A 55-percent reduction in sage-grouse habitat is significant, and if accurate would represent substantial impacts to the species. The Service recommends evaluating the impacts in the draft PEIS on both a local population and range-wide scale. 154-061

Appendix C, Table C-1, Page C-5, para 3, Amendments Common to All Land Use Plans, Alternatives B and C: The text indicates that land use plan amendments would, "Specify that utilization will occur utilizing a lease by application process described in Section 2.2.3." Correct the reference; Section 2.2.3 does not include this description.

Appendix C, Table C-1, Page C-7, para 2 of Alternative B, and elsewhere in Table C-1: The text states, "As discussed in Section 2.2.3.1, all lands…[not excluded]… will be available for application of commercial leasing." Correct the reference; Section 2.2.3.1 does not exist. 154-062

Appendix C, Table C-1, Page C-7, para 2 of Alternative B, and elsewhere in Table C-1: The text states, "As discussed in Section 2.2.3.2, all lands…excluded from commercial

leasing under Alternative B will also be excluded under Alternative C." The reference to Section 2.2.3.2 is in error (the section does not exist). 154-062 (cont.)

Appendix E, Table E-1, Pages E-21 to E-38: The Service recommends considering the status of Ute ladies'-tresses in Sweetwater and Sublette counties, Wyoming in the analysis. 154-063

Please clarify table E-1 (p. E-23) such that the endangered Colorado River fishes (bonytail, humpback chub, Colorado pikeminnow, and razorback sucker) are not known to occur in Wyoming, but they are affected by water depletions from the Colorado River basin in Wyoming. 154-064

Table E-1 on page E-38 indicates that black-footed ferrets do not occur in Wyoming. Please update this table to include black-footed ferrets as potentially occurring in white-tailed prairie dog towns in Sweetwater and/or Sublette counties Wyoming. 154-065

Appendix F: The title of Appendix F may be somewhat misstated. It is our understanding that that BLM intends the conservation measures to apply to subsequent leasing actions, rather than PEIS action (amendments of land use plans). Also, we understand that the conservation measures are intended to apply to subsequent leasing under any action alternative, rather than just the Preferred Alternative. Please clarify the title. 154-066

The appendix contains measures to avoid and minimize impacts to federally listed species and proposed plant species. The Service recommends that similar conservation measures also be provided for candidate plant species. 154-067

The Service recommends that conservation measures for migratory birds and raptor protection guidelines be included in conservation measures, as these birds are protected under the Migratory Bird Treaty Act. Bald and golden eagles are also protected under the Bald and Golden Eagle Protection Act. Additionally, for protection of migratory birds, the Service recommends avoiding initiation of land-disturbing activities during the breeding season. 154-068

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Response for Document 00154

00154-001: The BLM recognizes that additional NEPA analysis will be required and is committed to preparing the appropriate level of analysis prior to the issuance of any oil shale lease. (See page 2-19 of the Draft PEIS for the description of additional NEPA requirements.) Since leasing will be an entirely different decision, a new NEPA analysis will be required. It is inappropriate to speculate at this stage whether such NEPA analysis will be programmatic in nature.

This new NEPA analysis will analyze the leasing of parcels of land for commercial oil shale exploration and development and under what conditions or stipulations. The analysis will also contain any new information or circumstances relevant to the technology, the affected environment, and any associated environmental consequences. This information may be a consequence of research on the RD&D leases or a result of industry performing research or studies on nonfederal lands.

As required by NEPA, all subsequent NEPA documents will analyze the cumulative effects from other reasonably foreseeable future actions. The scope and nature of the specific proposed action will drive the type of NEPA analysis the BLM performs. As required by NEPA, the cumulative effects analysis would consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) federal and nonfederal actions, taking into account the relationship between the proposed action and these reasonably foreseeable actions.

The affected environment of the action could vary greatly from a large regional area to a small discrete area. The scope of the analysis in the NEPA document would be dependent upon the number of applications received and the type and size of operations proposed by the applicant(s). This could result in a statewide, regional, basin-wide, or a site-specific impact analysis. Overall, the geographic extent of the analysis would be limited to those areas that could experience a change in the pattern of land use, as a consequence of a direct impact or other induced effects on the natural resources. The nature of the action can also vary greatly based on the type of technology or mining method. Another critical factor would be the type of infrastructure needed to support the operation, in particular, the source of electrical power.

Hypothetically, the proposal in subsequent NEPA documents could offer for commercial lease 1) only a limited number of parcels, 2) parcels located in a geologic basin, or 3) parcels located throughout a state. Estimated oil shale exploration and development activities assumed to occur as a result of issuing the leases would be based on actual applications, therefore analyses of proposed operations, hypothetical development scenarios, and an RFDS could be developed. Depending on the information included in the applications, technologies whose impacts would be analyzed could include any or all of

underground and surface mining with surface retort operations and/or in situ operations.

Based on the nature of the proposed action, existing sources of electrical power may be sufficient to power the operation, or electrical power may need to be generated on lease using either conventional energy sources like natural gas or renewable energy sources like wind or solar. A third hypothetical analysis may include the expansion of existing power plants or the construction of additional power plants (coal, gas, nuclear). In each case, the scope of the NEPA analysis would be limited to the extent of the direct and indirect effects from activities described in a reasonably foreseeable development scenario.

For example, if the proposed action were to lease three tracts in Utah, using underground mining technology only, the scope and scale of the analysis would differ from the scope and scale of the analysis that would be done if the proposed action were to lease several parcels in all three states, using a variety of technologies. The geographic extent of analysis for a leasing decision is based on the extent of the potentially affected resource(s). In the first instance, the NEPA analysis would most likely not be a programmatic EIS, but would define the area subject to analysis as the area bounded by the three leases. The analysis may not necessarily include an analysis of building additional power plants (dependent on whether the additional mines could pull power off the existing grid or not). In the second instance, it may be appropriate for BLM to perform a regional NEPA analysis that would look at leasing in all three states and include an analysis of the power plants (coal, gas, nuclear) as well as refinery capacity that might be necessary for any development to occur.

In both instances, the NEPA analysis would be limited to the extent of effects from activities described in an RFDS. While the proposed leasing area may be the three Utah tracts, effects on some resources can be extensive, going beyond the boundaries of the proposed leasing area and determined by the distance over which effects remain significant (e.g., effects on air quality or effects on an entire watershed), while the effects on other resources remain within the leasing area boundary and are geographically limited by the resource itself (e.g., a specific species of threatened and endangered plant or a specific culturally significant feature). The impact zones of particular resources may be superimposed or may overlap only in part. All relevant effects, including those that extend outside the project, or, even, in some cases, the planning area where the project is located, must be evaluated and considered in the leasing decision that is made for the planning area.

Thus, while the BLM is committed to performing NEPA analyses prior to leasing, we cannot commit to a certain type of NEPA analysis (regional, planning area, or local). The proposed action will drive what analysis must be done to comply with the requirements of NEPA.

00154-002: The BLM acknowledges the commentor's preference for Alternative C.

00154-003: The BLM is committed to preparing the appropriate level of analysis prior to the issuance of any oil shale or tar sand lease, including the appropriate level of cumulative effects analysis.

It is inappropriate to speculate at this stage whether such future NEPA analysis will be programmatic in nature. A more appropriate level of analysis for a defined leasing program would be based upon the number of applications received, the location(s) referenced in the application(s), and the type and size of operations proposed by the applicant(s). This could result in a statewide, regional, basin-wide or a site-specific impact analysis. With a more focused scope at the leasing decision stage, the consequences and implications—direct, indirect and cumulative—to listed and nonlisted species, as well as other resources, can be better defined. This will result in a more informed leasing decision, as well as aid in the development of potential mitigation measures to minimize or eliminate any adverse impacts.

When commercially viable technologies are identified and better understood, the BLM will be better able to analyze impacts of leasing decisions. The scale of the leasing will be subject to the Secretary's discretion to offer leases for sale and the industry's interest in bidding for tracts. The exercise of this discretion, and the level of interest expressed by industry, will be informed by the increased amount of information regarding technologies and effects.

00154-004: The BLM notes USFWS's preference for Alternative C.

Alternatives B and C are limited to an allocation decision that provides an opportunity for subsequent levels of NEPA analysis prior to any decision on leasing or development of these resources. The only decision in this respect proposed to be made on the basis of the PEIS is to open or close lands to further consideration of leasing of these resources. With respect to the recommended specific exclusion of watersheds and the creation of no-lease buffers around critical habitat areas, consideration of the need for such exclusions would be more appropriate when areas are designated at the lease sale stage. Please note that all ACECs are excluded from application for commercial leasing under both Alternative B and C for tar sands and for Alternative C for oil shale. ACECs not specifically closed to mineral entry are open for application for commercial leasing in oil shale Alternative B. The fact that ACECs may be open for application does not indicate that they will be disturbed by development. The subsequent NEPA process considering a lease application will make specific decisions regarding the protection and management of any ACECs open for application. See descriptions of the alternatives in Sections 2.3.3, 2.3.3.2, 2.4.3, and 2.4.3.2. All subsequent NEPA analysis and decisions associated with potential leasing of parcels or potential plans of operations will be performed in full compliance with existing environmental laws and associated regulations.

In deciding whether to lease or to approve plans of development, the BLM will comply with the ESA, including all necessary consultations with the USFWS. In addition to compliance with the ESA, the BLM will offer leases only in conformance with its policies and procedures for BLM-designated sensitive species. For example, the BLM's policies for "exclusion radius" around greater sage-grouse leks might be amended between the date of this PEIS and the issuance of a lease or approval of a plan of development.

Furthermore, Alternative B does not imply a commitment to leasing that is too large to be sustainable or that would threaten the existence of species; as noted above, each of the action alternatives only contemplates opening certain lands to further consideration of leasing. Within the areas open for leasing under either Alternative B or Alternative C, the Secretary will retain the discretion to decide which particular tracts to offer for lease and the stipulations on such leases.

00154-005: The specific impacts associated with development and technology deployment cannot be assessed at this time given the state of the science in oil shale and tar sands extraction and processing. Technologies are evolving and specific information on impacts such as water depletions is not fully understood. Information is being gathered as part of the RD&D program. The conservation measures presented in Appendix F of the PEIS were developed in consultation with the USFWS. These measures are presented as examples of the types of measures that will be appropriate to mitigate impacts to special status species. Final conservation measures will be developed at the leasing and project development phase in consultation with the USFWS.

00154-006: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact under either NEPA or Section 7 of the Endangered Species Act (ESA) on threatened or endangered species.

The impact analysis provided in the PEIS qualitatively indicates the types of impacts that could occur as a result of the development of these resources, based on BLM experience with other types of mineral development. The reasons for presenting this information include to address additional information needed and to provide sufficient information for the decision maker to make a reasoned choice among the alternatives. Cumulative impacts, as defined pursuant to NEPA, to threatened and endangered species are discussed in Sections 6.1.5.3.7 and 6.2.5.3.7 of the PEIS. At this time, it is not possible to provide a quantitative evaluation of cumulative effects as requested in the comment. There are many uncertainties regarding the amount of development that is reasonably foreseeable, the types of technologies that might be deployed, and the locations of potential

projects. Cumulative impacts will be evaluated in project-specific NEPA assessments and consultations conducted prior to leasing and development.

00154-007: In consultation with our cooperating agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The only decision in this respect proposed to be made on the basis of the PEIS is to open or close lands to further consideration of leasing of these resources. Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. Specific monitoring requirements to evaluate environmental consequences are more suited at future leasing and/or plan of development stages. Although specific monitoring plans are not included, examples of potential types of mitigation measures to protect wildlife, plants, and habitat resources are provided for consideration at subsequent stages of NEPA analysis (see Sections 4.8.2 and 5.8.2).

The PEIS outlines the process for making subsequent decisions regarding both leasing and development. For example, see Chapter 1 and Chapter 2 (Sections 2.3.3 and 2.4.3).

00154-008: All decisions related to land use planning for oil shale and tar sands resources in the PEIS study area will be made in the ROD for the PEIS. The ROD will amend the existing plans (MFP or RMP or ongoing RMP if the PEIS is completed first) by making land use planning decisions on whether or not lands will be available for application for future leasing and development of oil shale or tar sands on public lands for those areas where the resource is present. Additional site-specific NEPA analysis will be completed on any future lease application before any leases would be issued. If, as part of this NEPA analysis, the BLM determines that leasing and subsequent development of the oil shale or tar sands resources would cause significant impacts, the BLM can require the applicant to: 1) mitigate the impact so that it is no longer significant, 2) move the proposed lease location, or if neither of these options resolves the anticipated conflicts, 3) the BLM can decide that development of the oil shale or tar sands resources outweighs protection of the on-site resources and approve the application. This NEPA analysis would include opportunities for public involvement and comment that are part of the NEPA process.

Under the provisions of FLPMA, the BLM has designated ACECs where special management attention is required to protect and prevent irreparable damage to important cultural, historic, and scenic values, fish and wildlife resources, other natural systems or processes, or to protect life and safety from natural hazards. In ACECs not closed to mineral entry, the BLM has specific management prescriptions outlined in the local land-use planning document to protect the relevant and important values. However, the ACEC Manual (BLM Manual 1613) states: “Normally, the relevance and importance of resource or hazards associated with an existing ACEC are reevaluated only when new information or changed circumstances or the results of monitoring establish a need.” Therefore, if there is new information or changed circumstances associated with the leasing of lands

within ACECs open to mineral development, the ACEC will be reevaluated to consider whether to retain the ACEC designation or develop additional management prescriptions in the NEPA analysis associated with the proposed leasing decision. ACECs closed to mineral entry are not available for application for commercial leasing. If an ACEC is closed by the BLM field office, it will have to undergo further NEPA analysis, as it will still have been excluded from the analysis covered in this PEIS.

00154-009: The referenced stipulations are developed for each BLM planning unit. Although BLM plans are generally developed with full knowledge of how other planning areas have handled similar situations, the final decisions are generally tailored to meet local conditions.

00154-010: Tables 2.6-1 and 2.6-2 have been revised to include a summary of impacts on BLM-designated sensitive species.

00154-011: The raptor habitat acreages presented in Tables 2.6-1 and 2.6-2 represent raptor habitats identified in BLM RMPs that have been identified for protection that could be developed under Alternative B for oil shale and tar sands, respectively. The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, providing more detailed discussion of raptor habitat is beyond the scope of the PEIS. Detailed discussion of raptor habitats, and quantitative analyses of potential impacts to raptors, would be conducted for any proposed project. Also, policies and BMPs that would be implemented at the project-specific level are expected to avoid impacts to raptor habitat and, where not possible, minimize and mitigate impacts to the extent practicable.

00154-012: USFWS lands, although subject to the Mineral Leasing Act (16 USC 668dd(c)), are not under consideration to be opened for leasing under this PEIS, and, accordingly, are not subject to direct impacts of potential commercial development on BLM-administered lands. Indirect impacts, however, depending on where commercial development might occur, are possible. Although the specific USFWS facilities are not identified by name, potential indirect effects of commercial development are discussed throughout the Ecological Resources sections of the PEIS in Chapters 4, 5, and 6. Once site-specific proposals are known, potential indirect impacts on USFWS and other federal, state, and private lands will be included in the NEPA analysis reviewing the proposed lease. The requested facilities, plus the Brown's Park NWR, have been added to maps in the document for reference.

00154-013: Thank you for the comment. Mallard Springs Wildlife Management Area has been added to Table 3.1.1-11 in Chapter 3.

00154-014: The Mancos shale formation is recognized as a major source of selenium in the Gunnison Basin, creating an issue in Colorado. The formation is not exposed on the surface in Piceance Basin and is stratigraphically under the productive zones of oil shale. Disturbance of the formation is unlikely. Selenium occurs in other streams in Utah, as shown in the 303(d) list (Table 3.4.1-1). The issue has been added to the text in the PEIS.

00154-015: Tables 3.4.1-2 to 3.4.1-4 focus on the water demand and consumptive uses of water. As instream flows are not considered consumptive uses, they are not included in the tables. CWCB has the exclusive authority to protect instream flows. A list of stream segments with current instream flows requirements in Water Divisions 5 and 6 has been added to the PEIS and is presented in Appendix I. Protection of Endangered Species Fishes is described in Section 3.7.4.

Water depletion due to oil shale development depends on many factors, including project sites, technologies to be used, and various activities involved in the development. The depletion issue would be handled at the project-level when these factors are better defined. Impacts of water depletion would be addressed in subsequent project-specific NEPA documents.

00154-016: The assumed 6 million acre-ft for the Upper Basin is based on the results of the "Hydrologic Determination" study of 1988 that calculated the water availability of the Upper Basin. The study used long-term historical data from 1906 to 1986 and assumed that the Lower Basin states could have 7.5 million acre-ft of water and the Upper Basin's contribution of 0.75 million acre-ft of water delivered to Mexico.

Historically, the natural flow of the Colorado River fluctuated annually. However, the Hydrologic Determination concluded that the assumed 6 million acre-ft for the Upper Basin per year rarely triggered water calls from the Lower Basin states.

Water demand differs from water consumption. The latter is the basis in various Colorado River compacts. Water demand does not take into account existing water delivery infrastructure (such as reservoirs to trap the water and canals to deliver the water to end users) and represents a desired quantity. The water consumption value that is used in Table 3.4.1-3 represents water actually used and is equal to the amount of water delivered minus the amount of water returned to streams or returned flows. Water demand in the western states generally is much larger than the water consumed.

The stream flow impacts on aquatic resources are described in Section 4.8.1.4.

00154-017: This section describes the water resource, while corresponding sections in Chapters 4 and 5 discuss the possible impacts on the water resource. Impacts to springs and seeps are included in Sections 4.5 and 5.5.

00154-018: Additional information pertaining to the occurrence and distribution of fish species (especially sensitive native fish species) within the Piceance Oil Shale Basin has been added to Sections 3.7.1 and 3.7.1.1.4 of the PEIS, including information about roundtail chub, bluehead sucker, flannelmouth sucker, and mountain sucker. Information about mussel species within the basin has also been added. References to the conservation agreement documents identified in the comment have been added.

00154-019: Text has been added to Section 3.7.1 to identify that the Colorado River cutthroat trout is managed under an interagency conservation agreement, and references to the conservation agreement have been added. Appendix F of the PEIS identifies conservation measures that would be applied to listed and sensitive species, including Colorado River cutthroat trout.

00154-020: Text regarding oil shale endemic species has been added to Sections 3.7.2, 4.8.1.2, 5.8.1.2, 6.1.1.7.2, 6.1.2.7.2, 6.1.3.7.2, 6.1.4.7.2, 6.2.2.7.2, 6.2.3.7.2, and 6.2.4.7.2. The BLM special status species designation is determined by each BLM State Director. The USFWS request to identify all oil shale endemic plant species as special status species should be directed to the BLM State Directors for Colorado, Utah, and Wyoming.

00154-021: The text in Section 3.7.4.1 has been revised as suggested.

00154-022: The text in Section 3.7.4.1 has been revised as suggested.

00154-023: The text in Section 3.7.4.1 has been revised to indicate the currently understood range of the southwestern willow flycatcher.

00154-024: Section 3.7.4.1 of the PEIS has been revised to include recent USFWS findings for the Uinta Basin hookless cactus complex.

00154-025: Section 3.7.4.1 of the PEIS has been revised to indicate that the Utah prairie dog is one of three prairie dog species found in the state of Utah. This section discusses the USFWS 90-day review and the decision to keep the Utah prairie dog listed as threatened.

00154-026: The PEIS identifies lands available for potential future leasing decisions. Leasing decisions will be based on future NEPA analysis where site-specific information will be available for the area under consideration. Appropriate stipulations can and will be developed for those areas that are eventually identified for leasing. Although the overburden is less than 500 ft thick and surface mining would be more economically feasible, underground mining where surface disturbance could create unacceptable risks can be required. Graham's beardtongue is a sensitive species on both the Colorado and Utah BLM sensitive species lists and, as such, is protected by the policies established under BLM Manual 6840. In addition, the BLM is signatory to the interagency Graham's beardtongue Conservation

Agreement and is committed to accomplishing the tasks identified in it to ensure attainment of its goals and objectives, and ultimately the long-term conservation of the species. The Conservation Agreement has not yet been signed by all involved parties.

00154-027: The text in Section 3.7.4.1 has been revised as suggested.

00154-028: This section describes species for which the USFWS and the BLM developed conservation measures specifically for the oil shale program. Because the USFWS and the BLM did not develop conservation measures for the white-tailed prairie dog or Gunnison prairie dog, the text in Section 3.7.4.1 has not been revised.

00154-029: The BLM agrees that only native species should be used to revegetate overburden stockpiles. The text has been modified accordingly.

00154-030: As discussed on pages 4-1 and 5-1 of the Draft PEIS, the PEIS provides examples of mitigation measures that the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final or a comprehensive list of required stipulations or management prescriptions. Project-specific requirements to ensure the successful reclamation of disturbed land would be established by BLM prior to leasing.

00154-031: The information presented in the PEIS that addresses disturbance impacts to wildlife is of sufficient detail for the purposes of the PEIS. The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and they provide an effective analytical foundation for subsequent project-specific NEPA documents. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to evaluate specific occurrences of wildlife, analyze the environmental consequences of leasing (including consideration of direct, indirect, and cumulative effects of disturbance to wildlife), reasonable alternatives, and possible mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. Site-specific NEPA analysis would include mitigation such as best management practices (BMPs), specific protections, or avoidance to mitigate impacts to wildlife from disturbance.

00154-032: Water depletion has been added as an impact category to Table 4.8.1-4.

00154-033: The text in Table 4.8.1-4 has been modified to indicate that the impacts of habitat fragmentation on terrestrial amphibians and reptiles could be large.

00154-034: Table 4.8.1-4 has been modified to indicate that the impacts of habitat fragmentation on terrestrial birds could be large.

00154-035: Table 4.8.1-4 has been modified to indicate that the impacts of habitat fragmentation on terrestrial mammals could be large.

00154-036: Table 4.8.1-4 has been modified to remove the column on impacts to terrestrial invertebrates because no special status terrestrial vertebrates are found in the study area.

00154-037: We disagree that changes in topography would have a large adverse effect on terrestrial amphibians and reptiles. Terrestrial species are less likely to be affected by changes in topography because they are less dependent on water or wetland features that would be affected by the changes in drainage patterns brought about by changes in topography. The text was not changed in response to this comment. Note that vegetation clearing and habitat fragmentation effects on these species are considered large.

00154-038: Table 4.8.1-4 has been changed to combine "alteration of topography" and "changes in drainage patterns" into one impact category. As noted above, we believe that changes in drainage patterns would not have a large adverse effect on terrestrial amphibians and reptiles. Terrestrial species are less likely to be affected by changes in drainage patterns because they are less dependent on water or wetland features. The text was not changed in response to this comment. Note that vegetation clearing and habitat fragmentation effects on these species are considered large.

00154-039: The BLM disagrees that changes in drainage patterns would have a large adverse effect on terrestrial mammals. Terrestrial species are less likely to be affected by changes in drainage patterns because they are less dependent on water or wetland features. Note that the effects on these species of vegetation clearing, habitat fragmentation, and injury or mortality of individuals are considered large. The text was not changed in response to this comment.

00154-040: The text in Table 4.8.1-4 has been revised as suggested.

00154-041: The text in Table 4.8.1-4 has been revised as suggested.

00154-042: Table 4.8.1-4 has been modified to indicate that the impacts of human disturbance and harassment on terrestrial amphibians and reptiles could be moderate.

00154-043: The text in Table 4.8.1-4 has not been revised as suggested. The human access impacts presented in the table relate to trampling or erosion impacts associated with improved access. The human collection category relates to the impacts mentioned in the comment. That impact magnitude has been revised to "large."

00154-044: The text in Table 4.8.1-4 has not been revised as suggested. The human access impacts presented in the table relate to trampling or erosion impacts associated

with improved access. The human collection category relates to the impacts mentioned in the comment. That impact magnitude has been revised to "large."

00154-045: Table 4.8.1-4 has been modified to indicate that the impacts of increased predation rates on aquatic and wetland animals could be moderate.

00154-046: Table 4.8.1-4 has been modified to remove the column on impacts to terrestrial invertebrates because no special status terrestrial vertebrates are found in the study area.

00154-047: Table 4.8.1-4 has been modified to indicate that the impacts of invasive plant species on terrestrial amphibians and reptiles, terrestrial birds, and terrestrial mammals could be moderate.

00154-048: The text in Table 4.8.1-4 has been revised as suggested.

00154-049: The text in Chapters 4 and 6 of the PEIS has been modified to remove the inconsistency and indicate that these ACECs would be available for application for leasing.

00154-050: Without project-specific details including development plans, locations of facilities, water needs, mitigation measures, and the locations of special status species, it is not possible to identify the impacts that could occur on specific special status species with any specificity. General habitat information has been added to Table 4.8.1-5 and 4.8.1-6. The reader can use this information to determine the types of impacts possible for each species on the basis of information presented in Table 4.8.1-1.

00154-051: The commentor is correct in stating that some ACECs are available for mineral development. The text in the PEIS has been corrected.

00154-052: There are existing federal laws, regulations, and Executive Orders placing requirements on federal agencies that will require extensive review of potential impacts within 100 year floodplains that would be addressed in subsequent NEPA analysis. Some of these are listed in Appendix D of the PEIS. Additionally, potential mitigation measures that could be applied depending on the specific situation are included in Sections 4.5.3, 5.5.3, 4.8.2, and 5.8.2. The BLM has identified that prior to future leasing and approval of plans of development, site-specific NEPA analysis will be required that, depending on the environment of the site, will address the kinds of issues raised by the USFWS.

00154-053: Section 5.5.2 includes subsections discussing estimated water availability at each of the STSAs. These estimates are related generally to the requirements of operations. Water availability to support a given operation relying on a given technology would be determined in a site-specific NEPA analysis. Determinations

about water would be based in part on state regulations regarding water rights and any reservoir construction.

00154-054: The potential effects of noise from tar sands development on wildlife are presented in Section 5.8.1.3.

00154-055: Any specific evaluation of wastewater lagoon development will be deferred to subsequent project-level planning prior to lease development. However, depending on the process method used and other mitigating circumstances, it may be necessary to establish open-surface water bodies. The mitigation measure pertaining to water bodies in Section 5.8.2.3 has been modified to state that such water bodies could have benefit to wildlife, but that they should be fenced or covered if they have poor water quality.

Site-specific NEPA analysis would include mitigation such as BMPs, specific protections, or avoidance to mitigate on eliminate impacts to wildlife from commercial oil shale or tar sands development. Mitigation measures, including those pertaining to wastewater lagoons or other surface water bodies, would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders.

00154-056: Section 4.1.8.3 provides an overview of impacts to wildlife that could occur from the types of impacts mentioned in the comment.

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. Therefore, the specific number and locations of projects cannot be identified within the PEIS. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. This will include an evaluation of the specific occurrences of key wildlife habitats, analyses of the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects (including those of other existing or reasonably foreseeable future oil shale and tar sands leases), reasonable alternatives, and mitigation measures to protect wildlife habitats, as well as what level of development may be anticipated. Project-specific NEPA analyses would also include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important wildlife habitats. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders.

00154-057: Impacts on migratory birds that would be common to all alternatives are addressed in Sections 4.8.1.3 and 5.8.1.3 for oil shale and tar sands, respectively. (Impacts on special status [e.g., threatened and endangered] migratory bird species are addressed in Sections 4.8.1.4 and 5.8.1.4.) The discussion in Chapter 6 of the PEIS mainly presents a comparison of the amount and location of lands that

could be developed by commercial leasing under the various alternatives. The wildlife information presented in Chapter 6 was meant to provide a few comparative examples of habitat currently identified for protection or state-identified habitat that overlap with lands available for leasing under the various alternatives.

00154-058: Table 6.1.4-5, which has been updated to include information for Alternative A, pertains to areas of select wildlife habitat that are currently protected under existing land use plans that could either be opened to leasing or remain unavailable to leasing under the various alternatives considered in the PEIS. It is acknowledged that wildlife habitat would be impacted under any alternative, including Alternative C.

See also response to Comment 00154-056.

00154-059: The text in Section 6.1.4.7 has been revised to clarify the entries in the table. The acres presented are those that have been identified in BLM land use plans as having lease stipulations to protect black-footed ferret habitat.

00154-060: The text in Section 6.1.4.7 has been revised to clarify the entries in the table. The acres presented are those that have been identified in BLM land use plans as having lease stipulations to protect threatened and endangered plant species.

00154-061: Table 6.2.4-3 presents the acreage of state-identified wildlife habitat within areas identified that could be available for commercial tar sands development. It is not the intent of the table to imply that all of these areas would be impacted by commercial tar sands leasing.

The sage grouse is a special status species and subsequent leasing decisions will be informed by the need to prevent the species from becoming an ESA-listed species. Site-specific NEPA analysis would include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts on sage grouse from commercial oil shale or tar sands development. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders. Mitigation of impacts to sage grouse would include recommendations included in BLM's national sage grouse habitat conservation strategy, as well as those contained in state-wide and regional sage grouse conservation strategies that have been prepared by state agencies.

00154-062: Section references have been corrected in Appendix C.

00154-063: We were unable to find information to suggest the Ute ladies'-tresses is found in either Sweetwater or Sublette counties. In Wyoming, the species is known from Converse, Goshen, Laramie, and Niobrara counties in the Antelope Creek, Horse Creek, and Niobrara River watersheds of the southeastern portion of the state.

00154-064: Table E-1 presents the counties and habitats in which the species are found. Tables 4.8.1-6 and 5.8.1-4 indicate that all depletions from the Colorado River Basin are considered to have an adverse effect on these species.

00154-065: The text in Table E-1, Section 3.7.4.1, and Tables 4.8.1-6 and 5.8.1-4 has been revised on the basis of the comment.

00154-066: The title of Appendix F has been revised as suggested.

00154-067: Conservation measures were mutually developed to address ESA-listed species conservation needs. Conservation measures were not developed universally for all candidate species, due in part to limited information. The PEIS does not preclude the development and application of conservation measures for any species at the next level of NEPA analysis.

00154-068: The list of mitigation measures presented in Chapters 4 and 5, as well as the conservation measures presented in Appendix F, is not meant to be a final list of measures to be employed for an oil shale or tar sands lease. Mitigation and conservation measures would be subject to modification on the basis of consultation with federal, state, and local agencies, and interested stakeholders at the project-specific lease and development stage. Any actions undertaken for oil shale or tar sands leases developed on BLM-administered lands would have to comply with both the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. Spatial and temporal mitigation measures to protect these species would be developed on a lease-specific basis.

OSTS_00155

mail_ostseisarchives

From: ostseiswebmaster@anl.gov
Sent: Tuesday, March 18, 2008 6:14 PM
To: mail_ostseisarchives
Subject: Oil Shale and Tar Sands Comment

Thank you for your comment,

The comment tracking number that has been assigned to your comment is OSTSD Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date:

Oil Shale and Tar Sands
Draft Programmatic EIS Comment:

First Name:
Last Name:
Address:
City:
State:
Zip:
Country:
Email:
Privacy Preference:

Comment Submitted:
Sherry Thompson, Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave.
Argonne IL 60439

Dear Ms. Thompson,

I am writing to comment on the Bureau of Land Management's Oil Shale and Tar Sands Draft Programmatic EIS. I strongly oppose Alternative B, the "Preferred Alternative" and support Alternative A, the "No Action" alternative in the PEIS. 155-001

It is clear that the "Preferred Alternative" B is almost certain to cause massive, irreversible damage to large areas of Utah, Colorado, and Wyoming. This includes devastating the land and water, endangering wildlife and their habitats, harming the people in local communities, and generating massive greenhouse gas pollution that would add to global climate change. Moreover, the BLM admits that more research is needed before we know the true impacts of the technology or if it is even commercially feasible. 155-002

At a time when we need to be moving away from fossil fuels and the damage they cause, this proposal would continue our dependence on them. The PEIS fails to adequately address any of these issues, or to consider a reasonable range of alternatives, including the potential for increased energy conservation and efficiency. This is contrary to agency regulations and the law. 155-003

I urge the BLM to choose the "No Action" alternative A, and to halt efforts to develop oil shale and tar sands on public lands. Thank you for the opportunity to comment on the Oil Shale and Tar Sands Draft Programmatic EIS. 155-001 (cont.)

Sincerely,

Responses for Document 00155

00155-001: The BLM acknowledges the commentor's preference for Alternative A.

00155-002: The PEIS is a programmatic-level document, analyzing allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provides an effective analytical foundation for subsequent project-specific NEPA documents. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives, as to whether lands are suitable for future consideration for commercial oil shale leasing.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technologies and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases, or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA processes.

00155-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional

information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

The preparation of the PEIS is not contrary to agency regulations or laws. Preparing the PEIS is in full compliance with the principles of the FLPMA of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals.

OSTS_00156

United States Department of the Interior

BUREAU OF RECLAMATION
Upper Colorado Regional Office
125 South State Street, Room 6107
Salt Lake City, Utah 84138-1147

IN REPLY
REFER TO:
UC-700
ENV-6.00

March 14, 2008

MEMORANDUM

To: PEIS Manager, Bureau of Land Management
Attention: Sherri Thompson

From: Nancy Coulam
Chief Environmental Officer

Subject: Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocation in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS)

Reclamation appreciates the opportunity to work with you on this NEPA analysis. Staff from the Upper Colorado Region reviewed the published document and they have some general and specific comments.

General Comments

We appreciate the attention that the BLM has paid to our prior comments on administrative drafts of the PEIS. Our biggest concern remains that technologies are not presently available to prevent salt loading and the introduction of other contaminants into the Green and Colorado rivers under the action alternatives. The PEIS does document the potential for adverse effects to the water quality in the Colorado River and we appreciate that. We believe the final should acknowledge that increased erosion and sedimentation could lead to increased salt loading and water quality concerns. We believe best management practices that are currently being investigated under the research and development projects could partially take care of this, and that the development of best management practices could be included as mitigation measures. 156-001

Specific Comments

Page 3-61, last paragraph It says, "reservoir salt leaching" and it should be "reservoir evaporation." 156-002

Response for Document 00156

00156-001: The general impacts of oil shale and tar sands development on water resources are described in Sections 4.5.1 and 5.5.1, respectively. However, the specific impacts and the magnitude of the impacts caused by soil erosion, dissolved salts, and sedimentation would be addressed in subsequent project-specific NEPA documents and are not provided in the PEIS.

00156-002: "Reservoir salt leaching" refers to the leaching of soil surrounding a reservoir and the leached dissolved salts that empty into the reservoir.

OSTS_00157

John Martin
Glenwood Springs, CO

Larry McCown
Rifle, CO

Trési Houpt
Glenwood Springs, CO

Garfield County

BOARD OF COUNTY COMMISSIONERS

March 17, 2008

Mike Nedd, BLM Assistant Director
Minerals, Realty and Resource Protection
1849 C Street N.W.
Washington, DC 20240

Dear Mr. Nedd:

We are submitting these comments on the Oil Shale PEIS under the public period. We respectfully appreciate Garfield County being included as a cooperating agency during this entire PEIS process.

Sincerely,

John Martin, Chair
Garfield County Board of County Commissioners

cc: Sherri Thompson, Project Manager
BLM Colorado State Office

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CO STATE OFFICE
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108 Eighth Street, Suite 213 • Glenwood Springs, CO 81601
(970) 945-5004 • Fax: (970) 945-7785

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GARFIELD COUNTY COMMENTS

ON

BLM OIL SHALE PEIS PUBLIC DRAFT

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CO STATE OFFICE
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INTRODUCTION

Garfield County wishes to thank the BLM for including the County as a Cooperating Agency throughout this PEIS process. The County has attended a majority of the Cooperating Agency meetings and public meetings that have been conducted over the past two years.

When this process began, the purpose of the PEIS project was to provide for commercial leases for the extraction and processing of oil shale. About a year into the project, the purpose was changed from awarding commercial leases, to identifying what lands might be made available for commercial leasing at a future date. This change in purpose was, in part, driven by a lack of information and knowledge of the exact process(es) that might be utilized in the extraction and processing of oil shale. Without a clear understanding of the process(es) that might be utilized, it was extremely difficult to determine the impacts that might be experienced in the three state area where oil shale operations might take place.

As a basis of Garfield County's analysis of the PEIS documents, and the drafting of these comments, the following assumptions were made:

- That no Tar Sand activities would take place within Colorado;
- That no surface mining activities would take place within Colorado;
- That the purpose of the PEIS study was to identify lands that might be made available for commercial leasing at some time in the future;
- While the bulk of Volumes 2 & 3 address the various existing technologies for extraction of the petroleum product from the shale material, and the refining of the product, it seems premature to provide in depth comments until the specific process is known, which could be totally different than those discussed in the draft document.
- That prior to any future commercial leasing, additional site specific NEPA analysis would be conducted and analyzed; and,
- That this PEIS would be used, as the basis, to amend 12 land use plans in Colorado, Utah, and Wyoming, to provide the opportunity for leasing. **"The land use plans currently in use do not address development of oil shale resources."**

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OVERALL COMMENTS

- Garfield County submitted comments on an earlier draft document (June 6,2007), provided to Cooperating Agencies. Many of the comments submitted at that time still apply to this Public Oil Shale and Tar Sands PEIS publication, and have been included in these comments, as appropriate.
- The earlier draft document contained four "Alternatives" none of which were acceptable to Garfield County. Garfield County offered an "Alternative E" which proposed delaying any decisions regarding commercial leasing until such time that the current RD&D projects could be completed and the proposed technologies and their impacts better understood.
- Under this revised draft, the alternatives have been reduced to three alternatives: Alternative A (no action, would include only the development approved in the existing RD&D leases); Programmatic Alternative B, (the BLM's Preferred Alternative); and, Programmatic Alternative C. Under Alternative B, a total of 1,991,222 acres would be made available for application for commercial leasing, including the 6 RD&D projects. (359,798 acres in Colorado) Under Alternative C, a total of 830,296 acres would be made available for application for commercial leasing, including the 6 RD&D projects. (40,325 acres in Colorado)
- It appears that the reason the BLM rejected Alternative A (the no action alternative) is found on page 6-103, of the Public PEIS document, which states " Under the no action alternative, the BLM's approach to commercial oil shale development would be fragmented and would require costly and time-consuming individual land use plan amendments. This is likely to translate into greater costs and, possibly, protracted time lines for establishing commercial oil shale development on public lands". 157-001
- The above statement is somewhat confusing since the existing nine BLM Management Plans will have to be amended prior to any commercial leasing of oil shale lands. It would seem that a delay in the amendments of the Management Plans, until after the RD&D projects are completed, would not result in any additional costs over that required to do them now. The benefit would be that the preferred process would be known and the impacts capable of being accurately determined, so the plans could reflect actual operations.
- If the concern is the loss of time in getting the Management Plans amended, due to waiting for the RD&D projects to be completed, then Alternative C would still drive the amendments, with far less impacts on all concerned.
- Alternative B would make 87% of public lands available for application for leasing, as compared to 36% under Alternative C.
- On page 6-104, of the PEIS document, there is a summary statement that says " alternative A, the no action alternative, would do the least to facilitate future commercial oil shale development. Alternatives B and C 157-002

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would be equally effective in facilitating commercial oil shale development over the next 20 years, by virtue of the land use plan amendments."

- On page ES-3, it is stated, that "once the PEIS has been completed and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and possible mitigation measures, as well as what level of development may be anticipated. On the basis of this NEPA analysis to be conducted at the lease stage, the BLM will consider further amendment of one or more plans, including, but not limited to, the establishment of general lease stipulations and best management practices." Given this statement it again would appear that Alternative C should be the "Preferred Alternative". This alternative places far less acreage at risk, especially since the actual process(es) are unknown, and the actual impacts are unknown. 157-002 (cont.)
- If Alternative C were the preferred alternative, it would seem reasonable that at some future point in time, if oil shale development is proven economically feasible, and is in commercial production, plans could then be amended to provide for more public land to be made available, if necessary, to recover a larger percentage of the resource. An added benefit of such an approach would be possible advancements in technology that would positively benefit oil shale production, and all stakeholders.
- It was noted that the maximum recoverable resource, included in the PEIS, was only approximately 50% of the 1.2 trillion barrels that has been discussed in both public meetings and the public media. This discrepancy places a cloud over all of the estimated data and impacts included in the PEIS. 157-003
- The PEIS was very unclear if possible commercial leasing would / could occur south of the Roan Plateau. 157-004
- The PEIS referred to Federal, State and private property owner reviews and approvals, but omitted reference to local government review and approval. 157-005
- There was no single chart or table provided that showed all of the assumptions included in the PEIS, thus no ability to compare or evaluate conflicts therein.
- There was not a clear understanding or definition of the "threshold effects" statements contained in the PEIS documents. For example: how is "moderate effect" and "large effect" defined? A table showing these definitions, thresholds and effects would be very helpful. 157-006
- The PEIS document acknowledges that additional development will most likely occur on private lands, above and beyond the development on Federal lands, but does not include any discussion of possible effects, on a cumulative basis, of such private development. 157-007
- The PEIS document does not address how, or if, local land use codes and regulations will be considered in the commercial leasing process, or how such consideration would take place. 157-008

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- Population growth, in the different communities within Garfield County, appears to be higher than those shown in the PEIS document, which refers to the growth as "moderate". At the present time, Garfield projections for just the Rifle area are an increase from approximately 8,200 people to approximately 50,000 people by 2030, which is not deemed as moderate. 157-009
- Local community housing would include "temporary housing built in local communities" per the PEIS document. This appears to run counter to current local land use codes, and local government will. 157-010
- The PEIS document does not adequately deal with the adverse impacts of reductions in traditional recreational use of the Federal lands involved; or the lack of local facilities to support traditional recreational uses of lands in, or near, the ROI. 157-011
- In general, there is a need for the PEIS to address cumulative time lines, population growth, and labor needs in the same section, charts, and analysis for socioeconomic impacts. 157-012

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SPECIFIC COMMENTS

Land Use

- On page 6-68 there is a statement that " although Alternative C makes approximately 1.2 million fewer acres available for application for commercial leasing, it does not provide for less potential development of commercial oil shale than does Alternative B."
- If this is an accurate statement, then it makes a compelling argument for Alternative C being the preferred alternative rather than Alternative B. 157-013
- Alternative C has an added benefit over Alternative B in that it removes from application for leasing approximately 23,000 acres of land identified as Areas of Critical Environmental Concern (ACECs).
- Under both Alternative B & C, the preference right lease areas established for the five Colorado RD&D projects would not be available for application for leasing, other than to the existing RD&D leaseholders. Does this mean that the leaseholders would use their process, or would they have to use the preferred process, selected from the RD&D projects by the BLM? If a leaseholder, following the RD&D projects, were to decide not to move forward on oil shale production, would the preference acres be frozen, or would they be an asset of the leaseholder and open for sale, pending an additional NEPA process, and approval of the BLM? 157-014
- Under Alternative B, there are approximately 2 million acres of proposed lease area. These lands include 10 ACECs totaling 23,000 acres, approximately 185,000 acres of potential ACECs, and 170,000 acres of lands with wilderness characteristics. Under Alternative C, there are only approximately 830,000 acres of proposed lease area. These lands include 157-013 (cont.)

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110,000 acres of lands with wilderness characteristics and 137,000 acres of lands with potential for designation as ACECs. 157-013 (cont.)

- At the present time, the Piceance Basin is in a major natural gas boom. The basin is one of the largest untapped natural gas reserves in the country, at a time when the demand for natural gas is increasing. The region has already experienced a tremendous amount of impacts as a result of this natural gas boom. Technology, and best management practices have worked to increase the extraction of the gas, while reducing the surface impacts on the land. Alternative C would likely have less of an impact on the natural gas play, thus reducing the risk of a substantial reduction in exploration and production of natural gas. Until such time that the process(es) are known for oil shale production, and the cumulative impacts determined, the recovery of natural gas should not be impeded. 157-015
- The White River BLM Office is in the process of amending their 20 year Management Plan to accommodate an increased level of activity in the exploration and production of natural gas. This plan, at the present time, does not have a provision for oil shale development built into it. The designation of lands, that will be available for future commercial oil shale development, could require the White River Management Plan to be completely revised before it is even completed; again, without any knowledge of how oil shale development will be done in the future, or what the impacts might be. 157-016
- The BLM anticipated the potential development of 1,100 oil and gas wells in their current plan, and are now projecting more than 21,000 wells could be drilled in the planning area over the next 20 years. How would these projections be impacted by Alternative B, or C? It is stated in the PEIS document, that natural gas recovery is not compatible with the recovery of oil shale. Again, without knowing what process(es) will be used, and the magnitude of the operations, it would appear that a known resource with improving technologies and best practices, would be placed at risk for a totally unknown, at this time. 157-015 (cont.)
- The PEIS document also states that recreational use of the lands would not be compatible with oil shale recovery operations. Recreational use of the lands, under consideration, is a major economic factor for the counties and municipalities encompassed within the identified acreage. Again to place a known economic driver at risk, for a driver that is so questionable at this time, does not make sense. 157-017
- There is considerable private acreage within the geographic area under consideration, that will not necessarily be bound by the same rules and regulations that might apply to public lands. This is another unknown that further argues for minimizing the amount of acreage that would be available for future leasing at this time. 157-018

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Environmental/Ecological

- Without knowledge of the process(es) that might be used in commercial lease operations, it is not possible to predict or analyze the impacts to the environment or ecological resources.
- Even without specific knowledge, impacts will be proportional to the amount of land impacted.
- Based on the analysis included in the draft PEIS document, there are considerable differences in the potential environmental and ecological impacts between the various technologies under consideration. The potential demand for water is a prime example of these differences. Power demands are another example of how impacts can, and will vary, based on the technology(ies) that will ultimately be used if commercial leasing occurs. 157-019
- Wildlife will be greatly impacted as the amount of acreage increases. The geographic area under consideration is prime winter range for many species, as well as major breeding grounds for the Greater Sage Grouse.

Socioeconomics

- On page 6-61, and several places within the draft PEIS document, it is stated that, "the designation of lands as available for leasing and the amendment of land use plans would not have socioeconomic impacts." Garfield County must question this statement on the basis that, the fact lands would be specified for possible oil shale development could alter the potential value of the land on a speculative perspective. Potential impacts on visual resources, noise, air quality, etc. could alter how the public would perceive the value and desirability of properties surrounding lands designated for future commercial leasing. 157-020
- Alternative B, could potentially alter the exploration and development of natural gas and oil, thus impacting the economy of the entire region. It could be possible that the identification of lands available for future commercial oil shale leases, could accelerate the exploration and development of gas and oil, thus increasing impacts and the costs of mitigation of impacts on local governments. The reverse could also be possible. How would the White River BLM office react to requests for permits to drill oil and gas wells on lands designated as available for future commercial oil shale leases. 157-021
- It is critical that local governments and communities attempt to get ahead of the curve on the development of infrastructure and social programs to manage future growth resulting from energy development. Without accurate knowledge of the direction of commercial oil shale development, it is extremely difficult to plan, much less implement the development of public works and social programs. 157-022
- The PEIS document does not take into account the cumulative impacts of existing and future traditional oil and gas development. It is critical that a 157-023

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total cumulative, regional, socioeconomic impact scenario be developed and planning be done on a regional basis. 157-023 (cont.)

- The PEIS document, does not address housing issues, except to say that additional housing will be developed by the energy companies on leased land, or by private entrepreneurs on private land. How this will be done and at what costs is not discussed adequately. 157-024
- Discussion of possible changes to public policy, required to address future commercial oil shale development, is also omitted from the PEIS document.
- Regardless of the future of oil shale development, the fact that lands will be identified for possible future leases, could alter the character of existing communities and the quality of life. 157-025
- The PEIS document clearly identifies two separate areas of the Piceance Basin, the north, and the south. The south Piceance Basin is located within Garfield County and is largely associated with the Parachute Creek drainage. This area is also a major area of natural gas exploration and development. The PEIS document does not address what affect the current natural gas development will have on future commercial oil shale leases and development. 157-026
- The socioeconomic impacts section generally relates to overall impacts and does not provide specific breakdowns of impacts on each county and/or municipality. This makes it very difficult for specific entities to digest and evaluate and estimate mitigation of potential impacts. 157-027
- The PEIS discusses a number of individual steps and/or operations, and indicates potential population and/or worker numbers, but there is no place where these are summarized in one table so the cumulative, timing, impact(s) can be evaluated.
- Estimated steps in the respective processes, alternatives, need to be shown in a chart where cumulative impacts and timelines are set forth in a clear and precise fashion so total employment, population, and associated socioeconomic impacts can be identified and evaluated. 157-028
- Assumptions necessary to estimate impacts at a more specific level of geographic detail, than the five county "Region of Influence (ROI), needs to be clearly and precisely spelled out.
- Local governments should not have to develop their own set of assumptions to determine potential impacts, but should be using a common set so consistency, and comparable impacts and costs of mitigation are assured. 157-029
- The PEIS contains much uncertainty, which compounds the ability of counties and local governments to determine socioeconomic impacts to their respective jurisdictions, much less the ability to evaluate the potential impacts and costs of mitigation. 157-030
- The PEIS proposes large, employer-housing compounds located on Federal lands, but does not provide sufficient discussion regarding the socioeconomic impacts, and needs, that will be caused by such 157-031

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developments; i.e. schools, recreation, shopping, supply and demand impacts on prices, governmental services, etc.

- No expectations of local governments and/or communities related to employer provided, remote housing was discussed.
- A discussion of the short term verses long term effects / impacts, of remote, employer provided housing needs to be included and evaluated as part of the PEIS document.

157-031 (cont.)

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Resources / Facilities Required

- The PEIS assumes that any additional power requirements would come from coal fired generation facilities.
- Given the time frames included in the PEIS document for commercial operations to ramp up, there would not appear to be adequate time to permit, build, and test new coal fired generation plants.
- Given the abundance of natural gas in the region, and to be produced as a by product of the oil shale recovery operations, gas fired generation facilities should have been included in the PEIS document and evaluated.
- Local impacts would be greatly altered based on the type of additional power generation facilities required. (Coal verses Natural Gas generation facilities)
- Environmental impacts would also change based on the type of power generation facilities built.

157-032

- If there are compelling reasons for limiting additional power generating facilities to coal, the direct and indirect socioeconomic effects of such generation should be totally considered and evaluated in the PEIS document.

157-033

- The discussion of what, and how much, raw materials, will be utilized for the construction of the oil shale facilities and infrastructure, and where it will be acquired, is very suspect. Gravel for instance is becoming a very scarce commodity in Garfield County and the price has escalated on a geometrically progressing scale.

157-034

- Construction labor in the entire region is in short supply and is currently being recruited from as far away as the east coast. To assume that local labor markets can absorb any of the increased construction demands would be suspect.

157-035

- The PEIS assumes a fairly linear progression of impacts as oil shale ramps up. This assumption does not take into account the local carrying capacity of the county and local municipality infrastructure. In place of a linear projection, it will most likely be a stair step impact, with major infrastructure changes required, to build increased carrying capacity prior to demand, followed by a linear decline in carrying capacity as growth occurs.
- The ability of local communities to absorb, or ramp up to meet the direct and indirect population growth in housing and / or infrastructure requirements, varies greatly by community. For example, Glenwood Springs is relatively land bound, and its community waste water treatment capacity is near

157-036

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maximum, thus, they would be impacted much differently than Rifle, which has very different land issues, and is in the process of, or has recently expanded their waste water and residential water systems. 157-036 (cont.)

- The PEIS document assumes that all petroleum based products recovered from oil shale will be shipped out of the region and refined at facilities in other areas. The PEIS document does not adequately assess the manner in which these petroleum resources will be transported, or if there is adequate capacity in other locations to receive and refine the resource. Costs of increased transportation systems and refining facilities, to process recovered product, was not adequately addressed. To assume that no other refining facilities will be required is suspect. If additional facilities will be required, where will they be located, how will the resource get to them, and what is the impacts and cost? 157-037
- There was not adequate discussion within the PEIS document on where and how the water needed in the respective oil shale alternatives would be acquired, or come from. The future / secondary impacts of diverting water from public use, to oil shale, needs to be evaluated. 157-038

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SUMMARY

- On page 2-51 "The BLM has determined that Section 369 of the Energy Policy Act of 2005 requires the agency to evaluate establishment of commercial leasing programs for oil shale and tar sands development. "The "no action alternative" for oil shale and tar sands (Alternative A) effectively is a no leasing alternative." "Any alternative in the PEIS that did not evaluate opening public lands for commercial leasing would not be consistent with the Energy Policy Act."
- Based on this interpretation, the BLM has rejected Alternative A, and feels compelled to select between Alternative B and Alternative C. 157-002 (cont.)
- Again, we make reference to page 6-68 of the PEIS document, that states " Although, Alternative C makes approximately 1.2 million fewer acres available for application for commercial leasing, it does not provide for less potential development of commercial oil shale than does Alternative B."
- In the Piceance Basin, Alternative C would likely have less of an impact on oil and gas operations since considerably fewer acres of potentially valuable oil and gas deposits, in a rapidly developing area, would be available for application for commercial oil shale development.
- The PEIS document needs to provide a section that includes time lines and cumulative data concerning all impacts on population, labor requirements, facility requirements, and resources required. 157-039
- The PEIS document makes the statement that no surface mining will be done in Colorado, and that only the In-Situ process will be allowed. There is one below surface mining operation currently allowed under the RD&D 157-040

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grants. Is this below ground process already ruled out for commercial leasing within Colorado? 157-040 (cont.)

- Ongoing cumulative effects on groundwater should be monitored and mitigated if, and when, necessary. The final PEIS document should contain language describing this commitment. 157-041
- The PEIS process, commercial leasing regulations, and pricing alternatives for commercial leasing are all occurring simultaneously, with overlapping impacts. This process is taking place prior to the results of the current RD&D projects being concluded and a preferred technology determined. Until the appropriate technology is known and evaluated, the impacts and cost of mitigation cannot be determined, thus the lease pricing, and potential bonus payments, is at best a guess. This does not appear to be prudent public policy nor ensure appropriate and adequate protection of public resources, or return on public equity. 157-042
- The PEIS document acknowledges, in several places, that there will be both primary and secondary impacts, but secondary impacts are not adequately addressed, nor are general growth that will be required to support, and / or address secondary impacts. 157-043

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CONCLUSIONS

The Energy Policy Act of 2005 directed the Secretary of the Interior to undertake a series of steps. In Summary, Congress directed that the Secretary shall:

- Complete a PEIS for a commercial leasing program for oil shale and tar sands on public lands;
- "Not later than 6 months after completion of the PEIS, the Secretary shall publish a final regulation establishing a commercial leasing program;"
- Consult with the Governors of States with significant oil shale resources on public lands … and other interested persons;
- "If the Secretary finds sufficient support and interest exists in a State, the Secretary may conduct a lease sale in that State under the commercial leasing program."

Given the above charges from Congress, it would appear that commercial leasing could move forward rapidly following final publication of this PEIS document.

And given that the BLM has determined that a "No Action Alternative" (Alternative A) is not consistent under the Energy Policy Act of 2005,

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GARFIELD COUNTY WOULD OFFER THE FOLLOWING RECOMMENDATIONS:

- Garfield County's preferred alternative would still be "The Alternative E" that was included as the final position in our comments previously submitted on June 6, 2007. Under this alternative, it would allow appropriate testing to occur, but would delay the evaluation and decision regarding commercial leasing until such time that the proposed technologies, and their impacts, are better understood, and the current RD&D processes and findings are available concerning economic and commercial viability of oil shale operations. 157-044
- Before the final analysis of a preferred alternative is completed, results of the current RD&D leases should be obtained and evaluated, along with cumulative impacts of each alternative.
- The final PEIS document and Leasing Regulations needs to include a policy statement that requires lessees to work with local and county governments, and accept financial responsibility for developing and funding energy related public services that will be required. 157-045
- The final PEIS document and Leasing Regulations should contain a commitment to continuously provide for air quality monitoring and mitigation if needed for oil shale development, and any additional requirements for power and water generation. 157-046
- The final PEIS document needs to include a commitment to monitor, evaluate, and mitigate impacts on local entities regardless of which alternative is selected. This commitment should carry forward to project specific NEPA analysis, once commercial oil shale leasing programs are underway. 157-045 (cont.)
- Given the BLM's assertion that Alternative A is not an option, there are only, realistically, two alternatives from which to choose, Alternative B or Alternative C. Since Alternative C does not result in less potential development of oil shale than does Alternative B, and includes far less acreage being made available for commercial leasing, and far less impacts on the environment, wildlife, and local governments and population, Garfield County would recommend that Alternative C be the preferred alternative rather than Alternative B. 157-002 (cont.)

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Responses for Document 00157

00157-001: The BLM has rejected no alternative. The ROD associated with the Final PEIS will provide a concise public record of its decision, which will include the rationale for that decision. The referenced text in Section 6.1.4 of the Draft PEIS on page 6-103 provides comparisons of alternatives. The paragraph and statement compare and contrast the alternatives.

00157-002: The BLM acknowledges the commentor's preference for Alternative C.

00157-003: The BLM has based its analysis on those extraction technologies that are believed to be most likely applied to future oil shale developments; however, allocation decisions are not being based on the resource numbers identified. The resource numbers quoted were for purely comparative purposes. The actual recovery numbers are yet to be determined and are contingent on the type of recovery method. This is also true for any recovery numbers that are being proposed by in situ methods. The purpose of the PEIS is to identify lands to be opened or closed to oil shale development, not to compare technologies. Additionally, the BLM's assumptions are in no way preemptive of alternative extraction technologies, and applicants for future leases are free to propose alternative technologies for extraction and processing of oil shale, together with a detailed plan of operation describing how they will identify, manage, and mitigate anticipated environmental impacts.

00157-004: The southernmost portion of the most geologically prospective area for oil shale is encompassed by the Roan Plateau planning area (see Figure 3.1.1-2). Within the Roan Plateau planning area, some land would be made available for application for commercial leasing under Alternative B and none would be made available under Alternative C (see Figures 2.3.3-1 and 2.3.3-4).

00157-005: Where previously omitted, local government review and approval has been added to the text of the PEIS.

00157-006: Assumptions regarding analysis of oil shale and tar sands technologies are located in Sections 4.1 and 5.1, and assumptions regarding cumulative impact analysis are in Section 6.1.5.1.

The potential magnitude of impacts in different impact categories (e.g., habitat fragmentation and water depletions) is defined for ecological resources in Sections 4.8.1 and 5.8.1 of the PEIS. Impact magnitude is described in these sections as small, moderate, or large using the following definitions. A small impact is one that is limited to the immediate project area, affects a relatively small proportion of the local population (less than 10%), and does not result in a measurable change in carrying capacity or population size in the affected area. A moderate impact could extend beyond the immediate project area, affect an intermediate proportion of the local population (10 to 30%), and result in a

measurable but moderate (not destabilizing) change in carrying capacity or population size in the affected area. A large impact would extend beyond the immediate project area, could affect more than 30% of a local population, and result in a large, measurable, and destabilizing change in carrying capacity or population size in the affected area.

Generally, for other resources, the meaning of comparative statements can be understood from the context of impact descriptions in the text that are specific to each resource area.

00157-007: Sections 6.1.5.2 and 6.1.5.3 have been revised to more clearly acknowledge the potential for oil shale development on nonfederal (e.g., private, state, Tribal) lands. However, the extent and impacts of such development are unknown at this time. It is assumed that development of oil shale or tar sands facilities on nonfederal lands would have impacts similar to such facilities located on federal lands, as described in Chapters 4 and 5 of the PEIS.

00157-008: The FLPMA and the Energy Policy Act of 2005 have specific requirements for coordination of activities with various levels of government (see Section 202(c)(9) of FLPMA and Section 369(e) of the Energy Policy Act). The BLM's Land Use Planning Handbook (H-1601-1) provides extensive guidance in Section I, paragraphs C, D, E, and F, regarding the role and the opportunities for participation in BLM planning and environmental processes.

There are also numerous places in the PEIS (among them, Sections 1.2, 2.3.3, and 2.4.3) that identify requirements for future coordination with various levels of government and for compliance with existing law and regulation. Appendix D contains a nonexclusive list of regulatory requirements potentially applicable to commercial oil shale and tar sands development.

Although rare, it is possible that a local or state regulation could interfere with the implementation of the statutes under which the BLM would lease or approve operations and that such an ordinance would be pre-empted.

00157-009: ROI Population projections presented in Section 6.1.1.10 were taken from county population forecasts prepared by each state and reflect growth rates projected in those forecasts.

Rather than present data at the county level, given the programmatic nature of the PEIS, the purpose of the data presented in Section 3.10 is to provide an overview of socioeconomic conditions in a region of influence around each oil shale and tar sands resource area, based on the likely residential location of project workers, and consequently the region in which the majority of socioeconomic impacts of the prospective facilities would most likely occur.

00157-010: The BLM has stated in the PEIS that housing developments will not be placed on public lands. Local land use regulations will determine how, where, and if both permanent and/or temporary housing will occur within their jurisdictions

00157-011: The economic impact of oil shale and tar sands development on recreation assesses the impact of a 10% and a 20% reduction in ROI recreation employment in each state ROI. Impacts include the direct loss of recreation employment in the recreation sectors in each ROI, and the indirect effects, which represent the impact on the remainder of the economy in each ROI as a result of a declining recreation employee wage and salary spending, and expenditures by the recreation sector on materials, equipment, and services.

In the Colorado ROI, the total (direct plus indirect) impacts of oil shale development on recreation would be the loss of 1,415 jobs with a 10% reduction in recreation employment, and 2,830 jobs if recreation employment were to decline 20% (Table 4.11.1-7). Income lost as a result of the 10% decrease in recreational employment would be $18.3 million, with $36.5 lost for the 20% loss in employment. In the Utah ROI, 388 jobs and $3.2 million in income would be lost in the ROI as a whole as a result of a 10% reduction in recreation employment, and 776 jobs and $6.3 million in income would be lost with the 20% reduction. In the Wyoming ROI, 1,360 jobs and $7.2 million in income would be lost under the 10% scenario, with 2,719 jobs and $14.4 in income lost if 20% of recreation-related employment were lost in the ROI.

Public lands in each ROI are used primarily hunting and other forms of dispersed outdoor activities. Table 3.1.2-1 in the PEIS provides a listing of the many recreational areas and other areas that may provide recreation opportunities located within about a 50-mi radius of the oil shale and tar sands resources. Whether or not there are adequate facilities to support traditional recreational activities in each ROI is beyond the scope of the PEIS.

00157-012: The cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). A more specific cumulative analysis of socioeconomic impacts would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

The cumulative impacts analysis in the PEIS summarizes the past, present, and reasonably foreseeable other activities (for example, oil and gas development, coal mining, minerals development) for the study area, and presents a preliminary qualitative assessment of the incremental impacts of those activities considered in conjunction with oil shale and tar sands development. At this preliminary stage, when the specifics of the extent of future oil shale and tar sands development are unknown, the discussion of the potential impacts of oil shale development are based on the BLM's experience with comparable surface-disturbing activities

from other types of mineral development. In order that the decision maker might have sufficient information to make a reasoned choice among the alternatives, the BLM has developed a general analysis of the potential incremental impacts from all past, present, and reasonably foreseeable actions, in conjunction with a single hypothetical oil shale or tar sands facility, with the understanding that there might be more than one, or even many, oil shale/tar sands facilities developed in the future. For the purpose of this analysis, parameters for consideration (such as jobs created) were developed where possible (see Section 6.1.5.3.10). For some parameters (such as air emissions), no estimates with respect to possible development could be made because the data would depend entirely on technology-specific inputs.

Prior to leasing (when site-specific and technology-specific data will be available) or approval of a plan of development (when accurate information on employment, etc., will be available), additional environmental analysis will be performed including a cumulative analysis, as appropriate.

00157-013: Assumptions as to the level of activity are too speculative to support a meaningful RFDS for this PEIS. Therefore, it was decided not to develop an RFDS. However, as part of subsequent NEPA analysis, an RFDS will be developed to project a likely anticipated oil shale and tar sands activity supported by a clear set of supportable assumptions. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industry.

00157-014: The existing terms and conditions of the individual RD&D projects will control the future availability and development of both the RD&D and PRLA acreages. Since these are valid existing rights, decisions regarding the operation of these leases are beyond the scope of this PEIS. The PEIS does, however, consider two separate options for future leasing of lands currently included in these leases should the current lessees relinquish their leases.

00157-015: It is BLM's policy to optimize the recovery of both resources in an endeavor to secure the maximum return to the public in revenue and energy production; prevent avoidable waste of the public's resources utilizing authority under existing statutes, regulations, and lease terms; honor the rights of each lessee, subject to the terms of the lease and sound principles of resource conservation; and protect public health and safety, and mitigate environmental impacts. The projections of oil and gas wells within the current plan are taken into consideration during the cumulative effects analysis (see Section 6.1.5.2.1).

00157-016: All decisions related to land use planning for oil shale resources in the White River RMP area (and in the whole PEIS study area) will be made by the PEIS and should not require a complete revision. The Record of Decision on the final PEIS will amend the existing White River RMP as described in Appendix C. The BLM

recognized that there were several ongoing land use planning efforts, as well as planned planning efforts that would begin while the BLM was preparing the PEIS. The BLM determined that it would be more administratively efficient to prepare the PEIS and provide a more focused analysis of the environmental consequences of a commercial oil shale and tar sands program than to disrupt the ongoing planning efforts.

00157-017: The statement in the current Draft PEIS has been clarified to discuss the potential nature of the conflict between oil shale and tar sands development and other uses of public lands.

The intent of the description in the Draft PEIS was to convey that, although the potential impact (i.e., surface disturbance) and duration of commercial development are unknown (see assumptions in Sections 4.1 and 5.1), impacts are likely to be similar to known uses such as coal mining, or oil and gas development. Surface disturbance during development and production may well displace other uses until reclamation is completed. The expected impact on other public land uses, including recreation, will be reviewed as part of subsequent NEPA analysis.

Recreational use, although important, does not necessarily have absolute priority over other authorized uses of federal land, including mineral development. The FLPMA mandate is one of multiple use and sustained yield of a variety of resources and land uses (Section 102(a)(7)). The BLM appreciates the commentor's concern for the economic importance of recreation, and acknowledges that the economic contributions of commercial oil shale operations will be somewhat uncertain, at least in the beginning. Nonetheless, the Energy Policy Act of 2005 requires the BLM to establish a leasing program for oil shale. There are risks and opportunities in every decision the BLM makes regarding competing land uses. At this stage, as explained in Chapters 1 and 2 of the PEIS, the decision to be made is quite limited. At subsequent stages, when applications for commercial lease of these resources are actually received and accepted, analysis of precisely these issues will take place and decisions made in accordance with BLM's statutory obligations.

00157-018: There is a substantial amount of nonfederal land in the study area (see discussion in Section 3.1); however, the scale and timing of potential future oil shale and tar sands development on these lands, as well as the technologies that would be used for development, are highly speculative at this time. Text has been added in Sections 6.1.5 and 6.2.5 to clarify that future levels of commercial oil shale and tar sands development (both on public and private lands) are unknown.

00157-019: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. Impacts would depend on many factors, including project sites, technologies to be used, and various activities involved in

the development. The impacts to wildlife (including greater sage-grouse) and surface and groundwater as well as the sources of required electric power would be addressed in subsequent project-specific NEPA documents. Depending on the type and level of development, regional water impacts may limit oil shale and tar sands development (Section 6.1.5.3.4). These site-specific NEPA analyses will evaluate specific occurrences of species of concern, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

00157-020: The text in Sections 6.1.2.10, 6.1.3.10, and 6.1.4.10 of the PEIS has been changed to indicate that there may be impacts on property values resulting from the designation of BLM land for oil shale in tar sands development.

00157-021: Conflicts associated with potential oil shale leasing and existing oil and gas leases will be analyzed, and stipulations could be developed to mitigate the conflict consistent with BLM policy. It is the BLM's policy to optimize the recovery of both resources in an endeavor to secure the maximum return to the public in revenue and energy production; prevent avoidable waste of the public's resources utilizing authority under existing statutes, regulations, and lease terms; honor the rights of each lessee, subject to the terms of the lease and sound principles of resource conservation; and protect public health and safety, and mitigate environmental impacts.

For example, a very high percentage of WRFO is currently leased for oil and gas development and will honor the valid existing rights according to the terms and conditions of the lease. Some leases in the White River Planning Area have specific stipulations, which allow the BLM to locate well pads to not interfere with oil shale leasing (leasing or operations). Oil and gas operators submit applications for Permit to Drill in order to receive approval from the BLM to explore and develop the petroleum resources on their leases. As stated previously, the PEIS does not grant a property right and, therefore, there is no immediate conflict. However, if the area is opened to potential future oil shale leasing, specific conditions of approval could be developed to address potential conflicts, as a result of the NEPA documentation associated with the APD approval process.

Various factors can affect the level of exploration and development associated with oil and natural gas. Economics and market conditions will continue to drive exploration and production activities. The production of oil and gas is also dependent on the ability to transport product to refineries, especially whether there is excess capacity to carry new production. Energy demand, tightening of air quality standards, and protection of sensitive/threatened and endangered species may also impact the location and pace of oil and gas development. It is not anticipated that the designation of lands available for future commercial oil shale

leases would be a major contributing factor to the level of exploration and development.

00157-022: The BLM believes that taking a measured approach to oil shale development, where each step builds upon a prior step, ensures that state and local communities have the opportunity to be involved and are fully informed of the activities associated with the program. The FLPMA and the Energy Policy Act of 2005 have specific requirements for coordination of activities with various levels of government (see Section 202(c)(9) of FLPMA and Section 369(e) of the Energy Policy Act). In addition, the BLM is committed to providing opportunities for state, local and Tribal governments to play a key role, as cooperating agencies, in the land use planning process. The BLM's Land Use Planning Handbook (H-1601-1) provides extensive guidance in Section I, paragraphs C, D, E, and F, regarding the role and the opportunities for participation in BLM planning and environmental processes.

00157-023: The cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). A more specific cumulative analysis of socioeconomic impacts would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available. However, projected levels of oil and gas development over 20 years (see Tables 6.1.5-4 through 6.1.5-6) were included in the socioeconomic cumulative impact assessment presented in Section 6.1.5.3.10. See also response to Comment 00157-012.

00157-024: As the scale and timing of oil shale, tar sands, and ancillary facility development are not known, the analysis described in the PEIS was based on a series of assumptions regarding direct project employment, direct and indirect population (workers and their families) in-migration rates, and the provision and location of direct and indirect worker housing during both construction and operations phases that may be built to accommodate increases in project populations. The location of project housing is unknown but is not expected to be on public land and is likely to be largely temporary in nature. Additional services may be provided for housing developments, the locations of which are also unknown. Housing developed in local communities may be similar in nature to housing built for the local residential market. Text has been added to Section 4.11 of the PEIS indicating assumptions made with regard to the nature of temporary housing. Sections 4.11 and 5.11 describe the impacts of constructing housing that would be occupied by workers and their families on ROI employment and income. The timing and location of housing developments would be assessed as part of future NEPA reviews associated with individual oil shale and tar sands and ancillary facility development.

00157-025: The BLM is undertaking the PEIS under direction from Congress in the Energy Policy Act of 2005, which was an outgrowth of public energy policy discussions. While the BLM is providing an analysis to assess the impacts of the current direction, public policy discussions are outside the scope of the PEIS. In Chapters 4 and 5, the PEIS has identified a range of issues regarding oil shale and tar sands technologies that could be part of future discussions.

The socioeconomic analysis in the PEIS concluded that there would not be effects associated with the land allocation decisions other than a possible effect on property valuation.

00157-026: Overall, it is BLM's policy to optimize the recovery of both resources in an endeavor to secure the maximum return to the public in revenue and energy production; prevent avoidable waste of the public's resources utilizing authority under existing statutes, regulations, and lease terms; honor the rights of each lessee, subject to the terms of the lease and sound principles of resource conservation; and protect public health and safety, and mitigate environmental impacts. The feasibility of concurrent oil shale and natural gas development on the same properties is discussed in Section 4.2.1.1, which states that existing oil and gas or other mineral leases would likely preclude oil shale development, and also that areas leased for oil shale development in the future would be unlikely to be used for natural gas production. See response to Comment 52763-003.

00157-027: As the scale of development and project locations associated with oil shale, tar sands, and ancillary development, and consequently the size and residential location on in-migrating workers and their families, are not known, assessing the impact on individual local governments was not possible in the PEIS. The analysis in the PEIS was limited to estimating impacts for a region of influence in each state, which includes the counties in which project workers are likely to reside. As described in Section 4.11.1.1 of the PEIS, for the purposes of the analysis, in-migrating population assumed with each facility was assigned to local communities in each ROI based on facility direct workforce, community population, and intervening distances. Expenditure levels to support the in-migrating population at existing levels of service in each community were then projected for each county and aggregated to the ROI level.

When commercial-scale oil shale or tar sands resource development occurs, additional NEPA analyses would be undertaken, where project locations, employment levels, and the residential location and number of in-migrating workers in each phase of development would be known for each individual community in the ROI. This would enable individual local government-specific analyses of oil shale and tar sands development and ancillary facility impacts on local tax revenues, facility and infrastructure capacity and expansion costs, and on the local government expenditures required to maintain different levels of service.

00157-028: Please see response to Comment 00157-012. The cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing).

00157-029: See response to Comment 00157-027.

00157-030: The BLM is conducting a phased decision-making process—proceeding from land use planning to leasing to operational permitting. The land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases. Specific impacts on county and local governments will be analyzed in the future NEPA analysis, which can help counties focus on potential impacts associated with a potential leasing or plan of development proposal. The BLM also initiated the RD&D leasing process to provide important information that can be used as the BLM works with communities, states, and other federal agencies to develop strategies for managing any environmental effects, including those of impacts on local communities.

00157-031: The BLM did not propose any employer housing on federal lands in the Draft PEIS. Specifically, the PEIS states that the location of employer-provided housing is unknown but not expected to be on public land. See also response to Comment 00157-027. Additional NEPA analysis would enable individual local government-specific analyses of oil shale and tar sands and ancillary facility impacts on local tax revenues, facility and infrastructure capacity and expansion costs, and on the local government expenditures required to maintain different levels of service provision in local government and educational and recreational services. These analyses could also include impacts on the provision of privately provided services, such as shopping, and on local wholesale and retail price inflation.

00157-032: Based on the nature of the proposed action, existing sources of electrical power may be sufficient to power the operation, or electrical power may need to be generated on lease using either conventional energy sources like natural gas or renewable energy sources like wind or solar. A third hypothetical analysis may include the expansion of existing power plants or the construction of additional power plants (coal, gas, nuclear). In each case, the scope of the NEPA analysis would include the direct, indirect, and cumulative effects from activities described in a reasonably foreseeable development scenario.

00157-033: Please see the response to Comment 00157-032.

00157-034: As discussed in the Draft PEIS, there were various uncertainties regarding location of developments, technologies to be employed, and the lack of knowledge of specific aspects associated with the required infrastructure. These uncertainties also make it difficult to estimate the types and amount of raw

materials required for oil shale and tar sands development. Therefore, the decision to offer specific parcels for leasing was dropped from consideration in the PEIS. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development taking into consideration the types of resources necessary for full-scale development.

00157-035: As the technologies, scale of development, and project locations associated with oil shale and tar sands resource and ancillary facility development are not known, the analysis described in the PEIS was based on a series of assumptions regarding the source of direct project employees and direct and indirect population (workers and their families) in-migration rates during both construction and operations phases. As the commentor suggests, some positions in each ROI are currently being filled from distant states, with anecdotal evidence of this occurring in the oil and gas industry presented in Section 3.10.2 of the PEIS. Accordingly, the PEIS assumes only a certain portion of labor for OSTS and ancillary development will come from labor markets within each ROI. Assumptions relating to the extent to which local labor would be provided from within each ROI are different for ROI and for the construction and operations phase of each facility. These assumptions, described in Section 4.11 of the PEIS, were based on publicly available NEPA reviews, past BLM experience with oil shale and tar sands and other energy-related projects, and industry data on power generation and coal mining. These assumptions are reasonable for a programmatic review of potential socioeconomic impacts.

00157-036: Given the programmatic nature of the PEIS, the purpose of the analysis of socioeconomic impacts is to provide an overview of the type and magnitude of impacts that would likely occur with the construction and operation of oil shale and tar sands facilities. As the scale of development and project locations associated with oil shale and tar sands resource development are not known, the analysis described in the PEIS was limited to estimating impacts for an ROI in each state, based on the likely residential location of project workers. As described in Section 4.11.1.1 of the PEIS, in-migrating population assumed with each facility was assigned to local communities in each ROI based on facility direct workforce, community population, and intervening distances. Expenditure levels to support the in-migrating population at existing levels of service are then estimated for each community and aggregated for each ROI.

If commercial-scale resource development occurs, additional NEPA analyses would be undertaken, where project locations, employment levels, and the number of in-migrating workers in each phase of development would be known, enabling a detailed analysis of oil shale and tar sands, and ancillary facility impacts on local tax revenues, facility and infrastructure capacity and expansion costs, and on the local government expenditures required to maintain different levels of service. Additional sources of revenue from local, state, and federal sources (including mineral lease revenues) to support increased state and local

government expenditures (including the cost of temporary housing and retail food establishment inspections) would be assessed, including impacts on TABOR local government revenue growth restrictions in Colorado, with some assessment made of the various channels available for local jurisdictions to receive funding from federal and state government.

00157-037: Attachment A1 in Appendix A and Attachment B1 in Appendix B contain descriptions of the expected reaction of the refinery industry to the availability of supplies of oil shale-derived feedstocks. In terms of additional refining capacity, the descriptions in A1 and B1 indicate that recent history has shown that the industry tends to expand existing facilities rather than develop wholly new ones.

Chapters 4 and 5 include summary information from Appendices A and B of the potential impacts associated with electrical transmission and pipelines corridors, additional workforce and housing needs, electrical generation capacity, refinery capacity, and timeline and other considerations (Sections 4.1.4, 4.1.5, 4.1.6, 4.1.7, 4.1.8, 5.1.3, 5.1.4, 5.1.5, 5.1.6, and 5.1.7, respectively). The analysis presented includes information on the impacts for one project to provide an example of the magnitude of potential effects. Section 6.1.5.3 contains the cumulative impact assessment for the alternatives, and Table 6.1.5-9 provides a summary of long-term activities including surface disturbance that would be related to transmission facilities and other activities associated with potential commercial development. The BLM believes that this level of information is adequate to support the proposed allocation decisions in the PEIS.

00157-038: The source of water needed for any oil shale and/or tar sands development projects would be specified in the project-specific NEPA documents and not in this PEIS. The water is unlikely to be diverted from public use water. Agricultural water might be a candidate for sources of water rights. Impacts on water resources caused by transfers of water from agricultural uses to oil shale development have been added to Section 4.5 of the PEIS. It would be a lessee's responsibility to obtain and maintain water rights necessary for its operations in accordance with state law. Thus, it would be mere conjecture to attempt an analysis of impacts from water demands for operations that might not obtain water rights.

00157-039: Please see response to Comment 00157-012. The cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing).

00157-040: The only technology excluded from Colorado in Alternatives B and C in the PEIS is surface mining. Underground and in situ processes are allowed in both alternatives. Alternative A, the no action alternative, allows all technologies, including surface mining.

00157-041: At this preliminary stage, when the specifics of the extent of future oil shale and tar sands development are unknown, the discussion of the potential cumulative impacts to groundwater is general (see Section 6.1.5.3.5). Groundwater impacts can be better assessed when the results of RD&D activities are available and when specific proposed locations for oil shale and tar sands development are known.

Prior to leasing (when site-specific and technology-specific data will be available) or approval of a plan of development (when accurate information on water use, air emissions, employment, etc., will be available), additional environmental analysis will be performed including a cumulative analysis of groundwater impacts, as appropriate.

00157-042: Thank you for your comment, but the promulgation of regulations on environmental protection standards, setting royalty rates and addressing bonding, establishing standards for diligent development, and determining the allowable size of leases are outside the scope of the PEIS.

00157-043: As a programmatic evaluation conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. Secondary impacts can be more adequately addressed at this later stage as additional project-specific and site-specific details are available.

00157-044: The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands.

The deadline Congress set for the BLM to complete this PEIS has been exceeded, but that does not allow the BLM to postpone this PEIS until new information becomes available or until the industry is ready to invest in commercial operations. Currently, there is sufficient information on a programmatic level to

make a reasoned choice among the alternatives when considering whether lands should be opened or closed for application for commercial oil shale or tar sands leasing. The PEIS analyzes the environmental consequences of this allocation decision. The PEIS also describes the requirement for additional site-specific NEPA analysis prior to both issuance of commercial leases and approval of proposed exploration or development project.

00157-045: The BLM does not have the authority to require industry to fund specific public services, but it has been made clear that any federal lessees will be required to comply with all applicable federal, state, and local laws and regulations.

As noted in response to Comment 00154-007, specific monitoring requirements to evaluate environmental consequences are more appropriate at the leasing and/or plan of development stage. Although specific monitoring plans are not included, examples of potential types of mitigation measures to protect wildlife, plants, and habitat resources are provided for consideration at subsequent stages of NEPA analysis.

00157-046: Any commercial operations will be required by terms of their lease to comply with applicable laws and regulations regarding air quality protection and monitoring. Establishment of monitoring requirements and how they are funded are primarily a state function, and the BLM would have a limited role. As in many aspects of development on public lands, the BLM would expect to have a close working relationship with state and local regulators during the NEPA process.

OSTS_00158

OFFICE *of* ARCHAEOLOGY *and* HISTORIC PRESERVATION

DOI-BLM
CO STATE OFFICE
2008 MAR 20 AM 11:38

March 17, 2008

Sally Wisely, State Director
Bureau of Land Management
Colorado State Office
22850 Youngfield Street
Lakewood, Colorado 80215-7093

RE: Oil Shale and Tar Sands Resources Leasing PEIS for Colorado, Utah, and Wyoming
CHS # 48519

Dear Ms. Wisely:

Thank you for the opportunity to comment on the PEIS for the captioned project received in our office on February 8, 2008.

We appreciate the extensive analysis included in the Class I Cultural Resource Overview dated November 2007 as well as the ethno-history report.

We are disappointed that the location of cultural resources will not be a more prominent factor in leasing decisions. Certainly alternative C, that includes less acreage to be leased than alternative B, would have less effect on cultural resources. That being said, we are pleased with several provisions of the PEIS as follows. 158-001

We appreciate the language in Section 4.10.2., entitle Mitigation Measures, that: 158-002

- Supports a phased approach to evaluating resources and effects.
- Requires each phase to undergo an appropriate level of Section 106 analysis.
- Requires additional cultural resource analysis, when appropriate, prior to individual lease sales.

Additionally we appreciate, pursuant to Section 6.1.3.9. entitled Cultural Resources, that special lease stipulations could be developed for specific lease parcels based on cultural resource evaluations and consultations with interested Tribes. 158-003

Regarding the general analysis of cumulative effects in Section 6.1.5., we understand the difficulty of assessing these given the large acreage involved and unknown factors regarding the number of leases to be negotiated. However, we urge that assessment of cumulative effects is ongoing during the life of this project. 158-004

COLORADO HISTORICAL SOCIETY
1300 BROADWAY DENVER COLORADO 80203 TEL 303/866-3395 FAX 303/866-2711 www.coloradohistory-oahp.org

OSTS_00158

There will be many Section 106 consultations in this project occurring over an undetermined period of time. We agree with the advice of the Advisory Council on Historic Preservation in its March 14, 2008 letter that binding terms of a programmatic agreement may be the best mechanism to guide these consultations. 158-005

If you have any questions, please contact Dan Corson, our Intergovernmental Services Director, at (303) 866-2673.

Sincerely,

Georgianna Contiguglia
State Historic Preservation Officer

cc: Nancy J. Brown, Advisory Council on Historic Preservation

DOI-BLM
CO STATE OFFICE
2008 MAR 20 AM 11:38

Responses for Document 00158

00158-001: On the basis of input from the cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. The PEIS analyzes the environmental consequence of land use allocation decisions that do not commit any resources or grant any lease rights. In addition, prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with and appropriate consultation as required by the National Historic Preservation Act and other authorities specific to Native American concerns. Subsequent NEPA analyses will be conducted to assess the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis, if significant cultural resources are present or found to be present during requisite surveys and consultations, may include mitigation such as use of best management practices, specific protections, or avoidance to mitigate or eliminate adverse effects to historic properties.

At the subsequent development phase, as well, the BLM will conduct further identification and evaluation of cultural resources and consultation under the National Historic Preservation Act. Consultation will include consideration of mitigation measures to avoid the area of concern that threatens significant cultural resources.

00158-002: Thank you for your comment.

00158-003: Thank you for your comment.

00158-004: Assessment of cumulative effects would occur at various stages in the process of OSTS development. The cumulative impacts analysis in this current programmatic EIS summarizes the past, present, and reasonably foreseeable other activities in the study area (e.g., oil and gas development, coal mining, minerals development), and presents a preliminary qualitative assessment of the incremental impacts of those activities considered in conjunction with oil shale and tar sands development. Prior to leasing (when site-specific and technology-specific data will be available), and prior to approval of a plan of development (when accurate information on water use, air emissions, employment, etc. will be available), additional environmental analysis will be performed including a cumulative analysis, as appropriate.

00158-005: Please refer to the responses to Document 00193 from the Advisory Council on Historic Preservation.

OSTS_00159

18 February, 2008

BLM Grand Junction Field Office
Attention: Oil Shale Plan
2815 H Road
Grand Junction, CO 81506

To whom it may concern:

I am opposed to oil shale development in Colorado. While we must all recognize that energy production is vital to all of us, oil shale is the worst possible option. 159-001

Oil shale production requires enormous amounts of water which we simply cannot spare for this destructive process. Recent data (National Geographic February 2008, Drying of the West) suggests that the past century was actually a relatively wet period of time. We're currently experiencing a drought which in fact may represent a more "normal" climate. Diverting huge amounts of water will adversely impact agriculture and ranching, two vital elements of Colorado's economy, history and culture. 159-002

Your own environmental assessment says that oil shale is likely to displace all other uses of public land, including agriculture, grazing, natural gas production, recreation, hunting and fishing. This not the right balance. 159-003

Oil shale production actually consumes more energy than it produces! This is an insane equation. If the objective is to end up with more energy then the oil shale industry has it completely backwards. Unless and until they develop a process which is less energy consumptive, it has no place in Colorado. 159-004

And that process will also need to be clean and non-polluting. It does not meet those criteria now. Colorado's tourist economy relies on crystal clear air and beautiful clear streams and rivers. We must preserve those valuable resources not destroy them 159-001 (cont.)

Thank you for this opportunity to comment on the future of our beautiful state.

Sincerely,

Sheelagh Williams

Sheelagh Williams
372 Pleasant Valley Drive
Ridgway, CO 81432
s_swilliams2001@yahoo.com
970.626.2599

2008 FEB 22 PM 3:55

Responses for Document 00159

00159-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

00159-002: The data used to estimate the amount of water available are long-term historical data from the 1988 Hydrologic Determination study. The study covers both dry and wet periods of the Colorado River. The BLM recognizes that the Upper Colorado River Basin is experiencing drought conditions. A prolonged drought condition can reduce water availability, as indicated in Section 4.5 of the PEIS. However, it is speculative to claim that the current drought conditions are "normal" conditions of the river.

Discussion of impacts on water resources caused by transfers of water from agricultural uses to oil shale development have been added to Section 4.5 of the PEIS.

00159-003: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00159-004: Thank you for your comment. The report of the Strategic Unconventional Fuels Task Force on unconventional fuels speaks directly to your concerns. Task Force reports can be accessed electronically at: http://www.unconventionalfuels.org/. Look also at the language in Section 369(b)(1) and (2) regarding the policy of the U.S. to develop these fuels, and to do so in an environmentally sound manner, using practices that minimize impacts.

OSTS_00160

February 21, 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I support the development of our nation's oil shale and tar sands resources as outlined in the Draft Programmatic EIS proposed by the Bureau of Land Management. Consumers and businesses can no longer afford the high cost of energy, and our nation's dependence on foreign sources of oil is a threat to domestic security. We must allow access to energy sources, such as oil shale and tar sands, found here in the United States.

The government estimates that the Green River Formation, which covers portions of Colorado, Utah and Wyoming, contains at least 800 billion barrels of recoverable oil from oil shale. Present U.S. demand for petroleum products is about 20 million barrels per day. If we used oil shale to meet a quarter of that demand, these resources would last for more than 400 years. Development of these resources and access to the 12 to 19 billion barrels of tar sands oil located in Eastern Utah would help meet our nation's growing energy needs and relieve the high cost of energy for consumers. 160-001

Access to oil shale and tar sands from these leasing areas will offer significant benefits to the local, state and national economies and will strengthen national energy security. I support environmentally-conscious access to these important energy sources.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00160

00160-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00161

February 19, 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Support Reasonable Development of Unconventional Fuels

Dear Sherri Thompson:

With global demand for energy on the rise, it is vital that the U.S. government allow thoughtful and appropriate use of our nation's natural energy resources, such as oil shale and tar sands, in order to reduce our reliance on foreign energy imports.

The Draft Programmatic EIS (PEIS) proposed by the Bureau of Land Management (BLM) offers a plan for exploration and development of these unconventional fuels in an environmentally-conscious manner. Development of these resources will offer significant benefits to local, state and national economies and will strengthen national energy security. 161-001

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil. Development of these resources would help meet our nation's growing energy needs and relieve the high cost of energy for consumers.

I support the BLM's PEIS proposing the exploration and development of our nation's oil shale and tar sands resources.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00161

00161-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00162

February 28, 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Access to oil shale and tar sands from the leasing areas outlined in the Draft Programmatic EIS proposed by the Bureau of Land Management would offer significant benefits to the United States, as it would enhance the economy and decrease dependence on foreign sources of oil.

The government estimates that the Green River Formation, which covers portions of Colorado, Utah and Wyoming, contains at least 800 billion barrels of recoverable oil from oil shale. Present U.S. demand for petroleum products is about 20 million barrels per day. If we used oil shale to meet a quarter of that demand, these resources would last for more than 400 years. Development of these resources and access to the 12 to 19 billion barrels of tar sands oil located in Eastern Utah would help meet our nation's growing energy needs and relieve the high cost of energy for consumers.

162-001

As energy demands increase, consumers and businesses are forced bear the burden of high energy costs. I support access to oil shale and tar sands to help relieve this burden by providing a domestic source of oil for the United States.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00162

00162-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00163

February 25, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Responsible Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Consumers, industry and businesses across the country are struggling with rising energy prices, tighter supplies and increased dependence on foreign imports. The federal government must allow for the thoughtful and appropriate use of our nation's oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community. The development of unconventional fuels in Utah, Colorado and Wyoming will produce a strong workforce and will support their local economies.

I support the development of unconventional fuels in these areas while protecting the environment, local communities and other economic interests.

163-001

Sincerely,

Name:

Address:

E-mail:

Response for Document 00163

00163-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00164

March 3, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Encourage Responsible Development of Unconventional Fuels

Dear Ms. Thompson:

I strongly support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful utilization of our domestic energy resources, particularly as energy prices continue to rise.

With world energy demand projected to increase by 50% during the next 20 years and possibly double in 50 years, we need to ensure that consumers, industry and businesses are not forced to bear the costs of higher energy prices. Current oil resource estimates in parts of Utah, Colorado and Wyoming project 800 billion barrels of recoverable oil from oil shale, which is three times greater than the proven oil reserves of Saudi Arabia. 164-001

Further, with today's technology, this enhanced development can be conducted in an environmentally safe manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Responsible access to oil shale and tar sands from these leasing areas will offer remarkable benefits to the local communities and will strengthen our domestic energy security. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00164

00164-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00165

March 4, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Support Safe Development of Domestic Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I support the thoughtful and appropriate use of our nation's natural energy resources to help lower consumer costs and increase national energy security. We must allow for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS, in order to reduce our reliance on foreign oil imports.

The government estimates that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, we can develop these resources in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for local and regional communities.

Utilizing the oil shale and tar sands from these leasing areas will strengthen our national energy security, bolster local communities and bring the necessary supplies of oil into the markets to offset increased global demand. I support the development of these areas while protecting the environment, local communities and other economic interests.

165-001

Sincerely,

Name:

Address:

E-mail:

Response for Document 00165

00165-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00166

February 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Support Safe Development of Domestic Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I support the thoughtful and appropriate use of our nation's natural energy resources to help lower consumer costs and increase national energy security. We must allow for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS, in order to reduce our reliance on foreign oil imports.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, we can develop these resources in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for local and regional communities.

Utilizing the oil shale and tar sands from these leasing areas will strengthen our national energy security, bolster local communities and bring the necessary supplies of oil into the markets to offset increased global demand. I support the development of these areas while protecting the environment, local communities and other economic interests.

166-001

Sincerely,

Name:

Address:

E-mail:

Response for Document 00166

00166-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00167

March 7, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Support Access to Oil Shale & Tar Sands

Dear Ms. Thompson:

I strongly support Alternative B of the Bureau of Land Management's Programmatic Environmental Impact Statement for Oil Shale.

America must do all we can to diversify and expand our use of domestic energy – including the thoughtful, environmentally responsible development of our abundant oil shale resources. By doing so, we will help reduce our dependence on imported oil and improve our domestic energy situation.

While expanded use of alternative energy is absolutely necessary, they can not meet our rising demand. Domestic oil and natural gas resources will continue to be needed for decades to come.

I urge the BLM and Congress to take action to expand use of our domestic oil and natural gas, including the use of oil shale as outlined in the PEIS.

167-001

Sincerely,

Name:

Address:

E-mail:

Response for Document 00167

00167-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00168

March 10, 2008

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: I Support Oil Shale and Tar Sands Development

Dear Ms. Thompson:

I urge the Administration and Congress to take steps to enhance use of U.S. oil shale.

According to the Bureau of Land Management (BLM), there is 1.2 to 1.8 trillion barrels of oil shale resources in the Colorado, Utah and Wyoming area. Developing thoughtful programs to allow feasible, environmentally-sensible use of these resources is in the national interest. 168-001

For these reasons, I support Alternative B of the BLM's Programmatic Environmental Impact Statement.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00168

00168-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00169

March 11, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: I Support Alternative B

Oil shale and tar sands, along with renewable energy sources, should be developed to diversify our energy portfolio and help create a stable domestic energy supply.

Modern technology allows for oil shale and oil sands development to be conducted in an environmentally sound manner.

When you consider that the US has as much as 1.8 trillion barrels of oil shale, production of domestic unconventional fuels will also have a positive impact on America's economy by helping improve our energy situation.

The utilization of oil shale and tar sands from these leasing areas will benefit local, state and national economies through increased taxes, royalties and other payments associated with development. Further, utilizing these resources will help bring the necessary supplies of oil into the markets to offset increased global demand.

169-001

For these reasons, I support Alternative B of the Programmatic Environmental Impact Statement (PEIS).

Our national leaders must protect our economic interests will also protecting the environment and local communities.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00169

00169-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00171

100 Limberpine Circle
Parachute, CO 81635

Dear BLM:

I am 80 yrs. old, & a native of the western slope of Colorado. I was raised in Glenwood Springs, lived 50 years in Rifle, & moved to Battlement Mesa in 2002. I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale & Tar Sands.

Since research & development of new technologies will not be completed for years, the analysis in this DPEIS document cannot possibly anticipate all of the potential impacts it could have on our area. 171-001

I urge the BLM to consider the cumulative effects of this industry on wildlife habitat & protected areas across western Colorado, eastern Utah & south western Wyoming! 171-002

Colorado is a year-round tourist destination, as are the states of Utah & Wyoming, & the impact of this massive development will negatively affect our air, water, wildlife & our communities who rely on the beauty of their areas & their recreational opportunities. 171-003

The predictions of the amount of electricity & water needed to support the oil shale industry would greatly increase the levels of greenhouse gases, & would severely reduce the amount of water in our rivers & streams. Do they really know how much water & electricity they will need!!! They are guessing! There are too many unknowns — & they should not be given the "go ahead" signal until every possible impact is known & addressed!!!!! 171-001 (cont.)

Sincerely, Bonnie Smeltzer

Responses for Document 00171

00171-001: Pursuant to Congress' mandate in Section 369 of the Energy Policy Act of 2005, the original intent of the PEIS was to amend 12 existing BLM land use plans to support commercial oil shale and tar sands leasing. As preparation of the PEIS proceeded, and in consultation with BLM's cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the scope of the PEIS was changed from a leasing decision to an allocation decision. To still be responsive to Congress's direction, the focus of the PEIS was changed to only identify public lands to be opened or closed to application for commercial oil shale and tar sands leasing.

Nevertheless, there is sufficient information at the programmatic level to make a reasoned choice among the alternatives when considering lands open or closed for consideration of commercial leasing. The PEIS analyzes the environmental consequences of this allocation decision in sufficient detail for the decision maker to choose which lands would be available for further consideration for leasing. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development, nor do they create any development rights. When applications to lease are received and additional information becomes available, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and possible mitigation measures, as well as what level of development may be anticipated.

00171-002: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding

the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

00171-003: The PEIS analyzes, to the extent possible, impacts on a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more-focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

Thank you for recent request to send a letter in support of proper utilization of the US Natural Gas Supply. Your involvement in our efforts is greatly appreciated and can help to make a difference. A letter similar to the one listed below will be sent on your behalf to Washington decision makers. If you would like get involved now, please click here. If you would like additional information or learn more about this important issue, please click here.

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Support Safe Development of Domestic Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I support the thoughtful and appropriate use of our nation's natural energy resources to help lower consumer costs and increase national energy security. We must allow for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS, in order to reduce our reliance on foreign oil imports.

The government estimates that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, we can develop these resources in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for local and regional communities.

172-001

Utilizing the oil shale and tar sands from these leasing areas will strengthen our national energy security, bolster local communities and bring the necessary supplies of oil into the markets to offset increased global demand. I support the development of these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Name Mary Palumbo-Lightfield
Address P.O. Box 306
Parish, N.Y. 13131

Response for Document 00172

00172-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00173

April 3, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Support Safe Development of Domestic Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I support the thoughtful and appropriate use of our nation's natural energy resources to help lower consumer costs and increase national energy security. We must allow for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS, in order to reduce our reliance on foreign oil imports.

The government estimates that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

173-001

With today's technology, we can develop these resources in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for local and regional communities.

Utilizing the oil shale and tar sands from these leasing areas will strengthen our national energy security, bolster local communities and bring the necessary supplies of oil into the markets to offset increased global demand. I support the development of these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Patricia Kluempers

Patricia Kluempers
6 Lansdowne Lane
Carmel, IN 46033

Response for Document 00173

00173-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00174

February 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Americans are facing an energy crisis of historical proportions. Consider:

- Analysts are predicting that gasoline will be over $4.00 per gallon this summer – due largely to the failure of international oil production to keep pace with increased international consumption of oil.
- Americans now import over 60% of the oil that we use to make gasoline and diesel – and send over $1 billion a day to countries like Saudi Arabia, Venezuela and Iran

In order to help lower gasoline and diesel prices – and in order to strengthen our nation's energy security, the United States needs to expand access to its domestic energy resources.

Domestic reserves of oil shale and tar sands are vital sources of domestic energy – in fact, the federal government estimates that oil shale deposits on public lands hold the equivalent of at least 1.23 trillion barrels of oil. These resources should be responsibly developed in order to lower gas and diesel prices, increase American energy security and reduce our dependence on imported oil. 174-001

Because a robust and active oil shale program can be done in a balanced manner that simultaneously promotes energy production and provides comprehensive environmental protections, I strongly support Alternative B in the PEIS.

If BLM adopts Alternative A, the United States will be turning its back on an important domestic energy source, continue to increase our dependence on imported oil and driving up gasoline and diesel prices, and Alternative C does not allow for full recovery of oil shale and tar sands resources and does not provide for sound or efficient management of the program.

Please ensure that these important national energy resources can be developed in an environmentally sound manner in order to help reduce gasoline and diesel prices, as well as our dependence on foreign oil by adopting Alternative B in the PEIS.

Sincerely,

Name: John Z. Miller (U.S. citizen)

Address: Box 700, Yarmouth, Nova Scotia B5A 4K3

E-mail: JZM@NS.sympatico.ca

Response for Document 00174

00174-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00175

Apr. 11, 2008

BLM Shale and Tar Sands
Draft PEIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne, Illinois 60439

Dear BLM,

I am writing to express my concern about the PEIS regarding oil shale development in Western Colorado. Leasing and development of oil shale deposits could have a devastating impact on the economy, environment and quality of life for not only the western slope but the entire region. 175-001

The negative environmental and social consequences resulting from the current Canadian tar sands development is fair and obvious warning of the potential damage for Colorado. The western slope is already suffering from the negative impacts of oil and gas development. It would be unconscionable to ask those citizens to contend with an additional burden. 175-002

One of the most obvious issues of contention in oil shale development is the amount of water required to process shale. There is no way to justify that at this 175-003

precarious time in our water history, OSTS_00175
The BLM has a responsibility to take care of the land that belongs to the public. Please don't sell us out to private industry. 175-003 (cont.) 175-001 (cont.)

Sincerely,
Diane Schrack
10170 Charissglen Ln.
Highlands Ranch, Colorado
80126

Responses for Document 00175

00175-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

00175-002: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing.

Subsequent NEPA analysis will be required prior to any leasing or plan of development decision and will address the direct, indirect, and cumulative effects of that action. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to avoid or mitigate short-term and long-term adverse impacts.

00175-003: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is primarily a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on public or worker health.

The amount of water that would be needed for future development is dictated by many factors, including scale of development, technologies used in the development, national economy, and the locations and hydrologic conditions of project sites. Without defining such uncertainties, it is difficult to specifically evaluate the impacts on water resources. Therefore, it would be more appropriate to evaluate the impact at the project level when many currently unknown factors are better defined. The results would be presented in subsequent project-specific NEPA documents.

OSTS_00176

Sunday, April 13, 2008

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Encourage Responsible Development of Unconventional Fossil Fuel Resources

Dear Ms. Thompson:

I strongly oppose the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming, as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must strive for the thoughtful development of renewable energy resources, particularly as the global supply of conventional crude oil has become unsustainable and non-conventional sources have a significantly lower return on energy invested. 176-001

With world energy demand projected to increase by 50% during the next 20 years and possibly double in 50 years, it is inevitable that consummers, industry and businesses will be required to bear the costs of higher energy prices. Exploitation of the current non-conventional oil resource in parts of Utah, Colorado and Wyoming projected at 800 billion barrels oil-in-place, will require substantial energy input to produce, can not be recovered at a rate fast enough to offset expected declines in conventional oil, will have negative impacts on the public lands and will continue to contribute to this country's greenhouse gas emissions. 176-002

There is a serious lack of foresight among government policy makers and non-government organizations such as the Consumer Energy Alliance who have a financial stake in the outcome of this decision.

Access to oil shale and tar sands from these leasing areas should be reserved as an energy source of last resort while the nation focuses its intellectual and economic resources on development of renewable energy. This will enable us to meet the growing immediate demand in a sustainable manner. Please do not let special interests dissuade you from developing sound public policy regarding the path forward for a sustainable future.

Sincerely,

Stephen F. Urschel

Mr. Stephen Urschel, PG, CPG
5 Tansy Ct.
Wynantskill NY 12198
Email: durschel2@nycap.rr.com

Responses for Document 00176

00176-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

00176-002: With the passage of the Energy Policy Act of 2005, Congress declared the policy of the United States to include that "oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed …." The FLPMA, the Mineral Leasing Act, and the Energy Policy Act of 2005 authorize use of some BLM land for commercial oil shale leasing and development. The BLM appreciates the commentors' support for the development of renewable energy resources.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands.

OSTS_00177

Mark W. Belles
9318 Willard Street
Rowlett, Texas 75088

BLM Oil Shale and Tar Sands Resources Leasing Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

10 April 2008

Dear Planning Team,

Regarding the Notice of Reopening of the Public comment Period for the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement, published in the Federal Register on April 1st, 2008 (Volume 73, Number 63), please place/retain my name on the mailing list for this project and consider the following comments.

First, I would like to thank the Bureau for reopening the comment period. Due to the timing release of the first Notice of Availability during the holiday season, I had missed the announcement and the opportunity to comment.

My comments are related to two broad areas of concern.

- Protection of lands with Wilderness Qualities, particularly those in the Southern Utah region.
- Water availability for development of Oil Shale and Tar Sands (OS&TS)

OSTS_00177

Protection of lands with Wilderness Qualities

The Draft PEIS clearly states that an administrative decision was made to defer evaluation of the appropriateness of OS&TS development to "…future site-specific NEPA analyses…" where "…the presence of any lands with wilderness characteristics will be taken into account." [Draft OSTS PEIS, page 2-52]

Elsewhere in the Draft PEIS, in addition to lands excluded from commercial leasing, "…on the basis of existing laws and regulations, Executive Orders, land use plan designations, and other administrative designations or withdrawals" [Draft OSTS PEIS, page 2-42], the Draft PEIS also determined that additional areas would be closed including, "Segments of rivers that have been determined to be potentially eligible for WSR status by virtue of a WSR inventory" [Draft OSTS PEIS, page 2-42].

Clearly the BLM has found it appropriate to administratively exclude certain categories lands from commercial leasing on the basis of sound policy, even where those lands were not yet designated in any formal way, but were administratively found to be qualified for possible designation. 177-001

The same criteria for exclusion of commercial leasing from lands which possess wilderness qualities should be applied to in a manner consistent with the exclusion from inventoried WSR river segments.

While I completely agree that individual assessment of the wilderness qualities of specific lands is most appropriately left to the applicable Resource Management Plan (RMP) NEPA processes, it is appropriate to make a programmatic policy statement to exclude commercial leasing from the areas identified in those RMPs.

I recommend this change to the plan and suggest the following additional bullet for the text on page 2-42.

- Areas found by individual Resource Management Plans to have wilderness qualities.

OSTS_00177

Water Availability

I must confess to being stunned by the reliance on obsolete data in the development of the assessment of available water for OS&TS development [For instance reference to SWCA 1997]. While current drought conditions are acknowledged, much of the data referred to by the PEIS has been recently updated by the Final EIS for Colorado River Operations under Low Reservoir Conditions, 2007. Beyond this official data developed by the Bureau of Reclamation (BOR), further scientific studies recently published suggest that even the BOR may be optimistic as to water availablity [When will Lake Mead go dry?, Barnett, T. P., and D. W. Pierce, 2008, Water Resources Research., Vol. 44, 29 March 2008].

While an estimate of 12 million acre-ft for total available water may be accurate, upon what grounds is it assumed that the 3 million acre-ft deficit (as compared to the basis of the Colorado River Compact) will be equally shared by the upper and lower basins? As the recent multi-State negotiations resulting in the agreement that allowed the approval of the Final EIS for Colorado River Operations under Low Reservoir Conditions demonstrated, tinkering with the provisions of the Colorado River Compact is complicated and fraught with legal issues. The Record of Decision (ROD) for the Final EIS for Colorado River Operations under Low Reservoir Conditions was only possible on the basis of shared pain. Nothing in that agreement resulted in a change to collection of water law known as "The Law of the River". While the Lower Basin States might be willing to accept less that the legally mandated 7.5 million acre-ft deliveries of water per year (on a ten-year averaged basis) with the understanding that all are sharing the pain equally, they are almost certainly not going to be willing to accept a 1.5 million acre-ft reduction (20%) to help facilitate the economic development of the Upper Basin States by virtue of the introduction of a new industry. 177-002

The Upper Basin States should put themselves in the position of the Lower Basin States – view this proposal from their point of view. What if the Lower Basin States decided to expand their economy in a manner that would require the additional delivery of 1.5 million acre-ft of water to the Lower Basin ***beyond*** the legally mandated 7.5 million acre-ft at the expense of the upper basin? For example this

OSTS_00177

might be done to develop new agricultural areas in the desert. What would the Upper Basin's response be?

It is one thing to convince all to share an equal burden. This was the basis of the Final EIS for Colorado River Operations under Low Reservoir Conditions ROD. It is quite another thing to make sacrifices for your own State to provide economic growth for another. What Governor would agree to that?

Based on this evaluation, I find the assumption for water use found in the Draft PEIS to be a hopeless fantasy produced more to satisfy Congress and the Energy Policy Act of 2005, than to be of any practical use. Even the conclusion that water will be available in the Upper Basin through the year 2040 [Draft PEIS, Table 3.4.1-5, page 3-74], is undermined by the concluding caveat that at least acknowledges a hint of the truth, 177-002 (cont.)

> *All in all, whether enough water is available for development depends on the results of intensive negotiations between various parties, including water right owners, state and federal agencies, and municipal water providers as well as the developers.[Draft PEIS, page 3-74]*

No kidding. Piece of cake!

Thank you for the opportunity to comment,

Mark Belles

Responses for Document 00177

00177-001: As described in Chapter 2 of the PEIS, only designated wilderness areas and WSAs are excluded from application for leasing. In the PEIS, areas identified by the BLM with wilderness characteristics (WCAs) that overlap with the alternatives are disclosed. For example, in Utah, these lands were reviewed as part of BLM's wilderness characteristics inventory maintenance, where a combination of data and on-site reviews were done. This included specific field inspections, interdisciplinary team review of data such as range files, county and BLM GIS data, and high-resolution 2006 aerial photographs. The BLM's findings are described in the 1999–2003 wilderness reinventory documentation, as well as the 2007 wilderness characteristics review process.

Decisions regarding management of the WCAs are being made in the local RMPs and not in this PEIS. Nevertheless, the management and level of protection of the wilderness characteristics on non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). The BLM may manage the lands to protect and/or preserve some or all of those characteristics through the local land use planning process.

00177-002: The data used to estimate water available are long term historical data from 1906 to 1986 (as in the 1988 Hydrologic Determination study [BOR 1988]) at the time this PEIS was prepared. That study concluded the Upper Basin states could be reasonably allowed to deplete 6 million acre-ft of water annually after their obligation to deliver 7.5 million acre-ft to the lower basin states plus 0.75 million acre-ft for Mexico. In other words, the long-term average annual natural flow at Lees Ferry has to be more than 14.25 million acre-ft (6 plus 7.5 plus 0.75 million acre-ft) to meet the mass balance of the water of the River. The "Final EIS for Colorado River Operations under Low Reservoir Conditions" confirmed that the average annual natural flow at Lees Ferry was 15 million acre-ft, by using data from 1906 through 2005. The original statement of 12 million acre-ft in the PEIS has been corrected.

Reference:

BOR (U.S. Bureau of Reclamation), 1988, *Hydrologic Determination on Water Availability from Navajo Reservoir and the Upper Colorado River Basin for Use in New Mexico,* U.S. Department of the Interior, Feb. 2.

OSTS_00178

Wednesday, April 09, 2008

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Encourage Responsible Development of Unconventional Fuels

Dear Ms. Thompson:

I strongly support the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming, as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful utilization of our domestic energy resources, particularly as energy prices continue to rise.

With world energy demand projected to increase by 50% during the next 20 years and possibly double in 50 years, we need to ensure that consumers, industry and businesses are not forced to bear the costs of higher energy prices. Current oil resource estimates in parts of Utah, Colorado and Wyoming project 800 billion barrels of recoverable oil from oil shale, which is three times greater than the proven oil reserves of Saudi Arabia. 178-001

Further, with today's technology, this enhanced development can be conducted in an environmentally safe manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Responsible access to oil shale and tar sands from these leasing areas will offer remarkable benefits to the local communities and will strengthen our domestic energy security. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Mr Norbert Paas
VP Engineering
DST
9S320 Stearman Drive
Naperville IL 60564
Email: paastek@aol.com

Response for Document 00178

00178-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00179

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Warren Zimmerman
330 SE 2nd St Apt 203H
Hallandale Beach. FL 33009-5628

RE: Support Safe Development of Domestic Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I support the thoughtful and appropriate use of our nation?s natural energy resources to help lower consumer costs and increase national energy security. We must allow for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS, in order to reduce our reliance on foreign oil imports.

The government estimates that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today?s technology, we can develop these resources in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for local and regional communities.

Utilizing the oil shale and tar sands from these leasing areas will strengthen our national energy security, bolster local communities and bring the necessary supplies of oil into the markets to offset increased global demand. I support the development of these areas while protecting the environment, local communities and other economic interests.

179-001

Sincerely,
Warren Zimmerman
Warren Zimmereman
330 SE 2nd St Apt 203H
Hallandale Beach, FL 33009

Response for Document 00179

00179-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00180

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Support Safe Development of Domestic Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I support the thoughtful and appropriate use of our nation?s natural energy resources to help lower consumer costs and increase national energy security. We must allow for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS, in order to reduce our reliance on foreign oil imports.

The government estimates that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today?s technology, we can develop these resources in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for local and regional communities.

180-001

Utilizing the oil shale and tar sands from these leasing areas will strengthen our national energy security, bolster local communities and bring the necessary supplies of oil into the markets to offset increased global demand. I support the development of these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Frany Cantler
69 Sycamore Dr
North East, MD 21901

Response for Document 00180

00180-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00181

Discount Water Supply Inc.

1263 West Airport Blvd
Sanford, FL. 32773

Water Treatment Systems, Parts, Supplies, Service

407.323.9010 www.discountwatersupply.com

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

April 1, 2008

RE: Encourage Responsible Development of Unconventional Fuels

Dear Ms. Thompson:

I strongly support the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming, as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful utilization of our domestic energy resources, particularly as energy prices continue to rise.

With world energy demand projected to increase by 50% during the next 20 years and possibly double in 50 years, we need to ensure that consumers, industry and businesses are not forced to bear the costs of higher energy prices. Current oil resource estimates in parts of Utah, Colorado and Wyoming project 800 billion barrels of recoverable oil from oil shale, which is three times greater than the proven oil reserves of Saudi Arabia.

181-001

Further, with today's technology, this enhanced development can be conducted in an environmentally safe manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Responsible access to oil shale and tar sands from these leasing areas will offer remarkable benefits to the local communities and will strengthen our domestic energy security. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

William M. Schrader

Response for Document 00181

00181-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00182

Thank you for recent request to send a letter in support of proper utilization of the US Natural Gas Supply. Your involvement in our efforts is greatly appreciated and can help to make a difference. A letter similar to the one listed below will be sent on your behalf to Washington decision makers. If you would like get involved now, please click here. If you would like additional information or learn more about this important issue, please click here.

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Support Safe Development of Domestic Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I support the thoughtful and appropriate use of our nation's natural energy resources to help lower consumer costs and increase national energy security. We must allow for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS, in order to reduce our reliance on foreign oil imports.

The government estimates that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, we can develop these resources in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for local and regional communities.

182-001

Utilizing the oil shale and tar sands from these leasing areas will strengthen our national energy security, bolster local communities and bring the necessary supplies of oil into the markets to offset increased global demand. I support the development of these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Name Charles A Martin
Address 6488 Sun Ridge Dr
Waynesville Ohio 45068

Response for Document 00182

00182-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00183

202-429-3945

March 19, 2008 6:28 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 183-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 183-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 183-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 183-004

Sincerely,

Responses for Document 00183

00183-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00183-002: In the PEIS, cumulative impacts analysis at a programmatic level has been conducted to the extent possible. The analysis summarizes the extensive current and planned other activities (e.g., oil and gas development, coal mining, minerals development) for the study area and offers a preliminary qualitative assessment of the impacts of those activities, combined with possible future oil shale and tar sands development, including but not limited to air, water, wildlife, and communities in the study area. Because of the limited character of the decision to be made on the basis of this PEIS (planning/allocation of lands where nominations to lease can be considered), because the locations and magnitude of future oil shale and tar sands development are highly speculative, and because there will be additional NEPA analysis prior to leasing, in this PEIS it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. This point has been clarified in the introduction to the cumulative impacts sections (Sections 6.1.5 and 6.2.5).

None of the alternatives in this PEIS, including the preferred alternative, projects a specific future level of production (e.g., production of one million barrels of oil shale per day is not forecasted). For the purposes of illustrating potential impacts, the PEIS does provide estimated impacts for individual oil shale and tar sands projects producing from 50,000 bbl/d to 200,000 bbl/d (see Chapters 4 and 5 of the PEIS).

The NEPA analysis at the leasing and development stages will consider effects from RFFA (40 CFR 1508.7). If the proposed action would affect a particular

resource that one or more RFFAs would also affect, the impacts of those RFFAs would be included in the cumulative effects analysis for the proposed action. At the leasing or development stage, the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects.

00183-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00183-004: In the Energy Policy Act of 2005, Congress requires the Secretary to complete this PEIS, and does not provide for delaying the PEIS until complete information might become available.

OSTS_00184

RIO BLANCO COUNTY DEPARTMENT OF DEVELOPMENT

Administration Bldg
317 E Market Street
Post Office. Box 599
Meeker, CO 81641

15 April 2008

Sherri Thompson
Bureau of Land Management
Sherri_Thompson@blm.gov

RE: Oil Shale PEIS Draft Comments

Thank you for the opportunity to review the Draft Oil Shale PEIS documents. Rio Blanco County forwarded comments and concerns related to the pre-draft documents as a Cooperating Agency in June of 2007. In reviewing the December 2007 Draft, I cannot see that any of the concerns or issues raised resulted in any changes to the final Draft. Those comments are repeated below (in italics) as continuing concerns and recommendations.

Socioeconomic

The PEIS considers impacts of the various alternatives as if they will occur in a vacuum. It does not account for the substantial impacts that have already occurred with the build up in oil and gas exploration in the last few years and are projected to expand at extreme levels over the next twenty years. There is currently no available housing in Meeker, Rangely, or Rifle. Prices for the few rentals have tripled since 2000. All RV spaces are full and numbers of workers are camping on BLM lands. Governmental and emergency services are tasked beyond their ability to supply services. A more detailed look at up-to-date and newly projected cumulative impacts needs to occur. More information is needed so that local governments can evaluate what portions of which impacts will affect them directly. 184-001

The White River Resource Area RFD is currently being re-evaluated. It would make sense to let those numbers be developed for use in the PEIS. 184-002

There needs to be more discussion on the proposed large, employer supplied housing complexes on Federal Lands. How would services be provided to these remote locations? 184-003

Transportation systems are already taxed with the current energy build-up. More discussion is needed on the capacity of transportation systems to accommodate all these new workers and get the products to market. 184-004

Water Quality OSTS_00184

The freezewall technology, though proven in construction applications, has not been tested in oil shale applications in which high temperatures are used in close proximity to the wall. This unproven application presents a very real risk to groundwater supplies. 184-005

In non-freezewall applications, the document discusses the dewatering of surface water and springs occurring within the cone of depression but gives no options for mitigation. Senior water rights could be affected and must be addressed. 184-006

Water Quantity

There doesn't seem to be enough un-allocated water in the system for oil-shale even at very limited levels. The projections in the draft allocate all available water in the Colorado River system to oil shale. Given the ramp up in oil and gas combined with the general population growth on the western slope of Colorado, this may be an unworkable plan. Further examination and discussion of water supply and demands, oil shale and cumulative, is advised. 184-007

Livestock Grazing

Grazing is an important economic and cultural component of the County. Whatever alternative is chosen, assurances beyond "Commercial operators would need to coordinate their activity with livestock owners" needs to be included. Long established grazing leases should supercede other leases where they are non-compatible or loss should be mitigated. 184-008

Wildlife

While mentioned in passing as "effects on large mammals" or on "big game", the wildlife portion needs a more detailed discussion on the effect on mule deer. The Piceance Basin is the primary winter range for the largest migratory mule deer herd in the US. Direct loss and fragmentation of this winter range with the development has already occurred and will be accelerated by oil shale. Because of the concentration on winter range, value to mule deer is not comparable, acre for acre, as in the rest of the ROI. The assumption that the effects can be mitigated is also suspect. 184-009

General

Do the alternatives reflect the true maximum possible development given the PEIS assumes only half of the estimated reserves are recoverable? 184-010

The idea that the in-situ process may co-generate recoverable amounts of natural gas has been discussed in the past. This gas presents the problem of additional, unaccounted for impacts of processing and transportation to market and the opportunity of using the gas for electrical generation, reducing the need for new coal-fired generation facilities. Both of these eventualities need to be included in the analysis. 184-011

There needs to be some sort of explanation of what constitutes a large vs. moderate effect. 184-012

Most of the identified recoverable resources of oil shale in Colorado occur within Rio Blanco County. We would like to know the rationale for not having any of the past or planned public meetings within the County. 184-013

OSTS_00184

In summary, the pace at which this document is being produced by far exceeds the pace which the science of commercial level oil recovery from oil shale is developing. The draft documents are extensively sprinkled with "could"s and "may"s. in every section. Rio Blanco County would like the BLM to consider an additional alternative that would delay the evaluation of commercial leasing of oil shale until the technology being testing with the RD&Ds and their impacts are better understood and can be incorporated in the PEIS analysis. There are just too many questions at this point. 184-014

Since the initial cooperator comments, Rio Blanco County has been a party to a study commissioned by the Associated Governments of Northwest Colorado (AGNC) entitled "Northwest Colorado Socioeconomic Analysis and Forecasts" funded by the Colorado Department of Local Affairs. The final report was issued on 11 April 2008 and is available on the AGNC web site. Review of this study reinforces the need to more carefully consider the socioeconomic impacts of commercial oil shale development, especially in the face of the present and continuing increase in natural gas drilling and associated activities. For a County presently numbering 6,000 residents, even without a commercial Oil Shale industry, the forecasts are staggering. As was stated last July, there is no consideration in the Draft PEIS for these cumulative impacts. Without this consideration, the Draft is fundamentally flawed. 184-015

Transportation is discussed briefly in the Draft. Because of the rapid escalation in natural gas activities, the numbers given are already out of date and under represented by a factor of three. What is not explored is that most all of the primary area of expected oil shale development is serviced by one small two lane County Road (CR 5) which is already at maximum capacity because of gas exploration and recovery. It assumed in the draft that much of the workforce for oil shale will be "in-migrated" daily. This will not be possible without major upgrades to the road system which will require significant environmental impacts which are not considered in the Draft. 184-016

Given the continuing uncertainties with practicable technologies for recovering oil from oil shale, the preferred alternative of Rio Blanco County remains the no action alternative. This would allow the 6 RD&D sites, 5 of which are in our County, to continue in a systematic manner to develop the best technology for recovering this important resource. 184-017

Thank you again for this opportunity to comment.

Jeff Madison
Natural Resources Specialist
Rio Blanco County Planning Department
PO BOX 599
Meeker, CO 81641
p 970 878 9584
f 970 878 5796
jmadison@co.rio-blanco.co.us

Responses for Document 00184

00184-001: The impact of oil and gas developments on housing markets and on the provision of public services and infrastructure in specific local government jurisdictions is discussed in Section 3.10 of the PEIS. However, as the scale of development and project locations associated with oil shale and tar sands development, and consequently the size and residential locations of in-migrating workers and their families, are not known, assessing the impact of these facilities on individual local governments was not possible in the PEIS. Instead the analysis was limited to estimating impacts for a region of influence in each state, which includes the counties in which project workers are likely to reside. Population projections for each ROI presented in Section 3.10 are based on county projections produced by state agencies and include projected population growth resulting from expansion in the oil and gas industry. The cumulative impact of oil shale and tar sands facilities is compared to ROI populations based on these estimates. When commercial-scale resource development occurs, additional NEPA analyses, including the cumulative impacts of these facilities in individual counties, would be undertaken, where project locations, employment levels, and the number of in-migrating workers in each phase of development would be known. This would enable a detailed analysis of the cumulative impacts of oil shale, tar sands, and ancillary facilities on local housing markets, tax revenues, facility and infrastructure capacity and expansion costs, and the local government expenditures required to maintain different levels of service.

00184-002: This PEIS analyzes the potential impacts to resources in various field offices in Colorado, Utah, and Wyoming. The most current reasonable development scenarios from study area field offices are summarized in Tables 6.1.5-4 through 6.1.5-6 and are considered in the cumulative impact assessments presented in Section 6.1.5.3. Because information for the individual field offices is updated on a regular basis, it is not feasible or required by NEPA to wait for new information. The NEPA does not require an agency to wait until studies are completed, especially if the information is not essential to a reasoned choice among alternatives. The PEIS analyzes only an allocation decision; therefore, subsequent NEPA analysis will be required. The RFDS currently being evaluated in ongoing land use planning efforts will be considered, if available, when a new NEPA analysis is prepared to analyze the environmental consequences of a leasing or development decisions.

00184-003: Currently BLM does not have the authority, nor is it policy, to permit nongovernmental housing (i.e., employer-provided housing or compounds) on public lands.

00184-004: The current transportation system in the study area is described in Section 3.10.4. Additional analysis of the impacts of commercial oil shale and tar sands developments on transportation systems in the study area would be provided as a part of additional required NEPA evaluation.

00184-005: The freeze wall technology is being researched by Shell under the authority of an RD&D lease. The Shell RD&D activities are outside the scope of this PEIS; however, the required NEPA evaluation for the Shell RD&D actions has been completed, and the results of that assessment are summarized in Appendix A.

00184-006: The extent of the groundwater cone of depression depends on hydrogeologic conditions of a site and pump rates. The depression could affect nearby surface water bodies. The impacts are site-specific. Similarly, water rights are project-specific. Both issues would be addressed in site- and project-specific NEPA documents and not in this PEIS.

00184-007: The PEIS described the water availability, water uses, and potential demands for oil shale and/or tar sands development in the oil shale basins and the STSAs. There is no intention to imply that all available water would be allocated to oil shale development. As stated in the PEIS (Section 4.3.1), whether enough water is available for development depends on the results of intensive negotiations between various parties, including water right owners, state and federal agencies, and municipal water providers as well as the developers.

00184-008: The decisions analyzed in the PEIS include no commitment by the BLM to approve lease applications for public lands without additional site-specific NEPA analysis. The PEIS provides examples of potential mitigation measures that can be adopted by the BLM; however, the subsequent NEPA analysis is not limited to only those that are listed in the PEIS. Specific mitigation measures, management prescriptions, and the use of best available technology to minimize impacts will be developed and applied in the form of stipulations to mitigate identified impacts. The BLM is committed to ensuring that local communities, landowners, and grazing permittees are involved throughout the NEPA process.

00184-009: The information presented in the PEIS for big game, including mule deer, is of sufficient detail for the purposes of the PEIS. The PEIS provides a brief discussion for the primary big game species that identifies basic life history and population information, existing threats, and the potential for the species to be affected by commercial oil shale and tar sands development. Additionally, the PEIS presents graphic overlays of the oil shale basins and STSAs that would be made available for leasing under each alternative within the summer and winter ranges of mule deer.

It is important to note that the allocation decisions being analyzed in this PEIS do not authorize the immediate leasing of lands for commercial development. Therefore, the specific number and locations of projects cannot be identified within the PEIS. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. They will include an evaluation of the specific occurrences of key wildlife habitats, analyses of the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and

cumulative effects (including those of other existing or reasonably foreseeable future oil shale and tar sands leases), reasonable alternatives, and mitigation measures to protect wildlife habitats, as well as what level of development may be anticipated. Project-specific NEPA analyses would also include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to big game species and their important habitats. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders.

00184-010: The alternatives would make available the following acreages for application for lease:

Alternative A 352,780
Alternative B 1,991,222
Alternative C 830,296

The source of the statement "half the estimated reserves are recoverable" is unclear. The alternatives do not provide an estimate of reserves that are recoverable. Reserves are defined as those quantities of oil shale or tar sands that geological and engineering data demonstrate with reasonable certainty to be recoverable in future years from known deposits under existing economic and operating conditions. The alternatives do provide the possible acres on public lands where applications for lease will be accepted; however, no assumptions are made as to maximum economic recovery of the resource. Resource estimates were provided for comparative purposes only, to illustrate the potential differences in the amount of resources present.

00184-011: In situ retorting is expected to generate a collection of flammable hydrocarbon gases, including methane, the principal component of natural gas. However, these gases will be initially recovered as a mixture and would need to be separated from one another and from any water and further processed before becoming commercially viable. It is more likely that recovered flammable gases will be cleaned only to the degree necessary to allow their use on site as a supplemental fuel for various external combustion sources (to produce steam, process heat, or perhaps, even electrical power) that are operational to support the oil shale development activities.

00184-012: The potential magnitude of impacts in different impact categories (e.g., habitat fragmentation and water depletions) are defined for ecological resources in Sections 4.8.1 and 5.8.1 of the PEIS. Impact magnitude is described in these sections as small, moderate, or large using the following definitions. A small impact is one that is limited to the immediate project area, affects a relatively small proportion of the local population (less than 10%), and does not result in a measurable change in carrying capacity or population size in the affected area. A moderate impact could extend beyond the immediate project area, affect an intermediate proportion of the local population (10 to 30%) and result in a

measurable but moderate (not destabilizing) change in carrying capacity or population size in the affected area. A large impact would extend beyond the immediate project area, could affect more than 30% of a local population, and result in a large, measurable, and destabilizing change in carrying capacity or population size in the affected area.

00184-013: An open-house-style meeting to allow the public to ask the BLM questions regarding the Draft PEIS was held in Meeker on February 14, 2008.

00184-014: Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sand resources among other unconventional fuels in an environmentally sound manner. As required by that Act, the BLM initiated this PEIS intending to provide the environmental analysis for issuance of commercial leases that would convey development rights to lease holders. As discussed in the Draft PEIS, because of various uncertainties regarding location of developments, technologies to be employed, and the lack of knowledge of specific impacts on various resources, the BLM decided not to analyze the environmental impacts of issuing particular leases at this time and instead decided to analyze amendments of land use plans. Amending those plans is necessary, but not sufficient, to proceed to commercial development of federal oil shale resources but is an important first step. The deadline Congress set for the BLM to complete this PEIS has been exceeded, but that does not allow the BLM to postpone this PEIS until new information becomes available or until the industry is ready to invest in commercial operations. Consideration of a new alternative such as is suggested would also not be consistent with the purpose of and need for the PEIS.

00184-015: The BLM is aware of the report stated in the comment, and text has been added to the PEIS to reference forecasts of oil and gas activity and total employment and population in the four-county area of Colorado.

The cumulative impact section of the PEIS, Section 6.1.5, does include projected oil and gas development currently under consideration in the White River RMP amendment along with other identifiable activities.

00184-016: Text has been added to Sections 4.1.8 and 5.1.8 acknowledging that there may be significant impacts due to the need for major upgrades to the existing road system. The need for upgrades is a site-specific and project-specific issue, depending on the location and scale of the proposed projects. Additional analysis of the impacts of commercial oil shale and tar sands developments on transportation systems and the need for system upgrades in the study area would be provided as a part of additional required NEPA evaluation.

00184-017: The BLM acknowledges the commentor’s preference for Alternative A.

OSTS_00185

3/18/08

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Sir or Madam:

I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This development envisioned by the study would come at a time when our land is already experiencing severe pressure from the current energy boom and significant population growth across the West. It is difficult to understand why the BLM is rushing toward a commercial leasing program without even knowing if oil shale development is feasible economically. In light of that, it's even more difficult to understand why the BLM seems so anxious to give oil shale development priority over other uses on our public lands as shale development would likely preclude all other activity, including natural gas development in priority areas. We must ensure the oil shale research and development projects already authorized by the BLM provide sufficient information to asses the impacts of experimental extraction technologies on energy consumption and water use before proceeding with the PEIS. It will be years before companies developing oil shale technology will know if it is technologically or economically feasible. I urge the BLM to consider the cumulative effects of this industry on wildlife habitat and protected areas across the West. This plan proposes development in some of the best hunting, fishing and recreation areas in Colorado, Wyoming and Utah and it is my opinion we can and should protect these areas from impacts such as diminished air quality and habitat fragmentation. Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits oil shale development will displace every other use of public land. The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming and Utah. I urge you to slow down and carefully consider the gigantic effect commercial oil shale development would have before committing the west slope to a future of industrial development and environmental degradation.

185-001

185-002

185-001 (cont.)

Sincerely,

Responses for Document 00185

00185-001: With the passage of the Energy Policy Act of 2005, Congress declared the policy of the United States to include that "oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed …." Congress also required the Secretary of the Interior to prepare a PEIS for oil shale and tar sands. The FLPMA, the Mineral Leasing Act, and the Energy Policy Act of 2005 authorize use of some BLM land for commercial oil shale leasing and development. The BLM appreciates the commentors' support for the natural gas leasing program. Conflicts between resource uses are not new, and resolutions to such conflicts are not achieved by the land use planning decisions analyzed in this PEIS. The amendments to the RMPs will only close certain areas, and open other areas to consideration for future leasing of oil shale and tar sands. The Secretary of the Interior retains discretion over leasing decisions. The NEPA analysis for future leasing decisions will analyze the compatibility and conflicts among resources.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands. This analysis will balance any conflicting uses, as required by FLPMA.

00185-002: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios and pertinent federal or nonfederal

actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to mitigate short-term and long-term adverse impacts.

It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

OSTS_00186

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The development envisioned by the study would come at a time when our land is already experiencing severe pressure from the current energy boom and significant population growth across the West. It is difficult to understand why the BLM is rushing toward a commercial leasing program without even knowing if oil shale development is feasible economically. In light of that, it's even more difficult to understand why the BLM seems so anxious to give oil shale development priority over other uses on our public lands as shale development would likely preclude all other activity, including natural gas development in priority areas. 186-001

We must ensure that the oil shale RD&D process has allowed us to asses the impacts of experimental extraction technologies on energy consumption and water use before proceeding with the PEIS. It will be years before companies developing oil shale technology will know if it is technologically or economically feasible.

I urge the BLM to consider the cumulative effects of this industry on wildlife habitat and protected areas across the West. This plan proposes development in some of the best hunting, fishing, and recreation areas in Colorado, Wyoming, and Utah. We can and should protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 186-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale development will displace every other public use of public land to benefit private companies. The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming, and Utah. I urge you to slow down and carefully consider the enormous effect commercial oil shale development would have before committing the West Slope to a future of industrial development and environmental degradation. 186-001 (cont.)

Responses for Document 00186

00186-001: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

The BLM believes that the RD&D program will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. The scope of the PEIS, in consultation with cooperating agencies, was changed from a leasing decision to an allocation decision. Consequently, new NEPA analysis will be required prior to offering parcels of land for lease for commercial oil shale exploration and development. This NEPA analysis will evaluate environmental impacts of the operation(s) and develop specific measures to mitigate or eliminate those impacts. This analysis will also contain any new information or circumstances relevant to the RD&D technology, which may be a consequence of research or lessons learned on the RD&D leases or as a result of studies on nonfederal lands.

00186-002: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios and pertinent federal or nonfederal actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably

foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to mitigate short-term and long-term adverse impacts.

It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

OSTS_00187

March 11, 2008

Sherry Thompson, BLM Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne, IL 60439

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 187-001 187-002 187-003

The Bureau of Land Management must also adequately consider the cumulative impact of the proposed development to all of the plants and animals that will be affected. 187-004

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 187-001 (cont.)

Sincerely,

Responses for Document 00187

00187-001: The BLM acknowledges the commentor's preference for Alternative A.

00187-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00187-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

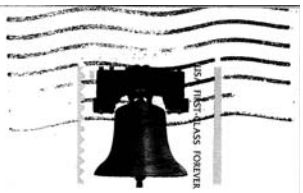
As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

00187-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

FROM OSTS_00188

GRAND JUNCTION CO 815
PM
19 MAR



Please add my name to the burgeoning list of Americans who support oil shale and tar sands development.

It's important for America to have diverse domestic sources of energy including traditional energy sources such as oil and natural gas, renewable sources like wind and solar, and unconventional sources like those found in oil shale and tar sands. The Bureau of Land Management is analyzing a three-state oil shale and tar sands program. If approved, the oil shale and tar sands program will help bridge the gap between today and our renewable energy future.

TO:

BLM Oil Shale and Tar Sands
Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

188-001

60439$4806 C050

Please submit my comments in support of moving forward with a vigorous oil shale and tar sands program in Colorado, Wyoming and Utah to the Bureau of Land Management:

Thank you,

Name:

Address:

Response for Document 00188

00188-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00189

202-289-1060

March 13, 2008 11:25 AM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I urge you to protect our public lands from dirty fuels production. Both oil shale and tar sands development could have massive impacts on the environment and local communities -- impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and increase global warming. 189-001

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create toxic waste sites that go on for miles, produce more greenhouse gasses than conventional fuel and use enormous amounts of clean water -- a priceless resource in the arid West. Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that dirty fuels should be the primary use of public land in order to benefit private companies.

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. 189-002

Sincerely,

Response for Document 00189

00189-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00189-002: The BLM acknowledges the commentor’s preference to not support access to oil shale and tar sands on public lands.

OSTS_00190

4/15/2008 8:39:46 AM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Encourage Responsible Development of Unconventional Fuels

Please reply to

I strongly support the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming, as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful utilization of our domestic energy resources, particularly as energy prices continue to rise.

With world energy demand projected to increase by 50% during the next 20 years and possibly double in 50 years, we need to ensure that consumers, industry and businesses are not forced to bear the costs of higher energy prices. Current oil resource estimates in parts of Utah, Colorado and Wyoming project 800 billion barrels of recoverable oil from oil shale, which is three times greater than the proven oil reserves of Saudi Arabia.

190-001

Further, with today's technology, this enhanced development can be conducted in an environmentally safe manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Responsible access to oil shale and tar sands from these leasing areas will offer remarkable benefits to the local communities and will strengthen our domestic energy security. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Response for Document 00190

00190-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00191

3/27/2008 2:35:21 PM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Please reply to

Consumers, industry and businesses across the country are struggling with rising energy prices, tighter supplies and increased dependence on foreign imports. The federal government must allow for the thoughtful and appropriate use of our nation's oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community. The development of unconventional fuels in Utah, Colorado and Wyoming will produce a strong workforce and will support their local economies.

191-001

I support the development of unconventional fuels in these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Response for Document 00191

00191-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00192

April 21, 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory
EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Re: Supplemental Comments on Oil Shale and Tar Sands Resources Draft PEIS

Please accept and fully consider these comments on behalf of the undersigned organizations. We represent individuals who live near the areas identified for oil shale and tar sands leasing, and many others who are concerned about the management of our public lands.

We appreciate the opportunity to submit these comments to the Bureau of Land Management (BLM) and their cooperating agencies on the *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement* (Draft PEIS) for amendment of 12 resource management plans to allow for commercial leasing of oil shale and tar sands resources on more than 2 million acres of public lands in western Colorado, Utah, and Wyoming. We are submitting these comments today via electronic mail as a supplement to the comment letter submitted on March 20, 2008, by Western Resources Advocates (WRA) and others.

As stated in the March 20 letter, we recognize the BLM's predicament in satisfying a Congressionally-mandated timetable to evaluate establishment of commercial leasing programs for oil shale and tar sands development under the Energy Policy Act of 2005. Nevertheless, this Draft PEIS is based on inadequate information; consequently, we request you **select Alternative A** and fulfill your management duty to protect sensitive resources on public lands as laid out in Section 102(a)(8) of the Federal Land Policy and Management Act of 1976, as amended:

> "[T]he public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use."[1]

192-001

Alternative A is the most prudent course given (1) the fundamental lack of information about impacts to those resources that would follow from the oil shale and tar sands leasing sanctioned by the proposed Resource Management Plan amendments, and (2) the questionable need for leasing of federal lands to support near-term responsible development of this resource. Furthermore, we ask that you be certain to incorporate several new pieces of information which we discuss below in your analysis.

[1] P.L. 94-579.

OSTS_00192

Action should await more complete information

As Draft PEIS documents, there is no knowledge or experience to determine how commercial production would be undertaken in the United States.[2] Best available data and contact with companies awarded federal research, development, and demonstration (RD&D) leases was not sufficient to enable the agency to determine what future commercial development will be like, including extraction and reformulation processes, energy requirements, water availability and quality, and the pattern and timing of surface disturbance. Accordingly, the BLM was unable to provide specifics on the location, practices, or pace with which commercial oil shale and tar sands production will be undertaken.[3]

192-002

The agency, charged with providing the public a reasonable picture of potential future conditions under future commercial development of this resource, clearly states the limits of available knowledge in the Draft PEIS:

> **"[T]he BLM concluded that critical information on which to assess potential impacts, define required mitigation measures, and approve commercial leasing is not available at this time**. Specifically, the BLM determined that it does not have, at this time, adequate information on the (1) magnitude of commercial development and pace of that development, (2) potential locations for commercial leases, (3) technologies that will be employed, (4) size or production level of individual commercial projects, and (5) development time lines for individual projects to support decisions about lease issuance.
>
> "**Published information** defining both oil shale and tar sands commercial development **is dated** (i.e., mostly dating back to the mid-1980s or earlier) **and unlikely to accurately describe future commercial technologies**.... **[C]onversations with the companies** holding the RD&D leases **provided little definitive information** about future commercial development beyond the locations of the preference right lease areas. For example, the companies are uncertain exactly what processes commercial development will involve, what the power requirements are for individual components of their technologies, whether there are ways to generate needed power on-site via the commercial process itself, how much water will be required per barrel of shale oil produced, how many employees will be required during the construction and operations phases, and how much land will be disturbed during different phases of development." [4]

In light of this limited information, the agency concludes that, "without this information, it is not possible to define what related impacts will be".[5]

Similarly, the agency acknowledges repeatedly in the Draft PEIS that there is insufficient information to analyze likely impacts of the designations, concluding that:

> "A variety of location-specific factors... will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The **combined effects of these location specific and project specific factors cannot be fully anticipated or addressed in a programmatic analysis**."[6]

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[2] Draft PEIS, pages 2-37 to 2-39.
[3] *Id.*, page 6-40 to 6-41.
[4] *Id.*, pages 2-50 to 2-51.
[5] *Id.*, page 2-51.
[6] *Id.*, page 1-8. (emphasis added)

Cooperating entities, including expert federal agencies and affected states, expressed strong reservations about these knowledge gaps which prompted the BLM to abandon their initial plan to establish a commercial leasing program.

> "The BLM considered constructing development scenarios for both oil shale and tar sands by developing assumptions in the absence of available information. **It concluded, however, that the amount of information that was available was too meager, that analyses would have to be based on an unacceptably large number of assumptions, and that such analyses would be unreliable and possibly misleading**.... **The uncertainty associated with the preliminary analyses indicated that BLM should defer approving the issuance of commercial leases until adequate information is available to define what the development will entail**."[7]

Likewise, we question whether this preliminary step of designating public lands as appropriate for leasing is any more supportable. As described in the March 20 comment letter submitted by WRA et al., implementing Alternatives B or C may have the effect of propelling an effort to lease these lands forward despite these knowledge gaps when, in reality, BLM may not be able to ever reconcile the impacts of oil shale and tar sands development with its mandate under FLMPA, Section 102(a)(8).

The analysis presented in the Draft PEIS still relies on an "unacceptably large number of assumptions" and we believe the information provided is "unreliable and possibly misleading". Hundreds of assumptions have been made in the BLM's analysis, many of which—such as the water demands of production technologies—are critical to meaningful analysis of the likely impacts. The Draft PEIS states that these assumptions are based on existing literature and previous environmental documents. BLM correctly acknowledges that the preponderance of the existing literature is "dated and unlikely to accurately describe future commercial technologies". Importantly, however, in a majority of instances specific data are apparently not available to define a potential impact-producing factor. In these cases, the agency exercised "best professional judgment" to establish "reasonable" assumptions. Given the magnitude and extent of the uncertainty associated with commercial development of oil shale and tar sands, we are doubtful that best professional judgment is a sufficient basis upon which to rest this prospective impacts analysis. Congress' investigatory and oversight body, the Government Accountability Office, has offered guidance on the need for what they call "grounded foresight." In an August 2006 statement, the Comptroller General of the United States stated,

192-002 (cont.)

> "**[T]o be credible, foresight work must have a strong factual and conceptual basis**. Such work needs to ground all trends in evidence... At the same time, **such work also needs to clearly convey the uncertainty that's inherent in foresight analysis**."[8]

The Draft PEIS provides a false sense of certainty about the reliability of results of this analysis. The knowledge base that was deemed insufficient to support commercial leasing is equally insufficient to support the designation of specific lands for leasing. The gaps in this knowledge base identified by BLM and others, including the RAND Corporation in their 2005 review and comments on the Draft PEIS by the Governors of Colorado and Wyoming, necessitate additional research to provide a more adequate analysis of future impacts across the landscape. For this reason, we believe that **no action should be taken** to begin to make specific lands available for

[7] *Id.*, page 2-51. (emphasis added)
[8] GAO-06-1041CG, page 4. (emphasis added)

commercial leasing until the RD&D program currently underway yields results and the impacts of commercial leasing can be meaningfully analyzed. 192-002 (cont.)

BLM has not justified the need to proceed with commercial leasing

The action contemplated by the BLM in this Draft PEIS might not even be necessary, and the need for this action is never considered in the document. Currently, more than three million acres of oil shale resources in Colorado, Utah, and Wyoming are already in private hands and have been for years.[9] Attachment 1 provides a description of the extent of the oil shale resource currently in the hands of private interests. For example, the following companies already control extensive oil shale resources but have not yet established technologies to develop them:

- ExxonMobil owns 50,000 acres of oil shale lands in Colorado's Rio Blanco and Garfield counties alone,[10]
- Red Leaf Resources controls oil shale leases of about 16,500 acres on Utah state lands,[11]
- Great Western Energy, LLC owns or controls oil shale leases on 16,500 acres of state lands in Uintah County, Utah,[12]
- Millennium Synfuels, LLC controls approximately 34,000 acres of oil shale leases in Utah,[13] 192-003
- Royal Dutch Shell owns 36,000 acres of oil shale lands in Rio Blanco and Garfield counties Colorado,[14] and
- The Oil Shale Exploration Company controls over 45,000 acres of oil shale lands in Colorado.[15]

These companies alone control nearly 200,000 acres of oil shale lands in Utah and Colorado. While the agency did not provide geospatial data that would allow for a more detailed analysis of the distribution of private claims, a geospatial analysis of available data by Earthjustice identified that many of these privately-held oil shale resources are found in the area identified by this Draft PEIS as most geologically prospective (see Attachment 2). When coupled with the RD&D leases currently held by private companies, we believe that ample resources are already at their disposal to begin developing a commercial-scale industry without the need for leasing of the public lands.

Revise analysis to consider new information

In the course of production of this document, substantial new information has been made available that is not addressed by this Draft PEIS. In finalizing this PEIS, the following must be adequately addressed. In doing so, we encourage the agency to take sufficient time to fully incorporate this new information in their analysis.

---

[9] *National Strategic Unconventional Resource Model*, U.S. Department of Energy Office of Petroleum Reserves, April 2006, page 6.
[10] *Secure Fuels from Domestic Resources: The Continuing Evolution of America's Oil Shale and Tar Sands Industries.* U.S. Department of Energy, 2007, page 33.
[11] *Id.*, page 61
[12] *Id.*, page 70
[13] *Id.*, page 47
[14] *Mahogany Research Project – Doing Oil Shale the Right Way*, Royal Dutch Shell, (company brochure), http://www.shell.com/us/mahogany/.
[15] *OSEC's Privately Held Land,* The Oil Shale Exploration Company (company brochure), http://www.oilshaleexplorationcompany.com/future.asp.

Impacts on human health and regional air quality

In February, the Environmental Protection Agency provided the BLM with its comments on a revised drilling plan for the Pinedale Anticline, citing concerns about human health issues including elevated ozone levels and groundwater contamination, as well as visibility impacts in nearby Wilderness Areas. Consistent with their responsibilities under Section 309 of the Clean Air Act, EPA reviewed the analysis of impacts and gave the plan its worst possible rating. EPA recommended that BLM revise the plan to correct the problems identified by EPA. In its decision, the EPA stated:

> "[I]t is of utmost importance that the Revised Draft SEIS identify effective and enforceable mitigation strategies to ensure environmental and public health protection as the proposed 4,399 additional wells on the Pinedale Anticline are developed."[16]

The BLM should do the same for the Oil Shale and Tar Sands PEIS and any other major decision document. Oil shale and tar sands development is acknowledged to have potentially severe impacts on air quality.[17] As noted in the comments submitted by WRA et al. on March 20, the approach taken to address human health and air quality impacts is unacceptable,[18] and the Draft PEIS should incorporate a formal methodology to evaluate all health issues and potential mitigations.[19] We therefore request that the BLM incorporate a Health Impact Assessment (HIA), which is a systematic, comprehensive methodology for assessing human health impacts, as part of the PEIS. A HIA looks at all the possible health effects from a decision, including contaminants and air pollutants but also water contamination, accidents and injuries, alcoholism and substance abuse, mental health impacts, and more. Not only is this approach used by U.S. and international health agencies, but it is used by the oil and gas industry itself in overseas operations. Included as Attachment 4 is a guide to conducting HIAs produced by the International Petroleum Industry Environmental Conservation Association and the International Association of Oil and Gas Producers.[20] Just last year, the BLM incorporated a full HIA into an oil and gas Draft EIS in Alaska.[21] A comparable approach should also be undertaken for oil shale and tar sands development as part of this PEIS for Colorado, Wyoming and Utah.

192-004

[16] Letter from EPA Regional Administrator, Region 8, to State Director, Bureau of Land Management, Wyoming State Office regarding Revised Draft Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project Sublette County, Wyoming (CEQ #20070542), February 14, 2008. Accessed April 18, 2008, via http://www.epa.gov/region8/compliance/nepa/nepadocs/FinalEPACommentsOnPinedaleAnticline14Feb08.pdf.

[17] Draft PEIS, page 4-46.

[18] Letter from WRA et al. to BLM regarding comments on Draft PEIS, March 20, 2008, pages 29-31.

[19] *Id.*, page 39.

[20] International Petroleum Industry Environmental Conservation Association and the International Association of Oil and Gas Producers, *A Guide to Health Impact Assessments in the Oil and Gas Industry*, (London; 2005). Accessed April 18, 2008, at http://www.ipieca.org/activities/health/health_publications.php.

[21] See *The Northeast National Petroleum Reserve-Alaska Draft Supplemental Integrated Activity Plan/Environmental Impact Statement*, available at http://www.blm.gov/ak/st/en/prog/planning/npra_general/ne_npra/northeast_npr-a_draft.html.

Designation of Adobe Town as Very Rare or Uncommon

The Wyoming Environmental Quality Council finalized its decision on the designation of the Adobe Town area as Very Rare or Uncommon under the state Environmental Quality Act. The final decision is included as Attachment 5. Adobe Town was so designated due to its geological, fossil, scenic, wildlife, and cultural and historical values. Non-coal surface mining (which would include oil shale) is expressly forbidden in Very Rare or Uncommon areas except in cases where surface mining would not detract from such qualities. In the case of this area, because scenic qualities are part of the designation, there is no possibility that an exemption for oil shale mining could be issued. While part of the Very Rare or Uncommon area is Wilderness Study Area which would not be made available for oil shale leasing under the DPEIS, the remainder is outside the WSA, including lands which fall within the proposed Washakie Basin leasing area. The designations proposed under this Draft PEIS must be revised to respect the Environmental Quality Council's decision.

192-005

Conclusion

Thank you again for this opportunity to provide additional input regarding the management of our public lands and the spectacular resources they hold. Because the actions contemplated in this Draft PEIS are likely to affect our public lands and surrounding communities for decades to come, it is critical that the agencies conduct a thorough, accurate, and comprehensive consideration of the likely impacts of commercial leasing, then provide the public with an additional opportunity to comment. Unless and until less speculative information can be provided as a basis for proceeding toward commercial leasing, the agency should consider alternative development pathways that respect the boundaries of current knowledge of oil shale and tar sands technologies.

Due to these significant knowledge gaps, the BLM has crafted the action contemplated by this Draft PEIS to avoid any real impacts analysis. This approach is unacceptable, however, as detailed in the March 20 letter. By deferring impacts analysis to future individual lease application, the PEIS avoids any meaningful basin-wide impacts analysis, and it is probable that the agency will never perform an appropriate landscape-level environmental consequences review.

192-006

For these reasons, we believe it is premature and irresponsible for the BLM to choose any alternative but Alternative A.

Respectfully submitted,

Eric Molvar, Executive Director
Biodiversity Conservation Alliance

Elise Jones, Executive Director
Colorado Environmental Coalition

OSTS_00192

Clare Bastable, Conservation Director
Colorado Mountain Club

Ben Schreiber, Staff Attorney
Environment America

Tyson Slocum, Director, Energy Program
Public Citizen

Amy Mall, Senior Policy Analyst
Natural Resources Defense Council

Harold Shepherd, Issues Director
Red Rock Forests

Stephen Bloch, Staff Attorney
Southern Utah Wilderness Alliance

Suzanne Jones, Regional Director
The Wilderness Society

Peter Hart, Conservation Analyst/Staff Attorney
Wilderness Workshop

OSTS_00192

Attachments

Attachment 1 – Department of Energy Overview of the Oil Shale Resource

Attachment 2 – Distribution of Private Oil Shale Claims in Colorado's Piceance Basin

Attachment 3 – Letter from EPA Regional Administrator, Region 8, to State Director, Bureau of Land Management, Wyoming State Office regarding Revised Draft Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project Sublette County, Wyoming

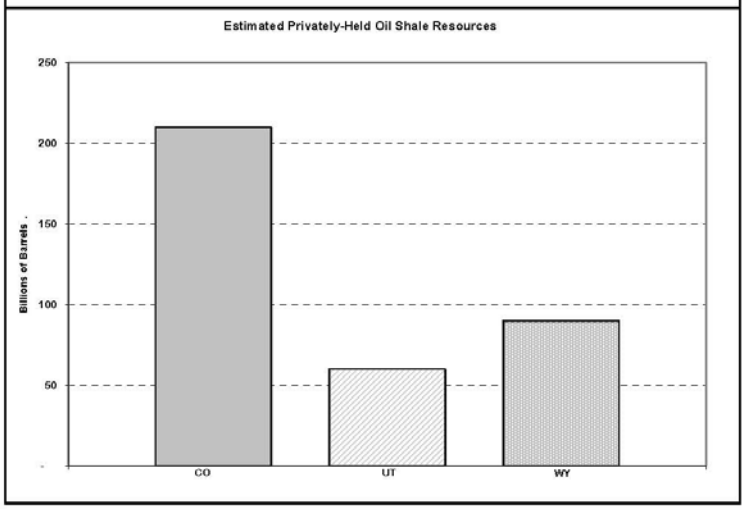
Attachment 4 – A Guide to Health Impact Assessments in the Oil and Gas Industry

Attachment 5 – Wyoming Environmental Quality Council Designation of Adobe Town as Very Rare or Uncommon (April 10, 2008)

Attachment 1
Department of Energy Overview of the Oil Shale Resource

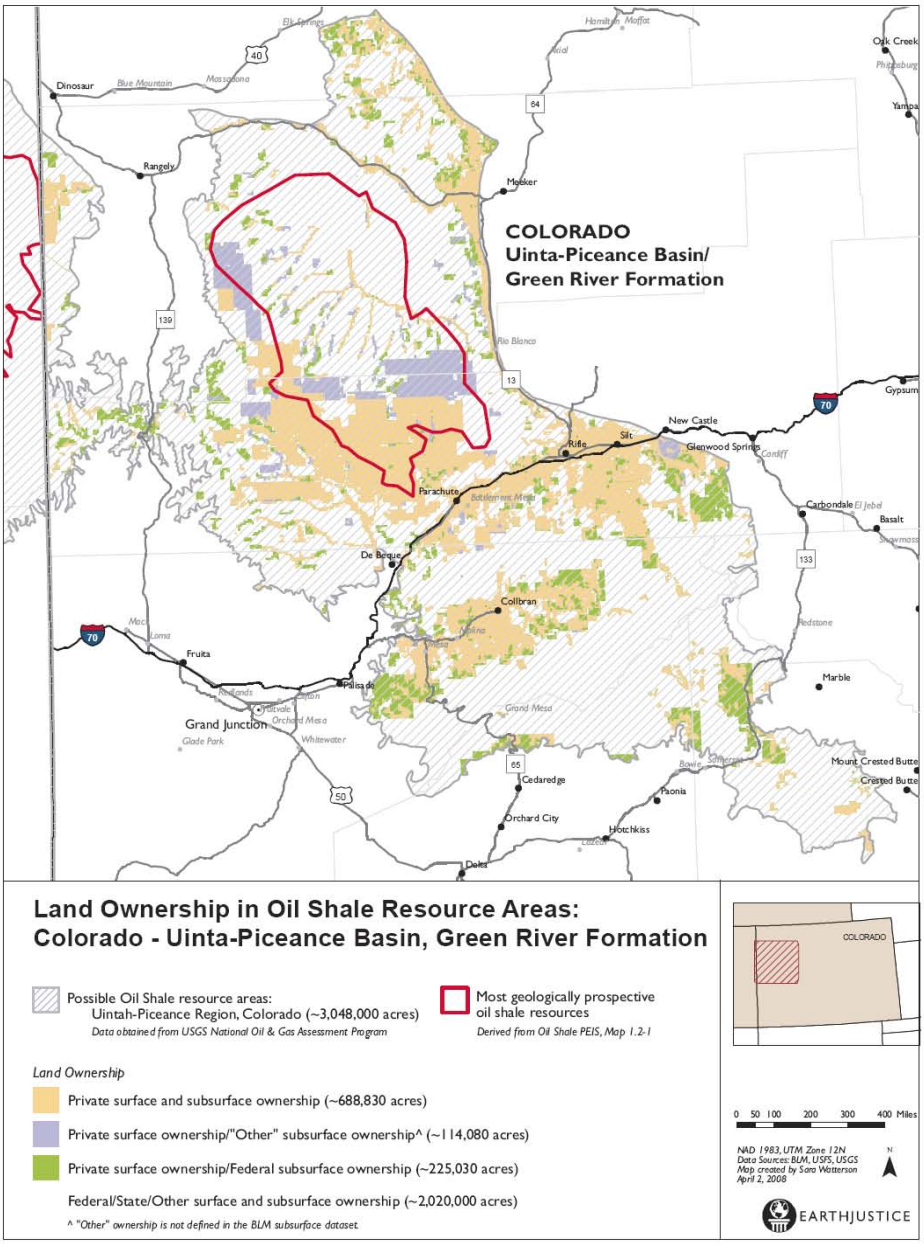
State	Ownership	Minimum thickness (feet)	Yield (gal/ton)	Average Yield	Acreage (thousands)	Resources (billion bbls)
CO	F	-	<10	5	570	-
	F	15	15-25	20	300	600
	F	10	>25	30	600	390
	NF	-	<10	5	165	-
	NF	15	15-25	20	80	130
	NF	10	>25	30	170	80
Subtotal					1,885	1,200
UT	F	-	<10	5	2,130	-
	F	15	15-25	20	1,070	150
	F	10	>25	30	600	70
	NF	-	<10	5	640	-
	NF	15	15-25	20	320	40
	NF	10	>25	30	170	20
Subtotal					4,930	280
WY	F	-	<10	5	1,500	-
	F	15	15-25	20	700	150
	F	10	>25	30	400	20
	NF	-	<10	5	890	-
	NF	15	15-25	20	440	80
	NF	10	>25	30	260	10
Subtotal					4,190	260
Totals	F				7,870	1,480
	NF				3,135	360
					11,005	1,840

Notes
F = federal NF = non-federal



Source: Adapted from data found in *National Strategic Unconventional Resource Model*, U.S. Department of Energy Office of Petroleum Reserves, April 2006, page 6.

Attachment 2
Distribution of Private Oil Shale Claims in Colorado's Piceance Basin



Attachment 3
Letter from EPA Regional Administrator, Region 8, to State Director, Bureau of Land Management, Wyoming State Office regarding Revised Draft Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project Sublette County, Wyoming

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

February 14, 2008

Ref: EPR-N

Mr. Robert A. Bennett, State Director
Bureau of Land Management
Wyoming State Office
5353 Yellowstone Road
Cheyenne, Wyoming 82009

Re: Revised Draft Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project
Sublette County, Wyoming CEQ #20070542

Dear Mr. Bennett:

In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Revised Draft Supplemental Environmental Impact Statement for the Bureau of Land Management's (BLM) proposed Pinedale Anticline Oil and Gas Exploration and Development Project (Revised Draft SEIS). The Revised Draft SEIS provides additional alternatives and impacts analyses in response to changes to the preferred alternative and to comments received on the December 2006 Draft SEIS.

The Revised Draft SEIS supplements a previous EIS and a 2000 Record of Decision authorizing up to 700 producing wells in the Pinedale Anticline Project Area (PAPA). The Revised Draft SEIS assesses both the site-specific and cumulative environmental impacts of year-round drilling, completions, and production of up to 4,399 additional natural gas wells on up to 12,885 acres of new disturbance. The year-round drilling is proposed within certain areas of the PAPA that coincide with big game crucial winter habitats and greater sage-grouse seasonal habitats. The PAPA encompasses 198,037 acres and is located directly south of Pinedale, Wyoming, in Sublette County. The Bridger-Teton National Forest is located west, north, and east of the PAPA and comes within 2.3 miles of the PAPA boundary. In addition, the PAPA is located approximately 11 miles west of the Bridger Wilderness Area. The Bridger Wilderness Area is a federal Class I area under the Clean Air Act, requiring special protection of air quality and air quality related values, such as visibility.

The Revised Draft SEIS considers five alternatives in detail. The preferred alternative consists of up to 4,399 additional wells on up to 12,885 acres of new surface disturbance by the year 2025. The drilling and completions within big game crucial winter habitats would occur year-round within concentrated development areas centered in a core area on the Anticline Crest. The Proposed Action also includes installation of a liquids gathering system in the central and southern portions of the PAPA complementing the existing liquids gathering system in the northern portion of the PAPA. Tier 2 equivalent emission controls would be installed on 29 out of 48 drilling rigs at peak drilling in 2009. The proponent's new Proposed Alternative is similar to the Preferred Action in that it consists of the same project components including 4,399 additional wells on up to 12,885 acres of disturbance. However, the core development area considered under the Preferred Alternative is different spatially from the Proposed Action and includes a potential development area (PDA). With the PDA, the Preferred Alternative has the potential for year-round development on 70,200 acres, over 60% greater than the core development area proposed under the Proposed Action. In addition to the Proposed Action and Preferred Alternative, the Revised Draft SEIS considers two other action alternatives that differ primarily in areas where year-round development may occur; installation of liquids gathering systems; and air quality mitigation measures. The Revised Draft SEIS also includes a No Action Alternative, which is based on elements set forth in the 2000 Pinedale Anticline Record of Decision (ROD).

EPA Region 8 has reviewed the Revised Draft SEIS and has three primary concerns, which are briefly highlighted in this letter: air quality impacts to visibility and ozone, and groundwater impacts. The enclosed "Detailed Comments" provides more discussion of our concerns regarding these issues as well as our comments on the proposal's impacts to surface water quality and wetlands.

AIR QUALITY IMPACTS - VISIBILITY

The Revised Draft SEIS discloses the significant and unanticipated impacts to visibility that occurred since implementation of the 2000 Pinedale Anticline ROD. The NO_X emissions from all sources operating in the PAPA in 2005 were five times the analysis threshold set in the 2000 Pinedale Anticline ROD (Revised Draft SEIS, page 3-70). For visibility, the 2005 emissions led to a modeled 45 days of visibility impairment greater than 1.0 deciview (dv) at the Class I Bridger Wilderness Area, 5 days at the Class I Fitzpatrick Wilderness Area, and additional days at other regional Class I areas (Revised Draft SEIS, page 3-73). Under the No Action scenario (ie., where development occurs under the provisions of the 2000 ROD) predicted 2007 visibility impacts are even higher than the 2005 predictions, with 62 days above 1.0 dv at Bridger Wilderness Area, 8 days at Fitzpatrick Wilderness Area, and additional days at other regional Class I and sensitive Class II areas (Revised Draft SEIS, page 4-78). Given the unforeseen and significant impacts that have occurred from the development of the 642 producing oil and gas wells approved under the 2000 Pinedale Anticline ROD, EPA recommends the Revised Draft SEIS identify effective and enforceable mitigation strategies to ensure environmental protection as the proposed 4,399 additional wells on the Pinedale Anticline are developed. EPA also recommends the Revised Draft SEIS provides a plan to mitigate the significant air quality environmental impacts resulting from the existing oil and gas development on the PAPA.

EPA and the Wyoming Department of Environmental Quality (WDEQ) participated on the Air Quality Stakeholders group that provided early guidance and comments to the BLM on the air quality modeling and visibility mitigation plan included in the December 2006 Draft SEIS. The air quality analysis and a substantial part of the visibility mitigation plan negotiated for the December 2006 Draft SEIS have been carried forward to this Revised Draft SEIS. However, the mitigation plan included in this Revised Draft SEIS includes significant modifications of the original commitments. EPA is concerned these modifications weaken the plan's ultimate goal and create uncertainty about achieving the ultimate goal of zero days of visibility impairment at Bridger Wilderness Area. The modified commitments suggest reluctance to commit to the full mitigation plan and have eroded EPA's confidence that the goal of zero days will be achieved. Without further specificity on how the ultimate goal will be achieved, EPA believes that the proposed project will result in at least ten days of visibility impairment at the federal Class I Bridger Wilderness Area. EPA considers ten days of visibility impairment greater than 1.0 dv a significant, adverse impact to air quality.

AIR QUALITY IMPACTS - OZONE

The Revised Draft SEIS updates the ozone analysis with a current state-of-science photochemical grid model. This level of analysis is particularly important given the elevated ozone levels that have been recorded at ambient air monitoring stations neighboring the PAPA. The BLM modeling analysis predicts ozone concentrations approaching EPA's current National Ambient Air Quality Standard (NAAQS). Specifically, ozone concentrations for the Proposed Action are predicted to be 0.0782 ppm near the PAPA. For Alternative C with the 80 percent reduction in drill rig emissions, ozone concentrations are predicted to be 0.0765 ppm near the PAPA (Alternative C is similar to BLM's Preferred Alternative). However, the Revised Draft SEIS does not provide analysis of ozone concentrations for the first five years prior to full implementation of the 80 percent reduction in drill rig emissions under the Preferred Alternative air quality mitigation strategy. The performance evaluation of the photochemical model supported the model's reliability in predicting ozone but also noted a small underestimation bias. With predicted ozone concentrations approaching the current standard and an underestimation bias in the model, EPA is concerned about the potential environmental and health impacts associated with the projected 0.0782 and 0.0765 ppm ozone concentrations. This concern is further substantiated by the elevated ozone concentrations above the current 0.08 ppm standard recorded at ambient air monitoring stations near the PAPA in 2005 and 2006. In addition, natural gas development and production under the Preferred Alternative is anticipated to continue until 2065.

In view of the ozone levels monitored, modeled and predicted, EPA recommends that an air quality mitigation strategy be developed to address these potentially significant air quality and health impacts. The SEIS should also include modeled demonstrations that the proposed action will not incrementally contribute to violations of a NAAQS. In addition, EPA is currently reviewing the national primary and secondary standards for ozone. This project may be affected if EPA determines that a revision to the current ozone standard is necessary and appropriate. Consequently, EPA may have further comments on the project's ozone analysis after the final rule is issued.

GROUNDWATER

The Revised Draft SEIS includes important new information on groundwater monitoring in the PAPA. The monitoring data suggest that current drilling and production activities on the PAPA have contributed to contamination of an aquifer used as a drinking water source. Existing benzene contamination exceeding the Drinking Water Standard (maximum concentration level or MCL) in two wells was attributed to oil and gas exploration activities in the Revised Draft SEIS. Further, benzene and other hydrocarbons have been detected in 88 of the approximately 230 water supply wells monitored. The Revised Draft SEIS does not disclose the monitored concentrations; it is, therefore, unknown how much the monitored concentrations are above or below the MCL. Based upon the extent of contamination of these two wells completed in an aquifer used as a source of drinking water and benzene contamination in approximately one third of the other wells monitored, EPA is concerned about the significance of existing and potential future impacts associated with activities in the PAPA. EPA believes that such impacts are environmentally unsatisfactory.

The Revised Draft SEIS provides only raw data. EPA believes the Revised Draft SEIS does not provide an adequate analysis of the effects of the expanded well field on groundwater; nor does it discuss the potential effectiveness of the proposed mitigation measures. Although the 2000 Pinedale Anticline ROD required all wells within one mile of proposed development be monitored on an annual basis, there is no documentation of how many wells exist within this defined buffer area nor can it be documented that monitoring took place in the defined areas. The Wyoming State Engineer has identified 4000 points of use within the PAPA. While some of these points of use may be duplicates, monitoring has taken place in only approximately 230 wells. The full extent of the benzene and hydrocarbon contamination in the PAPA has not been comprehensively evaluated. Although there are distinct aquifers in this area described in the Revised Draft SEIS, information on impacts and potential mitigation measures were generalized across all of the aquifers. Further, the Revised Draft SEIS acknowledges the source of the widespread low concentration detections (lower than the MCL) is not known (Revised Draft SEIS, page 3-85). EPA recommends that a more clear understanding of the extent of the benzene and hydrocarbon contamination, the aquifers, and the source of contamination is needed to develop effective mitigation measures.

The Revised Draft SEIS provides mitigation measures intended to reduce impacts to groundwater. These measures, however, were not identified as necessary nor were they evaluated as to their effectiveness in any of the alternatives. As the source of the widespread contamination remains unclear, it is difficult to identify and implement appropriate and effective mitigation measures to protect valued groundwater supplies. EPA recommends that where impacts have occurred or may reasonably be expected to occur to groundwater sources as a result of oil and gas production, including but not limited to hydraulic fracturing practices, an effective and enforceable mitigation plan should be developed. The mitigation plan could specifically include plans for replacement of quality water to water users if necessary.

EPA's RATING

Consistent with section 309 of the Clean Air Act, it is EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. In accordance with our policies and procedures for reviews under NEPA and Section 309 of the Clean Air Act, EPA is rating this Revised Draft SEIS as "Environmentally Unsatisfactory – Inadequate Information" (EU-3) because our review has identified significant, adverse, long-term impacts to air quality and groundwater quality. The "EU" rating is based on potential adverse impacts to visibility in federal Class I areas without adequate mitigation; the extent of groundwater contamination in the PAPA where development has already occurred; and EPA's concern about further potential groundwater contamination impacts that may occur with the proposed project. Some of this contamination exceeds National Drinking Water Quality Standards. In addition, EPA is currently reviewing the national primary and secondary standards for ozone. This review will be completed by March 12, 2008. Should the ozone standard be revised, EPA may have additional comments on the SEIS and project. These impacts are of sufficient magnitude that the proposed action should not proceed as proposed. Further, the "EU" rating makes this project a candidate for referral to the Council on Environmental Quality (CEQ) if the unsatisfactory impacts we identified are not resolved. The rating of "3" is based on the lack of adequate information to characterize existing groundwater contamination or the extent of potential groundwater impacts from the proposed action. The Revised Draft SEIS also does not contain adequate analyses from air quality modeling to disclose the predicted ozone concentration under varying emission scenarios. This "3" rating indicates EPA's belief that the Draft EIS is not adequate for purposes of our NEPA and/or Section 309 review, and thus, should be formally revised and made available for public comment in a supplemental or revised Draft EIS. The "3" rating also makes this project a potential candidate for referral to CEQ. In addition to EPA's detailed comments on the Revised Draft SEIS, a full description of EPA's EIS rating system is enclosed.

If you have any questions regarding our comments or this rating, please contact Larry Svoboda, Region 8 NEPA Program Director, at 303-312-6004, or Carol Campbell, Acting Assistant Regional Administrator of Ecosystems, Protection and Remediation at 303-312-6340.

Sincerely,

/signed/

Robert E. Roberts
Regional Administrator

cc: John Corra, Wyoming Department of Environmental Quality
Chuck Otto, BLM Pinedale Field Office Manager

Enclosures

Detailed Comments by the Region 8 Environmental Protection Agency for the Draft Supplemental Environmental Impact Statement (SEIS) Pinedale Anticline Oil and Gas Exploration and Development Project Sublette County, Wyoming

Air Quality – Visibility

The Clean Air Act requires special protection of air quality and air quality related values (such as visibility) in many of the nation's wilderness areas and national parks. Subpart II of Part C of the Clean Air Act prescribes a program specifically for the protection of visibility in federal Class I areas and establishes "as a national goal the prevention of any future, and the remedying of any existing, impairment of visibility in mandatory class I federal areas which impairment results from man-made air pollution." EPA's implementing regulations require states to submit implementation plans that contain such measures as are necessary to make reasonable progress towards the national requirements, and that states establish reasonable progress goals toward improving visibility on the worst days and preventing further degradation in visibility during the best days. Actions by BLM that lack adequate mitigation of potential visibility impacts could impede Wyoming's and neighboring states' ability to submit State Implementation Plans that meet the Clean Air Act requirements.

In addition to its visibility provisions, the Clean Air Act contains general provisions for a Prevention of Significant Deterioration (PSD) program designed to protect federal Class I areas from air quality degradation under Subpart I of Part C. The PSD program places an affirmative responsibility on federal land managers to protect air quality in many of the most important national parks and wilderness areas in the nation from human-caused pollution. The Wilderness Act further directs the federal land management agencies to protect the wilderness character of those areas designated as wilderness. In that Act, Congress recognized the importance of preserving designated areas in their natural condition and declared a policy to "secure for the American people of present and future generations the benefits of an enduring resource of wilderness."

As stated on page 4-74 of the Revised Draft SEIS, "BLM considers a 1.0 deciview (dv) change to be a significance threshold for visibility impairment," which is consistent with other federal agencies' approach to visibility protection. Pursuant to the Clean Air Act and other provisions of law, EPA and the Federal Land Managers have developed regulations, guidance, and technical tools including models and data that land managers can use to help protect air quality in federal Class I areas. One of these is a guidance document from the Federal Land Managers' Air Quality Related Values Workgroup (FLAG), a workgroup that the federal land managers formed to develop a more consistent approach to evaluate air pollution effects on the areas that they manage. The FLAG guidance document states that impacts greater than 1.0 dv would be considered perceptible and significant for new source review purposes, and EPA supports efforts by the Federal Land Managers to coordinate and streamline their participation in

permitting. EPA has not adopted the 1.0 dv threshold into rules governing the requirements for federal or state New Source Review programs.

The Revised Draft SEIS includes analysis of modeled visibility impacts for both the current level of development in 2005 and the proposed project development through 2023. In Chapter 3.11, the Revised Draft SEIS discusses the visibility analysis conducted for 2005 and discloses the impacts of development that have occurred since BLM's 2000 Pinedale Anticline ROD. This analysis was conducted because the level of development since 2000 led to emissions that significantly exceeded those analyzed in the earlier EIS, triggering additional analysis under the 2000 Pinedale Anticline ROD. The visibility modeling analysis for the 2005 level of development predicts 45 days per year of visibility change greater than the 1.0 dv threshold at the Bridger Wilderness Area, five days per year at the Fitzpatrick Wilderness Area, and additional days at other regional Class I and sensitive Class II areas. Under the No Action scenario where development occurs under the provisions of the 2000 ROD, predicted 2007 visibility impacts are even higher with 62 days above 1.0 dv at Bridger Wilderness Area, 8 days at Fitzpatrick Wilderness Area and additional days at other regional Class I and sensitive Class II areas.

The BLM Preferred Alternative (Alternative D) proposes an air quality mitigation plan that attempts to reduce visibility impacts to Federal Class I areas from both the existing development and the proposed development. Detailed in Section 4.9.3.5 of the Revised Draft SEIS, the air quality mitigation plan provides for a two-phased approach to minimizing visibility impacts. Phase I mitigation would initiate after issuance of the ROD and would require operators to reduce project induced visibility impairment to 2005 levels. Immediately following Phase I, Phase II would require operators to reduce drill rig emissions by 80 percent over four years. The intervening years (years two through five) would have stepped 20 percent decreases in NO_x emissions with corresponding decreases in the number of days of impairment in the Class I areas. The ultimate goal of Phase II mitigation is zero days of visibility impairment at Bridger Wilderness Area. However, after the five-year period and the 80 percent reduction in NO_x emissions from drilling rigs, the Bridger Wilderness area is projected to have at least 10 days of impairment (greater than 1.0 dv) with impairment at other nearby Class I areas as well. During the first five years the proposed project will not meet the intent of Section 169A of the Clean Air Act (CAA) Amendments of 1977, which requires the "prevention of any future, and the remedying of any existing, impairment of visibility in mandatory Federal Class I areas which impairment results from man-made air pollution."

EPA fully supports the ultimate goal of Phase II air quality mitigation: zero days of visibility impairment over 1.0 dv at the Bridger Wilderness Area. However, EPA is concerned that the commitment to achieve the goal has been weakened with the significant modifications of the original commitments. Specifically, EPA is concerned that the addition of "practicable" in the commitment for "using any and all practicable means with full consideration of all resources" and the addition of "technically and economically practicable" create uncertainty and doubt that the ultimate goal will be achieved. The modified commitments suggest reluctance to commit to the full mitigation plan and have eroded EPA's confidence that the goal of zero days will be achieved. Without further specificity on how the ultimate goal will be achieved, EPA

believes the proposed project will result in at least ten days of visibility impairment at the federal class I Bridger Wilderness Area. EPA considers ten days of visibility impairment greater than 1.0 dv a significant, adverse impact to air quality. EPA recommends BLM strengthen the language and include more specific details in the air quality mitigation plan to ensure the goal of zero days of impairment is met within a scheduled timeframe. Specifically, EPA recommends that the Revised SEIS include the air quality mitigation commitments set forth in the December 2006 Draft SEIS that if modeling cannot demonstrate achievement of this goal within five years of the ROD being signed, the Operators, BLM, EPA, and WDEQ would jointly agree to a mitigation plan that complies with the goal of zero days, using any and all available means.

Air Quality – Ozone Analysis

EPA commends BLM for updating the Ozone (O_3) analysis using the photochemical grid model, CAMx. The Revised Draft SEIS discloses summary results from air modeling conducted for the proposed Pinedale Anticline project and other cumulative emission sources. The maximum predicted ozone impacts using the EPA guidance approach occur near the PAPA. For Alternative C (Alternative C is similar to BLM's Preferred Alternative) with the 80 percent reduction in drill rig emissions, ozone concentrations are predicted to be 0.0765 ppm near the PAPA. The Revised Draft SEIS does not provide analysis of ozone concentrations for the first five years prior to full implementation of the 80 percent reduction in drill rig emissions under the air quality mitigation strategy. The performance evaluation of the photochemical model supported the model's reliability in predicting ozone but also noted a small underestimation bias. With predicted ozone concentrations approaching the current standard and an underestimation bias in the model, EPA is concerned with the health impacts associated with the projected 0.0782 and 0.0765 ppm ozone concentrations with this proposed project. This concern is further substantiated by the elevated ozone concentrations above the current 0.08 ppm ozone standard recorded at Sublette County ambient air monitoring stations in 2005 and 2006.

In view of the ozone levels monitored, modeled and predicted, EPA recommends that an air quality mitigation strategy be developed to address not only NO_x sources, but include measures to control other O_3 forming precursors such as volatile organic compounds (VOCs) and formaldehyde. The SEIS should also include modeled demonstrations that the proposed action will not incrementally contribute to violations of a NAAQS. In addition, EPA is currently reviewing the national primary and secondary standards for ozone. This project may be affected if EPA determines that a revision to the current ozone standard is necessary and appropriate. Consequently, EPA may have further comments on the project's ozone analysis after the final rule is issued.

Detailed Ozone Comments

1. The design value predictions for the reported modeling for Alternative C (Alternative C is similar to BLM's Preferred Alternative) were based on an 80 percent NO_x reduction in the PAPA after four years with intervening years of 20 percent stepped decreases in NO_x emissions. For the intervening years, predicted O_3 design value concentrations have not been reported. These values may be considerably higher and EPA recommends they be reported in the SEIS.

2. Figure 4-4 of Appendix H of the Air Quality Impact Analysis Technical Support Document for the Revised Draft SEIS upper right map depiction for Alternative C (Alternative C is similar to Alternative D, BLM's Preferred Alternative) presents the predicted difference in O_3 design value impacts from Alternative C with Phase II mitigation to the base case scenarios. Please clarify the location of the maximum impact location from this figure. Furthermore, the difference of 5.5 ppb presented in Figure 4-4 is not represented in Table 4-1 of Appendix H. EPA recommends the maximum predicted O_3 concentration near the PAPA and approximate location of these impacts be presented in the SEIS.

3. Ozone concentrations were predicted for cumulative sources in the PAPA and surrounding areas. EPA recommends the SEIS disclose ozone concentrations for PAPA specific sources in order to determine the direct project impacts. In addition, EPA recommends the analysis disclose the absolute modeled results in addition to the results calculated under EPA's guidance approach.

4. Section 5.2.2.1. EPA Guidance Ozone - Projection Approach EPA guidance for projecting future ozone concentrations using relative reduction factors to scale current observed ozone design values is required for State Implementation Plan (SIP) modeling in urban non-attainment areas. The approach is useful in the context of the current study; however, the ozone monitoring network is very sparse compared to urban monitoring networks. For this reason EPA recommends the absolute model prediction of maximum ozone concentrations be presented in addition to the "scaled" modeled attainment test (MATS) results used in SIP modeling.

Groundwater

The Revised Draft SEIS includes significant new information on groundwater monitoring that was completed under a monitoring program established under the 2000 Pinedale Anticline ROD. The monitoring data suggest that current drilling and production activities on the PAPA have contributed to contamination of an aquifer used as a drinking water source. Benzene and other hydrocarbons have been detected in 88 of the approximately 230 water supply wells monitored or 38 percent of the wells tested. Existing benzene contamination exceeding the Drinking Water Standard (maximum concentration level or MCL) in two wells was attributed to oil and gas exploration activities in the Revised Draft SEIS. The Revised Draft SEIS does not disclose the monitored concentrations; it is, therefore, unknown how much the monitored

concentrations are above or below the MCL. Based upon the extent of contamination of these two wells completed in an aquifer used as a source of drinking water and benzene contamination in approximately one third of the other wells monitored, EPA is concerned about the significance of existing and potential future impacts associated with activities in the PAPA. EPA believes that such impacts are environmentally unsatisfactory.

While the monitoring data suggest significant impacts to groundwater have occurred in the PAPA, insufficient information has been provided to fully understand the nature of the existing contamination and the potential for additional groundwater contamination from the proposed action. Although the 2000 Pinedale ROD required that all wells within one mile of proposed development be monitored on an annual basis, there is no documentation of how many wells are within this defined buffer area nor is it documented that monitoring took place in the defined areas. The Wyoming State Engineer has identified 4000 points of use within the PAPA. While some of these points of use may be duplicates, monitoring has taken place in only approximately 230 wells. The full extent of the benzene and hydrocarbon contamination in the PAPA has not been comprehensively evaluated. In addition, although there are five distinct aquifers in this area described in the Revised Draft SEIS, information on impacts and potential mitigation measures were generalized across all of the aquifers.

The Revised Draft SEIS provides mitigation measures intended to reduce impacts to groundwater. These measures, however, were only identified as potential requirements and were not evaluated as to their effectiveness in any of the alternatives. As the source of the widespread low concentration detections remains unclear, it is difficult to identify and implement effective mitigation measures to protect valued groundwater supplies without understanding of the source of contamination. EPA recommends that where impacts have occurred or may reasonably be expected to occur to groundwater sources as a result of oil and gas production, including but not limited to hydraulic fracturing practices, an effective and enforceable mitigation plan should be developed. The mitigation plan could specifically include plans for replacement of quality water to water users if necessary.

Based on the information included in the Revised Draft SEIS, EPA recommends BLM develop a monitoring plan sufficient to characterize each of the aquifers throughout the PAPA. Use of industrial water wells, not designed for monitoring purposes, provides inadequate information to identify and mitigate groundwater problems. We suggest that monitoring methods approved by the Wyoming DEQ be used to ensure Quality Control over the monitoring process, including proper drilling methods and casing. Furthermore, each new well within the PAPA should be logged and sampled during drilling preventing any cross-contamination with industrial uses. EPA also suggests the Revised SEIS include a map identifying the approximately 230 wells that have been tested; the wells with detectable levels of benzene and other hydrocarbons; and the wells with benzene concentrations above the MCL.

EPA believes it is important to sustain and protect quality drinking water supplies in times of increased demand for water and especially in times of drought. Rather than using potable grade water for drilling, EPA recommends BLM consider and evaluate non-potable alternative drilling water sources in the Revised SEIS. The Fort Union Formation at a slightly

deeper depth is an aquifer with adequate quality for industrial purposes but is not of high enough quality for a water supply at this time. In addition, reuse of produced water is also demonstrated within the PAPA and could potentially be an appropriate alternative for industrial water supply.

Finally, EPA recommends the Revised SEIS include a more detailed analysis of cumulative groundwater impacts. EPA is aware of additional groundwater contamination that has occurred in the Jonah field directly south and adjacent of the Pinedale Anticline. The drilling water well in the Jonah field has monitored levels of benzene of 615 ug/l at a depth of over 900 feet with lower concentrations near surface. This information should be disclosed to the public in addition to any other existing monitoring analyses for the area.

No Action Alternative

As previously mentioned in EPA's April 6, 2007, comments on the Draft SEIS, NEPA requires analysis of a No Action Alternative in order to establish an environmental impacts baseline for comparison with the Proposed Action. In the December 2006 Draft SEIS and in this Revised Draft SEIS, BLM analyzes the No Action Alternative in terms of continuing with the present course of action until that action is changed (i.e., approving wells under the 2000 ROD until approval of a new ROD). The Revised Draft SEIS states there is "uncertainty" with regard to the 2000 ROD. Any uncertainty should be resolved by examining the extent of development actually analyzed in the Pinedale Anticline Oil and Gas Exploration and Development Project EIS, that is, impacts associated with the development of 700 producing natural gas wells over a 10 to 15 year time period. EPA believes that this scenario should be the basis for the No Action Alternative rather than the No Action Alternative considered in the Revised Draft SEIS which includes the development of an additional 1,139 wells for a total of approximately 1,800 wells by the year 2011. EPA recommends the No Action Alternative and baseline analysis be revised to accurately reflect the 700 producing well scenario analyzed in the initial Pinedale Anticline EIS and implemented in the 2000 ROD.

Surface Water, Water Quality, and Aquatic Habitat

In the Revised Draft SEIS's executive summary, it is acknowledged that sediment yields will be substantially increased above current conditions in six hydrologic sub-watersheds that coincide with the Anticline Crest. This conclusion is substantiated by the *Erosion Modeling, Sediment Transport Modeling and Salt Loading Technical Report* prepared by HydroGEO which was presented in Table 4.14-4 in the previous Draft SEIS (December 2006). This important finding and the table illustrating the diverse and varied effects in different subwatersheds should be re-inserted in the Revised Draft SEIS. This information provides insight and geographic pattern to a potentially significant environmental effect, and EPA recommends that this Table and a discussion of its findings should be a part of this analysis. According to the model, the average annual sediment yield would increase by 73% in the New Fork River – Alkali Creek, 102% in Mack Reservoir and 26% in the Sand Draw-Alkali Creek sub-watersheds in 2023 (under the worst case modeling scenario with no reclamation). Yet, Chapter 4.14 concludes these substantial increases in sediment yield are not expected to result in "significant" impact to surface water resources under any of the alternatives. It appears this conclusion is reached based

on a finding that the increased sediment loading, although substantial, would not impair the designated uses for these waters. The Revised Draft SEIS does not clearly explain the basis for this conclusion. EPA strongly recommends that the Revised SEIS clarify how the projected increased sediment yields are translated into projected compliance with Wyoming's narrative water quality standard for settleable solids, which states:

> "In all Wyoming surface waters, substances attributable to or influenced by the activities of man that will settle to form sludge, bank or bottom deposits shall not be present in quantities which could result in significant aesthetic degradation, significant degradation of habitat for aquatic life or adversely affect public waters supplies, agricultural or industrial water use, plant life or wildlife."

It is also clear from the Revised Draft SEIS that avoiding adverse effects to the designated uses will rely on "extensive" use of Best Management Practices (BMPs) to prevent erosion, as well as timely reclamation. To ensure adverse effects to surface water quality are avoided, EPA recommends the Revised SEIS identify: 1) the target and the threshold of change (e.g., percent change of fines, or in suspended sediment) from the target being used to determine compliance with the designated uses assigned to these waters; and 2) the level of effectiveness for the applicable BMPs; 3) the process that will be used to ensure effective implementation and maintenance of those BMPs (i.e., ongoing and future monitoring of effectiveness and implementation enforcement); 4) and how sufficient reclamation will be accomplished and monitored given the ambient ecological conditions.

The Revised Draft SEIS notes that a number of waters within the Anticline Crest are prime sport fisheries. Measures of impact to these aquatic communities from increased sediment yield could be based on either change in biological condition or change in bedded sediments (% fines). The Revised Draft SEIS notes that a report by EcoAnalysts, Inc. (2005) concluded "... there has been no discernable change in ... invertebrate biology indices between 2000 and 2005." EPA recommends the Revised SEIS provide more detail about this analysis as well as the general approach to and results of the monitoring conducted by the Sublette County Conservation District (SCCD). For example, is the biological monitoring approach used similar to, or consistent with, the Wyoming DEQ's bioassessment protocol? [see: Wyoming DEQ's *Redevelopment of the Wyoming Stream Integrity Index (WSII) for Assessing the Biological Condition of Wadeable Streams in Wyoming*]. At a minimum, EPA recommends the discussion include information about the biological metrics or index used, the basis for their derivation and application, and level of precision by which these analyses are able to define thresholds that would avoid "significant degradation of habitat for aquatic life" under Wyoming's narrative standard.

Once a target and threshold of change from the target have been identified, EPA recommends BLM implement a comprehensive water monitoring plan to ensure the BMPs are successfully mitigating the impacts from increased sedimentation and that the identified target is being met. At a minimum, we recommend that BLM establish a monitoring program in the most sensitive watersheds and the watersheds most likely to be impacted. EPA is concerned that such monitoring is not already ongoing, and looks forward to BLM establishing an effective

monitoring program and utilizing the results from those monitoring efforts to direct reclamation resources and efforts.

It is best to involve a system of BMPs that targets each stage of the erosion process to ensure success from construction activities. The most efficient approach involves minimizing the potential sources of sediment from the outset. This means limiting the extent and duration of land disturbance to the minimum needed, and protecting surfaces once they are exposed. BMPs should also involve controlling the amount of runoff and its ability to carry sediment by diverting incoming flows and impeding internally generated flows. And finally, BMPs should involve retaining sediment that is picked up on the project site through the use of sediment-capturing devices. On most sites successful erosion and sedimentation control requires a combination of structural and vegetative practices. Above all BMPs are best performed using advance planning, good scheduling and maintenance.

In the 2000 Pinedale Anticline ROD, BLM committed to implementing a monitoring program to ensure that the Green and New Fork Rivers continue to support their designated uses. Yet, the Draft SEIS indicates that it is not known if significant impact has occurred to surface water. EPA recommends BLM include a discussion of the surface monitoring program, any obstacles in implementing the program, and any monitored results in the Revised SEIS. Further, the Revised SEIS should analyze the potential for underground aquifer interaction with surface water and the potential resulting impacts should the benzene and hydrocarbon contamination reach these high value prime fisheries.

Wetlands

As noted in the Revised Draft SEIS, certain wetlands are subject to protection pursuant to the Clean Water Act and Executive Order 11990. The Clean Water Act (CWA) Section 404 regulates discharge of dredged or fill material into "waters of the United States," including jurisdictional wetlands. Under CWA Section 404, permits for such discharges are generally issued by the U.S. Army Corps of Engineers, in accordance with EPA's CWA Section 404(b)(1) guidelines. These guidelines require, among other provisions, that no discharge of dredged or fill material shall be permitted unless appropriate and practicable steps have been taken which will minimize potential adverse impacts of the discharge on the aquatic ecosystem (40 CFR 230.10(d). In addition, Executive Order 11990 – Protection of Wetlands (May 24, 1977) states in pertinent part as follows: "Section 1. (a) Each agency shall provide leadership and shall take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency's responsibilities for (1) acquiring, managing, and disposing of Federal lands and facilities; and (2) providing Federally undertaken, financed, or assisted construction and improvements; and (3) conducting Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulating, and licensing activities. (b) This Order does not apply to the issuance by Federal agencies of permits, licenses, or allocations to private parties for activities involving wetlands on non-Federal property." It should be noted that Executive Order 11990 is not limited to wetlands regulated under the Clean Water Act.

EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Executive Order 11990 directs all Federal Agencies to provide leadership and take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands. EPA recommends that, consistent with the Executive Order, indirect draining of, or direct disturbance of, wetland areas should be avoided if at all possible. If disturbance is unavoidable, BLM should commit to replace in kind such impacted wetlands and to a level that fully restores wetland function and value. Due to the time it can take to adequately reclaim disturbed wetlands and the potential life of this project, BLM may consider requiring mitigation to begin concurrent with the disturbance.

The Revised Draft SEIS provides updated information on potential impacts to wetlands from the Proposed Action and Preferred Alternative. An additional 183.9 acres of disturbance in riparian forest and riparian shrub vegetation are predicted, yet no mitigation for wetland and riparian resources has been identified (page 4-129). EPA recommends that the Revised SEIS discuss BLM's approach to implementing federal wetland policies and legal requirements in the continued development of the PAPA. In particular, EPA recommends the Revised SEIS clearly explain how BLM will be mitigating the loss and disturbance of wetlands and streams within and adjacent to the PAPA under Executive Order 11990. EPA is available to provide guidance and work with BLM towards development of a mitigation plan for the Revised SEIS and development of an implementation plan.

Greenhouse Gas Emissions

EPA believes the greenhouse gases section in the Final SEIS should be expanded, keeping in mind that there are currently no EPA regulatory standards directly limiting greenhouse gas emissions[1]. While methane represents only 8 percent of the U.S. greenhouse gas emissions, it is 23 times more effective as a greenhouse gas than carbon dioxide. Oil and natural gas systems are the biggest contributor to methane emissions in the U.S., accounting for 26 percent of the total (EPA's Natural Gas Star Program and the US Emissions Inventory 2007: Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2005). EPA recommends that to the extent possible the Revised SEIS estimate and disclose the amount of methane and carbon dioxide emissions associated with each alternative in carbon dioxide-equivalent terms. As a point of comparison, EPA recommends the Revised SEIS consider utilizing a greenhouse gas equivalencies calculator to translate greenhouse gas emissions into terms that are easier to conceptualize. For example, a comparison of emissions to a range of other greenhouse gas

[1] Since issuance of the April 2, 2007 Supreme Court opinion in Massachusetts, et. al. v. EPA, 127 S. Ct. 1438, 549 U.S. __ (2007), EPA has begun to develop regulations to address greenhouse gas emissions from motor vehicles and fuels under the direction of the President's May 14, 2007 Executive Order and relevant Clean Air Act authorities. The Agency continues to evaluate the potential effects of the Court's decision with respect to addressing emissions of greenhouse gases under other provisions of the Clean Air Act. Thus, neither this comment letter nor the EIS for an individual project reflects, and should not be construed as reflecting, the type of judgment that might form the basis for a positive or negative finding under any provision of the Clean Air Act.

emitting sectors (www.epa.gov/solar/energy-resources/calculator.html).

As part of a cumulative impact analysis, in the event the GHG emissions associated with the project are significant, EPA recommends the Revised SEIS compare annual projected greenhouse gas emissions from the proposed project to annual emissions from other existing and reasonably foreseeable future projects. In addition, we recommend that the Revised SEIS compare the annual greenhouse gas emissions from the proposed project to estimated annual greenhouse gas emissions at a regional, national, and global scale. Emissions of greenhouse gases in the United States have been quantified by the U.S. Department of Energy and EPA in publications released in 2007. EPA recommends that the cumulative impacts analysis also include a general, qualitative discussion of the anticipated effects of climate change, including potential effects at a regional level.

The Revised SEIS should also identify possible mitigation measures that may be implemented to reduce and capture methane gas and reduce potential impacts. There are a number of voluntary, cost-effective technologies and practices to reduce and off-set greenhouse gas emissions. Through EPA's Natural Gas STAR (www.epa.gov/gasstar), EPA works with companies that produce, process, transmit and distribute natural gas to identify and promote the implementation of cost-effective technologies and practices to reduce emissions of methane, a potent greenhouse gas.

Accountability for Implementation of Effective Mitigation Measures

The Revised Draft SEIS discloses the significant and unanticipated impacts to groundwater, air quality and wildlife that have occurred since implementation of the 2000 Pinedale Anticline ROD. Of particular concern:

- Benzene and other hydrocarbons have been detected in 88 of approximately 230 water supply wells sampled since monitoring began in 2004 (Revised Draft SEIS, page 3-84).

- Elevated ozone concentrations above the current National Ambient Air Quality Standard (NAAQS) have been recorded at Sublette County ambient air monitoring stations in 2005 and 2006 (Revised Draft SEIS, Table 3.11-2) and ground-level ozone concentrations have also increased.

- For 2005 "actual" emissions, a modeled 45 days of visibility impairment greater than 1.0 dv has occurred at the Class I Bridger Wilderness Area, 5 days at the Class I Fitzpatrick Wilderness Area, and additional days at other regional Class I areas (Revised Draft SEIS, page 3-73). For 2007, the predicted impacts to visibility are even higher with 62 days of visibility impairment predicted for the Bridger Wilderness Area (Revised Draft SEIS, page 4-78).

- Sage grouse male counts have declined by 51 percent on leks near the PAPA that were heavily impacted by gas wells from one year prior to well development in 1999 through 2004 (Revised Draft SEIS, page 3-135, Holloran, 2005).

Given the unforeseen and significant impacts that have occurred from the development of the 642 producing oil and gas wells approved under the 2000 Pinedale Anticline ROD, EPA believes that it is of the utmost importance that the Revised Draft SEIS identify effective and enforceable mitigation strategies to ensure environmental and public health protection as the proposed 4,399 additional wells on the Pinedale Anticline are developed. The Revised Draft SEIS should also develop a plan to mitigate the significant environmental impacts resulting from the oil and gas development that has already occurred on the PAPA. While the Revised Draft SEIS includes many of the necessary components that provide a starting point for mitigation, EPA recommends each of the mitigation plans include a mechanism for public accountability, such as stakeholder forums and/or annual status reports. Public accountability can be an important tool in ensuring mitigation targets are met in a timely manner.

Attachment 4
A Guide to Health Impact Assessments in the Oil and Gas Industry

A Guide to

Health Impact Assessments

in the oil and gas industry

OGP
International Association of Oil & Gas Producers

IPIECA
International Petroleum Industry Environmental Conservation Association

Attachment 5
Wyoming Environmental Quality Council Designation of Adobe Town as Very Rare or Uncommon (April 10, 2008)

BEFORE THE WYOMING ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING

FILED
APR 10 2008
Terri A. Lorenzon, Director
Environmental Quality Council

IN THE MATTER OF THE PETITION OF BIODIVERSITY CONSERVATION ALLIANCE FOR DESIGNATION OF "ADOBE TOWN" AS VERY RARE OR UNCOMMON	)))))	**EQC DOCKET NO. 07-1101**

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

THIS MATTER came before the Environmental Quality Council (EQC) on October 24 and October 25, 2007, for an evidentiary hearing and the record was closed on October 25, 2007. Council members present at the hearing included Richard C. Moore, P.E., Chairman and Presiding Officer, John N. Morris, Kirby L. Hedrick, Dennis M. Boal, and Mark W. Gifford. Terri A. Lorenzon, Executive Director of EQC and Bridget Hill, Assistant Attorney General were also present. Deborah A. Baumer from the Office of Administrative Hearings served as the Hearing Examiner in the proceeding. The Petitioner, Biodiversity Conservation Alliance (BCA) and seven other conservation groups appeared by and through Erik Molvar, Director of BCA. Written opposition to the Petition was received from the Wyoming Mining Association, Sweetwater County, the Sweetwater County Conservation District, the Rock Springs Grazing Association, and a coalition referred to as the Oil and Gas Operators. EQC received a 26 page written comment with three attachments from BCA, as well as over 250 written comments in support of the Petition for designation as very rare or uncommon. The EQC received a 29 page written comment from the Oil and Gas Operators, along with eight exhibits. Written comments were also received from the Office of State Lands and Investments and the Wyoming Outdoor Council. The EQC reconvened on November 28, 2007 for deliberations. Council member Sara

Flitner read the transcript and was present for deliberations. Council member F. David Searle recused himself in this matter. The Council has considered the evidence and argument of the parties, and makes the following:

I. JURISDICTION

"The council shall act as the hearing examiner for the department and shall hear and determine all cases or issues arising under the laws, rules, regulations, standards or orders issued or administered by the department or its air quality, land quality, solid and hazardous waste management or water quality divisions." Wyo. Stat. Ann. § 35-11-112(a) (LEXIS 2006).

The council shall, "Designate at the earliest date and to the extent possible those areas of the state which are very rare or uncommon and have particular historical, archeological, wildlife, surface geological, botanical or scenic value. When areas of privately owned lands are to be considered for such designation, the council shall give notice to the record owner and hold hearing thereon, within a county in which the area or a major portion thereof, to be so designated is located, in accordance with the Wyoming Administrative Procedures Act." Wyo. Stat. Ann. § 35-11-112(a)(v) (LEXIS 2006).

The EQC enacted rules of procedure for designation hearings and these rules are contained in Chapter VII of the DEQ Rules of Practice and Procedure.

On November 6, 2006, BCA, along with seven other conservation groups, filed a Petition with the EQC seeking designation of approximately 180,910 acres of land located in Sweetwater County, Wyoming as very rare or uncommon. For convenience, this acreage will be referred to in this document as the area in and around Adobe Town. Therefore, the EQC has jurisdiction to hear and decide this matter.

II. STATEMENT OF THE CASE

BCA and seven other conservation groups filed a Petition with the EQC to designate 180,910 acres in Sweetwater County, Wyoming, which includes the boundary in and around an area known as "Adobe Town," as very rare or uncommon. On June 21, 2007, the EQC considered the petition at a public meeting held in Rock Springs, Wyoming pursuant to Chapter VII, Section 6 of the DEQ Rules of Practice and Procedure. Notice of the meeting was provided to the petitioner and surface and mineral owners "whose lands or minerals are within the area proposed for designation". The EQC heard a presentation on the petition from BCA and comments from a number of citizens and organizations present at the meeting. At the conclusion of the meeting, the EQC accepted the petition and determined that a formal hearing on the proposed designation should be held. At the designation hearing in September, 2007, the EQC heard comments supporting the designation and comments opposing designation of all or some of the acreage proposed for designation. A number of oil and gas operators, as well as the Wyoming Mining Association and the Rock Springs Grazing Association opposed the designation. The Petitioner asserted the entire 180,910 acres has scenic, surface geological and fossil values, archeological and historical features, as well as a sensitive wildlife habitat.

III. ISSUES AND CONTENTIONS

The sole issue in this case is whether the Petitioner has proven, by a preponderance of the evidence, that the areas in and around Adobe Town meet the requirements to be designated as very rare or uncommon pursuant to the Environmental Quality Act, Wyo. Stat. Ann. § 35-11-112 (a)(v) (LEXIS 2006) and Chapter 7 of the EQC Rules and Regulations governing very rare or

uncommon designations. If so, the Council must decide what effect such a designation has on the area.

IV. FINDINGS OF FACT

1. On November 6, 2006, BCA and seven other conservation groups including the Wyoming Wilderness Association, Wilderness Society, Wyoming Chapter of the Sierra Club, Friends of the Red Desert, Wyoming Outdoor Council, Center for Native Ecosystems and Natural Resources Defense Council, submitted a Petition to the EQC for Designation of an Area Known as Adobe Town as Very Rare or Uncommon.

2. On June 18, 2007, the EQC received a written objection to the designation from the Wyoming Mining Association. The Mining Association took the position that the designation was "nothing more than a covert effort to prohibit domestic mining and oil and gas development in the area, especially on federal lands." The Mining Association further argued that a portion of the lands are amply protected by an existing Wilderness Study Area (WSA) designation and the majority of the land outside the WSA area is currently leased and subject to valid existing federal lease rights which must not be infringed upon. The Mining Association opposed the designation because the Petition included over 50,000 acres within the Land Grant checkerboard area and would result in impossible administration of the checkerboard area.

3. On June 21, 2007, the EQC considered the petition at a public meeting held in Rock Springs, Wyoming pursuant to Chapter VII, Section 6(b) of the DEQ Rules of Practice and Procedure. The Petitioner presented information on the attributes of the Adobe Town area and argued that these attributes warranted taking the petition through the formal designation process.

Comments were accepted from those present who supported the petition and those who opposed the petition.

4. The EQC received written opposition to the designation from a coalition of oil and gas developers including Anadarko Petroleum Corporation, Devon Energy Company, Samson Oil and Gas, Questar Exploration and Production Company and Yates Petroleum Corporation collectively referred to as Oil and Gas Operators (Operators) at the June 21st meeting and at the later hearing on the Petition. The Operators opposed the designation asserting they are "actively pursuing projects and investing millions of dollars into these leases to develop the commercial gas resources which are present in the area. BCA's Petition here is a thinly veiled attempt to thwart mineral development under the Operators' valid leases." The Operators also opposed the designation alleging the proposed lands were already fully protected, do not qualify under the standards set forth in the statute and EQC's Rules. Additionally, the Operators argued the land encompasses almost exclusively BLM administered land and would render any state designation ineffectual and impossible to administer and the term "very rare or uncommon" is vague and cannot be implemented in a manner that is not inherently arbitrary and capricious. At the conclusion of the meeting, the Council voted to accept the petition and move forward with a formal hearing on whether the Adobe Town area should be designated as very rare or uncommon.

5. The areas identified by BCA to be included in the very rare or uncommon designation include an area currently designated by the federal government as a Wilderness Study Area (WSA) and consisting of approximately 86,000 acres. Additionally, BCA identified nearly 95,000 acres surrounding the WSA area. The Petitioner designated these areas as Area A, Area

B, Area C, Area D, Area E and Area F. These areas are marked on the maps used in the hearing and are contained in the record. Each area will be discussed separately below.

6. The area proposed for designation is described as follows:

> Bounded by roads and pipelines, as follows. T17N R97W: Sec. 36 S1/2. T17N R96W: Sec. 22 SE1/3; Sec. 24 SW1/3; Sec. 28 SE1/2; Sec. 32 S2/3; and Sec. 26, 34, & 36. T17N R95W: Sec. 30 SW1/2; Sec. 32 SW1/2. T16N R97W: Sec. 8 SE1/8; Sec. 18 SE1/3; Sec. 25 S1/2; Sec. 27 SE1/4SE1/4; Sec. 33 SE¼ & Sec. 2, 10, 12, 14, 16, 20, 22, 24, 26, 28, 30, 32, 34, 35, and 36. T16N R96W: Sec. 29 S½; Sec. 27 SE 7/8 & Sec. 2, 4, 6, 8, 10, 12, 14, 16, 18, 20, 22, 24, 25, 26, 28, 30, 31, 32, 33, 34, 35, & 36. T16N R95W: Sec. 8 W1/3; Sec. 20 W1/3; Sec. 19 SE5/8; Sec. 29 W1/3; Sec. 29 SE1/5; Sec. 28 SW1/3; Sec. 33 W2/3 & Sec. 6, 18, 30, 31, & 32. T15N R98W: Sec. 12 E1/2; Sec. 13 SE1/2; Sec. 24 NW1/4, NE1/4, SE1/4; Sec. 25 E1/3; Sec. 36 E1/3. T15N R97W: Sec. 5 SE1/4, E1/2 of SW1/4; Sec. 7 NE1/4, SW1/4, SE1/4 & Sec. 1, 2, 3, 4, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, & 36. T15N R95W: Sec. 4 SW7/8; Sec. 3 S1/2; Sec. 2 SW1/8; Sec. 11 SW2/3; Sec. 13 SW1/4; Sec. 14 NW1/8, SE1/8; Sec. 15 NW7/8; Sec. 22 SW7/8; Sec. 23 SE2/3; Sec. 24 SW2/3; Sec. 25 all but NE1/4NE1/4 & Sec. 5, 6, 7, 8, 9, 10, 16, 17, 18, 19, 20, 21, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, and 36. T15N R94W: Sec. 30 SW1/4SW1/4 & Sec. 31 W1/3. T14N R94W: Sec. 6 NW1/4. T14N R95W: Sec. 1 NW7/8; Sec. 10 NW2/3; Sec. 11 N1/3; Sec 12 NW1/4NW1/4, SW1/4NW1/4, NE1/4NW1/4; Sec. 16 NW1/3; Sec. 17 NW7/8 & Sec. 2, 3, 4, 5, 6, 7, 8, 9 & 18. T14N R96W: Sec. 24 NW1/3; Sec. 25 NW1/8; Sec. 26 N1/3; Sec. 27 N1/3 & SW1/4; Sec. 34 W1/2 & Sec. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 28, 29, 30, 31, 32, 33. T14N R97W: Sec. 18 NE¾; Sec. 19 NE1/4NE1/4; Sec.20 NE2/3; Sec. 29 NE1/3; Sec. 31 S1/2 except SE1/4SW1/4 & NW1/4SE1/4; Sec. 32 SE¾ & Sec. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 21, 22, 23, 24, 25, 26, 27, 28, 33, 34, 35, 36. T14N R98W: Sec. 1 E1/3; Sec. 12 E2/3; Sec. 13 NE1/3; Sec. 36 SE1/3. T13N R98W: Sec. 1 NE1/4NE1/4, E1/2 of SE1/4; Sec. 12 NE1/4NE1/4. T13N R97W: Sec. 6 all but SE1/4SW1/4; Sec. 7 E1/2, NE1/4NW1/4, S1/2 of NE1/4, NE1/4SW1/4; Sec. 18 E1/2; Sec. 19 NE1/4NE1/4; Sec. 29 E3/4; Sec. 32 NE1/3; Sec. 33 N2/3; Sec. 34 all but SW1/4SW1/4 & Sec. 1, 2, 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 28, 35, 36. T13N R96W: Sec. 3 W3/4; Sec. 10 NW2/3; Sec.15 NW1/4; Sec. 16 N2/3; Sec. 17 all but SE1/4SE1/4; Sec. 20 W½; Sec. 29 W1/3; Sec. 31 all but SW1/4SW1/4; Sec. 32 SW2/3 & Sec. 4, 5, 6, 7, 8, 9, 18, 19, and 30. T12N R96W: Sec. 5 N1/4; Sec. 6 NE1/8. T12N R97W: Sec. 1 NW1/4NW1/4; Sec. 2 N1/3; Sec.3 NE1/6. All of T15N R96W

7. The legal description above differs from the legal description published in the public notice for this case. The differences are typographical corrections and the elimination of several

parcels of private land that were inadvertently included in the original description. BCA did not petition for designations of private lands.

8. The EQC and the hearing participants referred to maps of the Adobe Town area throughout the hearing process. Two maps are attached to this order. The first map that is attached was prepared for the EQC by the Bureau of Land Management Office in Rock Springs, Wyoming. This map is easily identified by the statement above the legend on the map which reads "This map was made at the request of the EQC using data provided by BCA and the BLM". This map is Attachment 1.

9. The second map that is attached was created by BCA at the request of the Council after the Council made its decision on the designation. This map is identified by the logo and information in the upper right-hand corner. The logo is "Adobe Town Proposed Very Rare or Uncommon Area". Below this logo are two notations. These notations state "Cherry-stem exclusions eliminated" and "BLM Inventory area labeled". The cherry stems that were removed were jagged black lines that indicated roads in the Adobe Town area. It was decided that these roads did not need to be excluded from the designation. This map also differs from the original map of the area to be designated as there is a correction of the boundary line on the western-most portion of the southern boundary of Area B. The corrected boundary runs east across a small "hook" shaped piece of land from the point where the boundary of Area C meets the southern boundary of Area B. This piece of land was erroneously included in Area B on the original map. The corrected map, that is attached, had the boundary line excluding the piece of land. This map is Attachment 2.

10. In reaching their decision in this matter, the EQC relied on the maps as showing the boundary of the area designated. The legal description appearing in paragraph 5 of this order generally describes the lands included in the designation as well as the boundary.

11. A third map that was used in the hearing process is a USGS Map of the Kinney Rim. This map is produced by the BLM and is readily available.

12. The WSA area consists of 86,000 acres and was estimated to contain 30 archeological sites per square mile. It is marked by stabilized sand dunes. The Skull Creek Rim is located in this area with buttes and pinnacles containing bands of uncommon colors such as pink and purple. It is the most visited area contained in the Petition due to its very scenic and photographic values. The WSA area also has historical value as mentioned in literature. Opposition to the designation of this area focused on the fact that the area is already designated as a WSA by the Federal Government and therefore, fully protected. The opposition also warned the EQC that overlapping designations may lead to conflict. However, no evidence was submitted by any party to support this contention as to how or what the conflict would be.

13. Area A is commonly referred to as the Haystacks. Area A received the most opposition to its designation as very rare or uncommon. It is located to the north of the WSA and is a checkerboard area, where every other section is private. BCA only requested the state and federal portions of the checkerboard to be designated as very rare or uncommon, leaving the private sections of the checkerboard out of the designation. The Petitioner argued the Haystacks area is a unique geological feature, has spectacular scenic values with pinnacles and spires and is an important habitat for nesting raptors and golden eagles. The Haystacks surface is a crucial winter range for mule deer and contains fossiliferous characteristics very rare or uncommon in Wyoming. The opposition focused on a fear that the checkerboard area would prove to be a

management nightmare and impossible to administer, that legal and liability issues arise surrounding access to the area and that the area is not uncommon because it is seen in other areas of Wyoming. The EQC strongly disagrees with the opposition and finds that the designation has no effect on management or access to the area and is very rare or uncommon in this state.

14. Area B is east of the Willow Creek Rim featured by a high sharp escarpment that is uncommon in the area and overlooks badlands that have a deeply eroded maze of canyons and ridges. BCA designated Area B due to its scenic and wildlife values as the area is a nesting site for golden eagles. BCA admitted that the features of Area B were not very rare in Wyoming, but argued the area was uncommon and the view shed needed to be protected. The EQC finds the area contains a scenic vista overlooking the entire Adobe Town area. A compelling case was made that the area contains fossiliferous features, historical, geological, wildlife, and paleontological values. The EQC rejects the opposition's argument that the only reason the area has been designated by BCA is to hinder oil and gas development. The EQC also rejects the oppositions "fear" that BLM would not re-nominate leases as they expire in the area due to a very rare or uncommon designation. No evidence was submitted to support these contentions.

15. Area C is located to the east of the WSA and contains sage grouse leks. Area D is located to the southeast of the WSA and contains rare mountain plover nesting habitats. Both areas are scenic and a designation protects the vista from Skull Creek Rim. The opposition focused on BCA understating the oil and gas development in both areas and the "fear" the BLM would not re-nominate leases as they expire in the area due to a very rare or uncommon designation. The EQC finds the designation affects non-surface coal mining operations and the opposition did not adequately make a case supporting their "fear" being justified.

16. Area E is to the south of the WSA and marked by the Powder Rim. The area has scenic values and contains juniper woodlands which support a botanical value. As a result, the area contains migratory songbirds not found elsewhere in Wyoming. The area also contains unique, geological features and has high aesthetic, photographic and scenic values. Additionally, Area E is a crucial winter range for mule deer. This area is very uncommon in Wyoming.

17. BCA argued Area F should be designated because of its archeological, historical paleontological and cultural values. It is covered with stabilized sand dunes ideal for archeological digs. It is a possible archeological site, and the EQC visited this area on its ground tour. The EQC finds the area is very scenic as it lies squarely between the Skull Creek Rim and Adobe Town Rim and contains the values stated in the Petition.

18. BCA also argued the entire proposed area is very rare or uncommon in terms of probable vertebrate fossil yield classification, rated at 5 by the BLM which is the highest classification. BCA argued the entire area has geological values and therefore should be designated. BCA also argued that in order to keep the view shed of the Skull Creek Rim in the WSA, its scenery is fully dependent on the lands that are outside the WSA.

19. On behalf of the Operators, Samson senior geologist, Greg Anderson, showed that BCA understated the value of the gas reserves in Areas B, C and D where wells currently produce gas. Anderson also believed if the designation was granted, BLM would not re-nominate those tracts of leases that expired. Anderson admitted that there was no real basis or evidence that the Operators would be negatively impacted by the designation, just a "fear" that this would happen.

20. The Operators also argued the EQC must evaluate the criteria, "weigh" the factors and look at the "intent" of the Petitioner. The Operators argued the intent of the Petitioner was to

oppose or hinder oil and gas development. The Operators failed to convince the EQC that the intent of the Petitioner should lead the EQC to deny the designation.

21. Jim Magagna (Magagna), Vice President of the Wyoming Stockgrowers Association commented in opposition to the designation for fear there would be a public expectation on how the area would be managed, i.e., that people do not want to walk through sheep or cattle to get to the area. Magagna admitted, however, that under the applicable statutes and rules, agriculture is clearly exempt from any impact from the designation.

22. Marion Loomis (Loomis), Executive Director of Wyoming Mining Association also commented in opposition to the designation. Loomis admitted they have no mines planned in the area, but the designation would preclude them from ever trying to develop a mine. Loomis stated that a designation in the past killed a mine and that features in the Adobe Town area are not uncommon because they were also found in the Bighorn Basin area. The EQC finds Loomis' fears were not justified and were not supported by evidence. The EQC also finds the entire Adobe Town area to be very rare or uncommon.

23. John Hay (Hay), from the Rock Springs Grazing Association, a surface and mineral owner in the checkerboard area north of the WSA, commented in opposition to the designation stating that energy development should be the top priority and should be accommodated. Hay commented that a designation would make it impossible to manage the area for multiple use purposes and the designation would have a negative impact on agricultural operations. According to Hay, it would be difficult to do any structural development, such as fences, wells, springs and weed control. The EQC does not find Hay's comments persuasive or supported by any evidence.

24. Professor Jason Lillegraven, Professor Emeritus in geology and zoology at the University of Wyoming, discussed the paleontological and geological importance of the Adobe Town area. Professor Lillegraven showed that Adobe Town is beyond rare, it is unique, because it is composed of rocks of early late Eocene age and Uintan age that are in strategraphic order. This is the only place in Wyoming where you find fossiliferous deposits of this age. The entire Haystacks area and Adobe Town Rim contain these deposits.

25. Throughout the two days of public comment, citizens testified to the reasons they believed the Adobe Town area should be protected. These reasons included the fossils that can be seen in the area, the rugged nature of the desert terrain, the harsh beauty of the rock features such as hoodoos, and the scenic vistas. People described taking their children to the area for hiking and exploration. Comments were received from university students who grew up hiking and hunting in the Adobe Town area and who frequently return to the area. One comment described the observations of an Israeli general who described the spiritual nature of this desert and compared Adobe Town to places in the Mideast where major religions were born. In summary, there was a diversity of comments from people who were familiar with the area, all in support of the designation.

26. The EQC also considered an October 24, 2007 letter from Sweetwater County and the Sweetwater County Conservation District generally opposing a very rare or uncommon designation for all areas outside the WSA for a number of reasons including the designation would interfere with range projects, would interfere with existing oil and gas rights, would interfere with local governments control of predators, noxious weeds and wild horses, did not meet the statutory criteria, would result in denial of mining permits, and was just another effort to propose wilderness management on lands that had been evaluated and rejected as having

wilderness characteristics. The EQC finds no evidence was submitted to support the "fears" of Sweetwater County and the Sweetwater County Conservation District.

27. All findings of fact set forth in the following conclusions of law section shall be considered a finding of fact and are fully incorporated into this paragraph.

V. CONCLUSIONS OF LAW

A. Principles of Law

28. BCA bears the burden of proof in the proceedings herein. "The general rule in administrative law is that, unless a statute otherwise assigns the burden of proof, the proponent of an order has the burden of proof." *JM v. Department of Family Services,* 922 P.2d 219, 221 (Wyo. 1996) (citation omitted); *Penny v. State ex rel. Wyoming Mental Health Prof. Licensing Board*, 120 P.3d 152, (Wyo. 2005).

29. "The EQC shall: …..

> (v) Designate at the earliest date and to the extent possible those areas of the state which are very rare or uncommon and have particular historical, archeological, wildlife, surface geological, botanical or scenic value. When areas of privately owned lands are to be considered for such designation, the council shall give notice to the record owner and hold hearing thereon, within a county in which the area, or a major portion thereof, to be so designated, is located, in accordance with the Wyoming Administrative Procedures Act." Wyo. Stat. Ann. § 35-11-112(a)(v) (LEXIS 2006).

30. In 1993 the Wyoming Supreme Court found that the phrase "very rare or uncommon" was too amorphous to allow such a designation without the benefit of corresponding standards created by the Council. *Matter of Bessemer Mt.*, 856 P.2d 450, 453 (Wyo. 1993). Accordingly, the Court directed the Council to adopt the factors and criteria that will serve as the standards for the classification of lands as "very rare or uncommon." I*d.* at 455. As a result, the Council

adopted Chapter 7 of the Department of Environmental Quality's Rules of Practice and Procedure. These rules set forth the process for designating "very rare or uncommon areas" as well as the criteria for such a designation.

31. When considering whether to grant the designation the EQC must follow a two-tiered review process. First, the EQC must determine if the area has some "particular historical, archaeological, wildlife, surface geological, botanical or scenic value." WYO. STAT. § 35-11-112(a)(v). Second, if one or more of those values is found to exist, the EQC must determine whether that particular value is "very rare or uncommon." The EQC's rules set out detailed factors that the EQC must consider for each statutory value, which are generally set forth below. *See* Rules of Practice and Procedure, Ch. VII, § 11 for additional detail. The EQC must consider the significance and the weight of all specifically identified factors that are set forth in the rules.

A. Historical, Prehistorical, or Archaeological Value:

- Whether the area is mentioned prominently in historic journals or other historic literature;
- Whether the area is important because it is associated with cultural or religious traditions and practices;
- Whether the area has received a designation pursuant to state or federal laws that provide for protection – such as National Historic Landmarks, National Historic Sites, or the National Register of Historic places; and
- Whether the area contains buildings, structures, artifacts, or other features that are significant in the history or prehistory of the state.

B. Wildlife value:

- Whether the area includes lands that are considered irreplaceable fish or wildlife habitat;
- Whether the area includes preserves or easements which have been established and used for the protection of habitat for wildlife;
- Whether the area includes lands that G&F has designated as crucial or vital habitat for resident species;
- Whether the area contains or may affect Class I fisheries;

- Whether the area includes fragile lands that offer unique wildlife or scientific values;
- Whether the area includes federally designated critical habitat for threatened or endangered plant or animal species;
- Whether the area contains an active bald or golden eagle nest; and
- Whether the area includes bald or golden eagle roost and concentration areas used during migration and wintering.

C. Surface Geological Value:

- Whether the area has unique surface geological formations that expose upheavals and faults that are indicative of sub-surface geological features;
- Whether the area has significant paleontological resources; and
- Whether the area has geological features with unusual or substantial recreational, aesthetic, or scientific value.

D. Botanical Value: – Petitioner has not asserted a particular Botanical value.

E. Scenic Value:

- Whether the area includes lands within or adjacent to a corridor for a river designated as a National Wild and Scenic River or a corridor for a National Scenic Byway;
- Whether the area had been the subject of substantial artistic attention in the works of artists, sculptors, photographers, or writers; and
- Whether the area has substantial aesthetic value and its value would be apparent to a reasonable person.

As noted above, if the EQC finds that the area is eligible for designation because it possesses one or more of the above described values, the EQC must then consider if the area is "very rare or uncommon." The rules set out the following factors to be considered when making this determination.

F. Very Rare or Uncommon:

- Whether the area exhibits historical, archaeological, wildlife, surface geological, botanical or scenic values that are very rare or uncommon when compared with other areas of the state or a region therein;
- Whether the area contains historical, archaeological, wildlife, surface geological, botanical or scenic values seldom found within the state or a region therein; and

- Whether the area contains historical, archaeological, wildlife, surface geological, botanical or scenic values known or suspected to be declining which, if left unprotected could become extinct or extirpated.

32. After applying these criteria, the EQC shall make their decision in a public meeting. Thereafter, the EQC shall issue a written decision. The decision may be to designate all or a portion of the area or to deny the Petition. The EQC must issue a written statement of the reasons for the decision and serve the Petitioner with a copy of the decision and statement of reasons.

33. The only other statutes that relate to the "very rare or uncommon" designation are WYO. STAT. ANN. §§ 35-11-406(m) and 35-11-1001. WYO. STAT. ANN. § 35-11-406 (m)(iv) provides that the director of the Department of Environmental Quality (DEQ) may deny an application for a mining permit if "the proposed mining operation would irreparably harm, destroy, or materially impair any area that has been designated by the council a rare or uncommon area and having particular historical, archaeological, wildlife, surface geological, botanical or scenic value [.]" WYO. STAT. ANN. § 35-11-1001 provides that any person having a legal interest in the mineral rights for which the State has prohibited mining operations based on a "rare or uncommon" designation may petition the district court to determine whether the prohibition constitutes an unconstitutional taking without compensation.

34. In addition to these statutory provisions, the EQC's rules related to "rare or uncommon" areas provide some additional guidance related to the effect of the designation. Specifically, the rules state, "[t]hese rules apply only to the Land Quality Article, Article 4, of the Environmental Quality Act. The scope of these rules is limited to areas sought to be designated for purposes

related to the permit approval and denial process contained in W.S. § 35-11-406(m) for noncoal mining operations." DEQ RULES OF PRACTICE AND PROCEDURE, Ch. VII, § 2.

35. "Non-coal mining operations" does not include oil and gas operations. Specifically, the Environmental Quality Act provides that nothing in the act "limits or interferes with the jurisdiction, duties or authority of … the oil and gas supervisor or the oil and gas conservation commission, …." WYO. STAT. ANN. § 35-11-1104 (Emphasis added). Additionally, WYO. STAT. ANN. § 35-11-401 provides "nothing in this act shall provide the land quality division regulatory authority over oil mining operations as defined in W.S. 30-5-104(d)(ii)(F)." "Oil mining operations" are defined as "operations associated with the production of oil or gas from reservoir access holes drilled from underground shafts or tunnels." WYO. STAT. ANN. § 30-5-104(s)(ii)(F).

36. Thus, considering the language of the statute a "very rare or uncommon" designation means that the area has a "particular historical, archaeological, wildlife, surface geological, botanical or scenic value." WYO. STAT. ANN. § 35-11-112(a)(v). However, the effect of a "very rare or uncommon" designation appears to be confined to mining permits issued by the DEQ. Indeed, the statutes do not indicate any other restrictions on the use of land that has been designated "very rare or uncommon."

B. Application of Principles of Law

37. Wyo. Stat. Ann. § 35-11-112(a)(v) (LEXIS 2006) requires that the EQC designate any area of the state as very rare or uncommon if it meets the criteria set forth in the statute and further defined by the EQC's rules and regulations. The Petitioner must demonstrate that the Petition complies with the requirements of the statute.

38. The designation protects the area from non surface coal mining only. The designation would prevent surface mining for oil shale and uranium, as well as gravel pit mining. The designation does not limit oil and gas leasing, exploration, drilling, production or related construction. The designation does not limit or curtail any type of access to private in-holdings or for purposes other than non-coal surface mining on public lands, including livestock grazing.

39. The Petitioner has proven that the area referred to as Adobe Town and included in the WSA should be considered as very rare or uncommon. The Petitioner has proven that the area has very scenic values, archeological values, is mentioned prominently in journals and is the subject of artistic and photographic attention. The WSA is very rare or uncommon and deserves the designation.

40. Likewise the Petitioner has proven that Area A deserves the very rare or uncommon designation due to its historical, geological, wildlife and scenic values. This area covers the Haystacks region and is beyond rare or uncommon.

41. A compelling case was made by the Petitioner for Area B to be considered rare or uncommon due to its historical, wildlife, geological, scenic and paleontological values.

42. Areas C and D contained botanical, geological, wildlife, and photographic values. These two areas are not common in the Sate of Wyoming.

43. Area E should be designated for its paleontological and scenic values

44. Finally, Area F should be designated because of its archeological, historical paleontological and cultural values.

45. The designation does not prevent the construction of roads, agricultural use or change the current use. The only effect this designation has is to provide a higher level of scrutiny when it comes to non-coal mine permits.

46. The Adobe Town Area, including Areas A, B, C, D, E, and F, exhibits surface geological, historical, archaeological, wildlife, and scenic values that is very rare or uncommon when compared with other areas of the state or the region. These values are seldom found within the state and could become extinct or extirpated if left unprotected.

DECISION

Pursuant to the authority vested in the Environmental Quality Council by WYO. STAT. ANN. § 35-11-112(a)(v) (LEXIS 2006), the Council hereby grants the Petition to Designate Adobe Town as Rare and Uncommon. The entire area was observed by the Council and planned with great caution and deliberation. The area as designated is very unique and spectacular and should be protected as very rare or uncommon.

ORDER

IT IS THEREFORE ORDERED that the Petition for Designation as Very Rare or Uncommon is hereby granted in its entirety as presented to this Council.

DATED this 10th day of ~~March~~ April, 2008.

Richard C. Moore, P.E., Chairman

Dennis Boal, Secretary

Sara Flitner

John Morris - Approved as to form

Kirby Hedrick

Mark Gifford

CERTIFICATE OF SERVICE

I, Joe Girardin, certify that at Cheyenne, Wyoming, on the 10th day of April, 2008, I served a copy of the foregoing ORDER by United States Mail, postage prepaid and by e-mail to the following person:

Erik Molvar, Executive Director
Biodiversity Conservation Alliance
P.O. Box 1512
Laramie, WY 82073
erik@voiceforthewild.org

also to the following persons via interoffice mail and by e-mail:

Don McKenzie, Administrator
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Cheyenne, WY 82002
DMcKen@state.wy.us

John Corra
Director, DEQ
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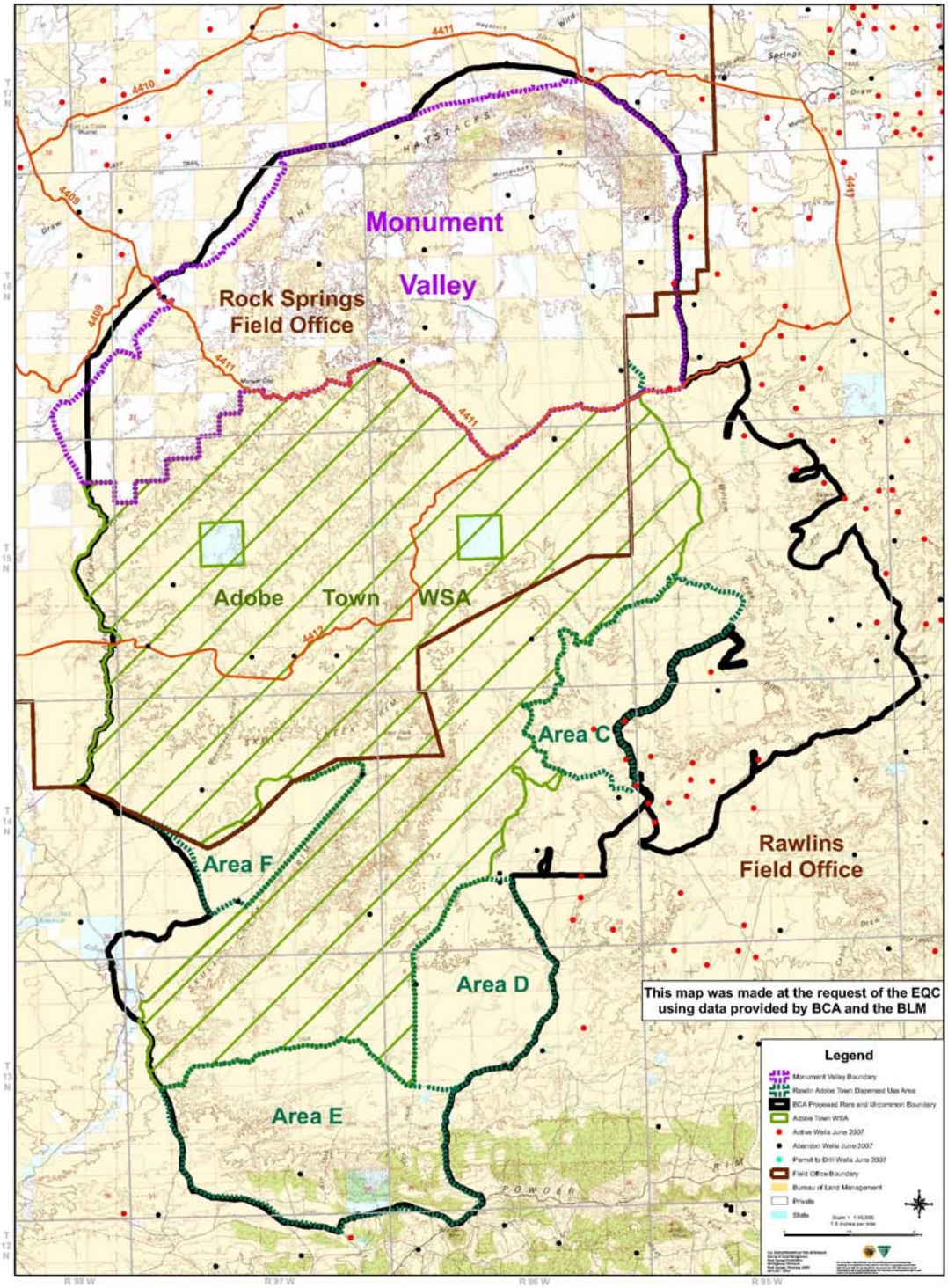
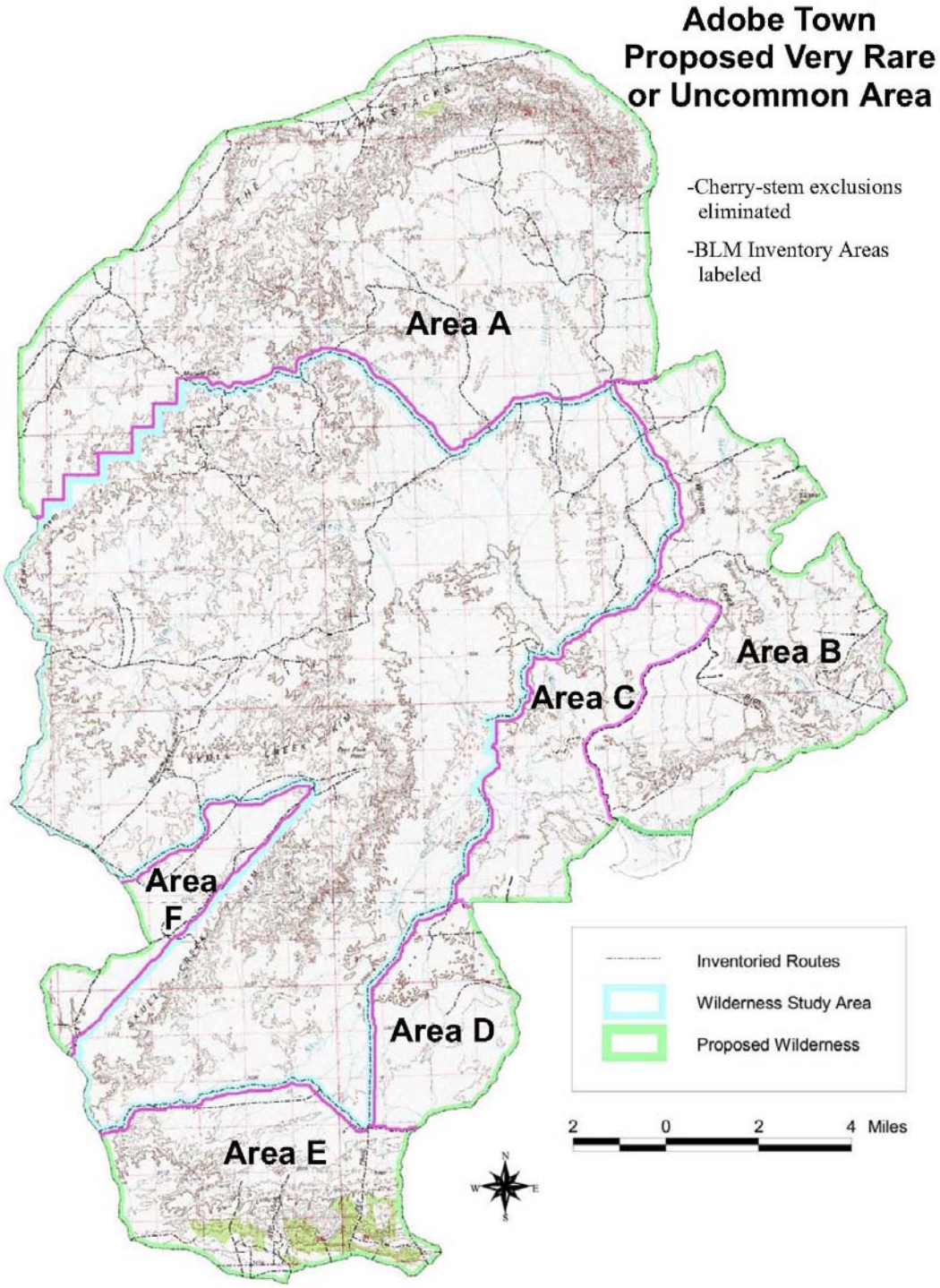
Environmental Quality Council
122 W. 25th Street
Herschler Building, Rm. 1714
Cheyenne, WY 82002
Phone: 307-777-7170
FAX: 307-777-6134


Monument
Valley
Rock Springs
Field Office
Adobe Town WSA
Area C
Area F
Area D
Area E
Rawlins
Field Office
This map was made at the request of the EQC
using data provided by BCA and the BLM
Legend


Adobe Town
Proposed Very Rare
or Uncommon Area
-Cherry-stem exclusions eliminated
-BLM Inventory Areas labeled
Area A
Area B
Area C
Area F
Area D
Area E
Inventoried Routes
Wilderness Study Area
Proposed Wilderness
2 0 2 4 Miles
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Responses for Document 00192

00192-001: The BLM acknowledges the commentor's preference for Alternative A.

00192-002: Pursuant to Congress' mandate in Section 369 of the Energy Policy Act of 2005, the original intent of the PEIS was to amend 12 existing BLM land use plans to support commercial oil shale and tar sands leasing. As preparation of the PEIS proceeded, and in consultation with BLM's cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the scope of the PEIS was changed from a leasing decision to an allocation decision. To still be responsive to Congress' direction, the focus of the PEIS was changed to only identify public lands to be open or closed to application for commercial oil shale and tar sands leasing.

There is sufficient information at the programmatic level to make a reasoned choice among the alternatives when considering lands open or closed for consideration of commercial leasing. In the PEIS, the BLM analyzes the environmental consequences of this allocation decision in sufficient detail for the decision maker to choose which lands would be available for further consideration for leasing. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development, nor do they create any development rights. When applications to lease are received and additional information becomes available, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

00192-003: The Secretary has been directed by Congress in the Energy Policy Act of 2005 to, among other things, prepare this PEIS, prepare commercial leasing regulations, and to consult with the governors of the states regarding their interest in a commercial leasing program. This PEIS is proceeding under that direction to identify public lands in the three involved states that would be available for future application for commercial oil shale and tar sands leasing. The PEIS is not making any leasing decisions and is conveying no rights in public lands for commercial development.

00192-004: The BLM is conducting a phased decision-making process—proceeding from land use planning to leasing to operational permitting. The land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases. The issues the comment raises concerning methodology for assessing human health impacts would be more appropriate at the leasing or plan of development phase.

00192-005: The BLM worked closely with 14 cooperating agencies, including the State of Wyoming, to determine the scope of the PEIS. Each agency brought an important local perspective and expertise to the process, resulting in the modification of the PEIS's scope from a leasing decision to an allocation decision. This new allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. The amendment of the land use plans does not authorize any ground-disturbing activities and is not an irreversible or irretrievable commitment of resources under NEPA. Moreover, the amendment does not constitute the granting of any property right. In this respect, the allocation decision does not conflict with any state plan or designation. However, the BLM looks forward to the participation of the State of Wyoming providing information about the state's important designations during subsequent NEPA analysis when specific technical and environmental information is available. At that time, conflicts with the Wyoming Environmental Quality Council's decisions and/or Adobe Town designation can be addressed.

00192-006: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures that any commercial oil shale program both meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offers opportunities for states, Tribes, local communities, and the public to be involved at each decision point. At future stages of environmental evaluation (i.e., leasing and/or Plan of Development), a landscape-level analysis will be performed if appropriate. This analysis would consider effects from Reasonably Foreseeable Future Actions, including other oil shale/tar sands leases/projects.

OSTS_00193

Preserving America's Heritage

March 14, 2008

Mr. Mike Nedd
BLM Assistant Director
Minerals, Realty, and Resource Protection
Bureau of Land Management
1849 "C" Street N.W.
Washington, D.C. 20240

Re: Oil Shale and Tar Sands Resources Leasing Programmatic Environmental Impact Statement Colorado, Utah, and Wyoming

Dear Mr. Nedd:

The Advisory Council on Historic Preservation (ACHP) received notification on January 24, 2008, that the Programmatic Environmental Impact Statement (PEIS) for Oil Shale and Tar Sands Resources Leasing had been released for a 90-day public comment period on December 21, 2007. We appreciate the opportunity to comment of this PEIS.

We wrote to the Bureau of Land Management (BLM) on February 15, 2007 requesting additional information on how you intend to fulfill your Section 106 responsibilities. While we appreciate your response dated May 11, 2007, BLM has still not described a clear path for how it intends to meet its Section 106 responsibilities prior to the issuance of these leases. It is essential that BLM establish a process for accomplishing this before proceeding, therefore, we request an explanation of how BLM will comply with Section 106 in this case. 193-001

We have been recently told informally by the BLM Federal Preservation Officer that BLM is using the National Environmental Policy Act (NEPA) process under Section 800.8(c) of our regulations, "Protection of Historic Properties" (36 CFR Part 800). If that is the case, please indicate where BLM notified the ACHP, and the relevant State Historic Preservation Officers, about such intent in advance as required by 36 CFR § 800.8(c). Our review of the correspondence does not indicate that we received such notification in writing. 193-002

Also, your May 2007 letter stated that the PEIS applied only to the first phase of development, and that the Section 106 analysis would be completed through a phased approach as leases are proposed. At the final phase, when a lessee submits a plan for operations for a site-specific project, you state that "BLM will complete comprehensive identification (e.g. field inventory), evaluation, protection, and mitigation following the policies and procedures contained within the 1997 BLM National Programmatic Agreement (PA) and State Protocols." Even assuming that BLM had notified us in advance of the intention to proceed 193-003

ADVISORY COUNCIL ON HISTORIC PRESERVATION
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OSTS_00193

with 800.8(c), it is not clear to us how BLM will comply with Section 106 prior to issuing the Record of Decision (ROD) for this PEIS nor how Section 106 compliance at this stage will be coordinated with Section 106 compliance at the other stages. Among other things, the process under 36 CFR § 800.8(c) does not provide for agencies to switch from compliance under this process to compliance through other means such as nationwide Programmatic Agreements while implementing a single undertaking.

193-003 (cont.)

Moreover, when adverse effects are expected, the process under 36 CFR § 800.8(c) for the PEIS must end with either binding commitments with measures to resolve those effects (in the ROD, the Environmental Impact Statement, or a Memorandum of Agreement/Programmatic Agreement) or through formal ACHP comment. 36 CFR § 800.8(c)(4).

Considering the compliance complexity involved in your tiered approach, we recommend that BLM consider resolving the various issues raised here through the development of a Programmatic Agreement that establishes a clear and specific process that BLM will follow for meeting its Section 106 responsibilities. This would allow BLM to meet its responsibilities under Section 106 in a timely manner and clarify to all consulting parties and the public how it will meet these responsibilities.

193-004

We look forward to your response on these matters. Should you have any questions or wish to discuss this matter further, please contact Nancy J. Brown by phone at (202) 606-8582 or by e-mail at nbrown@achp.gov.

Sincerely,

Don L. Klima
Director
Office of Federal Agency Programs

Response for Document 00193

00193-001: On the basis of input from the cooperating agencies, the BLM determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. The PEIS analyzes the environmental consequences of land use allocation decisions that do not commit any resources or grant any lease rights. Prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with, and appropriate consultation as required by the National Historic Preservation Act and other authorities specific to Native American concerns. Subsequent NEPA analyses will be conducted to assess the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis, if significant cultural resources are present or found to be present during requisite surveys and consultations, may include mitigation such as use of best management practices, specific protections, or avoidance to mitigate or eliminate adverse effects to historic properties.

The PEIS provides an early opportunity to continue discussions with your office, SHPOs, Tribes, and the interested public on Oil Shale and Tar Sands program, in keeping with our 1997 National Programmatic Agreement. The cultural resource information collected to date from the various overviews and previous consultations conducted for the PEIS will be brought forward into future Section 106 consultation regarding leasing. The BLM will continue to propose the phased approach to completing Section 106 for leasing. At the subsequent leasing phase, the BLM will consider using the existing 1997 National Programmatic Agreement or a new and separate Programmatic Agreement to outline the phased approach to completing Section 106 for leasing and project- or site-specific development.

00193-002: The BLM does not intend to use the NEPA process to satisfy its Section 106 responsibilities. Our December 14, 2006, letter indicated that consultation was being initiated in accordance with the 1997 National Programmatic Agreement and applicable State Protocols. Some confusion may have resulted from our May 11, 2007, letter in response to your question about how the BLM planned to use the PEIS to meet NEPA requirements related to its Section 106 responsibilities. This response was not meant to convey that NEPA was being used to satisfy BLM Section 106 responsibilities.

00193-003: As described for Comment 00193-001, the PEIS is a land use allocation decision and not a leasing or development decision that requires compliance with Section 106 prior to issuing the ROD for this PEIS. Prior to any commercial leasing and development, additional NEPA analysis will be required, as well as the appropriate level of compliance and consultation as required in the National Historic Preservation Act and other regulations specific to Native American concerns. Subsequent NEPA analyses will be conducted to assess the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis, if significant cultural resources are present or found to be present during requisite surveys and consultations, may include mitigation such as use of best management practices, specific protections, or avoidance to mitigate or eliminate adverse effects to historic properties.

At the subsequent leasing phase, the BLM will consider using the existing 1997 National Programmatic Agreement or a new and separate Programmatic Agreement to outline the phased approach to completing Section 106 for leasing and project- or site-specific development.

00193-004: At the subsequent leasing phase, the BLM will consider using the existing 1997 National Programmatic Agreement or a new and separate Programmatic Agreement to outline the phased approach to completing Section 106 for leasing and project- or site-specific development.

OSTS_00194

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Responsible Development of National Oil Shale and Tar Sands Resources

Dear Sherri Thompson:

I would like to express my strong support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, this enhanced development can be conducted in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example:

194-001

- In spite of significant conservation efforts, world energy demand is projected to increase by 50% during the next 20 years and could double in 50 years.
- Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
- The United States military currently uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will produce a strong workforce and will support the local and regional economies of Utah, Colorado and Wyoming.

The utilization of oil shale and tar sands from these leasing areas will offer significant benefits to the local communities and will strengthen our national energy security while bringing the necessary supplies of oil into the markets to offset increased global demand. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Name:
Address:

E-mail:

Response for Document 00194

00194-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00195

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Responsible Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Consumers, industry and businesses across the country are struggling with rising energy prices, tighter supplies and increased dependence on foreign imports. The federal government must allow for the thoughtful and appropriate use of our nation's oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

195-001

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community. The development of unconventional fuels in Utah, Colorado and Wyoming will produce a strong workforce and will support their local economies.

I support the development of unconventional fuels in these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Name:

Address:

E-mail:

√

Response for Document 00195

00195-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00196

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Encourage Responsible Development of Unconventional Fuels

Dear Ms. Thompson:

I strongly support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful utilization of our domestic energy resources, particularly as energy prices continue to rise.

With world energy demand projected to increase by 50% during the next 20 years and possibly double in 50 years, we need to ensure that consumers, industry and businesses are not forced to bear the costs of higher energy prices. Current oil resource estimates in parts of Utah, Colorado and Wyoming project 800 billion barrels of recoverable oil from oil shale, which is three times greater than the proven oil reserves of Saudi Arabia.

196-001

Further, with today's technology, this enhanced development can be conducted in an environmentally safe manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Responsible access to oil shale and tar sands from these leasing areas will offer remarkable benefits to the local communities and will strengthen our domestic energy security. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00196

00196-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00197

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Responsible Development of National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I would like to express my support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming, as outlined in Alternative B of the Bureau of Land Management's (BLM) Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil. 197-001

With today's technology, this enhanced development can be conducted in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

The utilization of oil shale and tar sands from these leasing areas will offer significant benefits to the local communities and will strengthen our national energy security while bringing the necessary supplies of oil into the markets to offset increased global demand. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00197

00197-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00198

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I support the development of oil shale and tar sands resources in Utah, Colorado and Wyoming. These areas contain immense amounts of recoverable oil, and the federal government must allow for the thoughtful and appropriate use of these natural energy resources.

As energy prices rise and supplies tighten, our country must act to increase domestic energy production. Access to domestic unconventional fuels will have a positive impact on America's energy security, and with today's technology, this enhanced development can be conducted in an environmentally sound manner.

I support Alternative B of the Bureau of Land Management's Programmatic Environmental Impact Statement for Oil Shale.

198-001

Sincerely,

Name:

Address:

E-mail:

Response for Document 00198

00198-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00199

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: I Support Access to Oil Shale & Tar Sands Resources

Dear Ms. Thompson:

Our government must work to diversify, rather than limit, our use of domestic energy. I urge the BLM and Congress to take action to expand use of domestic oil and natural gas, including the use of oil shale and tar sands as outlined in Alternative B of the Bureau of Land Management's Programmatic Environmental Impact Statement for Oil Shale.

The utilization of oil shale and tar sands from these leasing areas will benefit local, state and national economies through increased taxes, royalties and other payments associated with development. Further, utilizing these resources will help bring the necessary supplies of oil into the markets to offset increased global demand. 199-001

By allowing the environmentally responsible development of our abundant oil shale resources, we will help reduce our dependence on imported oil and improve our domestic energy situation.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00199

00199-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00200

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: I Support Alternative B of the Oil Shale PEIS

Dear Ms. Thompson,

It is the role of our nation's leaders to protect our economic interests while also protecting the environment and local communities. We must allow the development of oil shale and tar sands resources, along with renewable energy resources, to diversify our energy portfolio and help create a stable domestic energy supply.

The government estimates that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil. Production of these domestic fuels would help improve our economy and national security by bringing the necessary supplies of oil into the markets to offset increased global demand. 200-001

I support the development of these areas while protecting the environment, local communities and other economic interests. For these reasons, I support Alternative B of the Programmatic Environmental Impact Statement (PEIS).

Sincerely,

Name:

Address:

E-mail:

Response for Document 00200

00200-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00201

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Thoughtful Development of Oil Shale & Tar Sands

Dear Ms. Thompson:

I strongly support Alternative B of the Bureau of Land Management's Programmatic Environmental Impact Statement for Oil Shale.

America must do all we can to diversify and expand our use of domestic energy – including the thoughtful, environmentally responsible development of our abundant oil shale resources. By doing so, we will help reduce our dependence on imported oil and improve our domestic energy situation.

201-001

While expanded use of alternative energy is absolutely necessary, this cannot meet rising energy demand. Domestic oil and natural gas resources will continue to be needed for decades to come.

I urge the BLM and Congress to take action to expand use of our domestic oil and natural gas, including the use of oil shale as outlined in the PEIS.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00201

00201-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00202

April 2008

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Dear Ms. Thompson:

I urge the Administration and Congress to take steps to enhance use of U.S. oil shale.

According to the Bureau of Land Management (BLM), there is 1.2 to 1.8 trillion barrels of oil shale resources in the Colorado, Utah and Wyoming area. Developing thoughtful programs to allow feasible, environmentally-sensible use of these resources is in the national interest. 202-001

For these reasons, I support Alternative B of the BLM's Programmatic Environmental Impact Statement.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00202

00202-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00203

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: I Support Alternative B

Oil shale and tar sands, along with renewable energy sources, should be developed to diversify our energy portfolio and help create a stable domestic energy supply.

Modern technology allows for oil shale and oil sands development to be conducted in an environmentally sound manner.

When you consider that the U.S. has as much as 1.8 trillion barrels of oil shale, production of domestic unconventional fuels will also have a positive impact on America's economy by helping improve our energy situation.

The utilization of oil shale and tar sands from these leasing areas will benefit local, state and national economies through increased taxes, royalties and other payments associated with development. Further, utilizing these resources will help bring the necessary supplies of oil into the markets to offset increased global demand. 203-001

For these reasons, I support Alternative B of the Programmatic Environmental Impact Statement (PEIS).

Our national leaders must protect our economic interests will also protecting the environment and local communities.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00203

00203-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00204

March 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Responsible Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Consumers, industry and businesses across the country are struggling with rising energy prices, tighter supplies and increased dependence on foreign imports. The federal government must allow for the thoughtful and appropriate use of our nation's oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community. The development of unconventional fuels in Utah, Colorado and Wyoming will produce a strong workforce and will support their local economies.

I support the development of unconventional fuels in these areas while protecting the environment, local communities and other economic interests.

204-001

Sincerely,

Name:

Address:

E-mail:

Response for Document 00204

00204-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00205

February 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Encourage Responsible Development of Unconventional Fuels

Dear Ms. Thompson:

I strongly support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful utilization of our domestic energy resources, particularly as energy prices continue to rise.

With world energy demand projected to increase by 50% during the next 20 years and possibly double in 50 years, we need to ensure that consumers, industry and businesses are not forced to bear the costs of higher energy prices. Current oil resource estimates in parts of Utah, Colorado and Wyoming project 800 billion barrels of recoverable oil from oil shale, which is three times greater than the proven oil reserves of Saudi Arabia. 205-001

Further, with today's technology, this enhanced development can be conducted in an environmentally safe manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Responsible access to oil shale and tar sands from these leasing areas will offer remarkable benefits to the local communities and will strengthen our domestic energy security. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00205

00205-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00206

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Dear Ms. Thompson:

I strongly support Alternative B of the Draft Programmatic EIS proposed by the Bureau of Land Management (BLM) that outlines the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming. We must allow for the thoughtful utilization of our domestic energy resources, particularly as energy prices continue to rise.

Current oil resource estimates in parts of Utah, Colorado and Wyoming project 800 billion barrels of recoverable oil from oil shale, which is three times greater than the proven oil reserves of Saudi Arabia. With world energy demand projected to increase by 50% during the next 20 years and possibly double in 50 years, we need to ensure that consumers, industry and businesses are not forced to bear the costs of higher energy prices. 206-001

Moreover, with today's technology, this enhanced development can be conducted in an environmentally safe manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00206

00206-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00207

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: I Support the Development of Domestic Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I support the thoughtful and appropriate use of our nation's natural energy resources to help lower consumer costs and increase national energy security. We must allow for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in Alternative B of its Draft Programmatic EIS.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, we can develop these resources in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for local and regional communities.

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example: 207-001

- In spite of significant conservation efforts, world energy demand is projected to increase by 50% during the next 20 years and could double in 50 years.
- Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years.
- The United States military currently uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

I support the development of these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00207

00207-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00208

Pitkin County

530 E. Main Street · Aspen, Colorado 81611-1948

April 17, 2008

Bureau of Land Management Oil Shale and
Tar Sands Draft Programmatic Environmental Impact Statement
Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

RE: Oil Shale and Tar Sands Resources Programmatic EIS

Dear Reviewers:

On behalf of the Board of County Commissioners of Pitkin County, we are submitting our comments on the Bureau of Land Management's *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement*.

We strongly support the comments submitted by Western Resource Advocates, et. al. dated March 20, 2008. This 47 page document clearly states the issues we believe to be of significant importance to our citizens. In addition, we strongly urge consideration of the issues raised regarding water impacts on page 16 and 17 of the Western Resource letter. 208-001

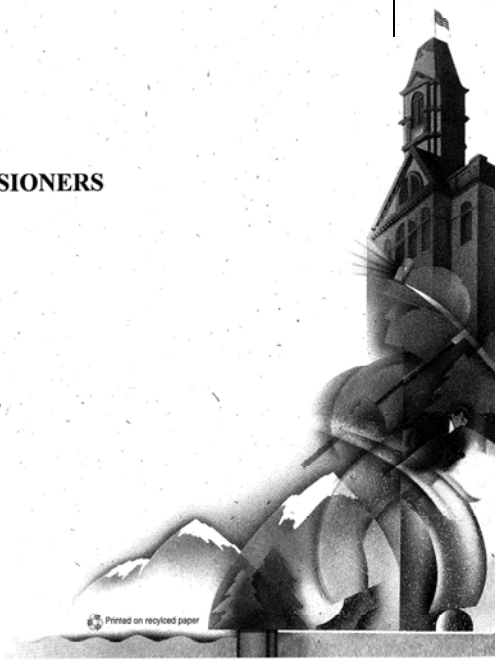
Thank you for consideration of these important matters.

Respectfully submitted,

PITKIN COUNTY BOARD OF COUNTY COMMIISSIONERS

Jack Hatfield
Chairman

cc: Peter Hart, Wilderness Workshop
Cindy Houben, Community Development Director



Administration
Suite 301
(970) 920-5200
fax 920-5198

County Commissioners
Suite 301
(970) 920-5200
fax 920-5198

County Attorney
Suite 302
(970) 920-5190
fax 920-5198

Finance and Use Tax
Suite 201
(970) 920-5220
fax 920-5230

Response for Document 00208

00208-001: Thank you for your comments. The responses to comments from Western Resource Advocates can be found in Document 00079.

OSTS_00209

1937 Fenton Lane\
Park Ridge, IL 60068
April 21, 2008

BLM Oil Shale and Tar Sand PEIS
Argonne National Laboratories
EVS/900
9700S. Cass Avenue
Argonne, IL 60439

Recent comments, such as from the NRDC [1] to the BLM, suggest commercial development of oil shale and tar sand would result in catastrophic environmental damage and that the prospect for any acceptable approaches are dim. These views are inaccurate and do not represent the current state of the art. Near commercial operation of in situ electrical heating methods have been demonstrated that do not require surface mining and use little or no water. These in situ electrical heating systems can be modified to accept wind power, thereby eliminating CO2 and particulate emissions. Such inaccurate comments may adversely affect the development and funding of environmentally and economically acceptable technologies that can recover fuel from the oil shale and tar sand deposits in the US.

At the last two Oil Shale Conferences that were held in the fall of 2006 and 2007, a number of in situ oil shale recovery process were presented or discussed that used electrical energy to extract the shale oil [2] These included the Shell ICP resistance heating and ExxonMobil's ElectroFrac. Not presented, but discussed was the IITRI RF oil shale heating process. [3]

All of these electrical related technologies are implemented in situ, and do not use surface or strip mining methods. All have small surface foot prints that are capable of being restored. All use little water [3, 4]. Also the in situ electrical methods need fewer workers than conventional above ground shale oil recovery processes.

209-001

These in situ electrical technologies can be modified to use intermittent wind power [4]. There is no need for coal fired electrical power plants. Resulting CO2 and particulate emissions are avoided.

The very pessimistic view that Shell oil is abandoning the ICP process is also misleading. In Alberta, a version of the ICP process recovered over 100,000 barrels of high quality oil during a pilot test [5]. Shell is planning to conduct an additional pilot test in other formations [6].

The pessimistic conclusion that in situ electrical heating method is fundamentally inefficient or intractable is incorrect. Recently, ET Energy [7] successfully demonstrated an in situ electrical--oil recovery method in Alberta. This is expected to recover more 10,000 bbl/d of bitumen or more in Canada in the 2010 time frame. No mining, little water use, and no on site combustion occurred.

OSTS_00209

The very pessimistic view that safe technologies suitable for commercial exploitation are decades away is also incorrect. In the late 1970s and 1980's most of the research needed to implement the IITRI RF heating method to extract oil from the Utah tar sand deposits was funded by the DoE [8]. This research included conducting four small scale RF heating tests two in oil shale and two in tar sands [8] Also the Bechtel group as funded by Occidental conducted cost studies that showed the RF process to be highly competitive and substantially better that other technologies regarding environment [8]

The success of the electrical heating projects in Alberta was due, in part, to the accessibility to suitable resources. If access to the oil shale and tar sand deposits in the US is delayed, this would curtail development of environmentally benign extraction technologies.

209-001 (cont.)

Both my wife and I have been contributors to the NRDC for many years. We hope the NRDC corrects the false impressions listed in its recent letter

Jack E. Bridges

copy sent to NRDC

Jack E Bridges
Retired, Senior Science Advisor
IIT Research Institute [IITRI]
Now with Pyrophase, Inc
Phone 1-847-823-4854
e-mail: bridges1937@comcast.net

References are attached

OSTS_00209

References

1. Letter to the BLM from Frances Beinecke, President, Natural Resources Research Council, dated March 20, 2008

2 .anon, "26th and 27th Oil Shale Symposiums", Colorado School of Mines, Golden, Colorado

3 J. R. Bowden, et al. "In situ retorting of oil shale using RF heating, a conceptual design", presented at the Synfuels Worldwide Symp., Washington DC, Nov.1985

4 J. E. Bridges, "Wind Power energy storage for in situ shale oil Recovery with minimal CO_2 emissions," IEEE Trans. on Energy Conversion, Special Issue on Wind Power, Vol 32, No. 1, March 2007, pp 103

5 Jan van der Eijk, Group Technology Officer, Royal Dutch Shell PLC, Leveraging Technology g, 4, December 2007, Technology Analyses Webcast, 4 December 2007

6. Anon, 2008 Nickle's Energy Group, HCN Publications Co Daily Buletin, 1/11/08

7. Anon. " ET [Electro-Thermal] comes home," New Technology Magazine, March 2007 \ pp20-22

8. R. D Carlson, E. F. Blase and T. R. McLendon, "Development of the IIT Research Insititute RF heating process for in situ oil shale/tar sand fuel extraction an overview. !14th Oil Shale Sym

Response for Document 00209

00209-001: Thank you for your comments.

OSTS_00210

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Support Safe Development of Domestic Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

I support the thoughtful and appropriate use of our nation's natural energy resources to help lower consumer costs and increase national energy security. We must allow for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS, in order to reduce our reliance on foreign oil imports.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, we can develop these resources in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for local and regional communities.

Utilizing the oil shale and tar sands from these leasing areas will strengthen our national energy security, bolster local communities and bring the necessary supplies of oil into the markets to offset increased global demand. I support the development of these areas while protecting the environment, local communities and other economic interests.

210-001

Sincerely,

Name:

Address:

E-mail:

Response for Document 00210

00210-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00211

April 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Access to oil shale and tar sands from the leasing areas outlined in the Draft Programmatic EIS proposed by the Bureau of Land Management would offer significant benefits to the United States, as it would enhance the economy and decrease dependence on foreign sources of oil.

The government estimates that the Green River Formation, which covers portions of Colorado, Utah and Wyoming, contains at least 800 billion barrels of recoverable oil from oil shale. Present U.S. demand for petroleum products is about 20 million barrels per day. If we used oil shale to meet a quarter of that demand, these resources would last for more than 400 years. Development of these resources and access to the 12 to 19 billion barrels of tar sands oil located in Eastern Utah would help meet our nation's growing energy needs and relieve the high cost of energy for consumers. 211-001

As energy demands increase, consumers and businesses are forced bear the burden of high energy costs. I support access to oil shale and tar sands to help relieve this burden by providing a domestic source of oil for the United States.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00211

00211-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00212

April 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Support Reasonable Development of Unconventional Fuels

Dear Ms. Thompson:

With global demand for energy on the rise, it is vital that the U.S. government allow for the thoughtful and appropriate use of our nation's natural energy resources, such as oil shale and tar sands, in order to reduce our reliance on foreign energy imports.

The Draft Programmatic EIS (PEIS) proposed by the Bureau of Land Management (BLM) offers a plan for exploration and development of these unconventional fuels in an environmentally-conscious manner. Development of these resources will offer significant benefits to local, state and national economies and will strengthen national energy security.

212-001

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil. Development of these resources would help meet our nation's growing energy needs and relieve the high cost of energy for consumers.

I strongly support the BLM's PEIS Alternative B that encourages the exploration and development of our nation's oil shale and tar sands resources.

Sincerely,

Name:

Address:

E-mail:

Response for Document 00212

00212-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00213

From:
Sent: Sunday, March 30, 2008 10:29 AM
To: info@consumerenergyalliance.org
Subject: cc: Allow Access to National Oil Shale and Tar Sands Resources

Sent via email to: Ms. Thompson

Consumers, industry and businesses across the country are struggling with rising energy prices, tighter supplies and increased dependence on foreign imports. The federal government must allow for the thoughtful and appropriate use of our nation's oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community. The development of unconventional fuels in Utah, Colorado and Wyoming will produce a strong workforce and will support their local economies.

I support the development of unconventional fuels in these areas while protecting the environment, local communities and other economic interests.

Sincerely,

213-001

Response for Document 00213

00213-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00214

From:
Sent: Wednesday, April 02, 2008 10:20 AM
To: info@consumerenergyalliance.org
Subject: cc: Encourage Responsible Development of Unconventional Fuels

Sent via email to: Ms. Thompson

I strongly support the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming, as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful utilization of our domestic energy resources, particularly as energy prices continue to rise.

With world energy demand projected to increase by 50% during the next 20 years and possibly double in 50 years, we need to ensure that consumers, industry and businesses are not forced to bear the costs of higher energy prices. Current oil resource estimates in parts of Utah, Colorado and Wyoming project 800 billion barrels of recoverable oil from oil shale, which is three times greater than the proven oil reserves of Saudi Arabia. 214-001

Further, with today's technology, this enhanced development can be conducted in an environmentally safe manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Responsible access to oil shale and tar sands from these leasing areas will offer remarkable benefits to the local communities and will strengthen our domestic energy security. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Response for Document 00214

00214-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00215

March 26, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Dear Bureau of Land Management staff,

I am writing to ask you to protect the public lands from dirty fuel production. Oil shale and tar sands will ruin the environment. Before starting the development, there should be a deeper research on oil shale and tar sand. For this development there will be lot of unconventional energy resources being use and this will cause a lot of pollution. 215-001

The draft PEIS can bring harm to a lot of wildlife and the landscapes. The water and air will be polluted with toxic. The water will be dried out and local committees will not have any water to depend on. There will be a lot of toxic waste being produced and that will not be good also because there are local committees around that area. 215-002

From Canada's experience, it was devastation because of the development of tar sand. They cut thousands of square miles of habitat. The toxics left behind prevented the ecosystem from recovering.

I urge you to stop before you kill thousands of wildlife and pollute the air. This will stop the increase of global warming.

I look forward to hearing your position on this issue.

Sincerely,

Jamie Yang

Jamie Yang
1463 Lisa Way
Marysville, CA 95901

Responses for Document 00215

00215-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00215-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

OSTS_00216

April 17, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Dear Bureau of Land Management staff,

I urge you to protect our public lands from dirty fuels production. Both oil shale and tar sands development could have massive impacts on the environment and local communities --impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and increase global warming. 216-001

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create toxic waste sites that go on for miles, produce more greenhouse gasses than conventional fuel and use enormous amounts of clean water -- a priceless resource in the arid West. Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that
dirty fuels should be the primary use of public land in order to benefit private companies.

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. 216-002

Sincerely,

Janis Keske

Janis Keske
807 Ninth St.
Golden, CO 80401

Responses for Document 00216

00216-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision, in consultation with our cooperating agencies. Consequently, leasing actions were dropped from consideration in the PEIS. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land use decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing oil shale and tar sands. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of such commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the PEIS analysis discloses, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00216-002: The BLM acknowledges the commentor’s preference to not support access to oil shale and tar sands on public lands.

OSTS_00217

March 16, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Dear Bureau of Land Management staff,

I urge you to protect our public lands from dirty fuels production. Both oil shale and tar sands development could have massive impacts on the environment and local communities --impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and increase global warming. 217-001

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create toxic waste sites that go on for miles, produce more greenhouse gasses than conventional fuel and use enormous amounts of clean water -- a priceless resource in the arid West. Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that dirty fuels should be the primary use of public land in order to benefit private companies.

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. 217-002

Sincerely,

LT Schultz

Larry T Schultz
2020 Jackson St
Golden, CO 80401

Responses for Document 00217

00217-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00217-002: The BLM acknowledges the commentor’s preference to not support access to oil shale and tar sands on public lands.

OSTS_00218

March 16, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Dear Bureau of Land Management staff,

I urge you to protect our public lands from dirty fuels production. Both oil shale and tar sands development could have massive impacts on the environment and local communities --impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and increase global warming. 218-001

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create toxic waste sites that go on for miles, produce more greenhouse gasses than conventional fuel and use enormous amounts of clean water -- a priceless resource in the arid West. Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that
dirty fuels should be the primary use of public land in order to benefit private companies.

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. 218-002

Sincerely,

Cecile Schultz

Cecile Schultz
1369 S Washington
Denver, CO 80210

Responses for Document 00218

00218-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00218-002: The BLM acknowledges the commentor’s preference to not support access to oil shale and tar sands on public lands.

OSTS_00219

March 16, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Dear Bureau of Land Management staff,

I urge you to protect our public lands from dirty fuels production. Both oil shale and tar sands development could have massive impacts on the environment and local communities --impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and increase global warming. 219-001

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create toxic waste sites that go on for miles, produce more greenhouse gasses than conventional fuel and use enormous amounts of clean water -- a priceless resource in the arid West. Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that dirty fuels should be the primary use of public land in order to benefit private companies.

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. 219-002

Sincerely,

Ted Schultz
1369 S Washington
Denver, CO 80210

Responses for Document 00219

00219-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00219-002: The BLM acknowledges the commentor’s preference to not support access to oil shale and tar sands on public lands.

OSTS_00220

March 16, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Dear Bureau of Land Management staff,

I urge you to protect our public lands from dirty fuels production. Both oil shale and tar sands development could have massive impacts on the environment and local communities --impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and increase global warming. 220-001

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create toxic waste sites that go on for miles, produce more greenhouse gasses than conventional fuel and use enormous amounts of clean water -- a priceless resource in the arid West. Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that
dirty fuels should be the primary use of public land in order to benefit private companies.

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. 220-002

Sincerely,

Lindon

Lindon Schultz
1809 1/2 Edgecliffe Drive
Los Angeles, CA 90026

4

Responses for Document 00220

00220-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00220-002: The BLM acknowledges the commentor’s preference to not support access to oil shale and tar sands on public lands.

OSTS_00221

February 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Americans are facing an energy crisis of historical proportions. Consider:

- Analysts are predicting that gasoline will be over $4.00 per gallon this summer – due largely to the failure of international oil production to keep pace with increased international consumption of oil.
- Americans now import over 60% of the oil that we use to make gasoline and diesel – and send over $1 billion a day to countries like Saudi Arabia, Venezuela and Iran

In order to help lower gasoline and diesel prices – and in order to strengthen our nation's energy security, the United States needs to expand access to its domestic energy resources.

Domestic reserves of oil shale and tar sands are vital sources of domestic energy – in fact, the federal government estimates that oil shale deposits on public lands hold the equivalent of at least 1.23 trillion barrels of oil. These resources should be responsibly developed in order to lower gas and diesel prices, increase American energy security and reduce our dependence on imported oil. 221-001

Because a robust and active oil shale program can be done in a balanced manner that simultaneously promotes energy production and provides comprehensive environmental protections, I strongly support Alternative B in the PEIS.

If BLM adopts Alternative A, the United States will be turning its back on an important domestic energy source, continue to increase our dependence on imported oil and driving up gasoline and diesel prices, and Alternative C does not allow for full recovery of oil shale and tar sands resources and does not provide for sound or efficient management of the program.

Please ensure that these important national energy resources can be developed in an environmentally sound manner in order to help reduce gasoline and diesel prices, as well as our dependence on foreign oil by adopting Alternative B in the PEIS.

Sincerely,

Name: Joseoh David Cohen, Massachusetts PE# 30246

Address: 26 Cornell Road, Danvers, MA 01923-2563

E-mail: jdc2485@comcast.net

Response for Document 00221

00221-001: The BLM acknowledges the commentor's preference for Alternative B.

FROM Clint Corgatelli OSTS_00222
1258 Inverness way
Fruita colorado 81521

Please add my name to the burgeoning list of Americans who support oil shale and tar sands development.

It's important for America to have diverse domestic sources of energy including traditional energy sources such as oil and natural gas, renewable sources like wind and solar, and unconventional sources like those found in oil shale and tar sands. The Bureau of Land Management is analyzing a three-state oil shale and tar sands program. If approved, the oil shale and tar sands program will help bridge the gap between today and our renewable energy future.

GRAND JUNCTION CO 815
PM
19 MAR

TO:

BLM Oil Shale and Tar Sands
Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

6043984806 C050

Please submit my comments in support of moving forward with a vigorous oil shale and tar sands program in Colorado, Wyoming and Utah to the Bureau of Land Management:

We need To move foward with This program. Our nation needs To depend on ourselfs for our oil rescorces. Lets depend on our own nation To get our oil from, not other countries. 222-002

This development, will create more jobs That are good paying. It will help business growth, which both of These help The economy. It will help our schools and mantaining and building new roads in our communities. 222-003

Thank you,

Clint Corgatelli
Name:

1258 Invernessway Fruita Co. 81521
Address:

Responses for Document 00222

00222-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

00222-002: The BLM acknowledges the commentor's preference for Alternative B.

00222-003: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

OSTS_00223

FROM: Dan Schwenke
528 Greenbelt Ct
G.J., CO 81503

BRIDGING THE GAP

It's more important than ever to develop America's energy resources. Traditional sources of energy, like oil and natural gas, should be complemented with other energy sources, like oil shale and tar sands. The development of oil shale and tar sands is a necessary step in maintaining a stable supply of domestic energy.

The federal government is seeking public comments on its Programmatic Environmental Impact Statement for oil shale and tar sands. If approved, the oil shale and tar sands program will help bridge the gap between today and our renewable energy future.

TO:

BLM Oil Shale and Tar Sands Draft
Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

223-001

I SUPPORT DOMESTIC OIL SHALE AND TAR SANDS DEVELOPMENT

60439$4&06 C050

I SUPPORT DOMESTIC OIL SHALE AND TAR SANDS DEVELOPMENT

Please submit my comments to the Bureau of Land Management for the Oil Shale and Tar Sands Programmatic Environmental Impact Statement (Oil Shale and Tar Sands PEIS):

This nation needs to responsibly develop all possible forms of energy for the sake of national security and economic well being.
Western Colorado has already seen the positive economic benefits of energy exploration and extraction.
Oil shale can help us bridge the gap between convential and renewable energy sources

223-002

Thank you,

Dan Schwenke
Name

Grand Junction, CO
Address

Responses for Document 00223

00223-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

00223-002: The BLM acknowledges the commentor's preference for Alternative B.

FROM: Mark Sabatini
PO Box 1397
Fraser, Colorado 80443

OSTS_00224 DENVER CO 802
04 MAR 2008 PM 12 L

BRIDGING THE GAP

It's more important than ever to develop America's energy resources. Traditional sources of energy, like oil and natural gas, should be complemented with other energy sources, like oil shale and tar sands. The development of oil shale and tar sands is a necessary step in maintaining a stable supply of domestic energy.

The federal government is seeking public comments on its Programmatic Environmental Impact Statement for oil shale and tar sands. If approved, the oil shale and tar sands program will help bridge the gap between today and our renewable energy future.

TO:

BLM Oil Shale and Tar Sands Draft
Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

224-001

I SUPPORT DOMESTIC OIL SHALE AND TAR SANDS DEVELOPMENT
60439+4806

I SUPPORT DOM TIC OIL SHALE AND TAR SANDS DEVELOPMENT

Please submit my comments to the Bureau of Land Management for the Oil Shale and Tar Sands Programmatic Environmental Impact Statement (Oil Shale and Tar Sands PEIS):

THE PEIS MUST BALANCE EXTRACTION & THE NEED TO PRESERVE ENVIRONMENTAL — DEFINED AS NATURAL, SOCIAL, & ECONOMICS OF THE IMPACTED AREA.

EXACTIONS ARE COST OF BUSINESS. THE INDUSTRY SHOULD BE HELD TO A PARAMOUNT STANDARD FOR IMPLEMENT, MITIGATION OF IMPACTS. WE CAN, AS A COMMUNITY SET A STANDARD FOR SMART ENERGY DEVELOPMENTS, LET'S DO THAT!

224-002

Thank you,

Mark C. Sabatini
Name
MARK C. SABATINI
PO BX 1397
FRASER, COLO. 80443

Responses for Document 00224

00224-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

00224-002: The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

FROM: National Oil Shale Association OSTS_00225
2700 Gilstrap Ct, Suite 305
Glenwood Springs, CO 81601

BRIDGING THE GAP

It's more important than ever to develop America's energy resources. Traditional sources of energy, like oil and natural gas, should be complemented with other energy sources, like oil shale and tar sands. The development of oil shale and tar sands is a necessary step in maintaining a stable supply of domestic energy.

The federal government is seeking public comments on its Programmatic Environmental Impact Statement for oil shale and tar sands. If approved, the oil shale and tar sands program will help bridge the gap between today and our renewable energy future.

TO:

BLM Oil Shale and Tar Sands Draft
Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

225-001

I SUPPORT DOMESTIC OIL SHALE AND TAR SANDS DEVELOPMENT
60439$4806 C050

I SUPPORT DOMESTIC OIL SHALE AND TAR SANDS DEVELOPMENT

Please submit my comments to the Bureau of Land Management for the Oil Shale and Tar Sands Programmatic Environmental Impact Statement (Oil Shale and Tar Sands PEIS):

2.3.2 – Alternative A No Action Alternative

This Alternative is unrealistic, but it is understood that BLM must consider such an Alternative. The Energy Security Act of 2005 contemplated the need for oil shale as a source of energy for the nation and this alternative would not meet that mandate.

2.3.3.1 – Alternative B for a Commercial Oil Shale Leasing Program

This Alternative B seems reasonable as it offers enough acreage to provide significant shale oil production for the nation, and a diversity of resource settings that could support surface and insitu processes. It opens prime resource areas to oil shale leasing that were earlier closed because of the priority given to other minerals (e.g. saline minerals and oil and gas). Also this Alternative does not close ACECs closed in Alternative C. It excludes Colorado and Utah Preference Right Lease Areas until such time as current R,D&D Lessees exercise their preference rights.

225-002

ou,

National Oil Shale Assoc
Name
2700 Gilstrap Ct, Suite 305
Glenwood Springs, CO 81601
Address

Responses for Document 00225

00225-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

00225-002: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00226

2/20/2008 11:26:00 AM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Responsible Development of National Oil Shale and Tar Sands Resources

Please reply to mftrost@peoplepc.com

I would like to express my strong support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS.

With today's technology, this enhanced development can be conducted in an environmentally sound manner.

226-001

Further, production of domestic unconventional fuels will have a positive impact on America's energy security.

Sincerely,

Mr. Michael Trost
4312 N. Wildwood Ave.
Shorewood WI 53211
Email: mftrost@peoplepc.com

Response for Document 00226

00226-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00227

2/20/2008 1:28:09 AM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Responsible Development of National Oil Shale and Tar Sands Resources

Please reply to gerigg@hotmail.com

I whole-heartedly support the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the rational and aggressive use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports and counter the spiraling cost of oil, now peaking at over $100 a barrel.

Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed for leasing have enough oil to meet America's gasoline demand for more than 18 years. Recent technological advances in tar sand oil extraction by Raytheon hold the potential for a vast increase in production efficiency with no negative impact on the environment.

Above all, it is imperative that the United States immediately and significantly increase its domestic oil production. Every barrel of domestically-produced oil is a barrel that:

a.) is not purchased from OPEC nations, which nations have been documented as having funneled money into the coffers of al-Qaida and other terrorist organizations that are sworn to the destruction of America and of Western Civilization as a whole;

b.) represents new American productivity on a vital resource, therefore a vital addition to our GDP, therefore a vital long-term fortification of our economy;

c.) would represent an immediate increase in the supply side of the supply-demand equation. This would create an immediate downward pressure on oil prices worldwide, triggering in turn a generalized reduction in costs, and consequent economic upturn throughout all world economies; 227-001

d.) would represent, in its downward pressure on oil prices, increased competition to OPEC - our current withholding of which they enjoy at our expense - and a reduction in overall revenues to that cartel;

e.) can be sold on the world market, further reducing our trade deficit and reducing dependence on OPEC among other world nations.

In short, moving forward with the harvest of this vast new source of petroleum makes sense on several different fronts, and is urgently needed. In a very real sense, the development of these new resources is actually a moral issue.

Other factors to consider:

. In spite of significant conservation efforts, conservation remains no *source* of energy, only a forgoing of energy use at one point to allow an equivalent use elsewhere. World energy demand is projected to increase by 50% during the next 20 years and could double in 50 years - a demand that must be met to avoid economic calamity worldwide.

. Business, industry and the economy as a whole are foundering dangerously under rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years - and oil prices have skyrocketed since 2005. Oil is the heart of literally every aspect of every industrial nation's infrastructure and standard of living; its scarcity directly impacts every one of us, whether in industrial superpowers or developing nations struggling to improve conditions for their people.

OSTS_00227

. The United States military currently uses approximately 500,000 barrels of oil daily - over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will produce a strong workforce and will support the local and regional economies of Utah, Colorado and Wyoming.

227-001 (cont.)

I encourage developing these resources as a matter of urgent necessity at an extremely dangerous time economically and geopolitically.

We *must* move toward energy self-sufficiency, and oil shale and tar sands development are crucial to this goal.

Sincerely,

Mr. Greg Gerig
4370 Ocean View Blvd
Montrose CA 91020
Email: gerigg@hotmail.com

Response for Document 00227

00227-001: The BLM acknowledges the commentor's preference for Alternative B.

2/29/2008 1:04:35 PM

OSTS_00228

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Please reply to jfsauto50@sbcglobal.net

I strongly oppose the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS).

While I fully support enhancing energy independence for America, we must begin aggressive investment in alternative fuels such as cellulose ethanol, bio-diesel and wind & solar energy. These energy resources can provide a low CO2, renewable way for America to power our economy and bring jobs back to the U.S. as we develop engineering and manufacturing expertise.

With rising energy costs and increasingly volatile supplies, it is more important now than ever that the United States pursue balanced energy solutions and alternative energy sources that move away from old school technology of drilling into the earth, damaging natural areas and not truly solving our energy constraints. The oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil, which will, at best, provide 18 years of driving. The hundreds of millions of dollars invested can be re-routed to alternative, green energy that will make a bigger impact in securing energy, reducing pollution & global warming gases and creating jobs.

228-001

For these reasons, we urge BLM to oppose Alternative B of the PEIS and re-focus efforts and investment into a sound renewable energy strategy.

Sincerely,

Mr James Stone
5631 Ivory Mist Lane
Houston TX 77041
Email: jfsauto50@sbcglobal.net

Response for Document 00228

00228-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

3/5/2008 11:50:36 AM OSTS_00229

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Please reply to nds33@sbcglobal.net

I strongly support the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS). An active oil shale program will add to our nation's energy portfolio and more importantly, our nation's energy security.

With rising energy costs and increasingly volatile supplies, it is more important now than ever that the United States pursue balanced energy solutions and alternative energy sources like oil shale and tar sands. Consumers, industries and businesses throughout the nation face rising energy prices, ever-tighter supplies and increased dependence on politically unstable imports. Conservation and renewables will, at best, play only a minor role in our future energy security. It is imperative that both conventional and unconventional energy supplies be developed. Due to the significant time required to bring unconventional sources on-line, the Nation cannot afford further delays in oil shale leasing. 229-001

With today's technology, this development can be conducted in a cost effective and environmentally responsible manner.

For these reasons, I urge the BLM to adopt Alternative B of the PEIS.
Sincerely,

Mr Neal Stidham
15921 Waybridge Glen Lane
Houston TX 77095
Email: nds33@sbcglobal.net

Response for Document 00229

00229-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00230

3/3/2008 4:40:29 PM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Please reply to a.fuex@sbcglobal.net

I strongly support the responsible development of US oil shale resources in Colorado for many important reasons:
1) The US is being crippled by being dependent on foreign oil such that we even have to spend multi-billions (trillions even) to fight wars that are otherwise unnecessary. Even though I support the Iraq war, it would have been unnecessary if we developed our own shale oil resources-- if we did not need foreign oil the government could be taking in tax money rather than spending it to protect our oil supply.
2) US dependence on foreign oil has cost us dearly in loss of freedom to deal with oil exporting nations (e.g. Saudi Arabia is no real friend of the US!)
3) Dependence on foreign oil has caused us to go much more in debt and eroded our currency value.
4) Oil shale development has the ability (along with other approaches) to provide the energy we need.
5) The only negative might be the environmental impact which can be mitigated. In view of the advantages to being independent of foreign oil, we should definitely move ahead promptly with development of our oil shale resources.

230-001

In summary, I see lots of benefits and no significant negatives to development of US oil shale resources.

Sincerely,

Dr. Anthony Fuex
Geochemical Consultant
Shell Oil Co.
4801 Spruce St.
Bellaire TX 77401
Email: a.fuex@sbcglobal.net

Response for Document 00230

00230-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

3/5/2008 3:47:36 PM

OSTS_00231

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Please reply to john_j_meyers@yahoo.com

I strongly support the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS). A robust and active oil shale program conducted in an environmentally sensitive manner as proposed by BLM will strengthen communities, add to our nation's energy portfolio and help reduce energy prices for consumers. 231-001

I urge BLM to adopt Alternative B of the PEIS. BLM should also investigate and analyze the positive impacts to the American public that would result in developing this valuable resource.

Sincerely,

Dr. John Meyers
12018 Isle Vista Drive
Houston TX 77041
Email: john_j_meyers@yahoo.com

Response for Document 00231

00231-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00232

3/13/2008 8:09:07 PM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Please reply to ahdalex@bellsouth.net

Consumers, industry and businesses across the country are struggling with rising energy prices, tighter supplies and increased dependence on foreign imports. The federal government must allow for the thoughtful and appropriate use of our nation's oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community. The development of unconventional fuels in Utah, Colorado and Wyoming will produce a strong workforce and will support their local economies.

I support the development of unconventional fuels in these areas while protecting the environment, local communities and other economic interests.

232-001

I also support any development of our own natural resources, including those of the Anwar Reserve, Gulf of Mexico, Atlantic Continental Shelf and Pacific Continental Shelf. I see no reason that we should be supporting foreign economies (especially those who advocate the demise of our country) when we have resources at home to circumvent this situation. I see no reason that a few environmentalists should hold the control of our destiny when it relates to our own country's best interest and national security. I am all for the development of alternative energy sources like bio-fuels, solar and wind power , but am pragmatic enough to know that this will not happen overnight. None of these will be really viable alternatives for perhaps decades. Meanwhile, we need to use our own resources, not those of Saudi Arabia, Venezuela, Iran and other countries who are at odds with our way of life. Please help insure that we utilize our own resources rather other countries.

Sincerely,

Mr. Alexander Holden
President
Alex Holden Designs, Inc.
P.O. Box 2288 (USPS)
452 Sunset Drive, Glenwood Office Condos, Sutie I
Blowing Rock NC 28605
Email: ahdalex@bellsouth.net

Response for Document 00232

00232-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

3/6/2008 3:02:07 PM OSTS_00233

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Please reply to harry.posey@shell.com

I strongly support expedited completion of regulations to foster development of oil shale and tar sands resources in Utah, Colorado and Wyoming as proposed by the BLM in its Draft PEIS. A robust and active oil shale program conducted in an environmentally sensitive manner as proposed by BLM will strengthen communities ad add to our nation's energy portfolio.

With the expensive, advanced research needed to bring about fuel supplies from these locked in resources, it is important that the United States enable exploration companies to access these lands in order to pursue the testing needed to bring them on line for the future. Regulatory access to oil shale and tar sands can help meet or nation's energy challenges. 233-001

With today's technology, and with the industry commitment, I believe that development can be conducted in environmentally sensitive ways.

Development of unconventional fuels will create a vibrant workforce that will strengthen the local and regional economies of Utah, Colorado and Wyoming. Development of oil shale and tar sands in these communities would provide tremendous local and national benefits that will help to strengthen our national energy security.

I urge the BLM to adopt Alternative B of the PEIS, and move quickly to develop regulations leading to a viable leasing program.

Sincerely,

Mr Harry Posey
Geologist/Environmental Engineer
Shell Exploration & Production Co
4582 S Ulster Ste 1400
Denver CO 80237
Email: harry.posey@shell.com

Response for Document 00233

00233-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

3/8/2008 10:45:36 AM OSTS_00234

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Please reply to bkbaggett@comcast.net

I writing to express to you my adamant support of the development of oil shale and tar sands resources in the Rocky Mountian region as proposed by Bureau of Land Management in its Draft Programmatic Environmental Impact Statement (PEIS). A well managed and active oil shale program conducted in an environmentally sensitive manner as proposed by BLM is critical to the energy needs of all Americans. Our appetite for energy continues to grow and we must develop our own natural resources to meet the growing demand. Continuing to rely on the oil imports from the middle east and other OPEC countries puts our economy at risk.

With rising energy costs and increasingly volatile supplies, it is more important now than ever that the United States pursue balanced energy solutions and alternative energy sources like oil shale and tar sands. Consumers, industries and businesses throughout the nation face rising energy prices, ever-tighter supplies and increased dependence on imports, often from politically unstable areas. Oil shale can help address the nation's energy challenges. 234-001

With today's technology and the technologies that are continuing to be developed, the production from oil shales can be conducted in an environmentally responsible manner.

In addition, the development of unconventional fuels will create jobs and will strengthen the local and regional economies of Utah, Colorado and Wyoming.

For these reasons, I support and urge the BLM to adopt Alternative B of the PEIS. BLM should also thoroughly investigate and consider the many benefits to the nation as a whole that will be derived from the development of the oil shales.

America NEEDS to move forward with these unconventional projects in a responsible manner to protect our national interests and security.

Sincerely,

Mr. Barry Baggett
1911 Desota
Friendswood TX 77546
Email: bkbaggett@comcast.net

Response for Document 00234

00234-001: The BLM acknowledges the commentor's preference for Alternative B.

3/11/2008 9:59:18 AM OSTS_00235

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Please reply to kevin.m.miller@shell.com

I strongly support the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS). A robust and active oil shale program conducted in an environmentally sensitive manner as proposed by BLM will strengthen communities, add to our nation's energy portfolio and help reduce energy prices for consumers.

With rising energy costs and increasingly volatile supplies, it is more important now than ever that the United States pursue balanced energy solutions and alternative energy sources like oil shale and tar sands. Consumers, industries and businesses throughout the nation face rising energy prices, ever-tighter supplies and increased dependence on imports, often from politically unstable areas. Oil shale can help address the nation's energy challenges.

Further, production of domestic oil shale and oil shale technology will have a positive impact on America's energy security. For example:

235-001

Oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil. No nation has more oil shale than the United States.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner.

Finally, development of unconventional fuels will create a vibrant workforce and will strengthen the local and regional economies of Utah, Colorado and Wyoming. Development of oil shale and tar sands in these communities would provide tremendous local and national benefits that will help to strengthen our national energy security and bring much-needed supplies of oil into the markets to offset increased demand in China and India.

For these reasons, we urge BLM to adopt Alternative B of the PEIS. BLM should also investigate and analyze the positive impacts to the American public that would result in developing this valuable resource.

Sincerely,

Mr. Kevin Miller
Shell Global Solutions US
1911 Silver Leaf Drive
Spring TX 77388
Email: kevin.m.miller@shell.com

Response for Document 00235

00235-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00236

3/14/2008 8:56:35 AM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Development of Our National Oil Shale and Tar Sands Resources

Please reply to jimmyglasgow@nwscc.edu

As a member of the U.S. forest products industry, I am writing toexpress my support for the development of our national oil shale and tarsands resources - including the leasing in Utah, Colorado and Wyoming -as proposed by Bureau of Land Management (BLM) in its Draft ProgrammaticEnvironmental Impact Statement (PEIS).

I support energy policies that invest in breakthrough technologies,promote conservation, increase access to energy supplies and encouragediversification of energy source. The federal government must allow theappropriate exploration and development of our nation's natural energyresources. By doing so, it will increase our nation's energy portfolio,reduce energy prices for consumers and ultimately make us less dependenton foreign energy imports.

Rising energy costs, tighter supplies and increased dependence onimports, often from politically unstable areas, are negatively affectingconsumers, industries and businesses. Production of domestic oil shaleand oil shale technology will have a positive impact on America's energysecurity.

Access to new energy supply is vital to the competitiveness of the U.S.Forest Products industry and to manufacturing in general. For example

236-001

. Energy reached an estimated 18 percent of paper industry manufacturingcosts in 2005, up from 12 percent just three years earlier. For mills,the cost of energy is about to eclipse employee compensation.. Since 2000, 270 mills have been closed and 196,000 jobs have been lost(13% of industry employment) because of high energy prices.. Oil shale deposits on public lands hold the equivalent of 1.23trillion barrels of oil. No nation has more oil shale than the UnitedStates. . In spite of significant conservation efforts, world energy demand isprojected to increase by 50% over the next 20 years and could double in50 years.

With today's technology, this enhanced development can be conducted inan environmentally responsible manner.

Finally, development of unconventional fuels will strengthen the localand regional economies of Utah, Colorado and Wyoming. Development of oilshale and tar sands will help to strengthen our national energy securityand bring much-needed supplies of oil into the markets to offsetincreased demand in China and India.

For these reasons, I urge BLM to explore and develop our national oilshale and tar sands resources.
Sincerely,

James Glasgow
Director
Alabama Center for Advanced Woodworking Technology
5205 Gravel Hill Road
Phil Campbell AL 35581
Email: jimmyglasgow@nwscc.edu

Response for Document 00236

00236-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00237

3/14/2008 8:58:16 AM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Development of Our National Oil Shale and Tar Sands Resources

Please reply to ala5@meadwestvaco.com

As a member of the U.S. forest products industry, I am writing toexpress my support for the development of our national oil shale and tarsands resources - including the leasing in Utah, Colorado and Wyoming -as proposed by Bureau of Land Management (BLM) in its Draft ProgrammaticEnvironmental Impact Statement (PEIS).

I support energy policies that invest in breakthrough technologies,promote conservation, increase access to energy supplies and encouragediversification of energy source. The federal government must allow theappropriate exploration and development of our nation's natural energyresources. By doing so, it will increase our nation's energy portfolio,reduce energy prices for consumers and ultimately make us less dependenton foreign energy imports.

Rising energy costs, tighter supplies and increased dependence onimports, often from politically unstable areas, are negatively affectingconsumers, industries and businesses. Production of domestic oil shaleand oil shale technology will have a positive impact on America's energysecurity.

Access to new energy supply is vital to the competitiveness of the U.S.Forest Products industry and to manufacturing in general. For example

237-001

. Energy reached an estimated 18 percent of paper industry manufacturingcosts in 2005, up from 12 percent just three years earlier. For mills,the cost of energy is about to eclipse employee compensation.. Since 2000, 270 mills have been closed and 196,000 jobs have been lost(13% of industry employment) because of high energy prices.. Oil shale deposits on public lands hold the equivalent of 1.23trillion barrels of oil. No nation has more oil shale than the UnitedStates. . In spite of significant conservation efforts, world energy demand isprojected to increase by 50% over the next 20 years and could double in50 years.

With today's technology, this enhanced development can be conducted inan environmentally responsible manner.

Finally, development of unconventional fuels will strengthen the localand regional economies of Utah, Colorado and Wyoming. Development of oilshale and tar sands will help to strengthen our national energy securityand bring much-needed supplies of oil into the markets to offsetincreased demand in China and India.

For these reasons, I urge BLM to explore and develop our national oil shale and tar sands resources.

Sincerely,

Ms. Amy Artmeier
Environemental Engineer
MeadWestvaco
111 Beresford Creek Street
Daniel Island SC 29492
Email: ala5@meadwestvaco.com

Response for Document 00237

00237-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00238

3/14/2008 9:44:25 AM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Development of Our National Oil Shale and Tar Sands Resources

Please reply to mlewis@smurfit.com

As a member of the U.S. forest products industry, I am writing to express my support for the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS).

I support energy policies that invest in breakthrough technologies, promote conservation, increase access to energy supplies and encourage diversification of energy source. The federal government must allow the appropriate exploration and development of our nation's natural energy resources. By doing so, it will increase our nation's energy portfolio, reduce energy prices for consumers and ultimately make us less dependent on foreign energy imports.

Rising energy costs, tighter supplies and increased dependence on imports, often from politically unstable areas, are negatively affecting consumers, industries and businesses. Production of domestic oil shale and oil shale technology will have a positive impact on America's energy security.

Access to new energy supply is vital to the competitiveness of the U.S. Forest Products industry and to manufacturing in general. For example

238-001

. Energy reached an estimated 18 percent of paper industry manufacturing costs in 2005, up from 12 percent just three years earlier. For mills, the cost of energy is about to eclipse employee compensation.
. Since 2000, 270 mills have been closed and 196,000 jobs have been lost (13% of industry employment) because of high energy prices.
. Oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil. No nation has more oil shale than the United States.
. In spite of significant conservation efforts, world energy demand is projected to increase by 50% over the next 20 years and could double in 50 years.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner.

Finally, development of unconventional fuels will strengthen the local and regional economies of Utah, Colorado and Wyoming. Development of oil shale and tar sands will help to strengthen our national energy security and bring much-needed supplies of oil into the markets to offset increased demand in China and India.

For these reasons, I urge BLM to explore and develop our national oil shale and tar sands resources.

Sincerely,

Mrs. Mindy Lewis
Government Affairs Specialist
Smurfit-Stone
58 St. Lawrence Drive
Ballwin MO 63021
Email: mlewis@smurfit.com

Response for Document 00238

00238-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00239

3/14/2008 10:12:43 AM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Development of Our National Oil Shale and Tar Sands Resources

Please reply to jmatheson@pw-inc.com

As a member of the U.S. forest products industry, I am writing toexpress my support for the development of our national oil shale and tarsands resources - including the leasing in Utah, Colorado and Wyoming -as proposed by Bureau of Land Management (BLM) in its Draft ProgrammaticEnvironmental Impact Statement (PEIS).

I support energy policies that invest in breakthrough technologies,promote conservation, increase access to energy supplies and encouragediversification of energy source. The federal government must allow theappropriate exploration and development of our nation's natural energyresources. By doing so, it will increase our nation's energy portfolio,reduce energy prices for consumers and ultimately make us less dependenton foreign energy imports.

Rising energy costs, tighter supplies and increased dependence onimports, often from politically unstable areas, are negatively affectingconsumers, industries and businesses. Production of domestic oil shaleand oil shale technology will have a positive impact on America's energysecurity.

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239-001

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With today's technology, this enhanced development can be conducted inan environmentally responsible manner.

Finally, development of unconventional fuels will strengthen the localand regional economies of Utah, Colorado and Wyoming. Development of oilshale and tar sands will help to strengthen our national energy securityand bring much-needed supplies of oil into the markets to offsetincreased demand in China and India.

For these reasons, I urge BLM to explore and develop our national oil shale and tar sands resources.

Sincerely,

Mr. James Matheson
Sr. Vice President
Parsons & Whittemore Inc
744 Shipwatch Dr
Jacksonville FL 32225
Email: jmatheson@pw-inc.com

Response for Document 00239

00239-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00240

3/13/2008 7:33:57 PM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Development of Our National Oil Shale and Tar Sands Resources

Please reply to James.Dixon@gapac.com

As a member of the U.S. forest products industry, I am writing to express my support for the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS).

I support energy policies that invest in breakthrough technologies, promote conservation, increase access to energy supplies and encourage diversification of energy source. The federal government must allow the appropriate exploration and development of our nation's natural energy resources. By doing so, it will increase our nation's energy portfolio, reduce energy prices for consumers and ultimately make us less dependent on foreign energy imports.

Rising energy costs, tighter supplies and increased dependence on imports, often from politically unstable areas, are negatively affecting consumers, industries and businesses. Production of domestic oil shale and oil shale technology will have a positive impact on America's energy security.

Access to new energy supply is vital to the competitiveness of the U.S. Forest Products industry and to manufacturing in general. For example

. Energy reached an estimated 18 percent of paper industry manufacturing costs in 2005, up from 12 percent just three years earlier. For mills, the cost of energy is about to eclipse employee compensation.
. Since 2000, 270 mills have been closed and 196,000 jobs have been lost (13% of industry employment) because of high energy prices.
. Oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil. No nation has more oil shale than the United States.
. In spite of significant conservation efforts, world energy demand is projected to increase by 50% over the next 20 years and could double in 50 years.

240-001

With today's technology, this enhanced development can be conducted in an environmentally responsible manner.

Finally, development of unconventional fuels will strengthen the local and regional economies of Utah, Colorado and Wyoming. Development of oil shale and tar sands will help to strengthen our national energy security and bring much-needed supplies of oil into the markets to offset increased demand in China and India.

For these reasons, I urge BLM to explore and develop our national oil shale and tar sands resources.

Sincerely,

Melvin Dixon
Chairman
Pulp & Paperworkers Resource Council
2584 County Road 6
Dixon's Mills AL 36736
Email: James.Dixon@gapac.com

Response for Document 00240

00240-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

3/19/2008 5:19:51 PM

OSTS_00241

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Please reply to keith.oxley@shell.com

I support the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS). A robust and active oil shale program conducted in an environmentally sensitive manner as proposed by BLM will strengthen communities, add to our nation's energy portfolio and help reduce energy prices for consumers.

With rising energy costs and increasingly volatile supplies, it is more important now than ever that the United States pursue balanced, strategic energy solutions and alternative energy sources like oil shale and tar sands. Consumers, industries and businesses throughout the nation face rising energy prices, ever-tighter supplies and increased dependence on imports, often from politically unstable areas. Oil shale can help address the nation's energy challenges.

Further, production of domestic oil shale and oil shale technology will have a positive impact on America's energy security. Oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil. No nation has more oil shale than the United States.

241-001

With today's technology, this enhanced development can be conducted in an environmentally responsible manner.

Finally, development of unconventional fuels will create a vibrant workforce and will strengthen the local and regional economies of Utah, Colorado and Wyoming. Development of oil shale and tar sands in these communities would provide tremendous local and national benefits that will help to strengthen our national energy security and bring much-needed supplies of oil into the markets to offset increased demand in China and India.

For these reasons, I urge BLM to adopt Alternative B of the PEIS. BLM should also investigate and analyze the positive impacts to the American public that would result in developing this valuable resource.

Sincerely,

Mr. Keith Oxley
18319 Spruce Creek Drive
Houston TX 77084
Email: keith.oxley@shell.com

Response for Document 00241

00241-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00242

3/19/2008 10:30:00 AM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Please reply to flavianschoice@hotmail.com

I support use of all fossil energy sources, including oil shale, oil sources within "sensitive" areas, and coal available within the United States in order to free us from foriegn sources which threaten the security and stability of our country.

Of course the expected or unexpected negative environmental consequences of such use must be ameliorated as much as possible. I do NOT support simply putting such resources "off limits" as a P.C. bow to alleged "conservationlists".

242-001

Mr. Paul McKean
403 Gun road
Relay MD 21227
Email: flavianschoice@hotmail.com

Response for Document 00242

00242-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00243

3/19/2008 10:27:03 AM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Develop National Oil Shale and Tar Sands Resources

Please reply to rdstegall@comcast.net

I strongly support the development of our national oil shale and tar sands resources - including the leasing in Utah, Colorado and Wyoming - as proposed by Bureau of Land Management (BLM) in its Draft Programmatic Environmental Impact Statement (PEIS). A robust and active oil shale program conducted in an environmentally sensitive manner as proposed by BLM will add to the nation's energy portfolio and provide the energy needed for a growing economy.

With rising energy costs and increasingly volatile supplies, it is more important now than ever that the United States pursue balanced energy solutions and alternative energy sources like oil shale and tar sands. Consumers, industries and businesses throughout the nation face rising energy prices, ever-tighter supplies and increased dependence on imports, often from politically unstable areas. Oil shale can help address the nation's energy challenges. 243-001

With today's technology, this development can be conducted in an environmentally responsible manner while providing energy for consumers and business.

For these reasons, I urge BLM to adopt Alternative B of the PEIS. BLM should also investigate and analyze the positive impacts to the American public that would result in developing this valuable resource.

Sincerely,

Mr. Rick Stegall
Engineering Consultant(P.E., PhD.)
Shell
1819 Augusta Drive,
419
Houston Tx 77057
Email: rdstegall@comcast.net

Response for Document 00243

00243-001: The BLM acknowledges the commentor's preference for Alternative B.

OSTS_00244

3/19/2008 10:27:11 AM

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Manufacturers Support Increased Access to National Oil Shale and Tar Sands Resources

Please reply to Barbara_Little@albemarle.com

Dear Ms. Thompson:

The U.S. manufacturing sector, which represents more than 14 million workers nationwide, is struggling with rising energy prices, tighter supplies and increased dependence on foreign energy imports. The manufacturing sector consumes more than 30 percent of the nation's energy and must have expanded access to plentiful domestic supplies in order to retain its international competitiveness.

The BLM is currently considering a proposal that will constitute important first steps to increasing domestic energy supplies. For this reason, we urge the federal government to allow for the thoughtful and appropriate use of our nation's oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil. With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community. The development of unconventional fuels in Utah, Colorado and Wyoming will produce a strong workforce and will support their local economies.

244-001

I support the development of unconventional fuels in these areas while protecting the environment, local communities and other economic interests.

Sincerely,

Barbara Little
5315 Glenwood Rd.
Bethesda MD 20814
Email: Barbara_Little@albemarle.com

Response for Document 00244

00244-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00245

4/16/08

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Bureau of Land Management:

I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This development envisioned by the study would come at a time when our land is already experiencing severe pressure from the current energy boom and significant population growth across the West. It is difficult to understand why the BLM is rushing toward a commercial leasing program without even knowing if oil shale development is feasible economically. In light of that, it's even more difficult to understand why the BLM seems so anxious to give oil shale development priority over other uses on our public lands as shale development would likely preclude all other activity, including natural gas development in priority areas. 245-001

We must ensure the oil shale research and development projects already authorized by the BLM provide sufficient information to asses the impacts of experimental extraction technologies on energy consumption and water use before proceeding with the PEIS. It will be years before companies developing oil shale technology will know if it is technologically or economically feasible.

I urge the BLM to consider the cumulative effects of this industry on wildlife habitat and protected areas across the West. This plan proposes development in some of the best hunting, fishing and recreation areas in Colorado, Wyoming and Utah and it is my opinion we can and should protect these areas from impacts such as diminished air quality and habitat fragmentation. 245-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits oil shale development will displace every other use of public land. The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming and Utah. I urge you to slow down and carefully consider the gigantic effect commercial oil shale development would have before committing the west slope to a future of industrial development and environmental degradation. 245-001 (cont.)

Sincerely,

Responses for Document 00245

00245-001: With the passage of the Energy Policy Act of 2005, Congress declared the policy of the United States to include that "oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed …." Congress also required the Secretary of the Interior to prepare a PEIS for oil shale and tar sands. The FLPMA, the Mineral Leasing Act, and the Energy Policy Act of 2005 authorize use of some BLM land for commercial oil shale leasing and development. The BLM appreciates the commentors' support for the natural gas leasing program. Conflicts between resource uses are not new, and resolutions to such conflicts are not achieved by the land use planning decisions analyzed in this PEIS. The amendments to the RMPs will only close certain areas, and open other areas to consideration for future leasing of oil shale and tar sands. The Secretary of the Interior retains discretion over leasing decisions. The NEPA analysis for future leasing decisions will analyze the compatibility and conflicts among resources.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands. This analysis will balance any conflicting uses, as required by FLPMA.

00245-002: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios and pertinent federal or nonfederal

actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to mitigate short-term and long-term adverse impacts.

It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

OSTS_00246

Western Colorado Congress
An Alliance for Community Action

BLM
Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Monday, April 21, 2008

Dear Reviewers:

A commercial oil shale industry would inflict unknown environmental and socio-economic impacts on the Northwest Colorado, and would displace all other values derived from public lands managed by the BLM. The BLM's preferred alternative would open over 350,000 acres of public land in Colorado to industrial development of oil shale. But Western Colorado Congress cannot support BLM's preference, rather we support **Alternative-A** of the Draft Programmatic Environmental Statement. 246-001

The BLM fails to elaborate on the status of existing technologies for oil shale and tar sands development, or the impact upon both communities and the environment. Within the document, the BLM notes numerous times that it is virtually impossible to identify with any certainty the scope of impacts that would be experienced by our environment, communities and economy. 246-002

Moreover, the BLM states:

> Because of the magnitude of actions on public land, the lack of information about how many projects might be undertaken… and the lack of information regarding the likely locations for future development, the cumulative effects discussed in this section are general in nature. The magnitude of the differences between the cumulative effects of Alternatives B and C cannot be identified.[1]

The DPEIS lacks significant amounts of necessary information ranging from technologies used, as well as potential environmental and socio-economic impacts. This lack of information results in an inability to quantify or define the cumulative impacts.

The DPEIS clearly states commercial oil shale development activities will directly displace other land uses from development areas.[2] The most geologically prospective oil shale development areas in Colorado overlap critical wildlife and plant habitat, as well as other unique ecological and geological resources, irreplaceable cultural resources, and sensitive natural landscapes.

According to a March 13, 2008, statement by Senator Ken Salazar,

> "BLM is rushing towards a commercial lease sale when the technology is not ready and the potential environmental impacts are unknown. The communities of Colorado's West Slope are wary of unchecked oil shale development in their backyard. We must take a judicious approach that will help, not hurt, West Slope communities and avoid any economic bust that could follow an unchecked boom on commercial leasing.[3]

Community Alliance of the Yampa Valley • *Routt County* Sheep Mountain Alliance • *San Miguel County*
Concerned Citizens Alliance • *Mesa County* Uncompahgre Valley Association • *Montrose County*
Grand Valley Citizens Alliance • *Garfield County* WeCAN • *Mesa County young adults*
Ridgway-Ouray Community Council • *Ouray County* Western Slope Environmental Resource Council • *Delta County*

Main Office
124 N. 6th Street
PO Box 1931
Grand Junction, CO 81502
970-256-7650; 970-245-0686 fax
☑ WCC is a member group of the Western Organization of Resource Councils and Community Shares of Colorado info@wccongress.org

OSTS_00246

No one can say whether the economics of oil shale will one day support full-scale production. Even today, however, with oil prices at an all-time high, industry fully acknowledges the uncertainty. *The Denver Post* reported that Shell Oil Company, considered by many as the front-runner of oil shale development in northwest Colorado, has withdrawn an application for a state mining permit. Shell spokeswoman Jill Davis said the withdrawal of a permit on one of its three oil-shale research and demonstration leases was done for economic reasons.[4] Shell's experience demonstrates that industry is unlikely to develop viable oil shale technology for years to come.

Impacts

The environmental impacts identified by the BLM are broad in scope and deep in impact. Western landscapes, and the services derived from our lands (such as hunting, fishing, agriculture and water), would be altered for generations. The proposed industrial development threatens clean air, clean water, human health, and local communities. At this time, the companies pursuing RD&D of oil shale in Colorado have neither proven nor demonstrated a viable technology for extraction. Adequate analysis of the environmental and socio-economic impacts of oil shale development cannot be performed until the techniques for extraction are known. Within the DPEIS, the BLM operates under a misguided model by applying one theoretical oil sands project and one theoretical tar sands project and projecting anticipated results over two million acres

246-003

The BLM fails to consider the cumulative effects of an oil shale industry on the landscape of oil shale and tar sands. A landscape level analysis of proposed commercial oil shale and tar sands development must be undertaken. The BLM must evaluate the distribution of resources and supporting facilities across the affected states. By doing so, the BLM would comply with their legal obligation to assess potential impacts and to implement management decisions that foster balance and protection of all resources found within these public lands.

246-004

As the BLM notes in section 6 of the DPEIS,

> "The purpose of this cumulative impacts assessment is to discuss how the environmental and socioeconomic conditions within the study area might be incrementally affected over the next 20 years (the study period) by oil shale development that would be made possible by land use plan amendments under either Alternative B or Alternative C. . . . [D]irect, indirect, and incremental cumulative impacts could occur due to future commercial oil shale development that would be facilitated by such land use plan amendments."[5]

In April 2007, Dr. James Bartis of the RAND Corporation provided the following testimony to Congress:

> "While the prospects of major economic and national security benefits motivate the development of oil shale, federal actions need to be tempered by the need to address the adverse environmental impacts and risks that accompany such development."[6]

According to the DPEIS, additional energy infrastructure and refining projects will be constructed in order to accommodate a new oil shale industry. The increased infrastructure required to access or service oil shale and tar sands leasing areas will likely have a cumulatively significant effect on the adjacent resources. Since the additional energy infrastructure development projects will to situated within the same geographic region as the leasing areas, these projects will certainly impose significant impacts. Location of support facilities (e.g., coal-fired electric power plants) aside, the impacts upon the lands, communities, and resources impacted by such facilities need to be analyzed in this document.

246-005

The document states that ten new large coal-fired power plants will be required to supply energy to oil shale and tar sands operations under the BLM's preferred alternative.[7] However, likely energy corridors and their impacts are not identified in the DPEIS, but are instead deferred to project-level NEPA analyses. Nor does the DPEIS analyze the likely emissions of greenhouse gases from these power plants.

OSTS_00246

Water Resources
Commercial leasing and development of public lands threaten our water supply. Development of oil shale resources would strain the Colorado River, a critical supply of water for any western communities and ecosystems. Water resources in Northwest Colorado are under increased pressure from many forms of development. Under the preferred alternative, the DPEIS states that water requirements for commercial development would be substantial.

The DPEIS underestimates oil shale's likely water demands and fails to consider numerous factors that limit water availability, especially in the context of other current and anticipated activities that compete for the same resource. Future municipal development, power production, in-stream flows for federally endangered fish, and other types of energy development are expected to rely on water from the Colorado River, yet these impacts are not sufficiently included in the DPEIS. When coupled with anticipated changes in climate, population, and land use both within and outside the Colorado River Basin, the DPEIS's widespread omissions render its water availability analysis incomplete and inaccurate.

246-006

Northwestern Colorado maintains a robust agricultural community, and their stability is dependent on the status of water. Depending on the scale of development and re-distribution of waters, associate impacts could transform the character of traditional agriculture-based communities across the region.[8] Shifts in water allocation will result in the loss of traditional, irrigated agriculture and shift towards dryland agriculture. Ultimately, the BLM states that oil shale development will likely transfer water from traditional agricultural uses to industrial uses.

The DPEIS fails to adequately analyze the scale of converting water from agricultural uses to industrial uses. Large-scale oil shale and tar sands production likely will shift hundreds of thousands of acre-feet from agricultural use, resulting in the dry-up of hundreds of thousands of acres of agricultural lands. The DPEIS fails to adequately analyze this issue and the related issues of potential impacts including soil erosion, sediment loading in streams, and other environmental resource issues. As in other sections of the DPEIS, the BLM's determination that oil shale development will not result in significant impacts to water is unwarranted and unfounded.

Air Resources
The protection of air quality should be a priority for the BLM, and Oil shale and tar sands development activities would directly contribute to air pollution. All impacts to air quality should be addressed in the DPEIS. Even though the BLM recognizes oil shale and tar sands development would negatively impact air quality, the DPEIS does not analyze the associated impacts that would result from actions authorized under the RMP amendments. There are ongoing air quality concerns because of oil and gas drilling and other activities in the study area, the BLM and industry are not starting with a clean slate. The final EAs for the five oil shale RD&D test sites in Colorado concluded there will be significant adverse effects on visibility at the Flat Tops Wilderness Area Class I area.

246-007

The BLM defers all air quality analyses until specific oil shale and tar sands development projects are proposed; in doing so, they fail to comply with both NEPA and FLPMA. Under NEPA, the BLM must conduct a comprehensive quantitative analysis of air quality impacts and evaluate the potential impacts of air pollution from commercial-scale oil shale and tar sands development on human health and the environment. The BLM is also required to assess and report on the cumulative impacts of expected emissions on the National Ambient Air Quality Standards (NAAQS), prevention of significant deterioration (PSD) increments, and air quality related values (AQRVs). The DPEIS bypasses this important analysis and reporting requirement, and also sidesteps requirements to identify alternatives or other mitigation measures sufficient to prevent expected impacts, including air quality violations.

BLM should proactively manage air quality. An appropriate model for responsible air-shed management includes: baseline air quality data, aggressive standards and requirements, analyzing the cumulative impacts of any proposed action, and establishing an effective monitoring program. Additionally, strong, unwavering consequences should be employed when monitoring reveals that standards have been exceeded.

246-007 (cont.)

Socio-Economic Impacts

There are numerous socio–economic impacts outlined within the DPEIS, but these significant impacts are dismissed by the BLM. The total economic contribution to Colorado alone from active outdoor recreation, including hunting, fishing, and wildlife-watching, is more than $10 billion, and results in 82,840 full-time jobs.[9]

Over the past 30 years, western economies have reduced their dependence on extractive industries. Today, many communities boast a more diversified economy that includes recreation and tourism, knowledge-based industries, as well as the professional and service sector. A recent study examining the impact of public lands on economic well-being in 11 western states found that only 3% of western counties could be classified as resource-extraction dependent.[10]

Environmental amenities provided by public lands are an important economic driver in the rural West (Rasker et al. 2004). Given the changing nature of these economies, prioritizing oil shale and tar sands development at the expense of non-extractive economic drivers may harm the economy of the region in the long run by depleting the natural amenities currently responsible for the economic growth of western communities. It is the amenities which are often paramount to maintaining a diversified and functioning local economy. Many communities in the Rocky Mountain region benefit from the growing demand for outdoors recreation, especially activities on federal public lands. The Outdoor Industry Foundation reported that more than 161 million Americans participated in outdoor recreation in 2005.[11]

246-008

Garfield County, Colorado, and many of its towns, would experience the negative impacts d with an increased desire to recreate on healthy public lands. Property value impacts could be substantial as a result of "deterioration in aesthetic quality, increases in noise, real or perceived health effects, congestion, or social disruption."[12] The new residential population would require the hiring of additional local public service employees, which would also require increases in local revenue and expenditures. [13]

Nowhere does the BLM identify the true impacts to local governments from what is essentially a federal government-private industry development plan that puts unfunded mandates on the backs of local governments. "Because of the relative economic importance of oil shale developments in small rural economies and the lack of available local labor and economic infrastructure, large-scale oil shale developments are likely to cause a large influx of temporary population. . . . [L]ocal communities may be unable to quickly absorb new residents, resulting in impacts on local finances and public service infrastructure."[14]

Water is likely to be transferred from traditional agricultural uses to industrial uses, resulting in the loss of traditional irrigated agriculture. Changes may also result in an increase in dryland agriculture, and depending on scale it may also result in a transition from traditional agriculture based community to a more urbanized lifestyle.[15]

246-009

Garfield County has also felt the disruption that accompanies booms and busts of the extractive industry. Since Black Sunday, the oil shale bust in 1982, Garfield County has successfully made a difficult transition from an economy that is dependent on extraction of natural resources to one that relies on natural amenities. Garfield County has developed a thriving retirement community, and has begun to market itself as a destination for outdoor recreation. Proposed oil shale development threatens these

sustainable economic drivers. The relationship between healthy public lands and a robust local economy warrants a thorough and comprehensive examination. The number of new residents lured by commercial development of oil shale will substantially change demographics and social fabric of rural communities. Small isolated, close-knit, homogeneous communities with a strong orientation toward personal and family relationships will become more urban.[16]

246-009 (cont.)

Management plans for public lands must account for all aspects of the economic and social systems neighboring communities. A thorough economic analysis of management alternatives should include investment and retirement income, recreation, tourism, and entrepreneurial businesses attracted to scenic locations. Management plans must also consider the increasing importance of industries and economic sectors that rely on these public lands, but not necessarily on the extraction of natural resources. As the population of the entire country grows, the presence of undeveloped lands becomes increasingly important because these lands strengthen western rural economies by meeting growing needs for clean air and water, wildlife habitat, and recreation opportunities.

246-010

Multiple Use?

Lands identified for oil shale development are currently managed for a wide variety of uses including recreation, mineral extraction and gas production, livestock grazing, and species of special concern. "Commercial oil shale development activities would have a direct effect on these uses, displacing them from areas being developed to process oil shale."[17]

"Indirect impacts of oil shale development would be associated with changing existing off-lease land uses including conversion of land in and around local communities from existing agricultural, open space, or other uses to provide services and housing for employees and families that move to the region in support of commercial oil shale development. Increases in traffic, increased access to previously remote areas, and development of oil shale facilities in currently undeveloped areas would continue changing the overall character of the landscape that has already begun as a result of oil and gas development."[18]

246-011

The residents and economy of Northwestern Colorado rely upon their public lands and the many values derived therein. Garfield, Rio Blanco and Mesa Counties, are experiencing a natural gas boom and its associated costs and benefits. The area is struggling to meet the increase pressure place on the local infrastructure such as But the DPEIS states that "Commercial oil shale development is largely incompatible with other mineral development activities and will likely preclude these activities while oil shale development and production are ongoing."[19]

Residents of Northwest Colorado would be negatively impacted by the loss of traditional grazing lands. The DPEIS states, "Grazing activities would be precluded by commercial oil shale development in those portions" of the lease area, and "[t]emporary or long-term reductions in authorized grazing use may be necessary because of loss of a portion of the forage base."[20]

Human Health

The DPEIS does not sufficiently consider the affects of an oil shale industry on public health, nor does the BLM present enough to the public that deserves more information on human health impacts. Additionally, the DPEIS does not discuss specific geographic areas where public health might be impacted, nor does it consider the number of people that would experience an increased risk of health impacts. For example, Tables 2.6-1 and 2.6-2, in comparing alternatives, only discuss health and safety impacts on workers, not on nearby residents.[21]

246-012

The DPEIS contains vague discussion of potential impacts. For example, tables 4.13.1.1 and 4.13.1.4 state: "Potential adverse health and environmental impacts associated with improper management of hazardous materials could be significant. If hazardous materials are managed according to

OSTS_00246

regulations, impacts are expected to be minimal or nonexistent."[22] Yet, the DPEIS does not define the terms "significant" or "minimal". Similarly, Tables 4.14.1 and 4.14.2 discuss risks associated with particles, fumes, chemicals, and contaminants, but do not specify what those might be or their known health threats.[23]

There does not appear to be any systematic or formal process utilized for evaluating substantive health issues. For the human health portion of the DPEIS to be adequate, its authors should include a comprehensive discussion, both qualitative and quantitative. The discussion must contain threats, known health risks of threats, and the populations at risk. 246-012 (cont.)

There is no evidence that relevant local agencies with health expertise were consulted in the development of the DPEIS. Considering the scale of the preferred alternative and its health potential impacts, there needs to be thorough consultation with all relevant health agencies. The DPEIS should also consider the increased burdens on the medical resources in Northwest Colorado. The DPEIS fails to incorporate one formal methodology to evaluate all health issues, including contaminant risks but also substance abuse and mental health risks.

Conclusions

Western Colorado Congress and its members, strongly oppose any action that potentially leads to a degraded environment or community. We encourage the slow, deliberate and thorough research development and research of oil shale and tar sands. But at this time, any commercial oil shale and tar sands development would be premature.

Prior to any decision that leads to the development of our public lands, there must be complete research. The BLM must first estimate the true costs associated with a commercial oil shale and tar sands industry. The DPEIS fails to adequately identify the potential threats posed to private landowners, the increased stressors placed upon public service and infrastructure, and analyze the socio-economic costs to communities associated with the potential future boom and bust cycles of oil shale and tar sands development.

Western Colorado Congress recognizes the importance of building a new energy economy, and its centrality to the long-term economic, social and environmental health of our nation. In order to protect the environment and economy, we must invest our resources in renewable and efficient forms of energy.

Until the results of the RD&D are assessed, it will be impossible to identify all of the associated environmental and socio-economic impacts derived from an oil shale and tar sands industry. We formally request Congress adopt legislation prohibiting the BLM from pursuing a leasing program, or adopting any leasing regulations, until the results of the congressionally mandated RD&D program are known and independently assessed. Our unique communities and healthy environment warrant protection. For these and other reasons **we support Alternative A—no leasing of federal lands until the completion of the RD&D program.** 246-001 (cont.)

Sincerely,

Heather Tischbein

Heather Tischbein,
Executive Director
Western Colorado Congress

Works Cited

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21. BLM. 2007. Draft Programmatic Environmental Impact Statement. Section 4; page 18.
22. BLM. 2007. Draft Programmatic Environmental Impact Statement. Tables 2.6-1 and 2.6-2
23. BLM. 2007. Draft Programmatic Environmental Impact Statement. Tables 4.13.1.1 and 4.13.1.4
24. BLM. 2007. Draft Programmatic Environmental Impact Statement. Tables 4.14.1 and 4.14.2

Responses for Document 00246

00246-001: The BLM acknowledges the commentor's preference for Alternative A.

00246-002: The PEIS is a programmatic-level document, analyzing allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis may include mitigation measures, such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to sensitive resources.

00246-003: Sections 4.1 and 5.1 of the PEIS provide analysis of the potential impacts based on the current knowledge and understanding of the environmental consequences associated with the experimental and older technologies, and correlations based on BLM professional judgment of comparable impacts associated with oil and gas development and underground and surface mining. The analysis in Chapters 4 and 5 is provided to enable the decision maker to make an informed decision concerning whether to consider specific lands open or closed to future oil shale or tar sands leasing.

The BLM is conducting a phased decision-making process, proceeding from land use planning to leasing to operational permitting. The land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases to assess impacts of those actions. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. Specific mitigation measures, management prescriptions, and best available practices will be applied to minimize or eliminate impacts as a result of the NEPA analysis.

00246-004: The cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). At this preliminary stage, when the specifics of the extent of

future oil shale and tar sands development are unknown, it is neither required nor possible for this PEIS to present a cumulative effect analysis showing the impacts of leasing and development of these resources across the entire landscape of large portions of Colorado, Utah, and Wyoming. At the leasing or plan of development stage (when site-specific information is available) and when the scope of the proposed action is determined, the appropriate level of additional analysis will be performed, including a cumulative analysis. Hence, the scope of the cumulative analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects. For example, the geographic extent of a cumulative effects analysis for leasing or for a proposed development project will reflect not only the geographical limits of the proposed lease/projects but also the geographical limits of the resource being affected (e.g., elk winter range).

00246-005: As noted in the response to Comment 00246-004, the PEIS cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

This PEIS does include in the cumulative impacts analysis a discussion of the possibility of land disturbance and other impacts from planned power lines, both those required for oil shale/tar sands facilities and those planned for other purposes (e.g., the transmission and pipeline rights-of-way are included in the total acreage estimate of 14,000 acres for an oil shale facility [Table 6.1.5-9 of the PEIS], and the potential impacts from other energy corridors are also acknowledged in Section 6.1.5.3.1). The impacts of greenhouse gas emissions from oil shale, tar sands, and ancillary facilities are not assessed at this time, because of the lack of scientific tools designed to predict climate change on regional or local scales limits the ability to quantify potential future impacts (see Sections 4.6.1 and 5.6.1).

It would be inappropriately speculative at this time to attempt to present an analysis of impacts from power generation for oil shale/tar sands development, because the amount of power required would vary with the technology to be implemented, and also because the source of the power and therefore the impacts are unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. Refinery requirements are also highly speculative at this time; however, the PEIS does include a preliminary assessment of these requirements, concluding that, even if significant oil shale/tar sands development occurs over the next 20 years, new national refining facilities are unlikely to be needed, although expansion of existing refineries would likely occur (see Sections 4.1.7 and 5.1.6).

00246-006: It is important to note that the programmatic-level allocation decisions analyzed in this PEIS do not authorize the immediate leasing of lands for commercial development. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. The PEIS provides an effective analytical foundation for subsequent project-specific NEPA documents.

The amount of water needed for oil shale or tar sands development depends on many factors, including scale of development, technologies used in the development, national agricultural economy, and the locations and hydrologic conditions of project sites. It would be more appropriate to evaluate the water needs at the project levels when many of the currently unknown factors are better defined. The results would be presented in project-specific NEPA documents.

The PEIS uses long-term hydrologic data, states' water plans, and historical water consumption data to evaluate regional water availability in the oil shale basins. Therefore, the water availability results represent long-term average conditions. For projected water uses, results from state water plans were used. The plans have taken regional population growth and regional economic conditions into consideration.

Endangered fish species in the Colorado River basin are protected by managing instream flows of various stream segments. Instream flow and recreational waters are not considered as consumptive waters. Instream flow water rights are held and administered by CWCB in Colorado. The water rights are protected the same ways as other water rights. Any water rights transferred to oil shale developers in Water Court would be subject to the test of the "No Harm Rule" that provides protection from injury to downstream water right holders. CWCB could also exercise water calls when existing instream flow water rights are threatened.

The description of water uses of other types of energy development can be found in the cumulative impact sections of the PEIS (Sections 6.1.5 and 6.2.5).

Projection of future climate change relies on modeling, which, in turn, uses assumptions and mathematical algorithms. These vary among models. Different model results have been reported and sometimes are contradictory. To avoid such uncertainty, long-term hydrologic data were used in the evaluation presented in the PEIS. The data cover periods of both dry and wet years.

The potential impacts of the transfer of water from agricultural use to oil shale or tar sands development have been added in the revised PEIS (see Section 4.5.1).

00246-007: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically

prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Potential air quality impacts were adequately analyzed under NEPA documents previously prepared for the oil shale RD&D projects. The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal or federal air quality laws, statutes, regulations, standards, or implementation plans. However, speculation regarding where and how potential development might occur is beyond the scope of this programmatic analysis.

00246-008: Text has been added to Section 4.11 of the PEIS covering the importance of amenities to economic development in rural areas and the potential conflict with energy development.

00246-009: When commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken, including a detailed analysis of impacts on local tax revenues, facility and infrastructure capacity and expansion costs, and the local government expenditures required to maintain different levels of service.

Text has been added to Section 4.11 of the PEIS covering the importance of amenities to economic development in rural areas and the potential conflict with energy development.

Impacts of oil shale, tar sands, and ancillary facilities on social change and the potential for social disruption are assessed in Sections 4.11 and 5.11.

00246-010: Given the programmatic nature of the PEIS, the purpose of the analysis of socioeconomic impacts is to provide an overview of the type and magnitude of impacts that would likely occur with the construction and operation of representative facilities. If commercial-scale resource development occurs, additional NEPA analyses would be undertaken to analyze in detail the extent of regional economic impacts, including impacts on local and regional housing markets, retirement communities, recreation, and agriculture.

Text has been added to Section 4.11 of the PEIS covering the importance of amenities to economic development in rural areas and the potential conflict with energy development.

00246-011: The comment has accurately portrayed the summary in the PEIS. The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified. Conflicts between potential commercial development of oil shale and grazing would be considered in future NEPA analysis associated with commercial leasing on public lands.

00246-012: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on public or worker health.

When actual exposure doses due to a process are known or can be estimated, it is possible to conduct quantitative health risk assessments that estimate the probability of health effects, such as cancer, or provide an indicator of the likelihood of other types of health effects. Because the locations of residences and

populations with respect to future oil shale and tar sands development are unknown, and the type and quantity of emissions to air and water from future facilities are also unknown, such a quantitative risk assessment is not possible as a part of this PEIS. Quantitative risk assessment would likely be possible as a part of NEPA analyses conducted for site- and technology-specific plans of development.

OSTS_00247

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

I would like to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The development envisioned by the study would come at a time when our land is already experiencing severe pressure from the current energy boom and significant population growth across the West. Before starting a commercial leasing program,we need to know if oil shale development is feasible economically. We must ensure that the oil shale RD&D process has allowed us to assess the impacts of experimental extraction technologies on energy consumption and water use before proceeding with the PEIS. Since it will be years before companies developing oil shale technology will know if it is technolog- ically or economically feasible, we need to proceed slowly in order to protect our air, water, wildlife and our communities in Colorado. 247-001

Sincerely,
barbara hill
2935 El Torro Rd
Grand Junction, CO 81503

Response for Document 00247

00247-001: Congress articulated in the Energy Policy Act of 2005 that oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed to reduce the reliance of the United States on foreign sources of oil; that these resources should be developed in an environmentally sound manner; and that these resources should be developed with an emphasis on sustainability to benefit the United States while taking into account affected states and communities. The Secretary of the Interior was given the charge to implement this direction from Congress and has initiated this PEIS along with other actions to implement that direction.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands. The BLM, through its land use planning process, will balance any conflicting uses, as required by FLPMA.

OSTS_00248

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

Thank you for allowing citizen input. Oil shale exploitation has been tried on the Western Slope before and it failed miserably that time and probably will again but the chaos took years to heal. Please quit solving our oil scarcity problem by developing more oil in completely impractical ways and work with the government to help us need less energy by using less because we've limited our population, we've made automobiles more efficient, and we have encouraged the creation and use of mass transit.

248-001

I realize none of these is your problem. But giving us more oil only delays their solution and therefore the the requirement increases.

Please, no oil shale development in this relatively unspoiled part of our world. Let's not ruin everything just to take care of man's insatiable desire to be where he's not.

Sincerely, Judy Hancock 5599 Snowmass Creek Road Snowmass, CO 81654

Sincerely,
Judy Hancock
5599 Snowmass Creek Road
Snowmass, CO 81654

Response for Document 00248

00248-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00249

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

Go Slow on Shale has been the attitude of the local community since the announcement in the 2005 energy plan that the shale lands in Colorado, Wyoming and Utah would be leased for commercial operations before the technology for extracting shale economically in commercial quantities has been proven. Because of the massive impact on water quality, air quality, wildlife, human habitation, and almost every other aspect of life in the impacted areas, the BLM should not issue any commercial leases until R & D has demonstrated that we have the basis for a viable commercial oil shale industry.

Premature leasing will almost inevitably lead to pressure for subsidies to sustain commercial development until it becomes profitable without subsidies. This may be never, at which point the industry will leave when the subsidy inevitable dries up. This is what happened in the last shale boom, ending with the devastating effects of a massive industry shut-down in western Colorado. Another such economic and environmental catastrophe must be avoided by not allowing commercial leasing unti technology is proven. 249-001

Put commercial leasing on hold until the technonogy to make it profitable is available. Meantime, continue with the R & D programs exploring how shale resources might be tapped for future needs.

Sincerely,
William Grant
357 Martello Drive
Grand Junction, CO 81503

Response for Document 00249

00249-001: With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development of this resource, as well as establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. After beginning the analysis of a leasing program, and in consultation with cooperating agencies, the PEIS was modified from a leasing document to one analyzing the impacts of an allocation decision, creating a "staged" or "phased" approach to an oil shale program. This provides an opportunity to build on the scientific, governmental, or industry research, including findings from the existing RD&D leases. Any new information and/or circumstances will be taken into consideration when preparing future NEPA analysis. Future analysis will consider a full range of alternatives, as well as specific mitigation measures, such as best management practices or stipulations to mitigate short-term or long-term adverse impacts to Colorado's environment, public safety, wildlife, and local communities.

OSTS_00250

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

This plan is a bad idea, and should not be implemented. 250-001

It is a piece of a misguided energy strategy that will waste US tax dollars, burden the planet with far more greenhouse gases at a time when we urgently need to be cutting back, will severely damage or destroy the lives and livelihoods of all the people living in the affected areas, as well as precious natural resources like streams and ecosystems and wildlife and beauty that ought to be there to be enjoyed now and by future generations.

This plan requires too much water, which is too scarce already.
It requires too much power, and power is always produced with too high a consequences. It disrupts too much land and air and water. And it's downright unnecessary. 250-002

What we need instead is measures to get Americans to USE LESS, NOT MORE. This can easily be accomplished with existing technologies, while making our lives more comfortable.

Please back up and take this much slower. Do not give away our heritage for a huge profit for a few companies. Study all the long-range impacts more thoroughly, and you'll find it isn't worth it. 250-003

Sincerely,
James Riddell
21448 Uncompahgre Rd
Montrose, CO 81401

Responses for Document 00250

00250-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

00250-002: Thank you for your comment.

00250-003: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The PEIS's analysis provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale or tar sands leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and non-federal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios, and pertinent federal or non-federal actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as best management practices to mitigate short-term and long-term adverse impacts.

OSTS_00251

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

As with leases for oil nnd gas drilling, the BLM seems here intent on granting permits far in excess of the measured and graduated exploration prerequisite to a credible business plan.
The difference between the two excesses seems to be that Oil Shale extraction has a history of bungled attempts(including the atomic explosion test site at Rulison) and reliance on an at-present unproven extraction techniques.

At hand is technology effective for gathering, storing and transmitting solar power. 251-001
On the rise are methods for weaning different quantities at different levels of geothermal deposits.
Sucess has been established in the art of moving turbines by sea mass.

All the tressures of our natural habitat, and their presence for future multiple and renewed use join me in asking you to go slow with Oil Shale.

Sincerely,
John Kiernan

Response for Document 00251

00251-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

OSTS_00252

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

All future utilization of Federal Lands for extraction Purposes must have environmental impact studies, including full life carbon offset studies. Allowing usages that produce tonnages of carbon into the atmosphere beyond a minimal standard is unacceptable. Full Life should include all aspects from Excavation and extraction to consumption and combustion. 252-001

Sincerely,
Fred Pittenger
784 Valley Ct
Suite B2
Grand Junction, CO 81505

Response for Document 00252

00252-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions could result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

OSTS_00253

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

I appreciate that you are taking the time to read this message.

I am asking that we take the time to be thoughtful and careful as we look at opening our state up to the extraction of oil shale.

The last time we had this extraction industry in our state, they left without notice, shattering the local economy and leaving behind waste that has yet to be cleaned up. It remains to be seen if $24 million of our tax payer's money will be sufficient to take care of the mess left behind. 253-001

This level of irresponsible management does not lead to trust.
We need absolute guarantees that when the oil shale is depleated and the industry pulls out, we still have our traditional resources to carry on.
Sincerely, Joyce Wizer 670 Village Drive Rifle, CO 81650

Sincerely,
Joyce Wizer
670 Village Drive
Rifle, CO 81650

Response for Document 00253

00253-001: Thank you for your comments.

OSTS_00254

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The development envisioned by the study would come at a time when our land is already experiencing severe pressure from the current energy boom and significant population growth across the West. It is difficult to understand why the BLM is rushing toward a commercial leasing program without even knowing if oil shale development is feasible economically. In light of that, it's even more difficult to understand why the BLM seems so anxious to give oil shale development priority over other uses on our public lands as shale development would likely preclude all other activity, including natural gas development in priority areas. 254-001

We must ensure that the oil shale RD&D process has allowed us to asses the impacts of experimental extraction technologies on energy consumption and water use before proceeding with the PEIS. It will be years before companies developing oil shale technology will know if it is technologically or economically feasible.

I urge the BLM to consider the cumulative effects of this industry on wildlife habitat and protected areas across the West. This plan proposes development in some of the best hunting, fishing, and recreation areas in Colorado, Wyoming, and Utah. We can and should protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 254-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale development will displace every other public use of public land to benefit private companies. The cumulative impact of this massive development will negatively affect our air, water, wildlife, and communities in Colorado, Wyoming, and Utah. Please slow down and carefully consider the enormous effect commercial oil shale development would have before committing the West Slope to a future of industrial development and environmental degradation. 254-003

Things to consider are: 1. Does this area have eneough water to support development.
2. Can CO2 piped from local coal fired power plants help release the oil from the shale? 254-004

Sincerely,
Martha W Bushnell
502 Ord Drive
Boulder, CO 80303

Responses for Document 00254

00254-001: With the passage of the Energy Policy Act of 2005, Congress declared the policy of the United States to include that "oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed …." Congress also required the Secretary of the Interior to prepare a PEIS for oil shale and tar sands. The FLPMA, the Mineral Leasing Act, and the Energy Policy Act of 2005 authorize use of some BLM land for commercial oil shale leasing and development. The BLM appreciates the commentors' support for the natural gas leasing program. Conflicts between resource uses are not new, and resolutions to such conflicts are not achieved by the land use planning decisions analyzed in this PEIS. The amendments to the RMPs will only close certain areas, and open other areas to consideration for future leasing of oil shale and tar sands. The Secretary of the Interior retains discretion over leasing decisions. The NEPA analysis for future leasing decisions will analyze the compatibility and conflicts among resources.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands. This analysis will balance any conflicting uses, as required by FLPMA.

00254-002: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios and pertinent federal or nonfederal

actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to mitigate short-term and long-term adverse impacts.

It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00254-003: Whether or not the area has enough water to support development depends on many factors, including scale of development, technologies used in the development, national agricultural economy, and the locations and hydrologic conditions of project sites. Finally, whether enough water is available for development depends on the results of intensive negotiations between various parties, including water rights owners, state and federal agencies, and municipal water providers as well as the developers. The BLM agrees that this is an important issue to consider.

00254-004: This question is outside the scope of the PEIS analyses.

OSTS_00255

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The development envisioned by the study would come at a time when our land is already experiencing severe pressure from the current energy boom and significant population growth across the West. It is difficult to understand why the BLM is rushing toward a commercial leasing program without even knowing if oil shale development is feasible economically. In light of that, it's even more difficult to understand why the BLM seems so anxious to give oil shale development priority over other uses on our public lands as shale development would likely preclude all other activity, including natural gas development in priority areas. 255-001

This 'energy' plan is a joke - the damage to the environment, pollution of water, the demand on water - which is a scarce resource in this part of the world. Shell's idea to heat an area using a freeze wall then heat it in the middle high enough to melt the oil out of the shale. Hello folks hot/cold do you see a problem here - then when the freeze wall does come down - IF it ever works then ground water will leach into the well site and then become what - CONTAMINATED. Where are the people with some common sense - this plan obviously doesn't have any. 255-002

Sincerely,
Jodie MacTavish
Po Box 3491
Grand Junction, CO 81502

Responses for Document 00255

00255-001: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

The BLM believes that the RD&D program will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. The scope of the PEIS, in consultation with cooperating agencies, was changed from a leasing decision to an allocation decision. Consequently, new NEPA analysis will be required prior to offering parcels of land for lease for commercial oil shale exploration and development. This NEPA analysis will evaluate environmental impacts of the operation(s) and develop specific measures to mitigate or eliminate those impacts. This analysis will also contain any new information or circumstances relevant to the RD&D technology, which may be a consequence of research or lessons learned on the RD&D leases or as a result of studies on nonfederal lands.

00255-002: Thank you for your comment.

OSTS_00256

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

PLEASE HOLD UP ON THE OIL SHALE LEGISLATION! 256-001

Since moving to Colorado in 1973, I have been employed at a Denver commercial and/or industrial real estate firm (two years) and 13 years as an employee of Colorado Interstate Gas Company.

Three of my four adult children are incredibly dedicated to the conservation of our country's natural resources,the protection as much as possible of our wild lands, the protection of our quality of life by prudent actions of individuals, industry and government. I cheer them for their dedication.

PLEASE, BLM, if, as the ancient wisdom goes, "An ounce of prevention is worth a POUND of cure", the "slow down" of the providing of these oil shale and tar sands leases is surely a prime example of wisdom. 256-002

Not being closely involved in the intrecacies of the gas production on the Roan Plateau, I do feel, with the technology available, surely parts of that could be a source of natural gas supply, without disrupting most of the Plateau.

HOWEVER, in the OIL SHALE energies, I say, "WAIT", until decisions can be made with more knowledge of the pros and cons. 256-002 (cont.)
The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming, and Utah. 256-003

I appreciate the opportunity to comment on the PEIS on oil shale and tar sands. I pray for wisdom on your part.

Sincerely, Donna F. Elder 311 Plainview Place Manitou Springs, CO 80829

Sincerely,
Donna Elder
311 Plainview Place
Manitou Springs, CO 80829

Responses for Document 00256

00256-001: The BLM rulemaking process is separate and apart from the drafting of the PEIS. The PEIS is analyzing the environmental consequences of an allocation decision, and therefore a comment concerning oil shale legislation is outside the scope of the PEIS.

00256-002: Congress articulated in the Energy Policy Act of 2005 that oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed to reduce the reliance of the United States on foreign sources of oil; that these resources should be developed in an environmentally sound manner; and that these resources should be developed with an emphasis on sustainability to benefit the United States while taking into account affected states and communities. The Secretary of the Interior was given the charge to implement this direction from Congress and initiated this PEIS along with other actions to implement that direction.

Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document and all subsequent NEPA documents will analyze the direct, indirect, and cumulative effects of the proposed action.

00256-003: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

OSTS_00257

Comments on the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

Even though BLM is not governed by a multiple use philosophy like the Forest Service, it must take into account other demands on its lands (wildlife, water, hunting and fishing, recreation, some interest in preservation for future generations). Right now the balance is skewed toward energy development; and massive leasing for oil shale development that hasn't been proven economically makes no sense. That is, unless the energy industry is setting the agenda. 257-001

Our western lands are beautiful, fragile and irreplaceable. As our population continues to grow the value of these qualities will only increase.

Sincerely,
John Domingue
3246 S Corona
Englewood, CO 80113

Response for Document 00257

00257-001: The FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

OSTS_00258

the Oil Shale DPEIS

Bureau of Land Management OSTSEIS

Dear BLM,

My name is Ben Hiller, and I am a Coloradan of many decades. I understand that without the efforts of those in the energy industry I could not enjoy my present lifestyle, but the parts of Colorado and indeed the entire Earth which I love are jeopardized by the plan to allow oil shale development in Western Colorado, a land made famous by and inhabited specifically because of its natural beauty. To destroy both nature's beauty and the living beings which compose it in effort to obtain natural resources goes against every human fundamental except industry.

Oil shale has long been studied here in Colorado, where we don't want our mountains destroyed by mining, as has been done to parts of West Virginia. And our regional response has not been to support more oil shale development, but to support wind, solar, hydroelectric, and other forms of so-called alternative energy. I myself have made numerous lifestyle changes to limit my use of and thereby conserve water, natural gas, electricity, and gasoline.

I believe that increased oil shale development would benefit mostly the developers, energy industry owners and workers, and those with little to no interest in conservation, environmentalism, nature, or the parts of Colorado which made and make it great. Such development surely would also benefit we who live here and use energy, but we are also the ones who would bear the brunt of the pernicious side-effects. I know the BLM cares about land management, but I don't think that miners or developers necessarily care about the impact of their business on the local population or environment, so long as they make money.

I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The development envisioned by the study would come at a time when our land is already experiencing severe pressure from the current energy boom and significant population growth across the West. It is difficult to understand why the BLM is rushing toward a commercial leasing program without even knowing if oil shale development is feasible economically. In light of that, it's even more difficult to understand why the BLM seems so anxious to give oil shale development priority over other uses on our public lands as shale development would likely preclude all other activity, including natural gas development in priority areas. 258-001

We must ensure that the oil shale RD&D process has allowed us to asses the impacts of experimental extraction technologies on energy consumption and water use before proceeding with the PEIS. It will be years before companies developing oil shale technology will know if it is technologically or economically feasible.

I urge the BLM to consider the cumulative effects of this industry on wildlife habitat and protected areas across the West. This plan proposes development in some of the best hunting, fishing, and recreation areas in Colorado, Wyoming, and Utah. We can and should protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 258-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale development will displace every other public use of public land to benefit private companies. The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming, and Utah. I urge you to slow down and carefully consider the enormous effect commercial oil shale development would have before committing the West Slope to a future of industrial development and environmental degradation. 258-001 (cont.)

Sincerely,
Benjamin Hiller
2354 Ivy Street
Denver, CO 80207

Responses for Document 00258

00258-001: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

The BLM believes that the RD&D program will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. The scope of the PEIS, in consultation with cooperating agencies, was changed from a leasing decision to an allocation decision. Consequently, new NEPA analysis will be required prior to offering parcels of land for lease for commercial oil shale exploration and development. This NEPA analysis will evaluate environmental impacts of the operation(s) and develop specific measures to mitigate or eliminate those impacts. This analysis will also contain any new information or circumstances relevant to the RD&D technology, which may be a consequence of research or lessons learned on the RD&D leases or as a result of studies on nonfederal lands.

00258-002: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios and pertinent federal or nonfederal actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably

foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to mitigate short-term and long-term adverse impacts.

It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

OSTS_00259

Oil shale draft programmatic EIS

Bureau of Land Management OSTSEIS

Dear BLM,

Please include this message as our comment on the draft programmatic EIS on oil shale and tar sands (OSTS) development.
I (George) studied natural resources at Utah State University and spent my career in natural resources and environmental protection. I have seen some of the areas affected by this project over a period of 45 years.

The rush toward commercial leasing for oil shale is unwise because the means of extracting energy from oil shale and tar sands at a commercial level remains unproven. Can it be done so as to yield energy without huge subsidies? That has not been demonstrated. For the present, the federal government should limit itself to making available small tracts of land for testing and development of technologies that might prove technically and economically feasible. 259-001

Once the impacts of extraction technologies are understood ?
including energy consumed and water required ? a PEIS can be written that analyzes the real impacts of developing OSTS. That appears to be years in the future.

For the present, we urge BLM to include in this EIS the best assessment possible of cumulative impacts of OSTS against wildlife habitat, scenic resources, wild rivers, air quality, ground and surface water supplies, and the tourism industry of this region in Utah, Colorado and Wyoming. 259-002

We believe the impacts would be severe, degrading many values that are important to the public ? both to residents of Utah, Colorado and Wyoming and to the millions of visitors who come from other states, Asia and Europe as tourists to enjoy the beautiful lands of this region. Any economic benefits of OSTS development could easily be outweighed by the benefits lost as the tourism economy would plummet because of degradation of the land, water and air by OSTS activities. 259-003

One alternative in the EIS should consider putting off-limits to OSTS activities all proposed wilderness areas, such as those in America?s Red Rock Wilderness Act (H.R. 1919) and the Colorado Wilderness Act (H.R. 3756), and all areas recommended by the Executive Branch for wilderness or Wild & Scenic River status. 259-004
Of course, existing BLM and Forest Service wilderness study areas are already closed to developments such as OSTS.

Please keep us informed of further action on this project. Thank you for considering our views.

Sincerely,
George and Frances Alderson
112 Hilton Avenue
Baltimore, MD 21228

Responses for Document 00259

00259-001: With the passage of the Energy Policy Act of 2005, Congress declared the policy of the United States to include that "oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed …." Congress also required the Secretary of the Interior to prepare a PEIS for oil shale and tar sands. The FLPMA, the Mineral Leasing Act, and the Energy Policy Act of 2005 authorize use of some BLM land for commercial oil shale leasing and development. The amendments to the RMPs will only close certain areas and open other areas to consideration for future leasing of oil shale and tar sand. Additional NEPA analyses will be required for leasing decisions.

Since the alternatives in the PEIS do not authorize the immediate leasing of the lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in this PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document and all subsequent NEPA documents will analyze the direct, indirect, and cumulative effects of the proposed action.

00259-002: In the PEIS, cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

The cumulative impacts analysis in the PEIS summarizes the past, present, and reasonably foreseeable other activities (for example, oil and gas development, coal mining, minerals development) for the study area, and it presents a preliminary qualitative assessment of the incremental impacts of those activities considered in conjunction with oil shale and tar sands development. At this preliminary stage, when the specifics of the extent of future oil shale and tar sands development are unknown, the discussion of the potential impacts of oil shale development are based on BLM's experience with comparable surface-disturbing activities from other types of mineral development. In order that the decision maker might have sufficient information to make a reasoned choice among the alternatives, the BLM has developed a general analysis of the potential incremental impacts from all past, present, and reasonably foreseeable actions, in conjunction with a single hypothetical oil shale or tar sands facility, with the understanding that there might be more than one, or even many, oil shale/tar sands facilities developed in the future. For the purpose of this analysis, parameters for consideration, such as land disturbed, water use, and jobs created,

were developed where possible. For some parameters (such as air emissions), no estimates with respect to possible development could be made because the data would depend entirely on technology-specific inputs.

Prior to leasing (when site-specific and technology-specific data will be available) or approval of a plan of development (when accurate information on water use, air emissions, employment, etc., will be available), additional environmental analysis will be performed including a cumulative analysis, as appropriate.

00259-003: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is primarily a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the physical, biological, or socioeconomic environment with the possible exception of impacts on property values. Any future lease or development actions proposed on the lands identified as open to application may have an effect, and therefore each lease application and/or development proposal will be evaluated by the BLM through the NEPA process to determine what impacts may occur and what mitigating measures may be applied to remove or reduce those impacts. This analysis will include, among other possible impacts, potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species.

The analyses of socioeconomic impacts are a preliminary assessment of the potential impacts of future development, provided for the purpose of identifying data gaps and potential mitigation measures. To address the concerns expressed in this comment, text has been added to Section 4.11 of the PEIS covering the importance of amenities to economic development in rural areas, and the potential conflict with energy development.

00259-004: As described in Chapter 2 of the PEIS, only designated wilderness areas and WSAs are excluded from application for leasing. The BLM does not manage public land based on pending draft or proposed legislation.

Regarding rivers or segments of rivers, a number of the BLM land use plans are currently undergoing revision, and as part of that process, WSR inventories have been undertaken. Where a river or river segment has been found to be “eligible” for inclusion in the WSR system as part of one of these inventories, the BLM has an obligation to protect the lands along the eligible segment until a “suitability” determination has been made as part of the land use planning process. If the river or river segment is found to be “non-suitable,” the lands along the river then would be available for other uses. If a river or river segment is determined to be suitable for inclusion in the WSR system, the BLM will forward that recommendation to Congress.

OSTS_00260

3/18/08

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Sir or Madam:

This letter represents the 400+ members of Grand Valley Audubon Society in Grand Junction, Colorado. Our homes are immediately adjacent to the proposed oil shale areas and long-time residents such as myself and many of our members have already seen the problems caused by unwise, hurried decisions toward oil shale leasing and production. I have personally met with Shell personnel and know how far out they believe production to be. It is ridiculous to go forward with the level of leasing and development as proposed in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Our area is already being devestated by the current energy boom. With all three major presidential candidates expressing the need for alternatives to fossil fuels, the BLM should not be rushing toward a commercial leasing program at this time. The economic feasibility of oil shale development is unknown now and will be for several years if not decades. Instead, the BLM should ensure the oil shale research and development projects already authorized provide sufficient information to asses the impacts of experimental extraction technologies on energy consumption and water use before proceeding with more leasing. The proposed plan includes development in some of the best hunting, fishing and recreation areas in Colorado, Wyoming and Utah and it is my opinion we can and should protect these areas from impacts such as diminished air quality and habitat fragmentation. Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits oil shale development will displace every other use of public land. The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming and Utah. Our organization urges the BLM to slow down this process and to ensure that cumulative impacts are well-studied and not assessed before the economic feasibility of the process is even known.

260-001

260-002

Sincerely,

Nick Korte
PO Box 1211
Grand Junction, CO 81502-1211

Responses for Document 00260

00260-001: With the passage of the Energy Policy Act of 2005, Congress declared the policy of the United States to include that "oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed …." Congress also required the Secretary of the Interior to prepare a PEIS for oil shale and tar sands. The FLPMA, the Mineral Leasing Act, and the Energy Policy Act of 2005 authorize use of some BLM land for commercial oil shale leasing and development. The BLM appreciates the commentors' support for the natural gas leasing program. Conflicts between resource uses are not new, and resolutions to such conflicts are not achieved by the land use planning decisions analyzed in this PEIS. The amendments to the RMPs will only close certain areas, and open other areas to consideration for future leasing of oil shale and tar sands. The Secretary of the Interior retains discretion over leasing decisions. The NEPA analysis for future leasing decisions will analyze the compatibility and conflicts among resources.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands. This analysis will balance any conflicting uses, as required by FLPMA.

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, it is justifiable that the evaluation of specific occurrences of resources and supporting facilities, analyses of the environmental consequences of oil shale or tar sands development, and the assessment of the cumulative effects of oil shale and tar sands development together with the other factors mentioned in the comment be included in subsequent project- or site-specific NEPA documents rather than in the PEIS.

OSTS_00261

3/18/08

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Sir or Madam:

I would like to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. It seems that extraction from oil shale is a still unproven technology. Why is the BLM in such a hurry to issue comercial leases? It seems that BLM might be bending due to political pressure rather than managing the land for ALL users. This technology sounds like it may be very WATER intensive - and water is such a precious resource in the west. Any new development needs to carefully consider the impact to wildlife and humans of increased water demands. I urge the BLM to carefully and deliberately study and consider the cumulative effects of this industry on wildlife habitat and other users of this land.

261-001

261-002

Sincerely,

Wendy Koontz
9683 N 89th St
Longmont, CO 80503-8554

Responses for Document 00261

00261-001: Congress articulated in the Energy Policy Act of 2005 that oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed to reduce the reliance of the United States on foreign sources of oil; that these resources should be developed in an environmentally sound manner; and that these resources should be developed with an emphasis on sustainability to benefit the United States while taking into account affected states and communities. The Secretary of the Interior was given the charge to implement this direction from Congress and initiated this PEIS along with other actions to implement that direction.

Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document and all subsequent NEPA documents will analyze the direct, indirect, and cumulative effects of the proposed action.

00261-002: See response to Comment 00261-001. Subsequent NEPA analysis will also help to form the basis for the development of mitigation measures, such as BMPs, to avoid or mitigate short-term and long-term adverse impacts.

OSTS_00262

3/18/08

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Sir or Madam:

Rather than destroy the beauty of our natural lands, we need to put forth ALL EFFORT into alternative energy sources that are SUSTAINABLE: this term refers to environment in all aspects, from burning of fossil-fuels to the retrieval methods for them. The party is rapidly coming to a close in fossil-fuels as we have decidedly peaked in global oil production over the past two years, and more importantly, as we will need to drastically change our lifestyles to use energy differently to curb our participation in climate change. This means DRASTICALLY CURBING OUR APPETITE FOR THE BURNING OF FOSSIL FUELS. Let's move forward, and put our conscious energy into CHANGE, not keep on a path to oblivion. I urge the BLM to consider the cumulative effects of this industry on wildlife habitat and protected areas across the West. This plan proposes development in some of the best hunting, fishing and recreation areas in Colorado, Wyoming and Utah and it is my opinion we can and should protect these areas from impacts such as diminished air quality and habitat fragmentation. Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits oil shale development will displace every other use of public land. The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming and Utah. I urge you to slow down and carefully consider the gigantic effect commercial oil shale development would have before committing the west slope to a future of industrial development and environmental degradation.

262-001

262-002

262-003

Sincerely,

Greg Pace
7266 Brooke Blvd
Reynoldsburg, OH 43068-5274

Responses for Document 00262

00262-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

00262-002: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios and pertinent federal or nonfederal actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to mitigate short-term and long-term adverse impacts.

It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the

Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00262-003: Congress articulated in the Energy Policy Act of 2005 that oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed to reduce the reliance of the United States on foreign sources of oil; that these resources should be developed in an environmentally sound manner; and that these resources should be developed with an emphasis on sustainability to benefit the United States while taking into account affected states and communities. The Secretary of the Interior was given the charge to implement this direction from Congress and initiated this PEIS along with other actions to implement that direction.

Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document and all subsequent NEPA documents will analyze the direct, indirect, and cumulative effects of the proposed action.

OSTS_00263

3/18/08

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Sir or Madam:

From everything that I have read oil shale is the best answer to bring down future prices of oil from the middle east and other suppliers and make America somewhat self-sufficient should the need arise in future times to distance ourselves from other countries, during times of unrest. Please move forward with oil shale research asap. 263-001

Sincerely,

Michael Hanna
860 Park Ave NE
Salem, OR 97301-2802

Response for Document 00263

00263-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00264

3/18/08

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Sir or Madam:

As a chemical engineering graduate student at the Colorado School of Mines, I am involved in alternative energy research. I attend an institution that is historically tied to the mining industry and graduates the majority of its students into the petroleum industry. Given my surroundings, the fallacy of developing oil shale is readily apparent. The return on energy input is perilously little, and makes the economics of such an undertaking laughable. This highly damaging, contaminating process only exists due to high government subsidies, which are cheating the taxpayers by agreeing to pay for such a doomed venture. Hire some economists, let them do the numbers, then please abandon the project and reinvest the taxpayers' money in an energy solution that will not poison future generations. I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This development envisioned by the study would come at a time when our land is already experiencing severe pressure from the current energy boom and significant population growth across the West. It is difficult to understand why the BLM is rushing toward a commercial leasing program without even knowing if oil shale development is feasible economically. In light of that, it's even more difficult to understand why the BLM seems so anxious to give oil shale development priority over other uses on our public lands as shale development would likely preclude all other activity, including natural gas development in priority areas. We must ensure the oil shale research and development projects already authorized by the BLM provide sufficient information to asses the impacts of experimental extraction technologies on energy consumption and water use before proceeding with the PEIS. It will be years before companies developing oil shale technology will know if it is technologically or economically feasible. I urge the BLM to consider the cumulative effects of this industry on wildlife habitat and protected areas across the West. This plan proposes development in some of the best hunting, fishing and recreation areas in Colorado, Wyoming and Utah and it is my opinion we can and should protect these areas from impacts such as diminished air quality and habitat fragmentation. Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits oil shale development will displace every other use of public land. The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming and Utah. I urge you to slow down and carefully consider the gigantic effect commercial oil shale development would have before committing the west slope to a future of industrial development and environmental degradation.

264-001

264-002

264-003

Sincerely,

Andy Young
482 Mt Evans Rd
Golden, CO 80401-9626

Responses for Document 00264

00264-001: Thank you for your comment.

00264-002: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

The BLM believes that the RD&D program will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. The scope of the PEIS, in consultation with cooperating agencies, was changed from a leasing decision to an allocation decision. Consequently, new NEPA analysis will be required prior to offering parcels of land for lease for commercial oil shale exploration and development. This NEPA analysis will evaluate environmental impacts of the operation(s) and develop specific measures to mitigate or eliminate those impacts. This analysis will also contain any new information or circumstances relevant to the RD&D technology, which may be a consequence of research or lessons learned on the RD&D leases or as a result of studies on nonfederal lands.

00264-003: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios and pertinent federal or nonfederal

actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to mitigate short-term and long-term adverse impacts.

It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

OSTS_00265

3/18/08

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Sir or Madam:

Thanks for the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. A booming economy is nice, but an intact landscape is enormously more important. Your organic act FLPMA expects you to see it this way too. A deliberative long-tenured bureacracy is also important to temper the extreme positions of short-term administrations. That is one of the genious features of American government. So let it work that way please. The development envisioned by the study would come at a time when our land is already experiencing severe pressure from the current energy boom and significant population growth across the West. It is all too easy to imagine why the BLM is rushing toward a commercial leasing program before knowing if oil shale development is feasible economically. It's even more maddening to to see the BLM rushing to give oil shale development priority over other uses on our public lands as shale development would likely preclude all other activity, including natural gas development in priority areas. It's reasonable to ensure the oil shale research and development projects already authorized by the BLM continues to provide sufficient information to asses the impacts of experimental extraction technologies on energy consumption and water use before proceeding with the PEIS. It will be years before companies developing oil shale technology will know if it is technologically or economically feasible. I urge the BLM to consider the cumulative effects of this industry on wildlife habitat and protected areas across the West. This plan proposes development in some of the best hunting, fishing and recreation areas in Colorado, Wyoming and Utah and it is my opinion we can and should protect these areas from impacts such as diminished air quality and habitat fragmentation. The Greater Sage-grouse comes to mind as one species vulnterable to being brought to a point where it may need to be listed. Oil shale development could be a major factor tipping the scales toward endangerment. Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits oil shale development will displace every other use of public land. The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming and Utah. The area of oil shale lands is too expansive to consider uninterinterrupted petroleum works across the whole range--at least not until previously spoiled lands have been rehabilitated. Think in terms of centuries instead of decades. I urge you to recommend slowing down and carefully considering the gigantic effect commercial oil shale development would have before committing the west slope to a future of industrial development and environmental degradation.

265-001

265-002

265-003

265-001 (cont.)

Sincerely,

Ron Lambeth
624 Yucca Dr
Grand Junction, CO 81503-1006

Responses for Document 00265

00265-001: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

The BLM believes that the RD&D program will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. The scope of the PEIS, in consultation with cooperating agencies, was changed from a leasing decision to an allocation decision. Consequently, new NEPA analysis will be required prior to offering parcels of land for lease for commercial oil shale exploration and development. This NEPA analysis will evaluate environmental impacts of the operation(s) and develop specific measures to mitigate or eliminate those impacts. This analysis will also contain any new information or circumstances relevant to the RD&D technology, which may be a consequence of research or lessons learned on the RD&D leases or as a result of studies on nonfederal lands.

00265-002: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios and pertinent federal or nonfederal actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably

foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to mitigate short-term and long-term adverse impacts.

Future site-specific NEPA analysis would include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to sage grouse from commercial oil shale or tar sands development. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders. Mitigation of impacts to sage grouse would include recommendations included in BLM's national sage grouse habitat conservation strategy, as well as those contained in state-wide and regional sage grouse conservation strategies that have been prepared by state agencies.

It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00265-003: Thank you for your comments. In compliance with Congress's mandate, the PEIS scope is restricted to the most geologically prospective lands within each of the states of Colorado, Utah, and Wyoming.

OSTS_00266

3/18/08

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Sir or Madam:

I worked out in the Piceance this past summer near the Exon Road where the Mahogany Zone is exposed. Altough stationed several miles away, I would take walks down into the valley nearby and found layers of kerogen rich shale and dolostone. There's only one method that I'm aware of that would be able to extract any oil from this rock with the huge overburdens centered toward the hilltops, and it's still in the experimental stages. The wildlife out here is abundant with elk, bear, and deer among other species. The area is still very beautiful in many places. Abundant trout could be seen jumping in nearby ponds. I think it's recless of BLM to even consider leasing out this land without considerable safeguards to help protect the area. Small entrerprises will try extraction processes that have proved ineffective in the past and will only succeed in poluting the land which will fall to the taxpayers to foot the bill for cleanup. Further, water is scare in the Piceance, and many of the rigs out in the area have difficulty getting water during the summer. A large portion of this area should be set aside for recreation so that common citizens have access. And a large portion of that should be accessable by foot only. I've seen the damage done by off roaders in the past. I hope that BLM management will have a moment of sanity and stop this slip shod, fast track approach to mangagement on this beautiful and important land. 266-001

Sincerely,

Glenn Mc Caslin
11647 Brook Rd
Golden, CO 80403-8512

Response for Document 00266

00266-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00267

United States Department of the Interior

NATIONAL PARK SERVICE
INTERMOUNTAIN REGION
12795 West Alameda Parkway
PO Box 25287
Denver, Colorado 80225-0287

2008 APR 18 AM 11:29
DOI-BLM
CO STATE OFFICE

A56 (IMDE-OPE)

APR 17 2008

Memorandum

To: Colorado State Director, Bureau of Land Management (BLM)
Attn: Sherri Thompson, Programmatic EIS Manager

From: Regional Director, Intermountain Region

Subject: Comments, Draft Programmatic Environmental Impact Statement to Amend Land Use Plans to Allow Oil Shale and Tar Sands Leasing (PEIS)

In our capacity as a Cooperating Agency in the BLM's PEIS, we offer the following comments for your consideration. National Park Service Director Bomar appreciated having the opportunity to meet with the BLM Director and his staff on March 14, 2008 to discuss the PEIS. From that meeting we understand that you envision a three-step process for ultimately leasing oil shale and tar sands resources. The process, as was communicated to the NPS, is to first amend land use plans to allow for oil shale and tar sands leasing, the second step would be to offer the leases, and the third step would be to review and take action on operational permits. As we understand it, BLM envisions amending land use plans based on a broad, generalized look at the potential for leasing with little detail. At the leasing phase where compensatory property rights would be created, the Bureau would prepare a detailed environmental analysis. At the site-specific permitting stage, the Bureau would carry out a final analysis of specific development proposals.

We appreciate that BLM is required to carry out § 369 of the Energy Policy Act of 2005, which directs that "[n]ot later than 18 months after the date of enactment of this Act…the Secretary shall complete a programmatic environmental impact statement for a commercial leasing program for oil shale and tar sands resources on public lands, with an emphasis on the most geologically prospective lands within each of the States of Colorado, Utah, and Wyoming." This Congressional direction calls for an analysis over a very large area under a very pressing timeframe, further complicating the Bureau's task. In addition, we realize that the Bureau has had to contend with a host of uncertainties and has had to make an array of assumptions in preparing this analysis.

As you know the mission of the National Park Service is to protect parks and to provide for their enjoyment in a manner that will leave them unimpaired for future generations. Because oil shale or tar sands development could adversely impact units of the National Park System, the Bureau must take into consideration such impacts in light of the Secretary's duties under the NPS Organic Act (16 USC 1, et. seq.) before opening public lands to such development. Among other things this act directs that "[t]he authorization of activities shall be construed and the protection, management and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which

267-001

TAKE PRIDE IN AMERICA

OSTS_00267

these various areas have been established, except as may have been or shall be directly and specifically provided by Congress."

The following eight units of the National Park System have a very high potential for being adversely affected by cross-boundary or direct impacts from exploration and development activities in what the PEIS calls the Region of Influence: Arches, Black Canyon of the Gunnison, Canyonlands and Capitol Reef National Parks; Colorado, Dinosaur and Fossil Butte National Monuments; and Glen Canyon National Recreation Area. Numerous additional national park units in the western United States could be adversely impacted by the regional air and water impacts likely to be generated from large scale, industrial activities associated with oil shale and tar sand development.

The PEIS contains a great deal more factual and background information useful to the analysis. But, from our perspective, the draft should still comprehensively analyze a mineral leasing and development process in the context of the three-state region that is also home to numerous National Park System units. New technologies may emerge but, fundamentally, what is being considered is an industrial process that requires logistics and infrastructure, uses electrical power and water, needs employees and oversight for operations, produces product that requires transport and has resultant impacts. Thus, we believe many of our comments from the scoping process (January 26, 2006) and our review of the preliminary draft (June 11, 2007) are still relevant.

267-001 (cont.)

We remain concerned with the potential impacts to NPS managed lands in light of the special protection they are afforded on behalf of the American public. As a result, we expect that any analysis of possible impacts associated with leasing of oil shale and tar sands will include an evaluation of the large scale, industrial development that may result from amending the twelve BLM Resource Management Plans. We are committed to working closely with BLM as the proposed plan amendment, possible leasing, and development scenarios move forward. We have prepared the attached detailed comments, which are geared toward improving the analysis contained in the environmental document and in assisting the BLM in meeting the requirements set forth in both the Energy Policy Act of 2005 and the National Environmental Policy Act (NEPA).

Thank you for the opportunity to comment on the PEIS. Questions or comments regarding this memorandum may be directed to Cordell Roy, State Coordinator—Utah, at (801) 741-1012, ext. 101 or his eMail address at cordell_roy@nps.gov.

Michael D. Snyder For

cc: Superintendents, GLCA, DINO, FOBU, CARE, CANY, ARCH, COLM, BLCA
Robert F. Stewart, Regional Environmental Officer, DOI-OEPC, P. O. Box 25007 (D-108), Denver, CO 80225-0007
Jacob Hoogland, WASO
Dale Morlock, WASO
Chris Turk, IMR
John Reber, IMRO
John Keck, NPS MT/WY Coordinator
James Doyle, NPS CO Coordinator
John Vimont, Carol McCoy, Kerry Moss, GRD

DOI-BLM
CO-STATE OFFICE
2007 SEP 19 AM 11:29

OSTS_00267

ATTACHMENT

NPS Comments on Draft BLM Programmatic EIS to Amend Land Use Plans to Allow Oil Shale and Tar Sands Leasing in Colorado, Utah and Wyoming (DES 07-06)

General Comments

The National Park Service has three primary concerns with the PEIS. First, the document limits its focus to amending 12 land use plans to open BLM managed lands for commercial leasing. As a result, the document does not fully address the requirements of the Act, which calls for a programmatic environmental impact statement for a commercial leasing program for oil shale and tar sands resources on public lands. It leaves the specifics of a commercial leasing program to a later time, and states that the Bureau intends to handle the NEPA compliance on such a program on a lease by lease basis.

Second, the document presents options for opening lands to commercial scale oil shale and tar sands development through a federal leasing program yet does not adequately analyze the impacts of doing so. Couched in terms that new technologies will emerge that may avoid many of the impacts associated with existing technology, the analysis presents an optimistic picture that impacts associated with the development of oil shale and tar sands can be avoided in the future. While such technologies may be developed in the future, NEPA compels a rigorous analysis based on available technology and information on environmental and socio-economic impacts. The current document does not reflect this requirement. 267-002

Third, in the past, BLM has always advised the NPS that it is most helpful to the Bureau if the NPS would raise adjacent park protection concerns during the Bureau's land use planning process when the Bureau is developing and/or amending existing land use plans. However, as relayed in the PEIS and conveyed to Director Bomar, the Bureau is now assuring us that the best time to raise park protection concerns is at the leasing stage. As a result, we will remain fully engaged in this process and will provide input at the leasing and site-specific permitting phase.

Depending upon the proximity of NPS units to potential oil shale or tar sands exploration or development, cross-boundary direct or indirect adverse effects may occur in the form of air or water quality impacts, sound, night sky, or visual impacts, and impacts on biologic or cultural resources. We also believe that large scale, industrial development associated with oil shale and tar sand development carries with it the potential for regional air and water impacts that may affect numerous parks in the western United States.

We realize that the BLM changed the focus of the draft preliminary EIS as a result of the Cooperating Agencies initial comments that the lack of information about specific, emerging technologies and their impacts rendered the analysis too speculative to support a decision to issue any leases. This same issue is evident in the current document, in which BLM's preferred alternative, Alternative B, makes nearly two million acres of public land available for oil shale and tar sands leasing without fully analyzing the magnitude of potential impacts to the environment. Under regulations implementing NEPA at 40 CFR § 1500.2(b), "[e]nvironmental impact statements shall be concise, clear, and to the point, and shall be supported by evidence that agencies have made the necessary environmental analysis." 267-003

After a careful review of Appendix A of the draft EIS, we believe that sufficient knowledge does exist to determine probable locations for future oil shale or tar sands development, and to project the type and extent of environmental impacts that may occur using current technology. The extensive history associated with past efforts to develop the oil shale resource along with the known impacts related to that development as presented in Appendix A would allow the BLM to undertake a more detailed and informative analysis than that presented in the existing document.

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Deferring a detailed analysis of environmental impacts associated with the development of the oil shale and tar sands resource to the leasing stage of the process may not provide decision makers with enough information to fully comprehend the cumulative environmental consequences of making nearly two million acres of public land across a three-state region available for oil shale and tar sands leasing and subsequent commercial scale development. 267-003 (cont.)

Considering the above issues, we offer two separate options for the BLM that we believe would lead to a more appropriate analysis of potential development of the known oil shale and tar sands resource.

1. Postpone the programmatic environmental impact analysis for oil shale and tar sands development until the recently approved Research, Development and Demonstration projects bring to light results that can be applied to large scale development. We realize that given the direction contained in § 369 of the Energy Policy Act of 2005, this option may not comport with that statute. 267-004

2. Rewrite applicable sections of the exiting EIS to reflect documented impacts associated with currently available technology for development of the oil shale and tar sands resource. We recommend using the significant amount of information presented in Appendix A of the current document as a starting point.

Detailed Comments

Chapter 2, Page 2-2, Section 2.2.1, Existing Relevant Statutory Requirements – We recommend that the final EIS indicate that a large portion of the Tar Sands Triangle Special Tar Sand Area is located within Glen Canyon National Recreation Area. Glen Canyon, which is one of three NPS units open to federal mineral leasing, is not analyzed in the draft EIS because NPS lands are not considered "public lands" as defined under the Federal Land Policy and Management Act of 1976. However, lands in Glen Canyon may be subject to leasing of the tar sands resource in conjunction with other lands in the Tar Sand Triangle area thereby contributing to possible local and regional environmental impacts. With this in mind, we suggest the following language be added to Section 2.2.1: 267-005

43 C.F.R. §3141.4-2 (b) states that "[t]he issuance of combined hydrocarbon leases within units of the National Park System shall be allowed only where mineral leasing is permitted by law and where the lands are open to mineral resource disposition in accordance with any applicable Minerals Management Plan. In order to consent to any issuance of a combined hydrocarbon lease or subsequent development of combined hydrocarbon resources within a unit of National Park System, the Regional Director of the National Park Service shall find that there will be no resulting significant adverse impacts to the resources and administration of the unit or other contiguous units of the National Park System in accordance with §3109.2 (b) of this title. (Emphasis added).'" We also request that this paragraph contain the statement that "the finding of no resulting significant adverse impacts to the resources and administration of NPS units is a statutory and regulatory responsibility of the Regional Director, National Park Service, and is not a function of this EIS." 267-006

We recommend that sections of the final EIS addressing tar sands resources leasing contain a statement to the effect that the BLM recently adjudicated the status of 13 expired Combined Hydrocarbon Leases (CHL) in the State of Utah. Due to what the BLM has characterized as an administrative error which caused the leases to expire, BLM proposes to reinstate the leases upon payment of back rentals by lessees. The pending CHL leases cover over 148,000 acres and include lands in the Grand Staircase Escalante National Monument, several Wilderness Study Areas, and Glen Canyon National Recreation Area. The potential development of these leases needs to be factored into the cumulative analysis of the impacts associated with tar sands development in the areas that the Bureau is considering amending lands use plans to allow for new tar sands leasing. 267-007

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Chapter 3, Page 3-95, Section 3.5.1.2, Global Climate Change – This section of the draft EIS addressing climate change contains language from various literature searches (Intergovernmental Panel on Climate Change and the National Academy of Sciences) acknowledging the potential effects of "greenhouse gas" emissions on global climate. However, the document does not present an analysis that would estimate the potential contribution to this phenomenon from oil shale or tar sands development. On February 28, 2008, the International Center for Technology Assessment, Natural Resources Defense Council, and Sierra Club filed a formal legal petition with the Council on Environmental Quality (CEQ) seeking to assure that climate change analyses are included in all federal environmental review documents. While CEQ is not yet requiring that NEPA documents contain an analysis of a project's potential contribution to global climate change, it is important to note that the Pew Center on Global Climate Change has stated that the refining of Canadian petroleum derived from Alberta oil sands produces 15 to 40 percent more carbon dioxide emissions than conventional oil. Section 526 of the Energy Independence and Security Act of 2007 states that "[n]o Federal agency shall enter into a contract for procurement of an alternative or synthetic fuel, including a fuel produced from nonconventional petroleum sources, for any mobility-related use, other than for research or testing, unless the contract specifies that the lifecycle greenhouse gas emissions associated with the production and combustion of the fuel supplied under the contract must, on an ongoing basis, be less than or equal to such emissions from the equivalent conventional fuel produced from conventional petroleum sources."

When considering the global climate change implications associated with the production, refining, and eventual combustion associated with the potential 61 billion barrels of petroleum derived from oil shale and tar sands resources contemplated under BLM's preferred alternative, we recommend that the BLM include a detailed climate change analysis in the final EIS.

267-008

Chapter 3, Page 3-232, Section 3.10.3.1 Visitation Statistics – Visitation to units of the National Park System is carefully tracked and reported in a timely manner. These data with accompanying economic and employment information is available at our website (**www.nps.gov**). For the eight parks in the Region of Influence the cumulative annual visitation (2006) is 4,460,683. The economic valuation of visitor spending for these parks in 2006 was $285,501,000. Tourism is a huge industry in the intermountain west. Given the 83 Federal and State Recreation Areas listed in Table 3.1.2-1 a more comprehensive discussion of tourism and visitation could be presented in this section than the one sentence mention of 1999 visitation from three Utah State Parks. The Institute for Outdoor Recreation and Tourism at Utah State University has great expertise in these matters and could provide great assistance to BLM in preparing the final EIS.

267-009

Chapter 3, Page 3-233, Section 3.10.4 Transportation – This brief section seems to focus on county roads. Based on information we have received from State of Utah Department of Transportation logistics planners, state highways in the Region of Influence are already stressed and exhibiting much shorter pavement life-cycling just from today's intense oil and gas activities. Add to that the level of development anticipated in BLM's earlier Reasonably Forseeable Development Scenario for oil shale and tar sands and we are concerned that transportation infrastructure impacts would be compounded. We mention this because such impacts, in addition to creating unsafe conditions, can adversely affect park visitation. For a more complete discussion of this issue, we refer BLM to our June 11, 2007 memorandum.

267-010

Chapter 4, Page 4-29, Section 4.5, Water Resources (and all other water resources sections) – We recommend that BLM undertake a more in-depth analysis of region-wide water consumption needs and possible contamination issues. As a downstream recipient of regional waters and manager of land resources dependent on regional aquifers, the NPS is concerned with the amount of water that may be consumed by large scale oil shale and tar sand development within the BLM's two million acre preferred alternative. As written, the draft EIS does not model or predict possible water quality and quantity impacts to region-wide resources including those managed or depended upon by other federal land management agencies.

267-011

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Air Resources (all sections) – The draft EIS air quality sections do not analyze potential impacts to air quality in NPS units as well as regional air quality due to oil shale and tar sands development in the three state areas. The draft document states that it is not analyzing impacts to air quality "[s]ince all activities conducted or approved through use authorizations by the BLM must comply with all applicable local, state, tribal and federal air quality laws, statutes, regulations, standards, and implementation plans, it is unlikely that future oil shale/tar sands leasing and development would cause significant adverse air quality impacts." (See Mitigation Measures sections 4.6.2 and 5.6.2.) Another paragraph states that "[i]mpacts on air quality would be limited by applicable local, state, Tribal, and federal regulations, standards, and implementation plans established under the Clean Air Act and administered by the applicable air quality regulatory agency, with EPA oversight." There are many potential air quality related ecological effects that can occur at levels well below the values set in the aforementioned air quality laws, statutes, regulations, standards, and implementation plans. The final EIS should evaluate air quality impacts and can not dismiss them by pointing to other regulatory authorities.

267-012

We recommend that the final EIS address air quality impacts to the national ambient air quality standards (sulfur dioxide, nitrogen dioxide, ozone, carbon monoxide, particulate matter, and lead), maximum allowable increases of regulated pollutants (increments), mercury, carbon dioxide, visibility, and atmospheric deposition. We also recommend that it address air quality regionally, globally (carbon dioxide and mercury), and the special protection afforded Class I wilderness areas and national parks designated under the Clean Air Act.

Under some of the alternatives 12,000 to 15,000 megawatts of electrical generation are identified. If this is accomplished with typical coal-fired power plants it would mean the construction of six to eight new generating stations. The NPS experience to date has been that a single power plant has the potential to cause significant, and at times adverse, effects in those areas. The scale of the power generation raises concerns. We recommend that the air quality impacts from power generation in combination with the hydrocarbon processing be analyzed.

Lands Acquired under the Land and Water Conservation Fund (L&WCF) and the Urban Park and Recreation Recovery Programs (UPRR) – We recommend that BLM analyze in the final EIS whether any lands acquired using funds under the L&WCF and the UPRR programs would be affected by proposed oil shale and tar sands leasing and development. The NPS was unable to determine which if any such areas may be impacted. There are 3 sites in Colorado, 4 sites in Utah, and 31 sites in Wyoming acquired with L&WCF assistance.

We recommend that the Bureau consult directly with the officials who administer the L&WCF program in the State of Wyoming, Colorado and Utah to determine any potential conflicts with section 6(f)(3) of the L&WCF Act (Public Law 88-578, as amended). This section states:

267-013

> "No property acquired or developed with assistance under this section shall, without the approval of the Secretary [of the Interior], be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the ten existing comprehensive statewide outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location."

2008 DEC 19 AM 11:30
CO STATE OFFICE
BUREAU OF LAND MGMT

Responses for Document 00267

00267-001: Thank you for your comments. As a cooperating agency on the PEIS, you provided special expertise and agency knowledge that was valuable in helping to draft the PEIS. As preparation of the PEIS proceeded, and in consultation with all the cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies, and consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. Since the PEIS's allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications, subsequent NEPA analysis will be required prior to the leasing and any development activities.

As required by NEPA, the BLM will prepare the appropriate level of NEPA analysis based on the nature and scope of subsequent leasing and development actions. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. The BLM is committed to providing the National Park Service the opportunity to become a cooperating agency on any subsequent NEPA analyses.

00267-002: The BLM is aware of the requirements of the Energy Policy Act of 2005, but the BLM is also aware of the requirements of other laws when preparing a programmatic environmental impact statement. The Energy Policy Act of 2005 did not exempt the Secretary from complying with the NEPA and other environmental laws and associated regulations. Consistent with the congressional mandates and in full compliance with NEPA, the BLM is moving forward with this broad-scale PEIS that analyzes the environmental consequences of a land use planning allocation decision. As pointed out by the cooperating agencies, the BLM cannot acquire information at this time to project the number, locations, or technologies of future commercial oil shale operations. Congress has not authorized the BLM to delay this PEIS until technologies have been proven commercially viable. Thus, this PEIS supports the programmatic decisions to amend land use plans to open certain lands to further consideration of oil shale or tar sands leasing and to close other lands to such leasing.

The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). The BLM cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those type of impacts may occur.

This PEIS fulfills three purposes: (1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; (2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and (3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner. It also reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment.

00267-003: It is correct that it is most helpful to the BLM if the National Park Service raises adjacent park protection concerns during the BLM's land use planning process. However, for oil shale development, the BLM anticipates that it would proceed in a three-step decision-making process instead of, although similar to, that used for federal onshore oil and gas (two-step process). The BLM determined that it was necessary to segregate the normal process into (1) the allocation decision, (2) the leasing decision, and (3) the permit or plan of development decision because of the experimental stage of the oil shale and tar sands technologies. Normally, the BLM is able to include sufficient site-specific information in its NEPA documentation for RMP amendment so that an additional NEPA document is not required for issuing an oil and gas lease. The BLM welcomes the National Park Service's continued participation in subsequent NEPA analysis.

For the BLM to undertake a more detailed analysis, as suggested, too many unsupportable and highly speculative assumptions would need to be made, which would call into question the ability to make an informed decision. However, the BLM, using comparable information based on BLM's experience with surface-disturbing activities from other types of mineral development and the best available information, such as that contained in Appendix A, discloses potential impacts (direct, indirect, and cumulative) and provides the decision maker with available, essential information for making the allocation decision. At the leasing decision stage, a more specific analysis would be able to be completed based on more specific technical and environmental information.

00267-004: The National Park Service correctly states that Option 1 does not comport with the requirements of Section 369 of the Energy Policy Act of 2005. As discussed in response to Comment 00267-003, for the BLM to perform the analysis as suggested in Option 2 would require too many unsupportable and highly speculative assumptions and would call into question the ability to make an informed decision.

00267-005: Thank you for your suggestion to enhance the description of the process that would take place if oil shale or tar sands development would be considered on NPS lands. However, this PEIS addresses only BLM-administered lands, and the process for NPS lands is outside the scope of the decision to be made.

00267-006: This comment is a continuation of the previous comment; please see response to Comment 00267-005.

00267-007: Although these CHL leases do exist, for the purposes of analysis in the PEIS, the BLM assumed no development on these leases, because during the last 20 years no activities or development proposals were submitted to the BLM (see Section 2.4.2). The industry has not demonstrated any technology for tar sands that would be commercially viable. However, the cumulative impacts analysis for tar sands development (Section 6.2.5) does acknowledge the potential for tar sands development on nonfederal lands, and text has been added to state that there may also be future development on CHLs.

00267-008: Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources. This section also indicates that the assessment of GHG emissions and climate change is in its formative phase, and it is not yet possible to know with confidence the net impact on climate. In addition, the Final PEIS has been modified to include the following text: "The lack of scientific tools designed to predict climate change on regional or local scales limits the ability to quantify potential future impacts. However, potential impacts on air quality due to climate change are likely to be varied. For example, if global climate change results in a warmer and drier climate, increased particulate matter impacts could occur because of increased windblown dust from drier and less stable soils. Cool season plant species' spatial ranges are predicted to move north and to higher elevations, and extinction of endemic threatened and endangered plants may be accelerated. Because of the loss of habitat, or competition from other species whose ranges may shift northward, the population of some animal species may be reduced. Less snow at lower elevations would be likely to impact the timing and quantity of snowmelt, which, in turn, could impact aquatic species."

00267-009: As public land in the three state ROIs is primarily used for hunting and other forms of dispersed outdoor activities, the numbers of visitors using these lands for these recreational activities are not available from all administering agencies. Although, as the commentor suggests, data on visitation may be available from some agencies, total visitation to each ROI is incomplete. Assessment of the impacts of oil shale or tar sands development on the recreational economy analyzes the impact of losses in employment and income in the sectors providing recreation goods and services in each ROI, and does not depend on visitation

statistics. Resources in each ROI used for recreation are listed in Table 3.1.2-1 of the PEIS.

00267-010: The transportation sections in Chapters 4 and 5 of the Final PEIS have been supplemented to ensure that the discussion of impacts are consistent with the decisions in the PEIS. The Natural Park Service's comments are being addressed at a general level because of the lack of information regarding where development may occur.

00267-011: The PEIS uses long-term hydrologic data, states' water plans, and historical water consumption data to evaluate regional water availability in the oil shale basins. Potential contamination of water resources is also addressed at a programmatic level (see Section 4.5). The PEIS lays an analytical foundation for subsequent project-specific NEPA documents regarding oil shale leasing and development. The amount of water that may be consumed depends on many factors, including scale of development, technologies used in the development, economy, and the locations and hydrologic conditions of project sites. The development also is restricted by the ownership of water rights by developers at the time they apply for leasing. Finally, whether enough water is available for development depends on the results of intensive negotiations between various parties, including water rights owners, state and federal agencies, and municipal water providers as well as the developers.

The PEIS does not model possible water quality and quantity impacts to region-wide resources because there are so many factors that remain undefined. This PEIS is a programmatic-level document, analyzing allocation decisions. These allocations do not authorize the immediate leasing of the lands for commercial development, nor do they authorize commercial development. Modeling at this stage would rely on many speculative assumptions and would generate unreliable results for use in future project-specific NEPA analyses.

00267-012: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be

fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00267-013: The decisions in the PEIS would only apply to BLM-administered lands that are open to mineral entry. In the case of any acquired lands, the BLM must publish an "opening order" that would make them available for mineral development. In the specific case of lands acquired by the BLM utilizing LWCF funds, the lands are not opened to mineral entry because of the clause contained in the comment. For that reason, no BLM-administered lands acquired utilizing LWCF funds would be available for application to lease under any alternative in the PEIS.

OSTS_00268

From: Junee Kirk [mailto:junee.kirk@comcast.net]
Sent: Tuesday, April 22, 2008 12:28 AM
To: ostseiswebmaster@anl.gov
Subject: Oil Shale and Tar Sands Question about Web Commenting

Dear BLM:

I urge the BLM to step back from the leasing of huge tracts of Western Colorado: Routt, Eagle, and Garfield counties to the commercial oil shale extraction companies. This is only 'a poke in the pig" for the significant negative impact this extractive process will have on the environment, will have a devastating, lasting effect on agriculture, wildlife and recreation in this area. 268-001

It is not worth the permanent destruction, when the same amount of energy gained, could be recouped by a concerted effort in energy savings by the public, given the right incentives. We other energy resouces which should be tapped. Once we ruin the wildnesses areas of the White River National Forest, its wildlife and ecosystem, it is gone forever.

They type of extrative energy policy is far too unproven, and will reap permanent damage to an ecosystem and area which is one of the last remaining pristine wildlife areas which should be preserved.

This energy policy, in a time of Global warming, over population, and deforestation should be revisited with renewable energy sources, and not oil shales extraction which depletes too much of our scarce water supply and dececrates our public lands, diminishing our wildlife which are already threatened by constant, continual human encroachments. 268-002

For the most part this new method of extraction is largely unproven with its successes, and the negative outcomes far out weigh the positive.

BLM should understand this, and I urge them to look to the future of this planet, by looking locally, and judging how this devastating Energy Policy Act of 2005 in the long run solves little,compared to the negative impacts it will leave forever.

Sincerely,

Junee Kirk
Aspen, Colorado

Responses for Document 00268

00268-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

00268-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

OSTS_00269

mail_ostseisarchives

From: ostseiswebmaster@anl.gov
Sent: Monday, February 11, 2008 5:38 PM
To: mail_ostseisarchives
Subject: Oil Shale and Tar Sands Comment

Thank you for your comment,

The comment tracking number that has been assigned to your comment is Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: February 11, 2008 05:38:03PM CDT

Oil Shale and Tar Sands
Draft Programmatic EIS Comment:

First Name:
Last Name:
Address:
City:
State:
Zip:
Country:
Privacy Prererence:

Comment Submitted:
Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 269-001 269-002 269-003

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 269-004

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 269-001 (cont.)

Sincerely,

Questions about submitting comments over the Web? Contact us at: ostseiswebmaster@anl.gov or call the Oil Shale and Tar Sands Webmaster at (630)252-6182.

Responses for Document 00269

00269-001: The BLM acknowledges the commentor's preference for Alternative A.

00269-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00269-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

00269-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

OSTS_00270

mail_ostseisarchives

From: ostseiswebmaster@anl.gov
Sent: Monday, February 11, 2008 5:43 PM
To: mail_ostseisarchives
Subject: Oil Shale and Tar Sands Comment OSTSD

Thank you for your comment,

The comment tracking number that has been assigned to your comment is OSTSD. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: February 11, 2008 05:42:28PM CDT

Oil Shale and Tar Sands
Draft Programmatic EIS Comment: OSTSD

First Name:
Last Name:
Privacy Preference:

Comment Submitted:
Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 270-001 270-002 270-003

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 270-004

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 270-001 (cont.)

Sincerely,

What's at stake:

On December 21, 2007, the Bureau of Land Management released a draft programmatic environmental impact statement proposing to open up almost 2 million acres of public lands in Wyoming, Colorado, and Utah to commercial leasing of oil shale and tar sands -- a nonconventional type of fossil-fuel energy production that requires an incredible amount of energy and emits tremendous amounts of greenhouse gases. 270-005

Oil shale rock must be heated up to about 900 degrees F to release the oil, and at least 40 percent of the energy value of the shale is consumed in production. Producing 1 million barrels of shale oil a day, as some have proposed, would require 10 new (and likely coal-fired) power plants and five new coal mines just to serve them, costing taxpayers billions, consuming millions of tons of coal and acre-feet of water each year, and producing an astronomical amount of greenhouse pollution. Development of oil shale and tar sands in the Rocky Mountains would also hurt species that depend on our public lands and 270-006

OSTS_00270

waters for survival, including migratory birds, endangered plants, and federally protected fish species like the humpback chub, Colorado pikeminnow, razorback sucker, and others. 270-006 (cont.)

The Bureau of Land Management's controversial proposal would fuel an outdated, fossil-fuel-intensive energy infrastructure and comes at a time when we need to be rapidly transitioning away from fossil fuels-based energy production. If "business as usual" greenhouse gas emissions continue, over one third of the world's plants and animals will be committed to extinction by the middle of this century or before. 270-001 (cont.)

It is time to tell the Bureau of Land Management that the environmental catastrophe known as oil shale and tar sands development will never be viable. Please write today to voice your opposition to this ill-conceived proposal.

Questions about submitting comments over the Web? Contact us at: ostseiswebmaster@anl.gov or call the Oil Shale and Tar Sands Webmaster at (630)252-6182.

Responses for Document 00270

00270-001: The BLM acknowledges the commentor's preference for Alternative A.

00270-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

00270-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

00270-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

00270-005: Thank you for your comment.

00270-006: The comment expresses concern for impacts on a number of federally protected species including migratory birds and threatened and endangered species. The impacts of leasing and development on these species are presented and discussed in Sections 4.8 and 5.8 of the PEIS.

The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that could be available for future application for leasing for oil shale or tar sands development. The proposed action is primarily a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on migratory birds or threatened or endangered species. Project-specific NEPA assessments and consultations would be conducted prior to any future leasing or development decisions.

OSTS_00271

BLM OIL SHALE AND TAR SANDS DRAFT PROGRAMMATIC EIS COMMENT FORM

The Bureau of Land Management (BLM) invites you to participate in the comment process for the *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS)*. The Public Comment period is open from December 21, 2007 until March 20, 2008. You can submit comments via the project web site **ostseis.anl.gov**, by mailing this and any other materials to the following address: BLM Oil Shale and Tar Sands Draft Programmatic EIS, Argonne National Laboratory, 9700 S. Cass Avenue, Argonne, IL 60439, or by handing this form to a BLM representative at the Open House.

(Please print clearly)
NAME Ken Beitel ORGANIZATION Public

ADDRESS 4410 Lunlow St, Boulder, CO 80305

SUBMITTING PERSONAL INFORMATION: You must submit your name for your comment to be considered. Any other information is optional.

WITHOLDING OF PERSONAL INFORMATION: Individual respondents may request confidentiality. If you wish the BLM to withhold your name or street address from public view or from disclosure under the Freedom of Information Act, check the appropriate box below and state this preference at the beginning of your written comment. The BLM will honor such requests to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be available for public inspection in their entirety.

- [X] **My name and address are provided for the public record**
- [ ] **Withhold my name and address from the public record**
- [ ] **Withhold only my address from the public record**

Comments (feel free to write on reverse side and/or attach additional sheets):

I REQUEST THAT THIS DEVELPMENT, PROCESS AND LEASES BE STOPPED IMMEDIATELY AS THERE ~~ARE~~ ARE ZERO AVAILABLE WATER RESOURCES FOR ANY AMOUNT OF OIL SHALE DEVELOPMENT IN COLORADO, UTAH & WYOMING. 271-001

~~SA~~ EVIDENCE IS PROVIDED IN ATTACHED DOCUMENT ~~#74~~ TITLED "LAKE MEAD COULD RUN DRY BY 2021" AND THE DAVID PIERCE STUDY PUBLISHED IN WATER RESOURCES JOURNAL FEB 2008. I REQUEST THIS STUDY TO BE FORMALLY INCLUDED AS PART OF THIS PROCESS. Ken Beitel Feb 12, 2008 DENVER SHERATON OPEN-HOUSE 271-002

Lake Mead Could Dry Up by 2021

OSTS_00271

Andrea Thompson
LiveScience Staff Writer
LiveScience.com
Tue Feb 12, 2:10 PM ET

Lake Mead, a key source of water for millions of people in the southwestern United States, could go dry by 2021, a new study finds.

The study concludes that natural forces such as evaporation, changes wrought by global warming and the increasing demand from the booming Southwest population are creating a deficit from this part of the Colorado River system.

Along with Lake Powell, which is on the border between Arizona and Utah, Lake Mead supplies roughly 8 million people in the cities of Las Vegas, Los Angeles, and San Diego, among others, with critical water supplies.

The system is currently only at half capacity thanks to a recent string of dry years, researchers say.

The study's findings indicated that there is a 10 percent chance that Lake Mead could be dry by 2014 and a 50 percent chance that reservoir levels will drop too low to allow hydroelectric power generation by 2017. There is a 50 percent chance the lake will go dry by 2021, the study says.

Researchers say that even if water agencies follow their current drought contingency plans, those measures might not be enough to counter natural forces, especially if the region enters a period of sustained drought or if human-induced climate changes occur as currently predicted.

"We were stunned at the magnitude of the problem and how fast it was coming at us," said study coauthor Tim Barnett of the Scripps Institution of Oceanography of the University of California at San Diego. "Make no mistake, this water problem is not a scientific abstraction, but rather one that will impact each and every one of us that live in the Southwest."

Several studies in recent years have predicted a prolonged period of drought in the Southwest as a result of global warming.

The team's analysis of Federal Bureau of Reclamation records of past water demand and calculations of scheduled water allocations and climate conditions indicate that the system could run dry even if mitigation measures now being proposed are implemented.

"It's likely to mean real changes to how we live and do business in this region," said coauthor David Pierce, a climate scientist at Scripps.

The new study has been accepted for publication in the journal Water Resources Research.

Responses for Document 00271

00271-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

00271-002: Water availability in the PEIS was calculated on the basis of the 1988 Hydrologic Determination study that used long-term hydrologic data from 1906 to 1986. Within that period, wet years and droughts have occurred. Therefore, the water availability results represent long-term average conditions. For projected water uses, results from state water plans were used. The plans have taken regional population growth into consideration.

The BLM recognizes that the Upper Colorado River Basin is experiencing drought conditions. However, wet and dry years are both possible in the future. A prolonged drought condition can reduce water availability, as indicated in Section 4.5 of the PEIS.

OSTS_00272

RECD 2/13/08 - KIRK, JEAN TUSINSKI.

BLM OIL SHALE AND TAR SANDS DRAFT PROGRAMMATIC EIS COMMENT FORM

The Bureau of Land Management (BLM) invites you to participate in the comment process for the *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS)*. The Public Comment period is open from December 21, 2007 until March 20, 2008. You can submit comments via the project web site **ostseis.anl.gov**, by mailing this and any other materials to the following address: BLM Oil Shale and Tar Sands Draft Programmatic EIS, Argonne National Laboratory, 9700 S. Cass Avenue, Argonne, IL 60439, or by handing this form to a BLM representative at the Open House.

(Please print clearly)
NAME Karen Johnson ORGANIZATION _____

ADDRESS _____

SUBMITTING PERSONAL INFORMATION: You must submit your name for your comment to be considered. Any other information is optional.

WITHOLDING OF PERSONAL INFORMATION: Individual respondents may request confidentiality. If you wish the BLM to withhold your name or street address from public view or from disclosure under the Freedom of Information Act, check the appropriate box below and state this preference at the beginning of your written comment. The BLM will honor such requests to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be available for public inspection in their entirety.

- ☐ **My name and address are provided for the public record**
- ☐ **Withhold my name and address from the public record**
- ☐ **Withhold only my address from the public record**

Comments (feel free to write on reverse side and/or attach additional sheets):

The Botton Line
Yes, you need a profit
But just as important is retrieving a High % of product and what's Left in a Accessible State that is also Recoverable when that Technology comes along.
Do that Responsibly with our USA Resources.

272-001

Response for Document 00272

00272-001: It is BLM's policy to optimize the recovery of resources to secure the maximum return to the public in revenue and energy production and prevent avoidable waste of the public's resources in accordance with its authority under existing statutes, regulations, and lease terms.

OSTS_00273

202-429-3945

Elizabeth Waldorf
3840 NW Lincoln Ave , CORVALLIS, OR 97330

March 19, 2008 5:47 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

We have been entrusted with the glorious beauty of US lands. Natural beauty resonates with our spirit. We do not own these resources; they are our national treasure. We are obligated to protect them for our children & grandchildren. 273-001

Sincerely,
Elizabeth Waldorf
3840 NW Lincoln Ave
CORVALLIS, OR 97330

Response for Document 00273

00273-001: Thank you for your comment.

OSTS_00274

202-429-3945

Tom Thorne

1674 Yale Avenue , Salt Lake City, UT 84105

March 14, 2008 3:18 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: No oil shale development in the San Rafael Swell!

Dear BLM,

I could not be more opposed to this, the potential development of oil shale and tar sands in the San Rafael Swell. I live here in Utah and have a bond to that area, have a lot of experience (15 years) exploring it, and am a strong advocate for wilderness designation where wilderness quality lands exist. What wilderness we have left should not be handed over for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. Thanks for the opportunity to comment. 274-001

Tom Thorne SLC, UT

Sincerely,
Tom Thorne
1674 Yale Avenue
Salt Lake City, UT 84105

Response for Document 00274

00274-001: Thank you for your comment.

OSTS_00275

202-429-3945

Barbara Iverson

300 Elysian Drive , Sedona, AZ 86336

March 14, 2008 3:34 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 275-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 275-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 275-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I 275-004

OSTS_00275

strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 275-004 (cont.)

The San Rafael Swell was the home of the Fremont people. Development in this area will cause great harm to what is left of their culture and the loss of knowledge of these ancient inhabitants will be complete. 275-005

Sincerely,
Barbara Iverson
300 Elysian Drive
Sedona, AZ 86336

Responses for Document 00275

00275-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00275-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00275-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related

services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00275-004: See response to Comment 00275-001. Congress requires the Secretary to complete this PEIS, and does not provide for delaying the PEIS until complete information might become available.

00275-005: See the response to Comment 00275-001. The general cultural setting of the areas under consideration for land use plan amendment in the PEIS is described in Section 3.9. Any future proposal for leasing or development of oil shale or tar sands resources on public lands would require additional NEPA analysis that would consider the potential environmental effects on cultural resources (and other environmental and socioeconomic resources) prior to decision making. A description of the potential impacts of leasing and development on cultural resources is included in Sections 4.10 and 5.10. Possible mitigation measures that may be adopted to address adverse effects to historic properties identified in future analyses are also described; however, specific mitigation measures would be developed based on project-specific details (such as location, technology, energy requirements, etc.) in consultation with the appropriate State Historic Preservation Office(s) and interested Native American Tribes.

OSTS_00276

202-429-3945

Steven Johnson
9737 West Ohio Avenue , Lakewood, CO 80226

March 14, 2008 3:44 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

I am much opposed to opening western lands for oil chale and tar sands development. As a society, we should be working diligently to reduce consumption, rather than despoiling our public lands to increase supply. In fact, if we had worked to use energy more wisely, 30 or 40 years ago, we would not have to be considering issues like this now. 276-001

Please ignore the calls from the Bush Administration to sacrifice beautiful public lands just to keep our gas tanks full.

Sincerely,
Steven Johnson
9737 West Ohio Avenue
Lakewood, CO 80226

Response for Document 00276

00276-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00277

202-429-3945

Richard Westcott
2057 Mockingbird Drive South , Salem, OR 97302

March 14, 2008 3:47 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

I hereby go on record as opposed to oil shale development that will irreparably despoil scenic areas of "Red Rock Country", areas in the San Rafael Swell of SE Utah, and also on the Roan Plateau of Colorado.

What is this going to gain us? As far as I have been able to ascertain, the technology is rather unproven. No, let's instead strenghthen conservation measure, push for better fuel economy standards...take a page from California! 277-001

Leave our scenic natural heritage alone.

I hope you will serious consider my position.

Sincerely,
Richard Westcott
2057 Mockingbird Drive South
Salem, OR 97302

Response for Document 00277

00277-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00278

202-429-3945

Lorraine DarConte

7354 E. Calle Nostalgico , Tucson, AZ 85715

March 14, 2008 5:12 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Stop the insanity! Leave public lands alone.... 278-001

Sincerely,
Lorraine DarConte
7354 E. Calle Nostalgico
Tucson, AZ 85715

Response for Document 00278

00278-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

OSTS_00279

202-429-3945

fritz bachman

150 E. Center , Moab, UT 84532

March 14, 2008 10:06 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

I've lived through this movie before. We were told in Parachute CO, that oil shale was impractible because it took more energy to remove the oil than you had when you finished the process. Have we now found a way to make it more efficient? Or is this another boondogle to benefit some special interest?

I have visited the Swell many times, and love the beauty and the solitude of the area. Are beauty and solitude being given equal weight with someone's desire to make an obscene amount of money? 279-001

What about the wildlife and the archeological artifacts in the area. How will their destruction be compensated to future generations to whom they will only be someone else's memory?

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 279-002

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire 279-003

OSTS_00279

year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 279-003 (cont.)

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 279-004

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 279-005

Sincerely,
fritz bachman
150 E. Center
Moab, UT 84532

Responses for Document 00279

00279-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

00279-002: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00279-003: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical

generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00279-004: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00279-005: See response to Comment 00279-002. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

OSTS_00280

202-429-3945

Cathy Snow

4005 S. Lake Mary Rd. #13 , Flagstaff, AZ 86001

March 15, 2008 11:57 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

I am particulary concerned about the San Rafael Swell. This amazing landscape is full of natural and culturally important features that provide us a sense of the world that is important for us to have as an unspoiled place. It has been an important, and perhaps even secret to some, place. The fact that it is perhaps unknown to the masses of tourists and developers, it has been protected. However, because it has not had the attention of, say our national parks, there are less of us who know enough to stand up for her beauty and cultural relics. 280-001

I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 280-002

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 280-003

OSTS_00280

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 280-004

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 280-005

Sincerely,
Cathy Snow
4005 S. Lake Mary Rd. #13
Flagstaff, AZ 86001

Responses for Document 00280

00280-001: Thank you for your comment. The analysis in the PEIS takes into consideration the general geologic, cultural, and scenic values of areas such as the San Rafael Swell. Since the BLM is analyzing an allocation decision in the PEIS, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of the area prior to making a decision.

00280-002: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00280-003: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00280-004: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00280-005: See response to Comment 00280-002. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

OSTS_00281

202-429-3945

Todd Tanner

178 Wolf Creek Ranch Road , Bigfork, MT 59911

March 15, 2008 3:14 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Oil shale development

Dear BLM,

As a sportsman, I'm extremely disappointed that the BLM seems willing to sacrifice large tracts of our public lands to commercial oil shale and tar sands development.

We don't need to destroy the places we hunt and fish, and we definitely don't need to produce more carbon-intensive fossil fuels that will make our global warming problems even worse. 281-001

It's really pretty simple -- NO OIL SHALE OR TAR SAND DEVELOPMENT ON BLM LANDS!!!

Sincerely,
Todd Tanner
178 Wolf Creek Ranch Road
Bigfork, MT 59911

Response for Document 00281

00281-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00282

202-429-3945

Christopher Cokinos

4950 Hollow Road , Nibley, UT 84321

March 15, 2008 5:01 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Your Oil Shale Nightmare

Dear BLM,

To whom it may concern:

I am struck once again by the disconnect between what science is telling us about the future of a planet addicted to fossil fuels (it's not good, if you need a reminder) and the policies of your agency.

Why on earth (I mean that not only rhetorically) would you allow development of over 2 million acres for unproven oil shale and tar sand energy development in such incredible areas as Utah's San Rafael Swell?

At the very least, perhaps it would be prudent to study the matter further with a comprehensive EIS.

282-001

Certainly it seems to be the case that--even without an EIS in hand--such development will harm wildlife and recreational values in the Swell and other such affected regions for years to come.

And to what end? Short-term greed? More crap in the air? Another failure to pivot our civilization to a sustainable future? Another few gallons of fuel to get hormone-addled beef from Colorado feed lots to a Wendy's in Baltimore? Is this what it's come to?

282-002

So--go figure. No, really, I mean that: Figure out an EIS that isn't a white-wash. Figure out what the carbon-footprint costs are to this scheme. Figure out what the wildlife and recreational costs are.

282-001 (cont.)

Figure out what the future ought to be.

Sincerely,

Christopher Cokinos 4950 Hollow Road Nibley, Utah 84321 chris.cokinos@usu.edu

Sincerely,
Christopher Cokinos
4950 Hollow Road
Nibley, UT 84321

Responses for Document 00282

00282-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels. The analysis in the PEIS takes into consideration the general geologic, cultural, and scenic values of areas such as the San Rafael Swell. Since the BLM is analyzing an allocation decision in the PEIS, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of any area proposed for leasing or development prior to making a decision.

00282-002: Thank you for your comment.

OSTS_00283

202-429-3945

Annette Lamb

238 Rainbow Drive #13839 , Livingston, TX 77399-2038

March 15, 2008 5:17 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: NO oil shale development in the West!

Dear BLM,

I appreciate the opportunity to comment on the "Draft Programmatic Environmental Impact Statement" (Draft PEIS) regarding commercial oil shale and tar sands development in the West.

We own land and plan to retire in southern Utah. We feel strongly that it is important to protect our public lands from activities that have a negative impact on the environment.

I fear that the BLM is about to sacrifice large tracts of the public lands without adequate information about the true environmental and social risks of this program. 283-001

Based on experiences around the world, excavation of tar sands resources has been found to have a devastating impact on the environment. Given the irreversible, large-scale environmental damage to public lands in Utah and other nearby states by a commercial leasing program, I feel the BLM should not lease these lands until it is shown that NO negative environmental impact will occur over the long term. 283-002

This program will displace other public uses of these lands including hunting, fishing, and recreation. 283-003 We must not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. 283-004

I strongly BLM NOT to give in to pressure from commercial groups!

Sincerely,
Annette Lamb
238 Rainbow Drive #13839
Livingston, TX 77399-2038

Responses for Document 00283

00283-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00283-002: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

00283-003: The FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00283-004: See response to Comment 00283-001. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

OSTS_00284

202-429-3945

Joan Gough

441 East Center Street , Moab, UT 84532

March 15, 2008 7:41 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Afer 35 years of hiking and camping in the Swell, I can tell you it is unique in the world. For one thing there is a deversity of plants in that area that rivals Hawaii. It is also a delicate and beautiful desert environment that should be a national park, not a tar sands pit. Please do not allow tar sands extraction, or any other mining operation in that area that will impact the area any more than has been by off road vehicles and tourism. 284-001

This area should not be sacrificed for the iffy technology of tar sands extraction.

Sincerely,
Joan Gough
441 East Center Street
Moab, UT 84532

Response for Document 00284

00284-001: The BLM acknowledges the commentor's preference against tar sands development.

OSTS_00285

202-429-3945

Marvin Malek

150 Northfield St , Montpelier, VT 05602

March 16, 2008 10:53 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: I oppose Oil-Shale development in the US

Dear BLM,

I oppose the sacrifice of large tracts of public lands for excavation of tar sands and oil shale development.

1 It is an environmental disaster as proven in the Canadian West

2 It has the worst carbon imprint of almost any form of energy development

3 The land you are considering sacrificing is a precious resource

285-001

4 Public support (in the form of inappropriately inexpensive leases and minimal royalties to the public, oil-depletion allowances, etc) should be directed away from environmentally destructive technologies, and should instead be spent on renewable energy development.

285-002

For this reason, your policy is an unwise plunder of precious land, taxpayer money, and has unacceptable impacts on our nations's already heavy carbon footprint.

Marvin Malek

Sincerely,
Marvin Malek
150 Northfield St
Montpelier, VT 05602

Responses for Document 00285

00285-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

00285-002: The promulgation of regulations on environmental protection standards and setting royalty rates is outside the scope of the PEIS.

OSTS_00286

202-429-3945

Tracy Yates

4301 Harvest Hill Road , Carrollton, TX 75010

March 16, 2008 4:40 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: No Oil Shale Development in the West

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. This is an industry with an inordinately large energy usage to extract so little petroleum. the ends do not justify the means. 286-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 286-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 286-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 286-004

Sincerely,
Tracy Yates
4301 Harvest Hill Road
Carrollton, TX 75010

Responses for Document 00286

00286-001: Thank you for your comment.

00286-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00286-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00286-004: In consultation with our Cooperating Agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil

shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

OSTS_00287

202-429-3945

Michael Wallace

PO Box 235 , Victor, CO 80860

March 16, 2008 6:39 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Just because this letter is by e-mail, does not mean we are less passionate about our environment. When surveys indicate that 70% of the people you attempt to represent chose an environmentally friendly approach to enery supply, why does our current administration continue to ignore our views. I thought polititans were all about getting votes. Well our laughable George, is going to find out how the voters have turned on the failed policies. Please delay the processing of requested permits until we have a chance to vote for change. 287-001

Sincerely,

Michael J. Wallace Victor, CO 80860

Sincerely,
Michael Wallace
PO Box 235
Victor, CO 80860

Response for Document 00287

00287-001: Thank you for your comment.

OSTS_00288

202-429-3945

Jerry Liebermann

1214 16th Ave E , Seattle, WA 98112-3313

March 16, 2008 10:28 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 288-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 288-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 288-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I 288-004

OSTS_00288

strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 288-004 (cont.)

It has also been shown that harvesting oil from tar sands and shale produces up to three times the CO2 emissions as drilling for oil, thus worsening global warming. No only would this development pollute the land but it is a wasteful and non-sustainable method of energy production. 288-005

Sincerely,
Jerry Liebermann
1214 16th Ave E
Seattle, WA 98112-3313

Responses for Document 00288

00288-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00288-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00288-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related

services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00288-004: See response to Comment 00288-001. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

00288-005: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and

climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

OSTS_00289

202-429-3945

Staci Larsen
4225 S. Rowland Dr, , Salt Lake City, UT 84124

March 16, 2008 10:48 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

This is an area in which I have had profound experiences. It is one of so few untainted land spaces in this nation where an individual is able to go and experience the wilderness, a gift given to us by God. 289-001

Not only is this land beautiful, it is a place where you can feel religion.

Sincerely, Staci Larsen 4225 S. Rowland Dr.
Salt Lake City, UT 84124

Sincerely,
Staci Larsen
4225 S. Rowland Dr,
Salt Lake City, UT 84124

Response for Document 00289

00289-001: Thank you for your comment.

OSTS_00290

202-429-3945

James Bohner
100 West 250 North , Bountiful, UT 84010

March 17, 2008 2:12 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Please allow oil shale development in the West

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

While I don't agree with sacrificing our public lands for commercial use, I believe allowing this development will be a valuable step to utilizing these resources effectively. 290-001

Thank you, James Bohner

Sincerely,
James Bohner
100 West 250 North
Bountiful, UT 84010

Response for Document 00290

00290-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00291

202-429-3945

Scott Braden

343 E 300 S , Moab, UT 84532

March 18, 2008 1:43 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

The BLM must take a "hard look" at the potential impacts of oil shale and tar sands development in the west. In my state, Utah, the lands considered for this type of development underlay some of the most physically stunning landscapes in North America. The BLM must weigh the potential development against the loss of irreplaceable natural and cultural resources -- including non-WSA lands with wilderness characteristics.

Lands potentially affected by oil shale include areas near WSAs and inventoried WC lands near Desolation Canyon and the White River. The BLM must consider the effects on these landscapes. 291-001

Lands potentially affected by tar sands development include WSAs and WC lands in the San Rafael Swell, Fiddler Butte, White Canyon and Fortknocker Canyon.

The effects, both near-term and cumulative, of industrial scale extraction on these lands would be devastating to those resources and permanent.

Many studies show that the energy expended to recover these energy sources is a NET LOSS when evaluating the potential of these sources. 291-002

Additionally, most techniques for the recovery of these types of resources require abundant supplies of water -- resources that do not exist in the areas considered in Utah. 291-003

Thank you for the careful consideration of this comment.

Sincerely,
Scott Braden
343 E 300 S
Moab, UT 84532

Responses for Document 00291

00291-001: The analysis in the PEIS takes into consideration the values of WCA areas that would be included within areas open for application for oil shale or tar sands leasing, including those listed in the comment. For each WCA area, BLM has identified the overlap between the alternative scenarios and the WCA areas and has disclosed the potential impact on WCA resources should the areas be developed in the future.

Since the BLM is analyzing an allocation decision in the PEIS, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of any area proposed for leasing or development prior to making a decision.

00291-002: Thank you for your comment.

00291-003: Water availability in the PEIS was calculated on the basis of the 1988 Hydrologic Determination study that used long-term hydrologic data from 1906 to 1986. Within that period, wet years and droughts have occurred. Therefore, the water availability results represent long-term average conditions. For projected water uses, results from state water plans were used. The plans have taken regional population growth into consideration.

The BLM recognizes that the Upper Colorado River Basin is experiencing drought conditions. However, wet and dry years are both possible in the future. A prolonged drought condition can reduce water availability, as indicated in Section 4.5 of the PEIS.

OSTS_00292

202-429-3945

Nina Wouk

1259 El Camino Real #2185 , Menlo Park, CA 94025

March 18, 2008 1:59 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Oil shale development - AGAINST

Dear BLM,

The trouble with Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development, or any similar document, is that the best we can get is a relatively small amount of lousy oil. In exchange we'd have to give up an awful lot of land. Even nuclear would be more practical and create less damage. 292-001

Sincerely,
Nina Wouk
1259 El Camino Real #2185
Menlo Park, CA 94025

Response for Document 00292

00292-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00293

202-429-3945

Johanna Wilson

1123 West River Blvd. , Wichita, KS 67203

March 18, 2008 10:18 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

I know I am not alone in believing that our momentary fuel demands do not outweigh the lasting value of scant "wilderness" areas. I ask that studies of the impact of energy resource development take into account the irreversable damage done to the natural resources that feed our spirits. 293-001

I will be following the progress of this PEIS and will be politicaly active accordingly.

Thank you for your consideration of public inout.

Sincerely,
Johanna Wilson
1123 West River Blvd.
Wichita, KS 67203

Response for Document 00293

00293-001: A discussion of irreversible and irretrievable commitment of resources is provided in Sections 6.1.6.3 and 6.2.6.3 of the PEIS.

OSTS_00294

202-429-3945

Linda Lowe
200 East Market St , Greensboro, NC 27401

March 17, 2008 1:19 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Lets use the US oil supplies from Alaska, Texas and wherever they already exist that we are sending to other countries, and instead of putting more money into oil, start developing alternative fuels. Plant corn instead

294-001

Sincerely,
Linda Lowe
200 East Market St
Greensboro, NC 27401

Response for Document 00294

00294-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00295

202-429-3945

Chandler Hatch
246 N 100 E , Provo, UT 84606

March 13, 2008 7:53 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Please be extremely careful

Dear BLM,

I'd really appreciate it if you would pursue a more complete analysis of the environmental side effects of oil shale and tar sands development in the West as you write up your environmental impact statement. Please don't be short-sighted. Humans will necessarily have an impact on their environment, but any risks of permanent damage we take in manipulating the environment are only justified by necessity, not convenience. Thanks. 295-001

Sincerely,
Chandler Hatch
246 N 100 E
Provo, UT 84606

Response for Document 00295

00295-001: Thank you for your comment. Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in this PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action.

OSTS_00296

202-429-3945

Doug Smith

14 Tanglewood Drive , Durango, CO 81301

March 13, 2008 8:43 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Plans for oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale development.

We enjoy lands that have been considered for oil shale use, and we fear that such use would ruin those areas. Why not wait until we know better the availability of necessary water, and how our need for oil is balanced against preservation of water and of beautiful country in western Colorado and central Utah? As you must know, some current predictions are for severe water shortages in the Colorado River drainage basin. 296-001

In 2009, the political scene may be different from that today. It may not only be good for the country, but also it may be good for the BLM to consider oil shale development with great care.

Thank you, Doug Smith 14 Tanglewood Drive Durango, CO 81301

Sincerely,
Doug Smith
14 Tanglewood Drive
Durango, CO 81301

Response for Document 00296

00296-001: With the passage of the Energy Policy Act of 2005, Congress declared the policy of the United States to include that "oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed …." Congress also required the Secretary of the Interior to prepare a PEIS for oil shale and tar sands. The FLPMA, the Mineral Leasing Act, and the Energy Policy Act of 2005 authorize use of some BLM land for commercial oil shale leasing and development.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands.

Water availability in the PEIS was calculated on the basis of the 1988 Hydrologic Determination study that used long-term hydrologic data from 1906 to 1986. Within that period, wet years and droughts have occurred. Therefore, the water availability results represent long-term average conditions. For projected water uses, results from state water plans were used. The plans have taken regional population growth into consideration.

The BLM recognizes that the Upper Colorado River Basin is experiencing drought conditions. However, wet and dry years are both possible in the future. A prolonged drought condition can reduce water availability, as indicated in Section 4.5 of the PEIS.

OSTS_00297

202-429-3945

Susan Chandler

1060 S US Hwy 1 #99 , Vero Beach, FL 32962-5681

March 13, 2008 9:04 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from oil shale development

Dear BLM,

Step down, let people that know that private industry belongs on private land take your places.

No moral compass, no common sense.

Um, let me guess. Bush appointees.

297-001

Be gone, bad apples. Rush to the opening arms of those corporations whose special interests you've sought to promote ahead of the public welfare.

Resign.

Sincerely,
Susan Chandler
1060 S US Hwy 1 #99
Vero Beach, FL 32962-5681

Response for Document 00297

00297-001: Thank you for your comment.

OSTS_00298

202-429-3945

tom savage

pob 1447 , moab, UT 84532

March 13, 2008 9:40 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

The rush to oil shale development in Colorado and Utah seems to me to be a repetition of, and very possibly portending a worse outcome, ever mineral rush this country has known. While we wonder what to do about the deadly remains of the uranium rush, observe the still unhealed slopes and valleys carved away during gold explorations, read case after case of miners losing their lives because of the greed and lack of respect for people exhibited by mine operators, and wonder how to reclaim vast areas of natural destruction caused by open pit operations, well, here we go again. 298-001

It is not the function of the BLM to facilitate greed. Nor is it the function of the BLM to over-ride its own rules due to pressure from politicians and corporations. It is the function of the BLM to be steward to the land. That means caring for it. I do not want another few weeks or months of abundant fuel supply so that I can travel over a scorched Earth.

Sincerely Tom Savage phegleton@juno.com

Sincerely,
tom savage
pob 1447
moab, UT 84532

Response for Document 00298

00298-001: Thank you for your comment. The BLM is committed to managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands and its resources, and to provide for domestic sources of minerals.

OSTS_00299

202-429-3945

James Meier
1521 E MacArthur , Cortez, CO 81321

March 13, 2008 11:31 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. Industry is still years away from completing research and development of commercial oil shale technologies.

I beleive these lands should be developed with a careful eye. I fully support this development. I hope that these lands will be used by future generations in ways we might not know. Please think of future generations as you manage these lands. But I wholeheartedly support this develpment. 299-001

Sincerely, James Meier

Sincerely,
James Meier
1521 E MacArthur
Cortez, CO 81321

Response for Document 00299

00299-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00300

202-429-3945

Steven Kimball

2056 11th Street , Port Townsend, WA 98368-2930

March 13, 2008 11:31 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am very concerned that BLM might sacrifice large tracts of public lands without determining the true environmental and social risks of this program. 300-001

Tar sands and oil shale are some of the worst forms of fossil fuels. In addition to the tremendous, large-scale local environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, exploitation of such resources will only worsen global warming and push us closer to catastrophic and irreversible climate change. Current science indicates that we have less than a decade to make major reductions in our CO2 emissions if we are to avoid disaster. The development of tar sands and oil shale is not merely bad public policy, it is a crime against humanity. 300-002

BLM should definitely wait until more is known about just how this program would be carried out before completing a programmatic EIS. 300-001 (cont.)

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts.

The preferred alternative forecasts production of one million barrels of oil shale per day - which would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. This is an attack on the local environment and local people. It is also an attack on the planet and all of it's inhabitants. 300-003

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of 300-004

OSTS_00300

public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. It could also contribute to tornadoes in Kentucky, the intensity of hurricanes on the Gulf Coast, and drought here in the Southwest, in Peru and in India, etc. 300-004 (cont.)

We should never sacrifice our public lands for commercial oil shale and tar sands leasing unless industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. It is impossible in the current context to do that. 300-005

Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. Anything less would be an unconscionable act for which your children, grandchildren and dozens of generations to come will condemn you.

Sincerely,
Steven Kimball
2056 11th Street
Port Townsend, WA 98368-2930

Responses for Document 00300

00300-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00300-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate

change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

00300-003: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00300-004: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving

and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00300-005: In consultation with our Cooperating Agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

OSTS_00301

202-429-3945

Pete Gross

853 Mountain View Dr , Moab, UT 84532

March 14, 2008 1:06 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Harness the free market to achieve energy independence

Dear BLM,

Anyone who thinks oil shale and tar sands development will do anything to further the United States towards energy independence needs to read the Pentagon-funded study, "Winning the Oil Endgame." In principle author Amory Lovins own words, "Winning the Oil Endgame provides an independent, peer-reviewed, detailed, transparent, and uncontested road map for eliminating United States oil use by the 2040's led by business for profit. ... half of US oil use can be saved by efficient use and the rest substituted by saved natural gas and advanced biofuels at respective average costs (in 2000 dollars) of $12/barrel and $18/barrel," well below today's price for oil. 301-001

Oil shale and tar sands development, in addition to being environmentally destructive, cannot even compete in a free market. The American people subsidize the destruction of Colorado Plateau for one of the most uneconomical options in energy development. Not only is it a waste of money, it actually prolongs U.S. dependence on foreign oil and gas by diverting money from more profitable and productive energy investments which could hasten energy independence.

I urge the BLM to reject any oil shale and tar sands development on public land for the economic folly and environmental disaster that it is. Again, I strongly urge you to consult the study "Winning the Oil Endgame" which is available at www.oilendgame.com. 301-002

Sincerely,
Pete Gross
853 Mountain View Dr
Moab, UT 84532

Responses for Document 00301

00301-001: Thank you for your comment.

00301-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00302

202-429-3945

Jack Locker

419 Main St. #317 , Huntington Beach, CA 92648

March 14, 2008 2:22 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

How hard is it to realize that the Bush-Cheney administration has not represented Americans or protected American interests. This group of individuals are made up of the humans who live here and all the indigenous wild life. Then we must also recognize world interests. These criminals who stole the last 2 Presidential elections to take office and changed the rules of US Forestry in December of 2004 after stealing their 2nd Presidential election theft can only think of the benefits of destroying these amazing places and lining their multi-national corporate pockets.

Trying to push through Constitutional changes after committing said crimes breaking the law along with poor decision making and loser leadership has put America on the wrong path for 7 years now. Federal World Trade Tower building #7 came crashing down into itself on 9/11 in less than 7 seconds. Left uninvestigated because the Arab hijacked airplane crash excuse for turning the 47 story steel concrete skyscraper into dust 10 1/2 hours after the Twin Towers collapsed could only point to the White House. Take note that the 2nd tower hit by aircraft actually collapsed 1st. The 1st Federal World Trade Tower hit eventually did implode into itself like the others 2 Federal World Trade Towers. 302-001

Bush administration attitude all along has been screw the environment and make wars as the answer. These wrongheaded corrupt loser leaders and their Democrat accomplices need to be prosecuted in a world court for their long list of treasonous high crimes of greed and misdemeanors.

Lastly, I believe this BLM must be independently investigated as the empowered government entity given authority to act as an instrument of these Bush administration land destructors? The BLM position must examined, reviewed and I believe eliminated in the best interests of America. We must make a 180 degree turn immediately to take on the role of world environmental leaders and boldly face the impending world environmental crisis head on. Not to mention, do the right thing by protecting our wild lands and the survival interests of all concerned.

Concerned Conservationist.

Sincerely,
Jack Locker
419 Main St. #317
Huntington Beach, CA 92648

Response for Document 00302

00302-001: Thank you for your comment.

OSTS_00303

202-429-3945

Richard Searle

150 Color Cove Rd , Sedona, AZ 86336

March 17, 2008 12:29 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Allowing exploration and development of oil shale and sands is a big boondoggle give away being attempted by the Bush Administration before it is replaced by the new administration nest january.

I am totally opposed to the idea under the present circumstances. If this action is taken now it will be reversed by the next administration and Congress. Then your boss will be fired.

303-001

Sincerely,
Richard Searle
150 Color Cove Rd
Sedona, AZ 86336

Response for Document 00303

00303-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00304

202-429-3945

Judith Moffett
2336 Glensboro Road , Lawrenceburg, KY 40342

March 15, 2008 1:54 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Don't do it!

Dear BLM,

I know it's important to find energy sources other than coal, but what you're prepared to destroy is worth more than it could possibly yield in temporary fuel. Once it's gone it's gone forever, like the oil it was destroyed to make. We have to get our priorities straight: some things MUST not be sacrificed to make the economy run. The natural landscape is holier to me than any manmade religious structure, St. Paul's Cathedral or the Vatican, could possibly be. Would you destroy them if oil could be made out of them? 304-001

Sincerely,
Judith Moffett
2336 Glensboro Road
Lawrenceburg, KY 40342

Response for Document 00304

00304-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00305

202-429-3945

Shiloh Allen

1400 E. 900 N. , Logan, UT 84321

March 14, 2008 8:28 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Opportunity for oil shale development in the West

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I, as well as many Americans, am concerned about US dependence on foreign petroleum and am pleased to see that efforts are being made to tap our own country's immense resources. Not only does this program have the potential of providing a much needed energy source, but it will also provide many new jobs to the affected areas.

Thank you for not caving in to the minority demands of the well-to-do, who insist that the entire western region of the United States is their personal playground. To argue that projects such as these cause unacceptable damage to the environment is an exercise in hypocrisy. Refusal to pursue our own natural resources ensures that the greatest adverse environmental impact will continue to occur in foreign regions where there are no controls and little or no effort made by their governments to minimize or avoid such impact. The majority of Americans appreciates your efforts and look forward to the day when fuel is affordable again.

305-001

Sincerely,
Shiloh Allen
1400 E. 900 N.
Logan, UT 84321

Response for Document 00305

00305-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00306

202-429-3945

Scott McKay

395 South 200 East , Nephi, UT 84648

March 14, 2008 12:21 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

No More Tar Sands or Oil Shale Exploration! Please...it is time to start thinking of the future. Fossil fuel energy generation is a dead end. Those BLM lands are worth far more as wild places than they are as potential energy sources. Please do not cater to the whims of a few (oil companies) that will experience short-term gain at the expense of the rest of us. 306-001

Thanks--Scott McKay 395 South 200 East Nephi, UT 84648

Sincerely,
Scott McKay
395 South 200 East
Nephi, UT 84648

Response for Document 00306

00306-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00307

202-429-3945

P Hoskisson

316B JSB Brigham Young University, Provo, UT 84602

March 14, 2008 1:22 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: No need to develop oil shale deposits

Dear BLM,

Any decision to allow commercial development of oil shale and tar sands in Utah and other western states is premature. Based on the evidence from such developments in Canada, the outcome would be an environmental disaster. No one knows how badly the development will turn out. Until the necessary studies have been made and the technology has been proven, hasty and unnecessary development would be premature. 307-001

In addition, any slight benefit to the public at large of increased domestic hydrocarbon production only postpones the inevitable catastrophe of increased demand and dwindling supply. The sooner we meet that crisis head-on the sooner alternate technologies will be developed. In the meantime, in a misguided attempt to stave off that crisis, we should not allow our public lands to be sacrificed and irreparably damaged without any proof that the damage can produce a compensating benefit. 307-002

Sincerely,
P Hoskisson
316B JSB
Brigham Young University
Provo, UT 84602

Responses for Document 00307

00307-001: In consultation with our cooperating agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. Consequently, the decision to offer specific parcels for leas was dropped from consideration in the PEIS. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

00307-002: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00308

202-429-3945

Andy Wakefield

5949 1/2 Guadalupe Trail , Albuquerque, NM 87107

March 14, 2008 1:35 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

I have worked as an archaeologist for both contract companies and the National Park Service for the past 5 years or so. This work has included consulting for Bill Barrett Corporation and other oil/gas/energy corporations working in the northeastern Utah.

I have grown increasingly concerned with stream-lined oil and gas development and am very concerned about massive oil shale and tar sands development, which have and will cause major disruption to surface ecosystems and watersheds. Also, I would like the BLM to address the conflict-of-interest inherent with the Bush-Cheney Energy Plan, which was streamlined oil and gas development. Energy industries and govermental oversight agencies, all the way up to the Secretary of Interior, the Vice President, and the President, have merged to favor one use of our public lands over all others: energy development. This has disrupted watersheds, ecosystems, and cultural resources. I do not see how continued development of our public lands can continue without first addressing whether or not we have a conflict-of-interest between the Department of the Interior and the various energy companies extracting resources from our public lands. 308-001

Our public lands are a "public trust resource," which requires the BLM to manage the public's land for everyone's interests--not just corporate interests. Therefore, I endorse the below letter composed by the Wilderness Society.

Best regards,

Andy Wakefield

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be 308-002

OSTS_00308

caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 308-002 (cont.)

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 308-003

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 308-004

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 308-005

Sincerely,
Andy Wakefield
5949 1/2 Guadalupe Trail
Albuquerque, NM 87107

Responses for Document 00308

00308-001: Thank you for your comment.

00308-002: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00308-003: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00308-004: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

00308-005: See response to Comment 00308-002. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

OSTS_00309

202-429-3945

brandon parcell

325 n gibson rd apt 617, henderson, NV 89014

March 11, 2008 9:29 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West

Dear BLM,

I am sick and tired of the U.S. government giving billions of dollars in subsidies and credits to oil companies. They pay less than their fair share. When is this going to stop? Hopefully soon. 309-001

Sincerely,
brandon parcell
325 n gibson rd
apt 617
henderson, NV 89014

Response for Document 00309

00309-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00310

202-429-3945

Bassam Imam

1625 Maisonneuvd W 31109 , Montreal, QC H3H 2N4 Canada

March 12, 2008 3:18 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

Please establish a policy of protecting the environment and lands that GOD has entrusted to you. It is sad to discover that more and more virgin lands are potential targets for corporate-sponsored devastation. 310-001

Our entire planet is becoming sicker and sicker from overdevelopment.

Please do the right thing!

Sincerely,
Bassam Imam
1625 Maisonneuvd W 31109
Montreal, QC H3H 2N4

Response for Document 00310

00310-001: Thank you for your comment. The BLM is committed to managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands and its resources, and to provide for domestic sources of minerals.

OSTS_00311

202-429-3945

Dick Artley
415 EN 2nd , Grangeville, ID 83530

March 12, 2008 5:46 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: My public land is not intended to bolster corporate profit!!!

Dear BLM,

I am a retired Forest Service employee. I know exactly what's extremely harmful to the ecosystem.

I am outraged that the BLM is planning to subject two million acres of public land to oil shale development.

I hope each BLM idiot who is responsible for such an irresponsible stumt goes square to hell!!

311-001

Sincerely,
Dick Artley
415 EN 2nd
Grangeville, ID 83530

Response for Document 00311

00311-001: The proposed action is to amend land use plans to allow applications to be submitted to the BLM for leasing oil shale and tar sands resources. The BLM does not commit any resources or grant any lease rights in this PEIS.

OSTS_00312

202-429-3945

John Carothers
6500 Soquel Drive , Aptos, CA 95003

March 13, 2008 4:54 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Say no to oil shale development

Dear BLM,

Oil shale and tar oil extraction does not solve our country's energy problem. Rather than the short term gain we need long-range solutions, and these are not them. The environmental damage the proposed extraction would cause is unconscionable. 312-001

Sincerely,
John Carothers
6500 Soquel Drive
Aptos, CA 95003

Response for Document 00312

00312-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00313

202-429-3945

Harold Carr

P.O. Box 58166 , Salt Lake City, UT 84158

March 13, 2008 4:59 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: AGAINST hasty oil shale development

Dear BLM,

I am against oil shale development in the West.
I have a Ph.D in computer science and can live anywhere I want. I choose to live in Utah for its wilderness experience. Please carefully consider oil shale development before proceeding. 313-001

Sincerely Harold Carr, Ph.D.
P. O. Box 58166 Salt Lake City, Utah 84158

Sincerely,
Harold Carr
P.O. Box 58166
Salt Lake City, UT 84158

Response for Document 00313

00313-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00314

202-429-3945

Brad Clements
3907 Valley View Dr , Cedar Hills, UT 84062

March 13, 2008 5:10 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Don't allow development in the San Rafael Swell

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I understand that BLM is considering opening large areas of public lands in Utah to tar sand extraction. While this may make sense in many areas, it should not be allowed in the San Rafael Swell. This unique, beautiful area needs to be protected. In fact it should be designated as a wilderness area. 314-001

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. 314-002

Sincerely,
Brad Clements
3907 Valley View Dr
Cedar Hills, UT 84062

Responses for 00314

00314-001: Thank you for your comment, but wilderness designation is beyond the scope of the PEIS

00314-002: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

OSTS_00315

202-429-3945

Harry Newell
32 Pond St , Natick, MA 01760

March 13, 2008 5:10 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

President Bush has said that we, as a society is and as an economy, have an "addiction" to oil. There has been no better indication of the depth of that addiction than the willingness expressed in this plan to consider oil sands/tars extraction as a possible best use for some of the most wildly beautiful and pristine lands in our great West.

To my mind, if we permit this kind of development, at least as we have seen it practiced so far (in Canada), we may not scorn nor pity the drug addict who steals from his or her mother's pocketbook. I don't care what hedge funds may be willing to pay today, or tomorrow, for oil futures. We must look to conservation and other energy sources to power our future. And we must do so before, not after, we have destroyed the best of our natural landscapes, to which future generations have a prior right. 315-001

Sincerely,
Harry Newell
32 Pond St
Natick, MA 01760

Response for Document 00315

00315-001: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An alternative of developing renewable energy was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

OSTS_00316

202-429-3945

Thomas Rampton

14800 W. County Road 270 , Nathrop, CO 81236

March 13, 2008 5:10 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

No damage to these special places on the Colorado Plateau! Those who drive Hummers and expect us to tear up our wild places to fuel them are wrong. Better technology than that exists. 316-001

Sincerely,
Thomas Rampton
14800 W. County Road 270
Nathrop, CO 81236

Response for Document 00316

00316-001: Thank you for your comment.

OSTS_00317

202-429-3945

Adam Johnston
1665 Binford St , Ogden, UT 84401

March 13, 2008 5:10 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

Frankly, I'm sure that you receive much, lengthy comment on this issue. Let me just add my two cents in particular about the San Rafael Swell. This area is unmatched in its pristine, fascinating geology and hidden mysteries. We have done too much already to make such places irreparably intruded upon already, and I am very opposed to the current plan to grant more development to oil companies. 317-001

Sincerely,

Adam Johnston 1665 Binford St.
Ogden, UT 84401

Sincerely,
Adam Johnston
1665 Binford St
Ogden, UT 84401

Response for Document 00317

00317-001: The BLM acknowledges the commentor's preference against oil shale and tar sands development on public lands.

OSTS_00318

202-429-3945

Sara Machlin

PO Box 437 , Springdale, UT 84767

March 13, 2008 5:20 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 318-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 318-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 318-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I 318-004

OSTS_00318

strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information.

Personal note: I live in southern UT and visit the San Rafael swell to hike and canyoneer. Please do not allow development of this precious area for the short term greed of oil companies. We Americans can do more by conserving than by development. 318-005

Sara Machlin Springdale, UT

Sincerely,
Sara Machlin
PO Box 437
Springdale, UT 84767

Response for Document 00318

00318-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00318-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00318-003: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA

also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00318-004: In consultation with our Cooperating Agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

00318-005: The BLM acknowledges the commentor's preference against oil shale and tar sands development on public lands.

OSTS_00319

202-429-3945

David Stone

1085 West Twelfth Ave , Eugene, OR 97402

March 13, 2008 5:26 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

I am particularly concerned about development in the San Rafael Swell, my favorite destination in southern Utah. 319-001

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 319-002

Sincerely,
David Stone
1085 West Twelfth Ave
Eugene, OR 97402

Response for Document 00319

00319-001: Thank you for your comment. The analysis in the PEIS takes into consideration the general geologic, cultural, and scenic values of areas such as the San Rafael Swell. Since the BLM is analyzing an allocation decision in the PEIS, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of the area prior to a decision being made.

00319-002: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

OSTS_00320

202-429-3945

Laura Brakke

585 Pleasant BayRd , Bellingham, WA 98229

March 13, 2008 5:37 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 320-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 320-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 320-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I 320-004

OSTS_00320

strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information

320-004 (cont.)

Please stop this foolhardy and environmentally devastating plan. At the same time the BLM is expanding the area allowed for ORV which use gas for recreation at the same time ruining Wilderness for any other use. A government that encourages use of a priceless commodity for recreation and then to supply the need proposes to ruin the land to obtain the gas needs to reevaluate their priorties and principles.

320-005

Will you please protect the land and act as if there will be a tomorrow.

Sincerely,
Laura Brakke
585 Pleasant BayRd
Bellingham, WA 98229

Response for Document 00320

00320-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00320-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00320-003: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA

also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00320-004: See response to Comment 00320-001. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

00320-005: Thank you for your comment.

OSTS_00321

202-429-3945

Teresa Kunzi

1475 Brooklane Circle , Salt Lake City, UT 84124

March 13, 2008 5:37 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: AGAIN?? WTF???

Dear BLM,

OH MY GOD IS THERE ANYWHERE LEFT TO GO THAT HAS NOT BEEN TOUCHED BY YET AGAIN GREEDY, STUPID SONS OF BITCHES!!! TELL THEM TO DRILL UP THEIR ASSES FOR OIL!! WE WON'T HAVE ANY KIND OF NATIONAL PARKS, NO PLACE TO GET AWAY FROM IT ALL, NO BREATHTAKING VIEWS, NO PLACE TO CAMP, OR FISH, NO PLACES TO GO BOATING AND ENJOY WHAT NATURE HAS MADE FOR US!!! DAMNIT WE CANNOT KEEP TAKING AWAY LAND THAT DOES NOT EVEN BELONG TO US IN THE FIRST F***ING PLACE!!! WAKE UP PEOPLE LEAVE NATURE ALONE, AND GIVE SOMETHING BACK TO OUR FUTURE YOU DUMBSHITS

MAYBE YOU NEED TO START A DIFFERENT APPROACH AND SPEND YOUR MONEY AND TIME IN THE WAY OF FINDING OIL ALTERNATIVES!!!
I THINK MOTHER NATURE WILL PAY US BACK FOR TAKING AWAY WHAT IS NOT OURS TO TOUCH

321-001

NOT SINCERELY

TERESA

Sincerely,
Teresa Kunzi
1475 Brooklane Circle
Salt Lake City, UT 84124

Response for Document 00321

00321-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00322

202-429-3945

Mitchell Gershten

4700 East Iliff , Den, CO 80222

March 13, 2008 5:41 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am shall keep this simple. I am unshakably opposed to this type of resource extraction in the San Rafael Swell or other at risk lands in South East Utah. As a regular visitor to the area, I do not wish to see it despoiled for short term gain. We must find a better way. 322-001

Sincerely,
Mitchell Gershten
4700 East Iliff
Den, CO 80222

Response for Document 00322

00322-001: The BLM acknowledges the commentor's preference against tar sands development in the San Rafael Swell.

OSTS_00323

202-429-3945

Logan Hebner

Box 527 , Springdale, UT 84767

March 13, 2008 5:41 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Well here we are; the last lap, the rancid dregs of W's administration. Everbody's ready for him to go, eh?

Even the drunkest redneck I'm proud to call friend (who, incidently, has never shot anyone hunting, ever) is sick of him. Who knows what dark delerium our ghoul of a vice president is entertaining now? Face it; we're all just trying to get to next January without a housecall from Dr. Strangelove, without Bush bunker busting Democratic National Headquarters, as they are known terrorists.

Unthinkable things have become commonplace. Remember when suicide bombers were shocking? Remember when we weren't known for torture and lies, when you weren't ashamed to be an American abroad? Remember when people used to get upset when a 6 billion dollar no look bid went to a vice president's company? Remember? 323-001

Well, now some of the final throe insanity is in your court. Bomb Iran? Can't stop that. Further separate the rich from the poor? Alas. But you, reading this, can stop this one madness. Come on, you can shuffle papers for a year, can't you? Just move them from pile to pile. Send them to the No Child Left Behind folks; they're pretty clueless too. Or to Eliot Spitzer's office. Heck, a couple of archeological studies could eat up the whole year.

Please do your part to stop the madness. Just one more year...

Sincerely:
Logan Hebner Box 527 Springdale, UT 84767

Sincerely,
Logan Hebner
Box 527
Springdale, UT 84767

Response for Document 00323

00323-001: Thank you for your comment.

OSTS_00324

202-429-3945

Deborah Walter
56 Grandview Loop , Kamas, UT 84036

March 13, 2008 5:51 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Please do not allow oil and shale and tar pit development in the San Rafael Swell. We go down there every year because it is the most beautiful spot in the world. We cannot sacrifice are environment for this development. Many people live in that area, and it will destroy their lifestyle. It is a fragile desert ecology that will not ever be able to rebound from this energy development. Please do not allow this development to take place.
Thank you, Sincerely, 324-001

Deborah Walter

Sincerely,
Deborah Walter
56 Grandview Loop
Kamas, UT 84036

Response for Document 00324

00324-001: The BLM acknowledges the commentor's preference against tar sands development in the San Rafael Swell.

OSTS_00325

202-429-3945

William Gould

PO Box 158 , North Chatham, MA 02650

March 13, 2008 5:56 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Last summer we drove by a Suncor Oil Shale Plant in Alberta, Canada. They have a huge water settling pond which is beginning to pollute the aquifir and nearby river. There have been numerous articles in the Calgary newspapers regarding the ecological disaster of oil share processing when the emphasis should be on alternate sources of fuel which are non-poluting and do not use enormous supplies of precious water and power. 325-001

We emplore the BLM carefully think through the ecological impact of major shale oil developments in the Roan Plateau in Colorado and San Rafael Swell in Utah. 325-002

Please, for our gandchildren's sake, block the efforts of the major energy companies to develope these natural resources.

Sincerely,

Bill & Sharon Gould PO Box 158 North Chatham, MA 02650

Sincerely,
William Gould
PO Box 158
North Chatham, MA 02650

Responses for Document 00325

00325-001: Thank you for your comment.

00325-002: Thank you for your comment. The BLM is committed to managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals. Although no impacts to ecological resources would result from the land use allocation decision proposed in the PEIS, a programmatic analysis of possible impacts to ecological resources from future leasing and development actions are presented in Sections 4.8 and 5.8. As indicated in the PEIS, further NEPA analysis would be required at the leasing and development stages.

OSTS_00326

202-429-3945

win blevins

box 223 , bluff, UT 84512

March 13, 2008 5:58 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

We should not sacrifice our public lands for commercial oil shale and tar sands. The San Rafael, especially, is essential to living creatures, and to the human spirit. Therefore, I strongly urge the agency keep commercial exploiters out of it. 326-001

win blevins Bluff UT author of GIVE YOUR HEART TO THE HAWKS, STONE SONG, and nearly twenty other books

Sincerely,
win blevins
box 223
bluff, UT 84512

Response for Document 00326

00326-001: The BLM acknowledges the commentor's preference for not allowing access to oil shale and tar sands resources on public lands.

OSTS_00327

202-429-3945

Brit Harvey

1224 Oregon St , Berkeley, CA 94702

March 13, 2008 5:58 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am writing to register my opposition to any oil and gas exploration or development in the San Rafael swell. Please leave the oil and gas in the ground where it doesn't exacerbate global warming. Thank you. 327-001

Sincerely,
Brit Harvey
1224 Oregon St
Berkeley, CA 94702

Response for Document 00327

00327-001: Thank you for your comment. The BLM acknowledges the commentor's preference against development in the San Rafael Swell area.

OSTS_00328

202-429-3945

MARGIE Barron

1320 Picket Fence Lane , Lincoln, CA 95648

March 13, 2008 6:00 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: develop oil shale potential

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I strongly SUPPORT such development.
We are too dependent on foreign sources and must become more self reliant. 328-001

Sincerely,
MARGIE Barron
1320 Picket Fence Lane
Lincoln, CA 95648

Response for Document 00328

00328-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00329

202-429-3945

Kevin Cromar

529 W 150 Street Apt 1B , New York, NY 10031

March 13, 2008 6:07 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Do not lease land for oil shale development

Dear BLM,

I would like to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

You will receive many letters over the next few weeks in opposition to leasing lands for oil shale development. I believe that Utah has many great natural resources that can help eliminate own reliance on foreign oil. However, I also feel that there is an irreplaceable nature resource in Utah as well. The cannot coexist in the same place. 329-001

I would ask for no approval for additional resource development until portions of Utah's BLM lands are designated as wilderness.

Thank you for letting me share my comments. I grew up in Utah and have many fond memores spending time in the Swell.

Sincerely,
Kevin Cromar
529 W 150 Street Apt 1B
New York, NY 10031

Response for Document 00329

00329-001: Only designated wilderness areas and WSAs are excluded from application for leasing. “Areas recognized as having wilderness characteristics” (WCAs) have no official status that removes them from consideration for leasing. WCAs are areas that are not officially identified as “wilderness” under the meaning of the Wilderness Act of 1964, nor are they “wilderness study areas” (WSAs) that were identified by BLM inventories in the 1970s and 1980s under the authority of FLPMA. Any non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to management prescriptions established in the appropriate land use plan. Unlike WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the BLM field offices will consider all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed in the appropriate RMP actions.

OSTS_00330

202-429-3945

Toni Snidow

9323 Manchaca Rd., #1124 , Austin, TX 78748

March 13, 2008 6:08 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the Red Rock country from oil shale development

Dear BLM,

The magnificent Red Rock country of the West, such as the Roan Plateau in Colorado and the San Rafael Swell in Utah, needs to be protected from development for oil shale and tar sands. Therefore, I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. 330-001

I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 330-002

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 330-003

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 330-004

OSTS_00330

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 330-005

Sincerely,
Toni Snidow
9323 Manchaca Rd., #1124
Austin, TX 78748

Response for Document 00330

00330-001: Thank you for your comment. The analysis in the PEIS takes into consideration the general geologic, cultural, and scenic values of areas such as the Roan Plateau and San Rafael Swell. Since the BLM is analyzing an allocation decision in the PEIS, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of the area prior to a decision being made

00330-002: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00330-003: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00330-004: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00330-005: See response to Comment 00330-002. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

OSTS_00331

202-429-3945

Ralph Roberts

12859 Tewksbury Dr , Herndon, VA 20171

March 13, 2008 6:20 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

331-001

Please do not allow BLM land in the Roan Plateau and San Rafael Swell to be used for oil shale and tar sands extraction. This would irreparably damage these beautiful areas and drive away tourists like myself. I have hiked Little Wild Horse in the Swell and plan to return to spend much more time in that area when I retire. Turning the area into an industrial zone will cause many travelers to bypass Utah altogether, or to flock to over-utilized parks such as Zion, Bryce and Canyonlands. Don't let that happen!

331-002

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation.

331-003

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming.

331-004

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information.

Sincerely,

Ralph Roberts
12859 Tewksbury Dr
Herndon, VA 20171

Response for Document 00331

00331-001: Thank you for your comment. The analysis in the PEIS takes into consideration the general geologic, cultural, and scenic values of areas such as the Roan Plateau and San Rafael Swell. Since the BLM is analyzing an allocation decision in the PEIS, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of the area prior to a decision being made.

00331-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00331-003: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00331-004: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

OSTS_00332

202-429-3945

nancy williams
3020 E 3175 S , Salt Lake City, UT 84109-2120

March 13, 2008 6:32 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Please protect the West from oil shale and tar sands development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

Last weekend, I saw the current evidence on both tar sands and oil shale. What I saw showed that there is net energy LOSS from their excavation and processing. That does not even take into account the horribly negative environmental impacts. With today's technology, the only way this effort could be made "worthwhile" for anyone is through government subsidy, which I presume plays some part in the scheme of this proposed plan. What a poor way to spend our tax dollars - consuming more energy to gain less! Every taxpayer (with the exceptions of the producers themselves) would lose financially from this operation and we ALL would lose some of our precious energy reserves and the environment, most importantly, loses greatly, too. 332-001

This sort of very costly mistake should not proceed toward any further consideration until much more extensive review of the potential damages is performed. Additionally, since there does not appear to be an economical means to extract energy from either tar sands or oil shale, we should demand that the producers prove the economic merit (without inclusion of any sort of government subsidy) prior to BLM spending any effort on evaluating any plans. I anticipate that economical feasibility cannot be achieved. 332-002

As I understand, BLM already recognizes that oil shale and tar sands development would displace every other public use in large tracts of public land yet would only benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. Please look for ways to stop these sorts of proposals in their tracks. They are way too damaging to the environment which would be sacrificed forever. 332-003

I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information and to reject the idea of doing a PEIS at all if sufficient evidence is not provided to show that oil shale or tar sands can be processed in an environmentally and financially conserving way.

Thank you.

Sincerely,
nancy williams
3020 E 3175 S
Salt Lake City, UT 84109-2120

Response for Document 00332

00332-001: In consultation with our Cooperating Agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

00332-002: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00332-003: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and

additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

OSTS_00333

202-429-3945

Dave McNeil

POB 513 , Gardnerville, NV 89410

March 13, 2008 7:13 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 333-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect the beauty of the landscape and quality of the air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 333-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. Can these states afford the loss of the related tourism industry? 333-003

I spent a week traveling through the San Rafael Swell on a canyoneering trip last year. This was my first ever trip to the "Swell" and I was mesmerized by its beauty and uniqueness. I now plan on returning to the area with friends for at least a week every year I can. 333-004

OSTS_00333

We definitely should not sacrifice the amazing beauty of the landscape of the San Rafael Swell and its environmental integrity for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 333-004

Rather than pursuing the path of such an environmentally destructive energy supply option, PEIA should include thorough discussion of a extremely logical and practical project alternative option: the value of making a similar dollar investment in energy demand reduction strategies, including improving vehicle fuel efficiency, mass transit, and car pooling to save an equivalent amount of energy savings, especially when the amount of energy required to develop and extract the energy from the oil shale and tar sands is considered. When the proposed commercial oil shale and tar sands development is evaluated through such a comparison, I submit that the proposal would be extremely hard to justify its necessity in light of the expected significant damage to the environment and the tourism economies. 333-005

Thank you for your consideration of my comments.

Sincerely,
Dave McNeil
POB 513
Gardnerville, NV 89410

Responses for Document 00333

00333-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00333-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00333-003: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA

also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00333-004: See response to Comment 00333-004. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

00333-005: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

OSTS_00334

202-429-3945

Stephanie Niles
363 Silver Hill Rd , Easton, CT 06612

March 13, 2008 7:13 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

Please consider that once these lands are developed, be it by building or destruction by searching for shale/ oil/ coal... they can't be brought back. We need to be focusing on solar and other forms of renewable energy- not digging for non-renewable resources that ruin nature in the process. 334-001

Sincerely,
Stephanie Niles
363 Silver Hill Rd
Easton, CT 06612

Response for Document 00334

00334-001: The BLM acknowledges the commentor's preference for renewable energy and reducing use of fossil fuels.

OSTS_00335

202-429-3945

Jeremy Jones

1126 5th St. SE , Minneapolis, MN 55414

March 13, 2008 7:24 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

I appreciate that you've opened up the Draft PEIS for public comment. I would strongly encourage you not to sacrifice the amazing wilderness areas in Utah, Colorado, and Wyoming for development that is of questionable value. Moreover, the cumulative environmental impacts threaten to overwhelm the relatively fragile ecosystem. 335-001

The minimal gains in energy resources possible from development should not outweigh the other uses at play in the BLM's calculus.

We should not endanger our public lands for commercial oil shale and tar sands leasing until the industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. 335-002

Thank you for considering my comments.

Sincerely,
Jeremy Jones
1126 5th St. SE
Minneapolis, MN 55414

Responses for Document 00335

00335-001: The FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

00335-002: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner. Congress requires the Secretary to complete this PEIS and does not provide for delaying the issuance of the PEIS until complete information might become available. Also see response to Comment 00335-001.

OSTS_00336

202-429-3945

Susan Epstein

P.O. Box 271397 , Fort Collins, CO 80527

March 13, 2008 7:46 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

I wish to comment on the Draft Programmatic Environmental Impact Statement for commercial oil shale and tar sands development. While western lands have long been exploited for the benefit of extraction industries, there is no time like the present to stop the approval of such damaging practices. This kind of extraction is bound to damage irreversibly the lands under consideration and eliminate any other uses. I urge the BLM not to proceed with an EIS or approval of oil shale development. As more research is done, alternative solutions to oil will render this kind of development obsolete, and future generations will bemoan our short-sightedness in committing such devastation. 336-001

Sincerely, Susan Epstein

Sincerely,
Susan Epstein
P.O. Box 271397
Fort Collins, CO 80527

Response for Document 00336

00336-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00337

202-429-3945

Tim Lundahl

8221 166th St W , Lakeville, MN 55044

March 11, 2008 8:13 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: No oil shale development!

Dear BLM,

Unacceptable! It is simply unacceptable to use BLM or other public lands for oil shale and tar sands development. The large scale mining operations that these energy sources require permanently destroy the natural qualities of these areas. I can accept limited oil and gas drilling on public lands because there is some possible long term restoration from their impacts. Restoration of any acceptable quality is not possible from tar sand and oil shale mining.

Our public lands are finite resources, and the wholesale development of our Western landscapes for energy extraction must stop with this proposal. Rather, the BLM should support renewable energy generation on our lands such as wind energy. 337-001

Please prohibit any tar sand and oil shale development on BLM lands. The permanent damage that would result does not justify the limited short term energy gains that this development might bring.

Thank you for considering my concerns.

Sincerely,
Tim Lundahl
8221 166th St W
Lakeville, MN 55044

Response for Document 00337

00337-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00338

202-429-3945

Mark Edgren

900 Cragmont Avenue , Berkeley, CA 947081410

March 11, 2008 2:55 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Protect these lands from commercial development. 338-001

Sincerely,
Mark Edgren
900 Cragmont Avenue
Berkeley, CA 94708-1410

Response for Document 00338

00338-001: Thank you for your comment. The BLM acknowledges the commentor's preference to not allow commercial development on public lands.

OSTS_00339

202-429-3945

Nina Cornett

POB 685 , Cooper Landing, AK 99572

March 11, 2008 2:03 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

This is a comment on the Draft PEIS on oil shae and tar sands development: I am opposed to oil shale and tar sands development in Colorado, Utah, and Wyoming. My reasons are severalfold.

First, such development will ruin the affected area, which BLM is supposed to manage for multiple use, for all other users except this industry. That's wrong. These are our national resources; they should not be given exclusively to a profit-making industry. 339-001

Second, developing this extractive industry will require a ton of energy, which means more energy plants, almost certainly coal-fired. It probably also means higher prices for every other user of energy. Furthermore, coal is a very dirty fuel so this means more air pollution, which will drive more global warming, wiping out more species and bringing destructive climate change too quickly to adjust to it. 339-002

Furthermore, it will take so much energy to get the oil that the gain will be marginal. It would be a lot better to spend that investment in developing renewable sources like sun, wind, geothermal, tidal and similar energy technologies that don't require such a huge amount of energy just to make more energy. 00339-003

Coal-fired power plants also mean more coal mining, almost all of it by strip-mining, which means large areas of coal producing states will be despoiled. In the Appalachians, that means more mountain-top removal, which is not only destroying the homes, land, and quality of life for the residents of Appalachia, but destroying and polluting drinking water there and downstream for millions of people. 339-002 (cont.)

Third, it will take an enormous amount of water, which is becoming a critical issue everywhere, but especially in the west where there are already major water wars. Even areas that used to have plenty, like Atlanta, are finding themselves in crisis. The west cannot - in fact, no place can - stand that kind of drawdown. 339-004

OSTS_00339

Fourth, besides the impact on species world-wide, such development will fragment habitat for local wildlife, so whatever survives all the other impacts will suffer from that. 339-005

All told, the BLM needs to look at total long-term impact, all over the west, all over the country, and all over the earth, and there's precious little indication that BLM has done that in this draft PEIS. 339-006

Please select a no-development alternative for this draft PEIS

Sincerely,
Nina Cornett
POB 685
Cooper Landing, AK 99572

Responses for Document 00339

00339-001: The BLM manages public lands in compliance with FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00339-002: Evaluation of the complete impacts of power requirements for oil shale/tar sands development is considered to be too speculative for analysis at this time. The impacts of power requirements are very speculative because the amount of power required varies with technology to be implemented, and also because the source of the power (and therefore the impacts) is unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources.

Refinery requirements are also highly speculative at this time; however, the PEIS does include a preliminary assessment of these requirements, concluding that, even if significant oil shale/tar sands development occurs over the next 20 years, new national refining facilities are unlikely to be needed (see Sections 4.1.7 and 5.1.6). Additional and more detailed cumulative impact analysis (including greenhouse gas emissions) will be conducted at two subsequent stages of development: for NEPA analysis of any leasing decisions, and for NEPA analysis of sites with specific plans of development being evaluated.

00339-003: The BLM acknowledges the commentor’s preference for renewable energy sources.

00339-004: Water availability in the PEIS was calculated on the basis of the 1988 Hydrologic Determination study that used long-term hydrologic data from 1906 to 1986. Within that period, wet years and droughts have occurred. Therefore, the water availability results represent long-term average conditions. For projected water uses, results from state water plans were used. The plans have taken regional population growth into consideration.

The BLM recognizes that the Upper Colorado River Basin is experiencing drought conditions. However, wet and dry years are both possible in the future. A prolonged drought condition can reduce water availability, as indicated in Section 4.5 of the PEIS.

00339-005: The information presented in the PEIS addressing habitat fragmentation impacts to wildlife is of sufficient detail for the purposes of the PEIS. The PEIS provides an overview of habitat fragmentation impacts that could occur from commercial oil shale and tar sands development.

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. This will include an evaluation of the specific occurrences of key wildlife habitats, analyses of the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects (including those of other existing or reasonably foreseeable future oils shale and tar sand leases), reasonable alternatives, and mitigation measures to protect wildlife habitats, as well as what level of development may be anticipated. Project-specific NEPA analyses would also include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to wildlife species due to habitat fragmentation. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders.

00339-006: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in this PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing.

Subsequent NEPA analysis will be required prior to any leasing or plan of development decision and will the direct, indirect, and cumulative effects of that action. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to avoid or mitigate short-term and long-term adverse impacts.

OSTS_00340

202-429-3945

Emilie Lauran

11037 Monogram Ave , Granada Hills, CA 91344

March 11, 2008 3:07 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Please Protect US from hasty development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program.

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. 340-001

As we get closer to "peak everything" I realize that resources are going to have more and more need to be put to use. But we must learn from the current destructive pattern of slash and burn resource collection that destroys all other resources in the process, and which has led us to the precarious place our planet is in right now with regards to compatibility with life.

As we get just a little more incompatible than we have become - life on earth will begin to die off. This is being call the Sixth great extinction. Scientists have begun to see the evidence already. This imformation is readily available in books and on the internet. 340-002

As reach "peak oil" and the end of the oil 'gravy train' we must protect all the remaining resources, not just the ones we can experience immediately. It is my feeling is that we have already hit peak oil. The date was Feb. 15th, 2008. We have to leave a safety net for what happens after peak oil. The closer we get to the end of the line with our environment - the effects being proportional, logorythmic - get greater. Every mistake we make now about the envirnment has enormous impact on the future of life on earth.

OSTS_00340

History has shown that when a civilization demolishes its resources, the civilization collapses. We're closer to that now than most people realize. Environmental protection in advance of and along with resources removal is a vital neccessary ingredient to save not just our bottom line, but our civilization.

This opinion is not just 'fluff', airy-fairy, or unimportant. This is a choice between a.) favoring the most profitable way to to continue our unsustainable reality for another 40 years along with the possibility of bringing on the end of life as we have come to know it, or b.) protecting all of life along the way and ensuring the possibility of wisely adapting our selves to the current demands of the situation we are in.

340-002 (cont.)

A cohesive eco-system is a requirement, not a luxury.

Thank you for your time and attention to this important matter. I hope and pray to God that you will do the right thing. Thank you.

Sincerely,
Emilie Lauran
11037 Monogram Ave
Granada Hills, CA 91344

Responses for Document 00340

00340-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00340-002: Thank you for your comment.

OSTS_00341

202-429-3945

Edward Vaughn

10710 Evergreen Way Apt. H-106, Everett, WA 98204

March 11, 2008 1:53 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

I appreciate being allowed to comment on you Draft Programmatic Environmental Impact Statement (Draft PEIS) regarding development tar sands and oil shale in the West.

NO!!

Don't allow it!!

It is neither finacially nor environmentally a sound decision. Until extraction is perfected, it costs almost as much in erergy to draw out the oil as is gotten from the tar sands and oil shale. 341-001

And the cost to the environment is absolutely catastrophic.

There is really only ONE answer here:

Forbid this catastrophic destruction of pristine wilderness for the sake of a few barrels of oil.

Sincerely,
Edward Vaughn
10710 Evergreen Way
Apt. H-106
Everett, WA 98204

Response for Document 00341

00341-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00342

202-429-3945

John Witte
4855 SE Tenino Court , Portland, OR 97206

March 11, 2008 1:17 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

My God, don't you people at BLM have even a modicum of common sense---at least enough to know that oil shale and tar sands are marginal producers of hydrocarbons at best? Most of the rest of us Americans do! So get with you dunces and keep the rapacious oil barons off of OUR public lands!!! 342-001

John Witte Ph. D.
Portland, OR

Sincerely,
John Witte
4855 SE Tenino Court
Portland, OR 97206

Response for Document 00342

00342-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00343

202-429-3945

Steven Dias

324 Main St. , Cold Spring, NY 10516

March 11, 2008 12:53 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Please Read this, I actually wrote it m'self... except the bottom there-- :)

Dear BLM,

Hi there, folks;
As a proud citizen of this great Nation, and a thankful, respectful "user" of BLM lands, particularly The San Rafael Swell in my favorite State, Utah, a place that holds my heart-- I would respectfully ask that you hold off on development of the tar sands and oil shale in all of The West, at least until extraction, processing, and refinement function show some sign of viability. 343-001

Be that as it may, as of this writing, the oil shale/ tar sand "industries" are, realistically, still in their infancy. Even the best and brightest are having a good, hard time at presenting and providing proof of the viability of such a processing approach... While I understand that the goal of R&D is to attempt to provide a viable, and economically sound and feasible solution to such "problems", the bottom line for most agencies, yourselves included, is the money. Even for you guys, there's a crunch coming on. From a purely economic perspective, I do believe it would be a wise choice to AT THE VERY LEAST hold off until the technology is more developed in the private sector, where it's funded by knowledgeable corporations, among others--but it doesn't always produce results that are feasible to utilize the resource wisely, conservatively, and with regard to future needs, and better unit per gallon costs for the BLM on down. My roundabout point is that there's nothing there yet to pour, and why pour it right onto the ground if there's not even any yet TO pour out onto the ground... 343-002

On a whole other level, Wall St. on down, in the largest corporate arenas, are starting to take these issues very seriously, and the economics they entail,-- .These are rational, fundamental considerations that are being adopted. Simply put, there is a need for and a personal, corporate, and governmental responsibility to our future as a People, and the future of our great Country, The United States of America. It starts with conserving, respecting, and considering the Resource as well as the Company, the Nation and its People as well as the Special Interests. It simply means Respect. The only thing the Oil Sands have proven up North in Canada is that they wreck the surroundings, pollute the groundwater, air and other resources, cost way too much money to be worth all that, and it doesn't even turn a profit, and probably won't ever.

OSTS_00343

We can and should be concerned with finding, developing, and implementing new approaches to traditional forms of energy--and exploring, and racing to develop alternative energies of many kinds. However, we must also have the courage and the common sense to realize when something doesn't work, and either re-develop the whole industry, and work out the problems, or at the very least, stop putting good money after Bad. There are much more proven, lower impact, and environmentally responsible industries that need more R&D. We as a Country need to keep pace with the Sea Change of genius in The Sciences that have migrated back across the oceans--it is our responsibility as the leaders of this world, or so we claim, to set a responsible standard, lead the charge, and lead by example, not by not walking the Walk. Please do what you can to preserve our natural lands, and please, respect your Mother.

343-003

343-002 (cont.)

Sincerely,
Steven Dias
324 Main St.
Cold Spring, NY 10516

Responses for Document 00343

00343-001: Thank you for your comment. However, In the Energy Policy Act of 2005, Congress required the Secretary of the Interior to complete this PEIS, and did not provide for delaying the PEIS until complete information might become available. This PEIS considers the resources of settings such as the San Rafael Swell in terms of their geologic, scenic, and other resources. The leasing or development of oil shale or tar sands resources on public lands would require additional NEPA analysis that would consider the potential environmental effects on the various resources prior to decision making.

00343-002: Thank you for your comments.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00343-003: The BLM acknowledges the commentor’s preference for developing alternative energy sources.

OSTS_00344

202-429-3945

Clinton Speas
6555 E. Northridge Street , Mesa, AZ 85215

March 11, 2008 12:44 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

All I ask is that before this is done we know what we are getting out of it. Is this worth the cost to the land, can they get fuels from this project. 344-001

Sincerely,
Clinton Speas
6555 E. Northridge Street
Mesa, AZ 85215

Response for Document 00344

00344-001: Thank you for your comment.

OSTS_00345

202-429-3945

Matthew Emmer

4143 Via Marina , Marina del Rey, CA 90292

March 11, 2008 6:42 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

I am commenting on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. BLM seems prepared to sacrifice large tracts of public lands without adequate information as to the risks of this program. Excavation of tar sands resources is known to be environmentally devastating, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 345-001

Harming our natural lands makes bad business sense. Millions of Americans and foreigners flock to these lands each year and spend billions of dollars in park fees, lodging, gas, food, gear and other purchases. The federal, state and local governments make billions in taxes collected from these purchases. All of this would be jeopardized by BLM's short-sighted proposal. 345-002

The answer to our energy needs is not more drilling. It is clean, renewable energy such as solar power. This would free us from Middle East dictators and OPEC, and free our involvement in the Middle East, which terrorists point to as a direct cause of their hatred of us. 345-003

Therefore, I strongly urge the agency to delay completing its PEIS process at least until the agency can provide better information. 345-001 (cont.)

Sincerely,
Matthew Emmer
4143 Via Marina
Marina del Rey, CA 90292

Response for Document 00345

00345-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00345-002: The socioeconomic impacts of OSTS development are assessed from a number of perspectives, including both the benefits and costs of these developments. In addition to an assessment of the economic impacts of OSTS development on ROI direct and indirect employment and income, the PEIS also assesses the impacts of these developments on those sectors of the economy providing goods and services to recreational visitors, also in terms of direct and indirect employment and income. Based on a review of the academic literature, the impacts of OSTS development on recreation on public lands measured only in terms of visitation rates and expenditures, while excluding non-market valuation of recreational resources, could significantly underestimate the value of recreational resources. A qualitative assessment of the impacts on agriculture is also included, in the event that water restrictions to agriculture occur with the commercial development of OSTS in the three state ROIs. A qualitative assessment of the impacts on property values is also included, where it is accepted that values may decline in the vicinity of project locations, but increase where employment impacts of OSTS development and overall levels of economic development contribute to higher values. The social impacts of OSTS development on traditional uses of public lands for hunting and angling are also considered, together with the potential impacts of environmental degradation and access restrictions on public lands to low-income and minority populations.

00345-003: The BLM acknowledges the commentor’s preference for renewable energy.

OSTS_00346

202-429-3945

Luise Davis

5619 Kentucky Ave Apt 305 , Pittsburgh, PA 152322624

March 11, 2008 5:53 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

I worked on oil shale Tract CA in Colorado years ago - the 70's. As part of the project, we were scouting valleys where we could dump the enormous mountains of broken, contaminated shale that are produced in extracting the oil from the shale. The shale produces a very small amount of oil in proportion to the gigantic amounts of waste. 346-001

Back then, it was decided that it just wasn't worth the cost - in dollars and in environmental damage - and so the idea was (thankfully) dropped.

Luise Davis, Ph.D.

Sincerely,
Luise Davis
5619 Kentucky Ave Apt 305
Pittsburgh, PA 15232-2624

Response for Document 00346

00346-001: Thank you for your comment.

OSTS_00347

202-429-3945

Gerald Rilling
5307 Nottingham Dr , unincorperated, IL 61111

March 11, 2008 4:22 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

It is great that you give the public a chance to be heard on importand environmental questions.

Please always err on the side of the environment. Once destroyed, wild land can never be brought back to their original state. 347-001

We do not need to develop oil shale & tar sands AT THIS TIME. We need to learn to conserve present oil supplies. In ten or twenty years time we may not need the oil & IF we do; we will have better developed the technology to extract it. Has anyone used mircowaves to heat the oil to get it to flow WITHOUT distruption to the environmment? 347-002 347-003

Then think of you legacy; do you want to be remembered as a destroyer or a protector of the natural world. 347-001 (cont.)

Sincerely,
Gerald Rilling
5307 Nottingham Dr
unincorperated, IL 61111

Response for Document 00347

00347-001: Thank you for your comment.

00347-002: Thank you for your comment. However, in the Energy Policy Act of 2005, Congress required the Secretary of the Interior to complete this PEIS and did not provide for delaying the PEIS until complete information might become available.

The proposed action of the PEIS is a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the physical, biological, or socioeconomic environment, other than a possible effect on property values. Any future lease or development actions proposed on the lands identified as open to application may have an effect and, therefore, each lease application and/or development proposal will be evaluated by the BLM through the NEPA process to determine what impacts may occur and what mitigating measures may be applied to remove or reduce those impacts on wildlife, plants, and threatened and endangered species.

00347-003: Appendix A, Section A.3.1.2, provides brief overviews of the various technologies that have either been proposed or attempted for in situ retorting of oil shale. Heating the formation by introduction of various forms of electromagnetic energy, including microwaves, has been studied. However, regardless of the energy source that is used to pyrolyze the kerogen, there is still the potential for groundwater contamination resulting from the leaching of toxic metals from retorted shale or the incomplete recovery of organic products of kerogen pyrolysis.

OSTS_00348

202-429-3945

Barry Krayer

4143 E Bluefield , Phoenix, AZ 85032

March 11, 2008 3:20 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.
The BLM should do everything possible to grease the skids to open as much land as possible to shale and tar oil exploration, this country is looking at $4 a gallon gas because of radical environmentalists and the stupid no drilling in America mentality they have. Not every area in America is some pristine wilderness area that should be protected for eons. It is time to do what is right and save us from foreign oil enslavement. 348-001

Sincerely,
Barry Krayer
4143 E Bluefield
Phoenix, AZ 85032

Response for Document 00348

00348-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00349

202-429-3945

Doug Deaton

Box 1193 , Bigfork, MT 59911

March 11, 2008 12:10 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Support oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I support the BLM Excavation of tar sands resources is needed to help reduce our reliance on foriegn oil.

The preferred alternative forecasts production of one million barrels of oil shale per day. We need that production to offset our dependence on OPEC. 349-001

Agency regulations and federal law require that the BLM manage its lands for multiple uses. I support continued access for motorized recreation in areas affected by this resource development.

Sincerely,
Doug Deaton
Box 1193
Bigfork, MT 59911

Response for Document 00349

00349-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00350

202-429-3945

William Belknap

629 Don Vincente Drive , Boulder City, NV 89005

March 11, 2008 12:05 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Oil shale development in the West

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I so not believe a PEIS can be adequately produced at this time due to the uncertainty involved in oil shale techonology. With the probability of carbon sequestration requirements on the horizon, the economic viability of oil shale becomes questionable. What is certain is that the method of extraction is unacceptable in many of the areas being considered. It would be unconscionable to allow extraction of oil shale (with its devastating effect on the landscape) at this time of flux in deciding the future of our energy sources. 350-001

Sincerely,
William Belknap
629 Don Vincente Drive
Boulder City, NV 89005

Response for Document 00350

00350-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

OSTS_00351

202-429-3945

David and Susan Link

9416 Skydome Court , Elk Grove, CA 95624

March 11, 2008 11:56 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

USE PROVEN SCIENTIFIC METHODS TO DETERMINE WHETHER THE BENEFITS OUTWEIGH THE RISKS INVOLVED. YOU HAVE NOT YET DONE THAT! 351-001

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 351-002

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 351-003

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 351-004

OSTS_00351

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 351-005

Sincerely,
David and Susan Link
9416 Skydome Court
Elk Grove, CA 95624

Response for Document 00351

00351-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00351-002: See response to Comment 00351-001.

00351-003: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00351-004: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to

cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00351-005: See responses to Comment 00351-001. Congress requires the Secretary to complete this PEIS and does not provide for delaying the PEIS until complete information might become available.

OSTS_00352

202-429-3945

Michael Zuber

89 Moore Avenue , Binghamton, NY 13903

March 11, 2008 12:05 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 352-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 352-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 352-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. I am also 352-004

OSTS_00352

concerned that future regulations regarding carbon fuels may preclude the use to the fuel extracted from these areas. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 352-005 352-004 (cont.)

Sincerely,
Michael Zuber
89 Moore Avenue
Binghamton, NY 13903

Response for Document 00352

00352-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00352-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00352-003: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA

also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00352-004: See response to Comment 00352-001.

Congress requires the Secretary to complete this PEIS, and does not provide for delaying the PEIS until complete information might become available.

00352-005: Thank you for your comment. However, the promulgation of regulations on carbon fuels is outside the scope of the PEIS.

OSTS_00353

202-289-1060

Bridget Sturdy

416 W Evelyn Ave , Hazel Park, MI 48030

March 17, 2008 10:42 AM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I am becoming rather furious by this administration's complete disregard for our natural recources. How many times must you be told that we need to explore and develop alternative energy, not destroy our land for what amounts to a temporary solution. 353-001

Leave the Baca National Wildlife Refuge alone! 353-002

Sincerely,

Bridget Sturdy
416 W Evelyn Ave
Hazel Park, MI 48030

Responses for Document 00353

00353-001: Thank you for your comment.

00353-002: The Baca National Wildlife Refuge is not within the study area and would not be affected by any decisions based on analyses in the PEIS.

OSTS_00354

202-289-1060

Ronald Deike

1786 Quail Avenue , Lime Springs, IA 52155

March 13, 2008 1:22 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

It is nonsensical for President Bush to say we need to use less oil and then for you to approve a tar sands project like this that will destroy millions of acres of habitat. 354-001

Sincerely,

Ronald Deike
1786 Quail Avenue
Lime Springs, IA 52155

Response for Document 00354

00354-001: Thank you for your comment. No tar sands resources will be committed for leasing or development as a result of this PEIS. The PEIS presents an analysis of the effects of a land use allocation. Prior to the granting of any lease right or the approval of commercial development, further project-specific NEPA analysis will be completed.

OSTS_00355

202-289-1060

Santiago Diaz

P.O.Box 2020, PMB 194 , Barceloneta, PR 00617

March 13, 2008 12:03 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Instead of oil shale and tar sand, I suggest to use wind and heat to generate electricity. Start by harvesting all the politicians in Washington, they are full of hot air and could be a grat source of fuel. 355-001

Sincerely,

Santiago Diaz
P.O.Box 2020, PMB 194
Barceloneta, PR 00617

Response for Document 00355

00355-001: Thank you for your comment.

OSTS_00356

202-289-1060

Dawn Hollier

1756 Washington Way , Venice, CA 90291

March 13, 2008 1:10 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Won't you please be a good steward of God's creation? Don't let short-term thinking cloud your judgment. Save this wilderness for your children's children's children. 356-001

Do the right thing, please!

Sincerely,

Dawn Hollier
1756 Washington Way
Venice, CA 90291

Response for Document 00356

00356-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

OSTS_00357

202-289-1060

Jillian Marohnic

PO Box 611 , Volcano, HI 96785

March 13, 2008 1:10 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

This administration has done enough environmental damage. Please try to limit further destruction until the Bush term ends. The rest of the world would still like to have some beauty remaining. 357-001

Sincerely,

Jillian Marohnic
PO Box 611
Volcano, HI 96785

Response for Document 00357

00357-001: Thank you for your comment.

OSTS_00358

202-289-1060

C. Cansler

61079 State Route 20 , Marblemount, WA 98267

March 13, 2008 1:46 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I am disgusted that the development of fossil fuel resources is still considered an appropriate use of our public lands. In an era of anthropogenic induced climate change this is entirely inappropriate. Oil and gas development in the past has seriously degraded the land near it; wildlife has been harmed, increased toxins are let into the air, water, and soils. The BLM is charged with caring for the public land it administers in a way that provides for the good of the American people. Instead, you are trying to perpetuate your own tragedy of the commons. A few corporations will benefit, and yes, perhaps some local residents will get needed jobs. But there are ways to provide for economic development that don't permanently impair natural resources that belong to the whole country. Similarly, there are ways to develop energy resources that don't perpetuate climate change. We need to start thinking forward. We need to innovate. Oil shale and tar sands development would be a repeat of mistakes mad in the past, moving us backwards not forward.

358-001

Sincerely,

C. Cansler
61079 State Route 20
Marblemount, WA 98267

Response for Document 00358

00358-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00359

202-289-1060

Peter Iano

1305 Forrest Oaks Ct N , Nashville, TN 37221

March 13, 2008 2:00 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Mining and processing shale and tar sands for oil just isn't worth the destruction and pollution it wreaks.

We would do better to develop environmentally sustainable sources of energy and use energy more efficiently.

359-001

Sincerely,

Peter Iano
1305 Forrest Oaks Ct N
Nashville, TN 37221

Response for Document 00359

00359-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00360

202-289-1060

Molly Helt

1726 Powell Rd , Powell, OH 43065

March 13, 2008 2:18 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Until the impacts of oil shale and tar sands development have been have fully assessed (and at this point they have not), I do NOT support this type of dirty fuels extraction.

You probably get tired of hearing about what this kind of production does to the Canadian air, water, land and wildlife, but you'll get even more tired of hearing about the degradation should you allow it to occur in the US.

Conservation and alternative, sustainable fuels will become the by-words -- we just need to stop these knee-jerk reactions and look at the effects of our decisions on the next generations of human beings. Please contribute to their welfare, and ours, by thinking long-term instead of short-term.

360-001

Thank you for listening.

Sincerely,

Molly Helt
1726 Powell Rd
Powell, OH 43065

Response for Document 00360

00360-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00361

202-289-1060

Donald Stevens

P.O. Box 32 , N Bonneville, WA 98639

March 13, 2008 2:30 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Don't sacrifice our country's future for a short-term profit. Leave our remaining wild areas as they are for our children & grandchildren. 361-001

Sincerely,

Donald Stevens
P.O. Box 32
N Bonneville, WA 98639

Response for Document 00361

00361-001: Thank you for your comment.

OSTS_00362

202-289-1060

Judy Corwin

783 Chimney Rock Dr. , Livermore, CO 80536

March 13, 2008 2:31 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

More scars upon the land. Fewer wildlands for our children and grandchildren to explore and enjoy. Less habitat for nature's beautiful creatures. Is this all you are about? 362-001

Sincerely,

Judy Corwin
783 Chimney Rock Dr.
Livermore, CO 80536

Response for Document 00362

00362-001: In the PEIS, the BLM analyzes proposed land allocation decisions; there are no commitments of mineral resources or granting of lease rights without future analysis of specific lease applications and plans of development. The BLM is committed to implementing its multiple use mandate in FLPMA, in accordance with its planning and other regulations, and notes that authorized uses include commercial development of oil shale and tar sands.

OSTS_00363

202-289-1060

Frances Scafidi

823 Laguna Street , Santa Barbara, CA 93101

March 13, 2008 2:52 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Oil production from shale is an environmental disaster.

363-001

It should not be permitted.

Sincerely,

Frances Scafidi
823 Laguna Street
Santa Barbara, CA 93101

Response for Document 00363

00363-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00364

202-289-1060

Emlyn Addison

186 8th Street , Providence, RI 02906

March 13, 2008 11:39 AM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

The Bush administration wants to sacrifice some of the wildest regions of Colorado, Utah and Wyoming to produce fuel from two of the most polluting sources: oil shale and tar sands.

This proposed development -- spanning an area of more than two million acres of wildlife habitat and outstanding recreation areas across three states -- could pollute air and water, jeopardize human health and dramatically worsen global warming. 364-001

Oil shale is rock that produces oil when heated to extreme temperatures. Tar sands contain extremely heavy oil mixed with sand and clay. Tar sands development in Canada has displaced wildlife, created toxic waste sites that go on for miles and generated three times the amount of global warming pollution per barrel produced as conventional fuel.

Furthermore, oil shale and tar sands development could release dangerous toxic elements such as arsenic, selenium, and boron into the Colorado River watershed -- a vital source of drinking water for local communities. 364-002

This area is also home to mule deer, elk, mountain lions, black bears, bald eagles and great horned owls and offers exceptional outdoor recreation opportunities. 364-001 (cont.)

I urge you to protect our public lands from dirty fuels production. There has to be better solution than plundering more of our natural resources.

Sincerely,

Emlyn Addison
186 8th Street
Providence, RI 02906

Responses for Document 00364

00364-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00364-002: Leachate concerns were included in the draft PEIS in the locations cited by the reviewer and elsewhere, including Sections 4.5.1.3 and 4.8.1. The decisions analyzed in the PEIS do not include a commitment by the BLM to offer for lease public lands within Colorado without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition,

the BLM will involve the state, local communities, and the public throughout the NEPA processes.

OSTS_00365

202-289-1060

Lori Atkins

1231 Southport , Gustine, CA 95322

March 18, 2008 4:54 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I urge you to protect our public lands from dirty fuels production. \

365-001

Your job is to protect our environment, leave our lands alone

Sincerely,

Lori Atkins
1231 Southport
Gustine, CA 95322

Response for Document 00365

00365-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00366

202-289-1060

Lisa Swallow

2835 N. Avenue W. , Missoula, MT 59804

March 13, 2008 3:50 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

The thought of converting our precious Rockies ecosystem in the wasteland that is Northern Alberta's tar sands to continue reliance on a fuel that is outdated is ludicrous. We need significant investment in restructuring to wind, solar, geothermal, biomass, hydro etc etc. 74% of all Americans acknowledge global warming as the greatest crisis of our time - if you want to leave one legacy for the next generation - it is to invest in other energy modalities and leave our remaining wilderness for future generations. 366-001

-Lisa Swallow

Sincerely,

Lisa Swallow
2835 N. Avenue W.
Missoula, MT 59804

Response for Document 00366

00366-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00367

202-289-1060

Glenn Dulken

3610 Sulkirk Road , Charlotte, NC 28210

March 13, 2008 5:07 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Our planet is in grave peril. Please be a part of the solution instead of a continued part of the problem.

We desperately need you to wake up.

Think of your children and grand children's world.

367-001

Sincerely,

Glenn Dulken
3610 Sulkirk Road
Charlotte, NC 28210

Response for Document 00367

00367-001: Thank you for your comment.

OSTS_00368

202-289-1060

Dianna Dennis

222 A.F. Moore Rd , spring hope, NC 27882-7846

March 13, 2008 5:52 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I think its time for cleaner sources of energy rather than destroying precious wildlife that will never be there again for oil shale. 368-001

Sincerely,

Dianna Dennis
222 A.F. Moore Rd
spring hope, NC 27882-7846

Response for Document 00368

00368-001: Thank you for your comment. The BLM acknowledges the commentor's preference for alternative energy sources.

OSTS_00369

202-289-1060

Donald Duerr

P.O. Box 1668 , Pinedale, WY 82941

March 18, 2008 7:33 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

You folks cannot be serious. The western states -- including Utah, Colorado and Wyoming -- are already being absolutely hammered by oil and gas development authorized by the BLM. Now BLM is proposing to authorize massive oil shale and tar sands development in these states? ... and at a time when evidence overwhelmingly shows burning fossil fuels is contributing to global climate change that will threaten the lives of many people (many have already died due to heat waves, hurricanes, floods and droughts), disrupt economies around the world, and drive many species into extinction?

Both oil shale and tar sands development will have massive impacts on the environment and local communities -- impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available. 369-001

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and increase global warming.

The draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that dirty fuels should be the primary use of public land in order to benefit private companies.

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. 369-002

OSTS_00369

The PEIS also fails to adequately address potential water depletions from the Colorado River Basin. Water will be needed to develop oil shales and tar sands; water will be needed to suppress dust from access roads; development sites and pipelines; and water will be needed by industry and employees moving to the region to work on these massive projects. By causing significant new water depletions the proposed developments would cause harm to four endangered fish species in the Colorado River (Colorado Pikeminnow, Razorback sucker, Humback chub and bonytail). The BLM must consult with the U.S. Fish and Wildlife Service and address all direct, indirect, and cumulative water depletions -- and use the agency's authorities to help recover those four fish species and conserve the river ecosystem upon which they depend. 369-003

Thank you for considering my views.

Sincerely,

Donald Duerr
P.O. Box 1668
Pinedale, WY 82941

Responses for Document 00369

00369-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00369-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

00369-003: Water depletion due to oil shale development depends on many factors, including project locations, technologies to be used, and various activities involved in the development. The depletion issue would be handled at the project-level when these factors are better defined. Impacts of water depletion would be addressed in NEPA documents at subsequent leasing and plan of development stages. .

If regulations for oil shale development are adopted, the water for the development is likely to come from the agricultural sector and ranchers. Physical

water availability is constrained by existing water rights and instream flows water rights. Both are protected by law. The instream flows water rights are tools used by CWCB to protect endangered fish species. These water rights are not likely to be exchanged or traded for oil shale development.

Agency consultation is common in federal programs. The USFWS would be consulted during future oil shale development.

OSTS_00370

202-289-1060

Dennis Abbott

1919 Sheridan Ave , Saint Paul, MN 55116

March 13, 2008 6:32 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I understand that oil shale and tar sands development will produce more climate change gases and particulates than conventional oil production. That would be a reallly bad idea. 370-001

Sincerely,

Dennis Abbott
1919 Sheridan Ave
Saint Paul, MN 55116

Response for Document 00370

00370-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

OSTS_00371

202-289-1060

John Zeiger

63 beacon hill rd , ardsley, NY 10502

March 13, 2008 7:46 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I am very surlprised that the Bureau of Land Management supports Oil Shale and Tar Sands development in the Rocky Mountain areas of Colorodo, Whyomming and Utah. These are some of the most environmentally harmful methods of extracting fuel, and contribute to global warming. If more energy is needed, the government should invest more in renewable energy sources like wind, solar or geothermal.

Besides despoiling some of the most beautiful scenery in the US, this plan would imperil endangered animals that need the untouched wilderness to survive, like grizzly bears and wolves. I plan to visit the west, and I want to see the ranches, mountains, and forest, I want to hunt and fish, I want to enjoy the nature of it all. I don't want to go hundreds of miles to see vast toxic waste sites on public land--land I should have a say in. And let me tell you, the majority of the American public does not want its land turned into a poisonous waste dump for energy interests. 371-001

Please don't allow oil and gas devolopment in sensitive wildlands in Colorado, Utah, and Wyomming.

Sincerely,

John Zeiger
63 beacon hill rd
ardsley, NY 10502

Response for Document 00371

00371-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

OSTS_00372

202-289-1060

Barbara Armento

19 Canfield Circle , Dearborn Hts., MI 48127

March 14, 2008 3:05 AM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Please protect the wilderness lands in CO, WY, and UT for future generations! Don't allow production of oil from shale or tar sands which threaten air quality and wildlife. It would also waste huge amounts of water - a precious scarce commodity in this area.

Our taxpayer $$$ should be put to MUCH BETTER use for the environment! Promote safe renewable energy & non-polluting fuels. I now own a Prius which gets 49 m/p/g, & I hope my next car uses NO gas at all! Please, no more dirty fuel production.

372-001

Sincerely,

Barbara Armento
19 Canfield Circle
Dearborn Hts., MI 48127

Response for Document 00372

00372-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00373

202-289-1060

Robert Jenkinson

RR 2 Box 4263 , Brackney, PA 18812

March 14, 2008 9:00 AM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

PROTECT THE EARTH 373-001

Sincerely,

Robert Jenkinson
RR 2 Box 4263
Brackney, PA 18812

Response for Document 00373

00373-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

OSTS_00374

202-289-1060

Mitchel Osman

617 East Broadway , Mt. Pleasant, MI 48858

March 14, 2008 4:17 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I understand you have been appointed by the Bush admisintration to ensure national treasures can be destoyed by business interests whose profits can be enhanced by disregard of polution and wildlife protection laws. In return of course you will recieve recommendations for well paying Republican jobs waiting for you when Republicans are kicked out of the White House.

374-001

Think of the dead animals, plants, trees, and destroyed habitat for which you are responsible and, indeed, which you were hired to ensure. Your legacy of death will be remebered when you are gone, and your names duly recorded in history.

Sincerely,

Mitchel Osman
617 East Broadway
Mt. Pleasant, MI 48858

Response for Document 00374

00374-001: Thank you for your comment.

OSTS_00375

202-289-1060

Anthony Drew

4109 Trebor Dr. , Cincinnati, OH 45236

March 15, 2008 6:33 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Our incessant attachement to petroleum has driven us to new extents; destroying lands that we had once protected. The consequence is relative to a feind to his substance.

We have one option to put both this addiction to rest and bring prosperity to all habitants of the earth; focus on the next renewable resource/s. Prolonging the inevitable is futile, our focuses need to be towards the future. 375-001

Let us put our minds together and see what we can leave for our children.

Sincerely,

Anthony Drew
4109 Trebor Dr.
Cincinnati, OH 45236

Response for Document 00375

00375-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

OSTS_00376

202-289-1060

Joan Hebert

5455 8th St. Unit 66, Carpinteria, CA 93013

March 17, 2008 12:03 AM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I wish you would lake a representative group of House & Senate chairmen of interested committees for a 4 day tour of the Canadian operations.
I believe that, seeing the damage with their own eyes, they will all come back willing to talk to EPA's PEIS, the small businesses, homes, ranches, and resorts in the 3 states that would be most affected by this kind of oil extraction processes.

We all know that you have had a somewhat checkered past in your efforts to protect our public lands and that you have been (and are still) pressured from Mr. Bush appointed agency heads. But since such dirty fuels production hurt more Americans than those it rewards [i.e., oil companies, big car manufactures and silly, immature consumers who buy that BIG image]. 376-001

We all know that both oil shale and tar sands development could have massive impacts on the environment and local communities -- impacts which are rarely reported on in our mega media, much lessfully assessed in in-house, politically motivated agencies doing Environmental Impact Statements.
Trust your eyes, not BIG lobbyiest. Corpoorations and politicians. Do what is best for our country, not just somebodies bottom lines

Sincerely,

Joan Hebert
5455 8th St.
Unit 66
Carpinteria, CA 93013

Response for Document 00376

00376-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

OSTS_00377

202-289-1060

Anne Schmidlin

114 Galway Dr , Rochester, NY 14623

March 13, 2008 11:57 AM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Stop this plan which will hurt over 2 million acres of wildlife and natural habitat.

It is LONG PAST TIME that we began to treat the earth as something we've borrowed from our children -- and that we need to give back to our children with all of the natural beauty and diversity it holds. 377-001

Please, DO NOT invest time, dollars or energy in pursing continued production of dirty fuels. Focus on alternative, cleaner energy sources.

Sincerely,

Anne Schmidlin
114 Galway Dr
Rochester, NY 14623

Response for Document 00377

00377-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00378

202-289-1060

Connor Donnelly

3 Oliveira Lane , Lafayette, CA 94549

March 13, 2008 12:07 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

This land is beautiful and should be for years to come. Spend some time out there, you'll change your mind. 378-001

Sincerely,

Connor Donnelly
3 Oliveira Lane
Lafayette, CA 94549

Response for Document 00378

00378-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00379

202-289-1060

Kurt Wullenweber

9216 Haydon Road , Jacksonville, FL 3218

March 13, 2008 12:10 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I urge you to totally ignore the usual dribble coming from the people who frequent this website and go forward at breakneck speed to develope the energy sources this country so desparately needs.
The clowns from Biogems totally ignore the facts that we have near ZERO polution from oil production in Alaska and totally ignore the facts that after hurricanes Katrina and Rita, which devestated many, many offshore drilling and profduction rigs, the polution along the Gulf Coast was non-existant.
The oil producing companies know what they are doing and how to produce oil with near zero polution.
Drill and produce!!!!

379-001

Sincerely,

Kurt Wullenweber
9216 Haydon Road
Jacksonville, FL 3218

Response for Document 00379

00379-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00380

202-289-1060

Spencer Weart

12 Buena Vista Dr. , Hastings On Hudson, NY 10706

March 13, 2008 12:22 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I wish to join those urging you to do everything possible to block the development of oil shale and tar sands in the Rockies. The development would harm areas I have personally enjoyed on many occasions (even though I live on the East Coast). And as an expert on the matter of climate change, I am convinced that such development would be positively harmful to the extremely important efforts to retard global warming. 380-001

Sincerely,

Spencer Weart
12 Buena Vista Dr.
Hastings On Hudson, NY 10706

Response for Document 00380

00380-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00381

202-289-1060

Pavita Decorah

POBox 414 , Crestone, CO 81131

March 13, 2008 12:34 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

As taxpayer-paid employees of the American people, you must listen to the people. If you don't, you will not only find Republicans out of office, but perhaps yourselves as well. The people of the American west do not want fossil fuel exploration carried any further. When water and the land that supports us are willfully polluted, ravished and destroyed, our lives here will not be sustainable.

381-001

STOP OIL and GAS DEVELOPMENT IN THE AMERICAN WEST. WE ARE NOT A COLONY OF CORPORATE OIL BARONS!!!!

Sincerely,

Pavita Decorah
POBox 414
Crestone, CO 81131

Response for Document 00381

00381-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00382

202-289-1060

Kunda Lee Wicce

2002-A Guadalupe St. PMB 290 , Austin, TX 78705

March 13, 2008 12:46 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Allow me to express myself succinctly:

no no no no no no no no no no no no

382-001

Thank you for hearing me.

Sincerely,

Kunda Lee Wicce
2002-A Guadalupe St. PMB 290
Austin, TX 78705

Response for Document 00382

00382-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00383

202-289-1060

John Broussard

59-148 Olomana Rd. , Kamuela, HI 96743

March 13, 2008 4:38 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Please insist on a PEIS that fairly discusses the impacts of oil shale and tar sand development on air and water quality, greenhouse gas production, wildlife, and other environmental degradation.

There's no excuse for permanently trashing the earth for short-term gain, when what is called for is an immediate and herculean effort to find long-term solutions and a sustainable world.

383-001

Sincerely,

John Broussard
59-148 Olomana Rd.
Kamuela, HI 96743

Response for Document 00383

00383-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

OSTS_00384

202-289-1060

K. Furtado

13914 SE 60th St , Bellevue, WA 98006

March 13, 2008 8:22 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I urge you to protect our public lands from fuels production. Both oil shale and tar sands development will damage the environment.

The draft PEIS could determine the fate of over two million acres of some of the best outdoor recreation areas in Colorado, Wyoming, and Utah. The proposed development would jeopardize human and environmental health, and increase global warming. 384-001

From tar sands production in Canada, we know that the operations destroy wildlands, displace wildlife, create toxic waste, produce greenhouse gasses than conventional fuel, and use enormous amounts of clean water. The draft PEIS does not analyze potential impacts on air and water quality, global warming, or human health.

Fuel production should not be a legitimate use for public land, nor should public land be use for private company profiteering. 384-002

Energy conservation and improved efficiency is our best investment. The Bureau of Land Management cannot spoil our public lands. I urge you to protect these areas for my childen, and yours.

Sincerely,

K. Furtado
13914 SE 60th St
Bellevue, WA 98006

Responses for Document 00384

00384-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00384-002: The BLM is managing public lands in compliance the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

OSTS_00385

202-289-1060

Andrew Moll

9127 Glenbrook Rd. , Fairfax, VA 22031

March 13, 2008 10:18 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Please do whatever you can to prevent any use of public land to get oil or gas. I would prefer to see alternative fuel use in the US, and our public lands preserved as they are for future generations. We owe it to our children to sacrifice now. 385-001

Sincerely,

Andrew Moll
9127 Glenbrook Rd.
Fairfax, VA 22031

Response for Document 00385

00385-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

OSTS_00386

202-289-1060

Lisa Dator

1355 Stoneham St. , Superior, CO 80027

March 13, 2008 10:53 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I urge you to protect our energy security and allow responsible development of our natural resources.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. I believe that the companies proposing to develop these lands will do so in an environmental responsible manner. We are all environmentalists who want to maintain the land, the air and the water for future generations. Energy developers and their employees live in the same place too and appreciate the places we live.

386-001

In the near term, energy efficiency and alternative energy technologies will only meet a small portion of the US demand for energy. I would much rather have that demand met by sources from North America than continuing to import oil from places with less regulation. The Bureau of Land Management should be advancing a plan that would responsibly develop these lands.

Please do not limit responsible resource development because of uninformed, extremists who seek to limit US energy options.

Sincerely,

Lisa Dator
1355 Stoneham St.
Superior, CO 80027

Response for Document 00386

00386-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00387

202-289-1060

Dale Oestmann

P.O. Box 871 , Pine, AZ 85544

March 13, 2008 11:10 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

We have more oil in the U.S. than any middle eastern country. The oil in ANWAR can be recovered by disturbing the equivalent of less than a pinhead in the average livingroom. The oilsands in CO & WY have tremendous potential. The Chicoms are drilling in the Gulf. Why aren't we?

The eco-wackos that own this website must hang out with the rest of the nust that want us to move back into caves.

387-001

BTW, natural global warming appears to have ended 10 years ago, and we are now in a cooling trend.

Sincerely,

Dale Oestmann
P.O. Box 871
Pine, AZ 85544

Response for Document 00387

00387-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

OSTS_00388

202-289-1060

mary taylor

61 hawthorn way , cambridge, cb4 1au United Kingdom

March 14, 2008 6:36 AM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I am truly appalled a the prospect of shale and tar sands being exploited in sensitive wilderness areas. This is not land management - it is land destruction. Energy efficiency and clean energy sources are available in abundance and the US should be developing these instead. Future generations will not thank you for creating toxic landscapes, damaging and destroying sensitive habitats and degrading the magnificent wilderness areas of the United States to satisfy the oil addiction of our "civilisation". We need to de-carbonise our economies and find a more sustainable way to live, not squeeze the earth dry of every drop of polluting hydrocarbons. 388-001

Sincerely,

mary taylor
61 hawthorn way
cambridge cb4 1au

Response for Document 00388

00388-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

OSTS_00389

202-289-1060

Gordon James

3036 S. Cherry Way , Denver, CO 80222

March 14, 2008 11:24 AM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Please promote or condone only cleaner operations in the production or extraction of energy sources. Thank you. 389-001

Sincerely,

Gordon James
3036 S. Cherry Way
Denver, CO 80222

Response for Document 00389

00389-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00390

202-289-1060

Tim George

1334 Rustic Ridge Court , Yorktown Heights, NY 10598

March 14, 2008 6:08 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Earth is in a state of peril and danger. In its past, Earth has suffered from senseless pollution and environmental destruction. If Earth encounters these things again, more serious and dangerous conflicts will arise.

The time to stop Global Warming is now. If pollution continues, humans may never be able to halt Global Warming in its tracks.

This is why places like Yellowstone and the Greater Rockies must be protected from oil shale and tar sands. If these places are not protected, not only will all of their animal inhabitants suffer, but Earth as a whole will suffer as well.

390-001

Thank you for your time.

Sincerely,

Tim George
1334 Rustic Ridge Court
Yorktown Heights, NY 10598

Response for Document 00390

00390-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00391

202-289-1060

Julia Groth

106 Sunnyview Ave. W. , Hackettstown, NJ 07840

March 13, 2008 1:36 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

I urge you to protect our public lands from dirty fuels production. Both oil shale and tar sands development could have massive impacts on the environment and local communities -- impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and increase global warming. 391-001

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create toxic waste sites that go on for miles, produce more greenhouse gasses than conventional fuel and use enormous amounts of clean water -- a priceless resource in the arid West. Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that dirty fuels should be the primary use of public land in order to benefit private companies.

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. 391-002

OSTS_00391

Also, please also stop the advancement of uranium mining and dirty coal-based electricity generation in the 4-courners region where it is despoiling the environment, taking away the livelihood of indigenous farmers and causing major health problems to people who have lived there for many generations. It's just plain wrong. 391-003

Sincerely,

Julia Groth
106 Sunnyview Ave. W.
Hackettstown, NJ 07840

Responses for Document 00391

00391-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00391-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

00391-003: The commentor's requests are outside the scope of this PEIS.

OSTS_00392

202-289-1060

Tolford Young

3260 E. Wasatch Pines Lane , Granite, UT 84092-4212

March 13, 2008 1:22 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Please do everything you can to protect our public lands from dirty fuels production. Both oil shale and tar sands development would have massive impacts on the environment and local communities -- impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and, probably, increase global warming. 392-001

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create many square miles of toxic waste sites, produce more greenhouse gasses than conventional fuel and use enormous amounts of clean water -- a limited resource in the arid West.

This water resource is not only subject to cyclical severe drought - which is where it is right now - but to increasing demand from the Colorado River Compact states and diminishing reserve. 392-002

Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that dirty fuels should be the primary use of public land in order to benefit private companies. 392-001 (cont.)

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. 392-003

OSTS_00392

Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. 392-003 (cont.)

Much of the western land for which the BLM has management responsibilities has great potential for the development of direct solar electrical energy collection & distribution. There would, of course be some adverse impacts from such development, but nothing in comparison to the proposed development of shale & sand. 392-004

Sincerely,

Tolford Young
3260 E. Wasatch Pines Lane
Granite, UT 84092-4212

Responses for Document 00392

00392-001: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00392-002: Water availability in the PEIS was calculated on the basis of the 1988 Hydrologic Determination study that used long-term hydrologic data from 1906 to 1986. Within that period, wet years and droughts have occurred. Therefore, the water availability results represent long-term average conditions. For projected water uses, results from state water plans were used. The plans have taken regional population growth into consideration.

The BLM recognizes that the Upper Colorado River Basin is experiencing drought conditions. However, wet and dry years are both possible in the future. A prolonged drought condition can reduce water availability, as indicated in Section 4.5 of the PEIS.

00392-003: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

00392-004: Thank you for your comment.

OSTS_00393

202-289-1060

Jody Norman

2886 Grandview Ave NE , Atlanta, GA 30305

March 17, 2008 8:10 AM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

We should not be investing in these kinds of development, but instead in renewable options! Public land should not be used in ways that despoil and ruin our use of them, either. The land there serves multiple purposes, not the least of them being ecosystems that benefit all those in the area. And then there's recreation and tourism to think about, too, not to mention the health effects of such 'development.' Such a program is simply not in the best interests of either the nation, the world, or the local regions of these states. Protect this land, don't destroy it! 393-001

I urge you to protect our public lands from dirty fuels production. Both oil shale and tar sands development could have massive impacts on the environment and local communities -- impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and increase global warming. 393-002

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create toxic waste sites that go on for miles, produce more greenhouse gasses than conventional fuel and use enormous amounts of clean water -- a priceless resource in the arid West. Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that dirty fuels should be the primary use of public land in order to benefit private companies.

OSTS_00393

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. 393-003

Sincerely,

Jody Norman
2886 Grandview Ave NE
Atlanta, GA 30305

Responses for Document 00393

00393-001: The BLM acknowledges the commentor's preference for renewable energy sources.

The BLM is committed to managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

00393-002: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00393-003: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00394

202-289-1060

J Kolenovsky

7055 Langtry , HOUSTON, TX 77040

March 13, 2008 3:10 PM

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 So. Cass Avenue
Argonne, IL 60439

Subject: Stop dirty oil shale and tar sands development in western wildlands

Dear Bureau of Land Management staff,

Bush, who are you a friend of?

Oil shale and tar sands development could release dangerous toxic elements such as arsenic, selenium, and boron into the Colorado River watershed -- a vital source of drinking water for local communities. 394-001

This area is also home to mule deer, elk, mountain lions, black bears, bald eagles and great horned owls and offers exceptional outdoor recreation opportunities.

I urge you to protect our public lands from dirty fuels production. Both oil shale and tar sands development could have massive impacts on the environment and local communities -- impacts which are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available.

The draft PEIS could determine the fate of over two million acres of wildlife habitat and some of the best hunting, fishing and outdoor recreation areas in Colorado, Wyoming and Utah. The proposed industrial development would threaten air and water quality, jeopardize human health and local communities and increase global warming. 394-002

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create toxic waste sites that go on for miles, produce more greenhouse gasses than conventional fuel and use enormous amounts of clean water -- a priceless resource in the arid West. Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human

OSTS_00394

health, and concluded that dirty fuels should be the primary use of public land in order to benefit private companies. 394-002 (cont.)

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. 394-003

Sincerely,

J Kolenovsky
7055 Langtry
HOUSTON, TX 77040

Responses for Document 00394

00394-001: Leachate concerns were included in the draft PEIS in the locations cited by the reviewer and elsewhere, including Sections 4.5.1.3 and 4.8.1. The decisions analyzed in the PEIS do not include a commitment by the BLM to offer for lease public lands within Colorado without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA processes.

00394-002: The PEIS provides an accurate and objective environmental analysis of the impacts associated with an allocation decision—identifying which lands are suitable for future consideration for commercial oil shale and tar sands leasing. The scope of the PEIS was changed from a leasing decision to an allocation decision, in consultation with our cooperating agencies. This PEIS discusses the available information concerning impacts from foreseeable types of operations. We agree that complete information is not available for the PEIS to support leasing decisions, but the information is sufficient to support land allocation decisions.

The FLPMA does not require the Secretary of the Interior to set aside all BLM lands for hunting, fishing, and recreation to the exclusion of other authorized uses, which include leasing of oil shale and tar sands resources. In order to analyze the effects of the limited decision that is being made here, to consider commercial leasing of oil shale and tar sands resources in some areas, the PEIS discusses the available information regarding impacts of possible commercial operations on air and water quality, human health, local communities, wildlife habitat, and water use. The PEIS also discusses the available information concerning requirements for electrical power and emissions of CO_2 equivalents. Although they are not within the scope of this PEIS, the regulatory programs for oil shale and tar sands will not allow for the creation of toxic waste sites. Note also that oil sand in Canada is a different resource than tar sands in Utah. Whether and where to lease oil shale or tar sands, and under what conditions and stipulations, are the decisions that will determine the actual use of any leased lands. Those decisions are not being made at this time; when those decisions are made, they will be accompanied by an appropriate NEPA document.

Based on the available information, the BLM discloses in the PEIS, to the extent possible, the direct, indirect, and cumulative effects on the public land resources including, but not limited to, air and water resources, CO_2 emissions, human

health, and wildlife, sufficient for the decision maker to make a reasoned choice among the alternatives for land use planning.

00394-003: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

OSTS_00395

202-429-3945

Christine Kassab

701 Moore Ave Box 1406 , Lewisburg, PA 17837

March 15, 2008 10:22 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 395-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 395-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 395-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I 395-004

OSTS_00395

strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 395-004 (cont.)

I just came back from a trip to Utah in which I spent two days doing geological mapping on the San Rafael Swell. This is a gorgeous and geologically important area. Geologists from all over the world come to study it. If oil shale development were to occur, it would destroy the area and future geologists wouldn't be able to study it. 395-005

Sincerely,
Christine Kassab
701 Moore Ave Box 1406
Lewisburg, PA 17837

Responses for Document 00395

00395-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00395-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00395-003: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA

also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00395-004: See response to Comment 00395-001. Congress requires the Secretary to complete this PEIS, and does not provide for delaying the PEIS until complete information might become available.

00395-005: The PEIS considers the resources of settings such as the San Rafael Swell in terms of their geologic, scenic, and other resources. The leasing or development of oil shale or tar sands resources on public lands would require additional NEPA analysis that would consider the potential environmental effects on the various resources prior to decision making.

OSTS_00396

202-429-3945

Robert Franz

169 Wildflower Drive , Plymouth Meeting, PA 19462

March 16, 2008 4:40 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. 396-001

I have been in the area of the San Rafael Swell, and indeed am heading back there this May for nearly a week of exploration. The difficulty in planning this trip is due to the failure to enforce regulations against ATV's, which are very disruptive to solitude. That this area, already adversely impacted by off road vehicle travel, is planned for further degradation is wrong. 396-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 396-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 396-004

Sincerely,

Robert Franz 169 Wildflower Drive Plymouth Meeting, PA 19462

Sincerely,
Robert Franz
169 Wildflower Drive
Plymouth Meeting, PA 19462

Responses for Document 00396

00396-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00396-002: Thank you for your comment. The PEIS considers the resources of settings such as the Roan Plateau and San Rafael Swell in terms of their geologic, scenic, and other resources. The leasing or development of oil shale or tar sands resources on public lands would require additional NEPA analysis that would consider the potential environmental effects on the various resources prior to decision making.

00396-003: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The

interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00396-004: See response to Comment 00396-001. Congress requires the Secretary to complete this PEIS, and does not provide for delaying the PEIS until complete information might become available.

OSTS_00397

202-429-3945

Lynne Roecklein

Ark Villa K, A-102 Kurono 307-1, Gifu-shi, 501-1131 Japan

March 13, 2008 7:58 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to give over large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. 397-001

I cannot understand how such plans can be considered responsible -- by any measure, whether economical or ethical or ecological -- when the results are so clear in Canada. I have seen the tar sands area in Canada while just passing through, and they are APPALLING. There might even be some justification if these areas would yield oil in the amounts tyoical of Indonesia or the Middle East, but the amount, as I understand it, will be but a tiny percentage of U;.S. daily usage. So for a few days worth of oil, "our" government is going to undo the work of several million years?! No company can put back the landscape we have now, the connection with nature that roots and grounds so many humans psychologically. Or perhaps the government will order the companies to undertake and COMPLETE research to create a giant virtual reality after they are finished? 397-002

Please do not authorize such a travesty of land use, at least and especially not before complete and NEUTRAL investigators have fully done a complete environmental and social study of the project. 397-003

It is my understanding -- all too often challenged -- that the BLM is commissioned to manage its lands for multiple uses. How, then, can it go ahead with this plan when the BLM itself admits that oil shale and tar sands development will displace every other public use of this land? And certainly NOT to the benefit of the public, given the very small dent such oil will make in the U.S. appetite for oil. 397-004

A cost-benefit analysis which includes honest accounting of the social and ecological costs will surely argue quite against this undertaking. 397-002 (cont.)

I am SO DISAPPOINTED so often that the BLM acts as a destroyer rather than a preserver. Almost everything I learned while growing up about values and responsible behavior has been

OSTS_00397

BETRAYED by "my" country endlessly in the last 30 years (I am 63 now). I think those values and standards of ethical judgment for difficult cases are correct and applicable to these times. PLEASE BE IMPARTIAL AND COMPREHENSIVE IN ASSESSING the oil shale & tar sands proposal.

Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can adduce more solid evidence that the project will a) live up to the projections of gain, and b) take fuller and fairer stock of the consequences. 397-005

Sincerely, Lynne Roecklein

formerly of Denver, Colorado;
now living in Japan but soon to return

Sincerely,
Lynne Roecklein
Ark Villa K, A-102
Kurono 307-1
Gifu-shi 501-1131

Responses for Document 00397

00397-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00397-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

00397-003: The BLM anticipates that the oil shale RD&D program will provide information, not only about technologies, but also about possible impacts to resources. The BLM believes this research effort will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands.

00397-004: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term "multiple use" means that not every use is

appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

00397-005: Thank you for your comment.

OSTS_00398

202-429-3945

Elly Duncan

345 Sheridan Av. , Palo Alto, CA 94306

March 14, 2008 5:05 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: No oil shale development in the West!

Dear BLM,

Here are my comments on the Draft PEIS for commercial oil shale and tar sands development:

1) Whenever I hear people from other countries talk about their visits to the West, they always marvel at the vastness of the wide open spaces and the lack of manmade intrusions into these wild lands. When America is blessed with spectacular landscapes like the Roan Plateau or the San Rafael Swell, what would possess us to permanently destroy these unique treasures(excavation of tar sands has been environmentally devastating in Canada) which so many sportsmen and outdoor enthusiasts enjoy? And I'm sure some tourists visit these areas as well - fiscally, America would benefit far more from promoting tourism to our unique Western landscapes than from any oil we might produce by digging up and permanently destroying these areas. Let the Saudis destroy their country digging for oil. 398-001

2) The amount of oil likely to be produced is minimal when compared to the large oilfields in other countries, and industry is still years away from completing research and development of commercial oil shale technologies. The BLM has to wait until this research is concluded in order to be able to accurately determine all of the environmental and social risks of this program, so postpone doing a draft PEIS until all of the data is in. 398-002

3) The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. So besides being a giant waste of precious resources, such massive development will also negatively affect air and water quality, wildlife, and the solitude that is getting increasingly harder to find these days. These things cannot be easily quantified, but they do need to me considered as impacts that are in ADDITION to the impacts of oil shale & tar sands development directly. 398-003

4) Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. I would remind the BLM that it is public taxes which pay for your department - not the oil companies. The public expects their public 398-004

OSTS_00398

lands to be managed for the benefit of all Americans and not for the financial gain of a few companies. 398-004 (cont.)

Sincerely,
Elly Duncan
345 Sheridan Av.
Palo Alto, CA 94306

Responses for Document 00398

00398-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

00398-002: The BLM anticipates that the oil shale RD&D program will provide information, not only about technologies, but also about possible impacts to resources. The BLM believes this research effort will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands.

00398-003: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

00398-004: In Section 6.1.2.1 of the PEIS, the BLM acknowledges that potential impacts from commercial oil shale development could occur as a result of the displacement of other resource uses.

The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). The BLM strives to ensure that the goals and objectives of each program (representing

resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

OSTS_00399

202-429-3945

roland griffith

box455 , carlsborg, WA 98324

March 14, 2008 1:23 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement for commercial oil shale and tar sands development. Excavation of tar sands has proven devastating in Canada. The President of Suncor (in which I have a large holding)recently addressed that industry's organization expressing his alarm at the damage being done in Alberta. He points out that the industry is years away from the development of acceptable, commercial oil shale methods and has not yet achieved a remidiation solution. Not in his address was reference to a pending legal issue barring in-situ techniques, a tested but failed solution to obvious shortcomings. Given the obvious, irreversible environmental damage that would be caused to public lands in our western states, BLM should postpone any action at this time. I strongly urge that all involved BLM personnel immediately schedule a comprehensive visit to the Canadian oil sands area. BLM surely is aware of the enormous demands that the oil shale industry places on both water and natural gas sources, neither of which are sufficient the West.
Roland K. Griffith grif@olypen.com

399-001

399-002

Sincerely,
roland griffith
box455
carlsborg, WA 98324

Responses for Document 00399

00399-001: Thank you for your comment. Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis as is described in the PEIS. The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands.

When applications to lease are received and additional information becomes available, the BLM will conduct further NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

00399-002: Any future oil shale or tar sands leasing will require subsequent NEPA analysis, as described in Section 1.1.1 of the PEIS. The BLM's analysis in this PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing.

Subsequent NEPA analysis will be required prior to any leasing or plan of development decision and will the direct, indirect and cumulative effects of that action. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to avoid or mitigate short-term and long-term adverse impacts.

OSTS_00400

202-429-3945

Scott Dwire

1920 E. Laird Drive , Salt Lake City, UT 84108

March 14, 2008 10:49 AM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

I am not witting as an alarmist. I worked at Tract CB for Occidental Oil Shale and for Exxon at their site near Parachute, Colorado in the late 1970's and early '80s. I monitored the impacts on water and discharges from the mining operations as well as other environmental studies. I saw first hand what kind of leachate came from processed oil shale ore. I understand how the various aquifers were being breached and cross contaminated. I remember the difficulty all the various oil companies were having trying to create an extraction process that was commercially feasible. I experienced the results as the synfuels money stopped flowing and the oil companies all left the area resulting in huge economic impacts as well as scared landscapes. 400-001

It is obvious the water required to process the ore is not obtainable with any regard for sustainability. The environmental impacts of the spent shale disposal, even for below ground retorting methods, is extremely damaging to the environment.

We understand there must be huge pressure from political forces right now to consider all energy options. I know the west has huge reserves in oil shales. I also know that future generations will look back at this 100 year period and to this generation as the one that caused such destruction world wide that for generations into the future they will struggle to understand how we could be so selfish. What was our justification to deplete the natural world for our "cheap" oil and not push harder to create sustainable renewable energy systems that would leave them a world worth inheriting. 400-002

The oil companies would have you believe they can get oil from rock responsibly and we need to tap all our available reserves. They would also ask you to believe they need subsidized to do it and that it is economically feasible. They would also ask you to allow them to have special dispensation to destroy the environment for the good of the country.

OSTS_00400

Regardless of the destruction caused by mining just ask them about what they are going to do with the spent processed ore. There will be valleys full of spent shale, and huge quantities of water used for processing. Ask about those two issues alone and you will understand the fallacy of the process. 400-003

Nuclear engineers can now turn lead into gold, the dream of alchemists, but at what cost? It is possible to get oil from rock, but are you willing sell the environment, the aquifers, and the west to get it? Without resistance to old thinking (we can always try oil shale again) there will be no progress towards renewable sources. Help us help ourselves by breaking our addiction to oil and in the process preserve what we will sorely miss when it's gone, namely the environment that sustains us. 400-002 (cont.)

Sincerely,
Scott Dwire
1920 E. Laird Drive
Salt Lake City, UT 84108

Responses for Document 00400

00400-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

00400-002: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

00400-003: Thank you for your comment. Sections 4.13 and A.4 both discuss spent shale management. Section 4.5 discusses water requirements and impacts, as do various Sections of Appendix A.

OSTS_00401

202-429-3945

Dr. James Farmer

123 2nd Ave Apt T8, Salt Lake City, UT 84103

March 15, 2008 2:14 PM

BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Subject: Protect the West from hasty oil shale development

Dear BLM,

I would like to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

The San Rafael Swell is an exceptionally beautiful area, more grand than many National Parks. It has already been abused, but is still a favorite place for recreation for my family and many, many others. It is also refuge for desert bighorn sheep and other endangered wildlife.

Please do not grant leases for oil shale and tar sands development there at this time, and prefereably not at any time. There are very few such wonderful, isolated places for recreation and for wildlife habitat.

401-001

Oil shale and tar sands are of questionable value at this location, especially since so much water is required to extract the oil. I suspect that the land would be scarred and then abandoned, leaving only a mess behind, which would be the worst of all possibilities for the land and for the American people.

Sincerely,
Dr. James Farmer
123 2nd Ave
Apt T8
Salt Lake City, UT 84103

Response for Document 00401

00401-001: Thank you for your comment. The analysis in the PEIS takes into consideration the general geologic, wildlife, cultural, and scenic values of areas such as the San Rafael Swell. Since the BLM is analyzing an allocation decision in the PEIS, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of the area prior to a decision being made.

Thank you for your comment, Jean Corey.

The comment tracking number that has been assigned to your comment is OSTSD50000.

Comment Date: December 21, 2007 11:33:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD50000

First Name: Jean
Middle Initial:
Last Name: Corey
Organization:
Address: 2328 E Willow Brook Way
Address 2:
Address 3:
City: Sandy
State: UT
Zip: 84092
Country: USA
Email: jwc@apptech-cats.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please allow as much drilling as possible with companies that are responsible and environmentally sensitive. We need to do everything we can to bring energy production back into the country, utilizing all forms of energy available to us.	50000-001

Responses for Document 50000

50000-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Kim Johnson.

The comment tracking number that has been assigned to your comment is OSTSD50003.

Comment Date: December 22, 2007 00:33:36AM
Oil Shale and Tar Sands
Comment ID: OSTSD50003

First Name: Kim
Middle Initial: I
Last Name: Johnson
Organization:
Address: PO Box 1117
Address 2:
Address 3:
City: Wilson
State: WY
Zip: 830141117
Country: USA
Email: wind_river_man2004@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

My comments are brief. Please don't destroy millions of acres of wonderful countryside for the sake of some short-sighted, for-profit, exploitive industries. I thought we were trying to get away from non-renewable, highly-polluting extractive resources and into more renewable ones like wind and solar energy. That's the direction we should be heading. The BLM should be protecting what's left of the American West from exploitive industries, not selling it off piece by piece to the highest bidder. Both oil shale and tar pits are just about the most destructive form of energy production next to mountain top removal and open pit coal mines...maybe they are just as bad. Please save our remaining mountains for the wildlife and recreational opportunities for the people who don't want to see them raped for short-term profits...which, buy the way, are MOST Americans. The BLM should abide by the wishes of the MAJORITY of Americans, not those looking to make a quick buck. Thank you. 50003-001

Response for Document 50003

50003-001: Congress mandated, in Section 369 (a) of the Energy Policy Act of 2005, that it is the policy of the United States to develop the nation's oil shale, tar sands, and other unconventional import domestic resources thereby, reducing our growing dependence on politically and economically unstable sources of foreign oil. Furthermore, the development of oil shale, tar sands and other strategic unconventional fuel, for research and commercial development, be conducted in an environmentally sound manner, using practices that minimize impacts. This philosophy was incorporated into all of the documents being prepared under the Energy Policy Act (RD&D leases, the PEIS, and the oil shale regulations). Once the Programmatic Environmental Impact Statement and the oil shale regulations are completed, applications for commercial leases will be accepted, subject to the requirements of the regulations, and additional National Environmental Policy Act analysis. At that time specific mitigation measures will be developed to ensure that the commercial operations use practices that minimize or mitigate impacts.

Thank you for your comment, nathan maxon.

The comment tracking number that has been assigned to your comment is OSTSD50004.

Comment Date: December 22, 2007 10:02:22AM
Oil Shale and Tar Sands
Comment ID: OSTSD50004

First Name: nathan
Middle Initial: g
Last Name: maxon
Organization:
Address: 1319 sanders st.
Address 2:
Address 3:
City: laramie
State: WY
Zip: 82070
Country: USA
Email: nmaxon@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I sincerely urge to te BLM to opt for alternative A. We should be thinking about curbing our reliance on hydorcarbons, not expanding it. This will be disastrous to the sage grouse and mule deer populations of the region, and it might very well affect pronghorn populations as well. 50004-001

This region is special, people come ere from all over the country to enjoy hunting, hiking, and other recreational pursuits. There oppportunities are becoming very rare and can't simply be reduced to a simple cost/benefit analysis. The attributes of the region are rare and thus priceless. But in terms of costs of this project, we can expect, increased CO2 emmisions, more roads, absolute annihilaiton of areas by the stip mines, a reduction in sustainable economic bases(recreation/tourism), decreased big game populations, decreased sage grouse habitats, social problems (crime, drugs, poverty, burdens on existing infrastructure, low wages, poaching), disruption of quality and funcitoning of aquifers and streams, viewshed reduction, extirminaiton of plant communities and habitat for other species (you can expect more ESA lisitngs if this happens at Alternative B levels). 50004-002

As for mitigation and reclamation, neither of these things have ever been shown to truly restore habitats to thier pre-disurbance conditions. Often completely different plant communities come in because of te changed structure of the soils and substrate (see powder river coal operations). 50004-003

Even if a natural community does return, rare species are very unlikley to return, especially if they are of a limited range and number. The BLM should be in the business of protecting our public lands, not destroying them. This is not multiple use, its misuse. 50004-001 (cont.)

Responses for Document 50004

50004-001: The BLM acknowledges the commentor's preference for Alternative A.

50004-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

50004-003: The difficulties associated with the restoration of native plant communities are acknowledged and described in Sections 4.8.1.2 and 5.8.1.2.

Thank you for your comment, Abe Levy.

The comment tracking number that has been assigned to your comment is OSTSD50005.

Comment Date: December 22, 2007 10:53:20AM
Oil Shale and Tar Sands
Comment ID: OSTSD50005

First Name: Abe
Middle Initial:
Last Name: Levy
Organization:
Address: 15 Sarles Road
Address 2:
Address 3:
City: Pound Ridge
State: NY
Zip: 10576
Country: USA
Email: abe@slought.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I do not feel that the advantages of extracting oil from oil shale and tar sands are sufficient to warrant the environmental consequences.

Therefore, I oppose this project and favor abandoning it.

Thank you for the opportunity to comment.

50005-001

Response for Document 50005

50005-001: The BLM acknowledges the commentor's preference to not support oil shale and tar sands development.

Thank you for your comment, patti kay-clapper.

The comment tracking number that has been assigned to your comment is OSTSD50006.

Comment Date: December 23, 2007 03:10:20AM
Oil Shale and Tar Sands
Comment ID: OSTSD50006

First Name: patti
Middle Initial:
Last Name: kay-clapper
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Not having the opportunity to review the entire PEIS my comments are limited to the following: 1. environmental and public health impacts cannot be and will not be limited to the "parcels" (under consideration for leasing)...specifically due to the fact that air and water know no "parcel" boundries...in other words..wind blows and water flows! 50006-001

2. socio-economic negative impacts are proven by the current/existing tradional forms of oil and gas extraction processes/methods...therefore this well documtented,actual,factual,and clearly associated information cannot be ignored but has to be used in order to assess these same impacts as will be caused by non-traditional (oil shale and/or tar sand) extraction processes/methods 50006-002

3. water...surface/subsurface quality and quantity are HUGE issues...not only to the States directly involved but to the States that depend on water that comes from those States (Colorado, Utah, Wyoming)therfore to fail to fully address the issue of water in itself causes this PEIS to in fact fail 50006-003

My comments as submitted above do not represent anyone other then myself. Further more I reserve the right to submitt additional comments if I so determine necessary. Thank you and sincerely, Patti Kay-Clapper

Responses for Document 50006

50006-001: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document and all subsequent NEPA documents will analyze the direct, indirect, and cumulative effects of the proposed action. Depending on the specific situation, where offlease impacts are a possibility, they will be considered as part of the future NEPA reviews.

50006-002: The potential socioeconomic impacts of oil shale and tar sands developments are presented in Sections 4.11 and 5.11 of the PEIS, including impacts to employment, income, population, housing, local government finances and employment, social disruption, agriculture, recreation, and property values. The recent experiences in each ROI with impacts from past oil shale projects and from oil and gas development, particularly with regard to social disruption, local government operations, and quality-of-life issues, are taken into account in the PEIS and are covered in Section 3.10 of the PEIS.

50006-003: Thank you for your comment. We recognize water is a treasured resource in the region. The analyses in the PEIS are intended to provide an objective evaluation of the impacts on the water resources within the scope of the programmatic document for land use allocation decisions. Subsequent project-specific NEPA documents would further specify water impacts for each project.

Thank you for your comment, Tod Young.

The comment tracking number that has been assigned to your comment is OSTSD50007.

Comment Date: December 26, 2007 18:45:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD50007

First Name: Tod
Middle Initial:
Last Name: Young
Organization:
Address: 3260 E. Wasatch Pines Ln.
Address 2:
Address 3:
City: Granite
State: UT
Zip: 840924212
Country: USA
Email: todyoung7@xmission.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

And a "Merry Christmas" to you all, too. The proposed alternatives B & C are blueprints for the most monumental disaster to be inflicted upon the great natural atreactions of the State of Utah.

Alternative A is the only one acceptable.

50007-001

Response for Document 50007

50007-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Christopher Buckley.

The comment tracking number that has been assigned to your comment is OSTSD50008.

Comment Date: December 27, 2007 20:51:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD50008

First Name: Christopher
Middle Initial: P
Last Name: Buckley
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

To Whom It May Concern:

I vigorously endorse any and all measures that will reduce our dependence on foreign fuel sources. I suggest that this program be fast-tracked for implementation. | 50008-001

Chris Buckley

Response for Document 50008

50008-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, David Weber.

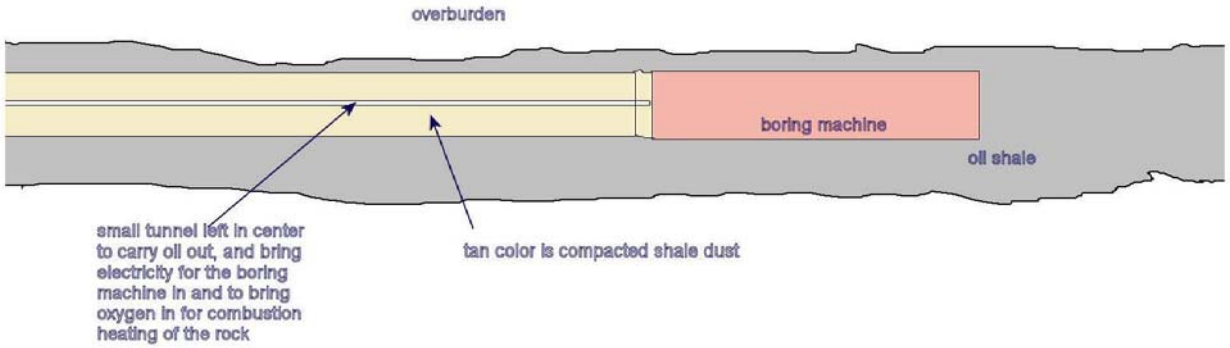
The comment tracking number that has been assigned to your comment is OSTSD50009.

Comment Date: December 28, 2007 20:01:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD50009

First Name: David
Middle Initial: C
Last Name: Weber
Organization:
Address: 4902 Rudgate
Address 2:
Address 3:
City: Toledo
State: OH
Zip: 43623
Country: USA
Email: dweber@buckeye-express.com
Privacy Preference: Don't withhold name or address from public record
Attachment: oil_shale_boring.doc

Comment Submitted:

For the large government reserves of oil shale that has about 1000' of overburden, it should be possible to develop a system to remove the keroten oil relatively inexpensively. The attached image shows the principle. A vertical shaft is dug and a boring machine is lowered down the shaft and it starts boring horizontally into the oil shale. The boring maching is like a conventional boring machine that digs tunnels, but it doesn't need any machinery for inserting concrete lining behind it, and it is extra long to contain a facility for burning the oil shale dust to about 1000 degF to remove the oil from the dust. The machine also has another section at the rear that compacts the dust. It leaves a center uncompacted region that is a tunnel so that the machine can trail the pipes required to bring the oil & CO2 out; and the oxygen (or air) in. Since there may be excess dust, the excess dust can be removed by oil slurry or entrained in the exhaust gas. The advantage is that the overburden doesn't need to be removed. There is some excess shale dust created, but this can be used to create building products or as land fill. This system also doesn't need ice dams or electric heating and many vertical shafts, like the Shell Oil system. See Attachment.	50009-001



For the large government reserves of oil shale that has about 1000' of overburden, it should be possible to develop a system to remove the keroten oil relatively inexpensively.
The attached image shows the principle. A vertical shaft is dug and a boring machine is lowered down the shaft and it starts boring horizontally into the oil shale. The boring machine is like a conventional boring machine that digs tunnels, but it doesn't need any machinery for inserting concrete lining behind it, and it is extra long to contain a facility for burning the oil shale dust to about 1000 degF to remove the oil from the dust. The machine also has another section at the rear that compacts the dust. It leaves a center uncompacted region that is a tunnel so that the machine can trail the pipes required to bring the oil & CO2 out; and the oxygen (or air) in. Since there may be excess dust, the excess dust can be removed by oil slurry or entrained in the exhaust gas.
The advantage is that the overburden doesn't need to be removed. There is some excess shale dust created, but this can be used to create building products or as land fill.
This system also doesn't need ice dams or electric heating and many vertical shafts, like the Shell Oil system.

Response for Document 50009

50009-001: Thank you for your comment.

Thank you for your comment, John Weatherman.

The comment tracking number that has been assigned to your comment is OSTSD50010.

Comment Date: December 30, 2007 23:22:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD50010

First Name: John
Middle Initial:
Last Name: Weatherman
Organization:
Address: 202W 1st st
Address 2:
Address 3:
City: Los Angeles
State: CA
Zip: 90042
Country: USA
Email: weatherman@whoever.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As a concerned citizen, I am expressing my extreme apprehension about any prospecting for oil shale on public lands. The well known environemntal impact of the oil sands extaction in Alberta should be a warning sign for the BLM. Due to the effects on the environment, I sincerely wish that the BLM will halt any further leasing for oil shale mining.	50010-001

Response for Document 50010

50010-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

Thank you for your comment, John Austin.

The comment tracking number that has been assigned to your comment is OSTSD50011.

Comment Date: January 1, 2008 16:21:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD50011

First Name: John
Middle Initial: F
Last Name: Austin
Organization:
Address: 30800 L25 Rd.
Address 2:
Address 3:
City: Hotchkiss
State: CO
Zip: 81419
Country: USA
Email: johnaustin@tds.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Domestic production figure on page A-109 is in error. Latest A.P.I. weekly production and refining statistics for week ending 12-21-07 lists 5,172,000 bbl./day, also shows 5,308,000 bopd average for the week ending 12-22-06. Figure for 2005 would fall somewhere in here. The PEIS report figure of 2.4 mmbopd (2005 average) is obviously incorrect. 50011-001

Sincerely, J. F. Austin

Response for Document 50011

50011-001: Thank you for your comment. As you no doubt appreciate, crude oil supplies vary daily. The figures provided were correct for the time period against which they were cited. The figures contained in this discussion were derived from data published on the Web site of the Energy Information Administration (EIA), the Nation's official source of energy statistics.

Thank you for your comment, heather tobin.

The comment tracking number that has been assigned to your comment is OSTSD50012.

Comment Date: January 1, 2008 19:48:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD50012

First Name: heather
Middle Initial:
Last Name: tobin
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am submitting my support for the more moderate of the three plans for the Development of Oil Shale in Colorado, Wyoming and Utah. Opening the 830,000 acres allows for sufficient energy development and allows protection for sensitive environmental areas. This compromise is in the best interests of everyone and I encourage the BLM to choose it. Thank you for your time.
Heather, Josh and Patrick Tobin

50012-001

Response for Document 50012

50012-001: The BLM acknowledges the commentor's preference for Alternative C.

Thank you for your comment, jack Dysart .

The comment tracking number that has been assigned to your comment is OSTSD50013.

Comment Date: January 2, 2008 10:30:37AM
Oil Shale and Tar Sands
Comment ID: OSTSD50013

First Name: jack
Middle Initial: c
Last Name: Dysart
Organization:
Address: 0310 crystal country cir
Address 2:
Address 3:
City: Carbondale
State: CO
Zip: 81623
Country: USA
Email: dysart@sopris.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Until technology and commercial viability, of Oil Shale and Tar Sands, only the minimum acreage. NEVER the maximum. | 50013-001

Response for Document 50013

50013-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50014.

Comment Date: January 3, 2008 08:45:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD50014

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

If the project can keep any environmental impact to a minimum then I would vote to proceed.

The energy act of 2005 was correct in acknowledging that the USA needs to limit its dependence on foreign oil. Dependence on foriegn oil creates a direct threat to national security and it has allowed the american consumer to be guaged with rediculous prices for fuel. 50014-001

In addition the government should continue to and enhance its promotion of alternative technologies and not be influenced by lobbyists to restrain such technology.

Response for Document 50014

50014-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Bob Brister.

The comment tracking number that has been assigned to your comment is OSTSD50015.

Comment Date: January 3, 2008 21:44:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD50015

First Name: Bob
Middle Initial:
Last Name: Brister
Organization:
Address: 1102 S 800 E #A
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84105
Country: USA
Email: bbrister@greens.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil Shale and Tar Sands development should not be allowed on public lands. This type of development uses a prohibitive amount of water in our desert state. The destruction of wilderness-quality land is unacceptable. We should be phasing out fossil fuel use because of global warming, not developing more. Thank you for considering my comments. 50015-001

Response for Document 50015

50015-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Greg Wells.

The comment tracking number that has been assigned to your comment is OSTSD50016.

Comment Date: January 6, 2008 15:12:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD50016

First Name: Greg
Middle Initial: J
Last Name: Wells
Organization:
Address: 3508 Timberline
Address 2:
Address 3:
City: Bakersfield
State: CA
Zip: 93308
Country: USA
Email: gregsmolly@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Stop global terrorism by reducing the price of oil as determined by Opec and Environmental groups. Develop shale oil and tar sands resources in the Lower 48; build a large capacity pipeline from Alaska to lower 48, develop infrastructure on the east coast to discontinue the use of home heating oil. Build nucleur power plants for the generation of electricty. Regulate the ligitation that slows, stops or elevates the cost of energy related projects.	50016-001

Response for Document 50016

50016-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50017.

Comment Date: January 6, 2008 23:51:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD50017

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

The US desperately needs a new source of domestic oil production in the face of declining production around the world in the near future. Government support is needed to start things going. Just having these BLM oil shale/ tar sand lands under development will act as a brake on rising oil prices and the falling dollar. A couple million barrel per day production would tend to restrain OPEC from raising prices too much.	50017-001

Response for Document 50017

50017-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Kenneth Belcher.

The comment tracking number that has been assigned to your comment is OSTSD50018.

Comment Date: January 9, 2008 07:40:30AM
Oil Shale and Tar Sands
Comment ID: OSTSD50018

First Name: Kenneth
Middle Initial:
Last Name: Belcher
Organization:
Address:
Address 2:
Address 3:
City:
State: IL
Zip:
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Huge mines here turning tarry sand into cash for Canada and oil for the United States are taking an unexpectedly high environmental toll, sucking water from rivers and natural gas from wells and producing large amounts of gases linked to global warming. The river used to be blue, now it's brown. Nobody can fish or drink from it. This has been the biggest environmental crime in history. Put money into alternative fuel research and leave are beautiful country alone	50018-001

Response for Document 50018

50018-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, William Fisher.

The comment tracking number that has been assigned to your comment is OSTSD50019.

Comment Date: January 9, 2008 08:59:22AM
Oil Shale and Tar Sands
Comment ID: OSTSD50019

First Name: William
Middle Initial: A
Last Name: Fisher
Organization:
Address: P.O. Box 31802
Address 2:
Address 3:
City: Edmond
State: OK
Zip: 730030031
Country: USA
Email: RockinFCoLtd@Cox.Net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Oil Shale and Tar Sands are enormous, strategic and tactical resources for our Nation's security: economically, politically and militarily. The current methodology of production is too expensive to make harvesting this resource feasible with the previously used methodologies, both from an enviromental remediation perspective and cost of operations in utilities, disposal of the 100% additional volume of shale and heavy metals AND from basic electrical usage required which would be a HUGE drain on the region's electrical grid capacity. HOWEVER, THERE IS A SOLUTION... We have tested our environmentally friendly chemical compound on oil shale from Parachute Creek. Our chemical worked exactly as predicted in encapsulating carbon on a molecular level and stripping it from its carrier, in this case the kerogen (the petroleum precursor) from the oil shale. Whereas our chemical separates oil from its carrier, then automatically separates from the oil (as our chemical is in a water medium), with the oil shale the kerogen went into solution or suspension rather than immediate separation. Since that initial testing, I have been introduced to one of Mobil's former chief chemists on their oil shale efforts. He has a patent on equipment which will easily separate the kerogen from our chemical using various sonic vibratory technologies. Dr. Lawerence Stowe was the individual who had to write the report for Mobil's Board advising them to abandon (for the time being) their efforts to harvest oil shale in 1988. This Dr. Lawerence Stowe told me he is certain our chemical is the "missing link" for the oil shale industry. Our "LP" chemical did NOT release any of the toxic heavy metals or double the volume of the oil shale processed as heating does. The oil shale CAN be simply mined most efficiently through removal of the overburden with its replacement and TOTAL REMEDIATION upon completion of processing. No creature visiting a remediated site, whether man or animal, can know where a site has been mined and where it hasn't. I would also insist as part of the sales contract to the oil companies that the canyon and scenic facades be left intact for a distance of at least 100 yards if not double that to maintain the beauty and natural wonder of the canyons and the geological integrity of the canyons facades in the oil shale formations. Since our used chemical's remenants are organic

50019-001

compounds which become fertilizer, there are no hazards or release of toxins from our chemical. None is released from the pulverized oil shale either. The gain in the volume of the oil shale is a net zero which allows for its clean, "green" replacement in the Earth form from which it came. Dr. Stowe is having our chemical's application tested and our claims verified by an independent oil lab in Dallas with videoing for presentation to the U.S. Senate and the heads of oil companies. I know they will have the same results we have experienced as the "sparks and magic" comes from our chemical, not my means of testing. If ANYTHING, an actual lab test of the LP will be even more effective as they will be able to achieve a much finer pulverized state of the oil shale than I was able to produce in our field test. Our chemical (all organic and approved for the EPA SNAP List, by the way) will also be effective for cutting through oil sand deposits like a hot knife through butter. A MAJOR international oil company's Canadian subsidiary is scheduled to receive our chemical for testing on their oil sands deposits in Alberta the week of January 14, 2008. Dr. Stowe, understanding our chemical's encapsulating process, confirmed my assumption (having not tested LP on the oil sands myself) that our chemical will indeed "cut through the oil sand like a hot knife through butter", thereby decreasing the costs of production financially while cleaning up the petroleum residue too often common in the oil sands communities' water, air and soil. Our chemical HAS BEEN TESTED AND USED on oil spills, paraffin build-ups in pipe lines, oil well purses and contaminated soils. It strips the hydrocarbon molecules out almost instantaneously and completely removes the carbon in a matter of just a few minutes. The oil then is collected from where it is "floating" on top of our chemical on top of the soil. In pipeline applications, our chemical stripped the paraffin from the clogged pipeline AND decreased the viscosity of the crude oil flowing through the pipeline, not only clearing out the pipelines for cheaper transport costs but also initiating the process of refining! At the terminus of the pipeline, the oil and the chemical were separated with the paraffin separating from the chemical when allowed to settle. This chemical WILL work to make the oil shale and oil sand deposits environmentally, financially, politically and aestheticallly viable for harvesting. It also won't hurt MY feelings and back account one little bit. Making the United States energy independent for the next 150 years (at a minimum) will have strategic, political and financial benefits and implications beyond my ability to fathom. By not having to import any oil, but rather becoming the world's #1 exporter of oil again, our economy will benefit immensely with the legitimate trickle down effects helping everybody in the country with an expanding economy, virtual elimination of any trade deficit and lower domestic fuel prices. It will also provide us not only the breathing room to develop legitimate complimentary energy resources but the economic capability to cover the cost of their development and implementation, while freeing the United States from "oil blackmail" by hostile regimes throughout the oil producing nations of the world. Our chemical produces the "win-win" solutions to the harvesting of these resources in an enviromentally friendly approach, both for the U.S. and Canadian Oil Sands AND the American Oil Shale. There is no legitimate negative to the use of an environmentally friendly chemical to harvest these resources while restoring, preserving and protecting the natural environment of our landscapes. We're ready to go with our LP right now and have additional blending plants ready for production within three months of siting the footprint. I for one, thank God for this breakthrough. It is more than timely.

50019-001 (cont.)

Response for Document 50019

50019-001: Thank you for your comment.

Thank you for your comment, David Cooper.

The comment tracking number that has been assigned to your comment is OSTSD50021.

Comment Date: January 9, 2008 13:06:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD50021

First Name: David
Middle Initial: B
Last Name: Cooper
Organization:
Address: 3286 Shadow Ridge Court
Address 2:
Address 3:
City: Clifton
State: CO
Zip: 81520
Country: USA
Email: megbirds@Yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is difficult to understand how so much can be done toward initiating oil shale production and the accompanying disruption of the environment when it has yet to be proved that such a process is actually viable, and is still so poorly understood and the potential value so in question. Wake up folks, this is our only planet. Let's not destory it for such an unproved, environmental dangerous procedure. Thank you. 50021-001

Response for Document 50021

50021-001: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, of Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable environmentally sound manner.

Thank you for your comment, Theresa Skelton.

The comment tracking number that has been assigned to your comment is OSTSD50022.

Comment Date: January 12, 2008 09:43:08AM
Oil Shale and Tar Sands
Comment ID: OSTSD50022

First Name: Theresa
Middle Initial: T
Last Name: Skelton
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am absolutely and completely opposed to any attempt to make these lands in Utah available for oil extraction. The money it would cost to make the deposits usable should be spent on alternative fuels. Destroying the southern Utah landscape (and air and water quality) forever in order to acquire merely 18 years worth of gas and oil???? That makes no sense whatsoever! Stop this nonsense immediately. We need long term solutions to the energy and global warming problems, not "finger in the dike" attempts which will only contribute to the problems, not solve or even improve them. 50022-001

Response for Document 50022

50022-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Randy Herbold.

The comment tracking number that has been assigned to your comment is OSTSD50023.

Comment Date: January 13, 2008 10:49:18AM
Oil Shale and Tar Sands
Comment ID: OSTSD50023

First Name: Randy
Middle Initial:
Last Name: Herbold
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I think our time, money, and efforts would be better spent on education in sciences, alternative fuels and protecting our environment. End any plan for tar sand and oil shale. | 50023-001

Response for Document 50023

50023-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, robert mccrory.

The comment tracking number that has been assigned to your comment is OSTSD50024.

Comment Date: January 13, 2008 13:10:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD50024

First Name: robert
Middle Initial:
Last Name: mccrory
Organization:
Address: 931 pea ridge rd
Address 2:
Address 3:
City: bostic
State: NC
Zip: 28018
Country: USA
Email: bmccrory1@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

i very much disagree with the BLM tar sand projects, the pics of canada's is discusting and disgrace | 50024-001

Response for Document 50024

50024-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, Charles Augustyn.

The comment tracking number that has been assigned to your comment is OSTSD50025.

Comment Date: January 14, 2008 08:11:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD50025

First Name: Charles
Middle Initial:
Last Name: Augustyn
Organization:
Address:
Address 2:
Address 3:
City:
State: NE
Zip: 68516
Country: USA
Email: caugustyn2@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Cost Benefit analysis. Internally to proposal: Benefits are stated but can't be verified. Costs are not clear, but were to costly in 1980's.

Proposal vs. other energy sources available: What is cost difference between processing oil shale than growing renewable crops like cane and corn?

I know this, growing crops provide a source of oxygen, and they look a heck of a lot better than a pit mine.

Will the BLM require restoration of land back to original condition as an area is deemed "done" as far as able to continue to be available for current source of energy?

50025-001

Response for Document 50025

50025-001: A cost-benefit analysis is not required to make a reasoned choice among Alternatives A, B, and C. The CEQ Guidelines for Implementation of the Procedural Provisions of the NEPA does not require preparation of a cost-benefit analysis for all EISs. The regulations state “If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences” (40 CFR 1502.23 Cost-benefit analysis). No such analysis was considered necessary for this PEIS to distinguish among alternatives for making an allocation decision.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50026.

Comment Date: January 14, 2008 11:00:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD50026

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I have been traveling the area you are proposing to develop for the last 50 years and can not believe you would even consider the tar sands development for an area such as this. The tar sands development would destroy some of the most beautiful and unique areas in the world. We owe it to future generations to leave this area unsullied. Rather than destroying this area for short-term oil reserves, we need to move forward in searching for alternatives to fossil fuel. The reserves are finite, we need to work on something to replace them.

50026-001

Response for Document 50026

50026-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, Robert Wallace Jr..

The comment tracking number that has been assigned to your comment is OSTSD50027.

Comment Date: January 17, 2008 10:04:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD50027

First Name: Robert
Middle Initial: W
Last Name: Wallace Jr.
Organization:
Address: 15731 N 91st Dr.
Address 2:
Address 3:
City: PEORIA
State: AZ
Zip: 85382
Country: USA
Email: rwallace66@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sir:

It seems to me that given the current energy situation, this effort by BLM and the Secretary of the Interior is not receiving much press coverage. Until recently I had only heard a few passing references to the potential for Oil Shale. After researching the subject I find that identified reserves are vast and the technology for recovery is being tested as I write this comment. Why hasn't the news media been more involved in the coverage or are they intentionally being kept in the "Dark"? 50027-001

Best regards,

R W Wallace Jr.

Response for Document 50027

50027-001: There has been a series of public meetings held throughout the study area of the PEIS over the last two years. There has also been substantial media coverage regarding oil shale and tar sands activities of both government and private industry activities within the area. BLM has been maintaining a web site (http://ostseis.anl.gov) with extensive information regarding the PEIS project since its inception.

Thank you for your comment, mike dyer.

The comment tracking number that has been assigned to your comment is OSTSD50029.

Comment Date: January 25, 2008 18:02:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD50029

First Name: mike
Middle Initial: a
Last Name: dyer
Organization:
Address: 212 redwood cir.
Address 2:
Address 3:
City: petaluma
State: CA
Zip: 94954
Country: USA
Email: dyer0057@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I hope you can find a cost effective means to refine this oil. I want the U.S. to be independent of the rest of the world for our oil. As far as I am concerned we should drill for oil wherever it is. It is ridiculous not yo. Mike Dyer

50029-001

Response for Document 50029

50029-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Lydia Garvey.

The comment tracking number that has been assigned to your comment is OSTSD50030.

Comment Date: January 25, 2008 23:40:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD50030

First Name: Lydia
Middle Initial:
Last Name: Garvey
Organization:
Address: 429 S 24th
Address 2:
Address 3:
City: Clinton
State: OK
Zip: 73601
Country: USA
Email: wolfhowlmama@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Re Draft PEIS for oil/shale/tar/sand development in CO,UT & WY

NIX it! It's grossly inappropriate to destroy BLM areas for a few hrs. of oil,the price is too high. Do your job- Protect Our Public lands, waters & wildlife! You work for citizens,not industry! Your attention to this most urgent matter would be much appreciated by all present & future generations of all species. thank you	50030-001

Response for Document 50030

50030-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Saif Siygron.

The comment tracking number that has been assigned to your comment is OSTSD50031.

Comment Date: January 26, 2008 01:43:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD50031

First Name: Saif
Middle Initial:
Last Name: Siygron
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please we would like to get your offer for the cerosote oil (tar oil) which is suitable for the immpregnated wooden poles . | 50031-001

Response for Document 50031

50031-001: The commentor's request is outside the scope of this PEIS.

Thank you for your comment, Byron McDonald.

The comment tracking number that has been assigned to your comment is OSTSD50032.

Comment Date: January 26, 2008 12:48:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD50032

First Name: Byron
Middle Initial:
Last Name: McDonald
Organization:
Address: 13741 Annandale Dr. 19-I
Address 2:
Address 3:
City: Seal Beach
State: CA
Zip: 90740
Country: USA
Email: poppabum@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Byron A. McDonald 13741 Annandale Dr. 19-I Seal Beach, CA 90740

Pueblo Colorado is my place of birth (1920) and Colorado University, Boulder, my Alma Mater (BSME 1942), Father, J.H. McDonald, Colo. Represenative and Senator 1936-42. I know the subject territory, very intersted in this project and am wondering how I will be able to invest. Any input will be appreciated.	50032-001

Response for Document 50032

50032-001: The commentor's request is outside the scope of this PEIS.

Thank you for your comment, Irwin Stewart.

The comment tracking number that has been assigned to your comment is OSTSD50033.

Comment Date: January 26, 2008 20:40:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD50033

First Name: Irwin
Middle Initial: I
Last Name: Stewart
Organization:
Address: 715 Galaxy Drive
Address 2:
Address 3:
City: Grand junction
State: CO
Zip: 81506
Country: USA
Email: irwinpenny@bresnan.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As a former Process Engineering Manager with Occidental (OXY) Oil Shale Inc. I disagree with the statement that utilities and water will be need to be imported to each site in order for them to operate. The OXY plant would generate electricity from shale removed to provide void space in the modified insitu retorts in a fluidized bed combuster. The insitu process generates water and the mine at Piceance Creek produced over 400 gpm from the shafts alone which would be increased once shaft and retort mining proceeds. 50033-001

Response for Document 50033

50033-001: Thank you for your comment.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50034.

Comment Date: January 27, 2008 21:11:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD50034

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

i have invested and visited tar sands operations in canada for 25 years..i'm sure you people will stop extraction of oil from colorado and utah..i hope you succeed...bwb	50034-001

Response for Document 50034

50034-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Robert San Socie.

The comment tracking number that has been assigned to your comment is OSTSD50035.

Comment Date: January 28, 2008 11:10:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD50035

First Name: Robert
Middle Initial: G
Last Name: San Socie
Organization:
Address: 4450 Timber Hollow Way
Address 2:
Address 3:
City: Jacksonville
State: FL
Zip: 32224
Country: USA
Email: sanscare@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We will lose more than we gain in value. This will not improve our energy position. I feel this is poor management and a waste of assets for a short term goal. | 50035-001

Response for Document 50035

50035-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Christopher Buckley.

The comment tracking number that has been assigned to your comment is OSTSD50036.

Comment Date: January 31, 2008 08:28:50AM
Oil Shale and Tar Sands
Comment ID: OSTSD50036

First Name: Christopher
Middle Initial: P
Last Name: Buckley
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

To whom it may concern:

I would like to express my supprt for the opening up & use of our abundant natural resources of oil shale & tar sands. I recommend that we open up the areas to increased exploration and ultimately to production in order to begin to free ourselves from the crippling reliance on foreign energy sources. I also recommend that we use the most effective environmentally safe measures in this process. We should limit the environmental impact of these projects as much as possible. 50036-001

Sincerely,

Chris Buckley

Response for Document 50036

50036-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Arthur Graham.

The comment tracking number that has been assigned to your comment is OSTSD50037.

Comment Date: February 1, 2008 10:37:57AM
Oil Shale and Tar Sands
Comment ID: OSTSD50037

First Name: Arthur
Middle Initial: S
Last Name: Graham
Organization:
Address: 6777 Reeder Mesa Road
Address 2:
Address 3:
City: Whitewater
State: CO
Zip: 81527
Country: USA
Email: arthur.graham@vectrabank.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Having worked in the oil shale industry in the late 1970's I can tell you that the damage to the land will last for several years. The effect on the wildlife and plants is tremendous. The last part of the equation is that these oil companies treat these leases like their private property. Access to this land by hunters, angler or hikers will be limited by the oil compaines who set up rules from thier headquarters somewhere. 50037-001 50037-002

Responses for Document 50037

50037-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

50037-002: Lessees may have rights to control access to properties depending upon the activities taking place. These rights generally apply to security and safety concerns. It is not known what measures may be applied in future oil shale or tar sands leases.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50038.

Comment Date: February 3, 2008 16:40:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD50038

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Oil shale makes no sense.The destruction of the enviroment will be overwhelming.Please consider more research in alternative enegry.	50038-001

Response for Document 50038

50038-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, william howard.

The comment tracking number that has been assigned to your comment is OSTSD50039.

Comment Date: February 3, 2008 16:49:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD50039

First Name: william
Middle Initial: p
Last Name: howard
Organization:
Address: 906 hill ave
Address 2:
Address 3:
City: grand junction
State: CO
Zip: 81501
Country: USA
Email: pikehoward@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil shale is destructive.The impact will be overwhelming to the enviroment.Please consider researching and promoting alternative energy. Regards, William

50039-001

Response for Document 50039

50039-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, John Jenkins.

The comment tracking number that has been assigned to your comment is OSTSD50040.

Comment Date: February 3, 2008 17:54:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD50040

First Name: John
Middle Initial:
Last Name: Jenkins
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I believe that developing oil shale in Colorado, Utah, and Wyoming is not in the best interest of the United States. Resources, both private and public, used to extract oil from shale would be better utilized encouraging the development of sustainable energy. Oil shale can not be developed without forever changing the integrity of the areas under consideration. These areas are much more important to the Nation as repositories for native organisms, archaeological sites, open spaces, etc. They are of greatest benefit undeveloped. Once the oil is extracted and used it is gone forever just as the destruction that such development produces will be forever. I strongly urge that the areas under threat from oil shale development be left in their natural state and future efforts should aim to maintain or enhance that naturalness. Thank you. 50040-001

Response for Document 50040

50040-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, ellen hunt.

The comment tracking number that has been assigned to your comment is OSTSD50041.

Comment Date: February 6, 2008 11:02:28AM
Oil Shale and Tar Sands
Comment ID: OSTSD50041

First Name: ellen
Middle Initial: f
Last Name: hunt
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

stop drilling. stop destroying the thing that will keep colorado solvent way beyond the "extraction" years...It is tourism. There is no way to repair this fragile eco system, nor restore water quality.....oil & gas companies are in this for short term gain. It is up to the BLM to stand strong and preserve the future. Thank you, Ellen Hunt	50041-001

Response for Document 50041

50041-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Nancy Peterson.

The comment tracking number that has been assigned to your comment is OSTSD50048.

Comment Date: February 11, 2008 17:40:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD50048

First Name: Nancy
Middle Initial:
Last Name: Peterson
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please withhold oil and shale from our lands. We must preserve the land for resources and natural habitats.	50048-001

Response for Document 50048

50048-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Edith Simpson.

The comment tracking number that has been assigned to your comment is OSTSD50049.

Comment Date: February 11, 2008 17:40:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD50049

First Name: Edith
Middle Initial:
Last Name: Simpson
Organization:
Address: 1325 Spring Avenue
Address 2:
Address 3:
City: Wynantskill
State: NY
Zip: 12198
Country: USA
Email: EdithESimpson@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bureau of Land Management's proposal would fuel an outdated, fossil-fuel-intensive energy infrastructure and comes at a time when we need to be rapidly transitioning away from fossil fuels-based energy production. If "business as usual" greenhouse gas emissions continue, over one third of the world's plants and animals will be committed to extinction by the middle of this century or before. 50049-001

Response for Document 50049

50049-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Travis Rummel.

The comment tracking number that has been assigned to your comment is OSTSD50053.

Comment Date: February 11, 2008 17:41:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD50053

First Name: Travis
Middle Initial: M
Last Name: Rummel
Organization:
Address: 4563 W 33rd Ave
Address 2:
Address 3:
City: Denver
State: CO
Zip: 80212
Country: USA
Email: travisrummel@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I do not support Oil Shale and Tar Sands exploration and extraction on public lands. | 50053-001

Response for Document 50053

50053-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, David Nauen.

The comment tracking number that has been assigned to your comment is OSTSD50060.

Comment Date: February 11, 2008 17:42:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD50060

First Name: David
Middle Initial:
Last Name: Nauen
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The US must move toward greater efficiency, conservation and new energy sources. Destructive searches for petroleum are crossing the threshold in the cost-benefit balance as they become increasingly destructive for the environment at the same time as their returns diminish for the American people.	50060-001

Response for Document 50060

50060-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Leslie Mace.

The comment tracking number that has been assigned to your comment is OSTSD50063.

Comment Date: February 11, 2008 17:42:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD50063

First Name: Leslie
Middle Initial: A
Last Name: Mace
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: bugsymooch@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil shale and tar sands produce lower quality oil, and oil that is harder to reach, more difficult to extract, and more expensive to process. In this time of green technology, the time and money involved in the effort to investigate oil shale and tar sands production would be better spent researching and developing green technology. Please think toward the future, especially the world we are leaving to our children.	50063-001

Response for Document 50063

50063-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Rick Rosner.

The comment tracking number that has been assigned to your comment is OSTSD50064.

Comment Date: February 11, 2008 17:42:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD50064

First Name: Rick
Middle Initial:
Last Name: Rosner
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

More unecessary and harmful development! Stop! | 50064-001

Response for Document 50064

50064-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sue Casad`.

The comment tracking number that has been assigned to your comment is OSTSD50069.

Comment Date: February 11, 2008 17:42:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD50069

First Name: Sue
Middle Initial: A
Last Name: Casad`
Organization:
Address: 1176 Idaho Avenue
Address 2:
Address 3:
City: Escondido
State: CA
Zip: 92027
Country: USA
Email: scasad@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. We need to take care of our land TODAY or it will never be habitable in the FUTURE! Let's save some for tomorrow, it's only ours to borrow! | 50069-001

Response for Document 50069

50069-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Noreen Weeden.

The comment tracking number that has been assigned to your comment is OSTSD50079.

Comment Date: February 11, 2008 17:43:59PM
Oil Shale and Tar Sands
Comment ID: OSTSD50079

First Name: Noreen
Middle Initial:
Last Name: Weeden
Organization:
Address: 493 Vermont Street
Address 2:
Address 3:
City: San Francisco
State: CA
Zip: 94107
Country: USA
Email: noreen@naturetrip.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Do not open our public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants. Instead investin in the transition to non-polluting, renewable energy sources.	50079-001

Response for Document 50079

50079-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, adam kimmel.

The comment tracking number that has been assigned to your comment is OSTSD50082.

Comment Date: February 11, 2008 17:44:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD50082

First Name: adam
Middle Initial:
Last Name: kimmel
Organization:
Address: 111 4th ave
Address 2:
Address 3:
City: new york
State: NY
Zip: 10003
Country: USA
Email: raaax@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Enough already, wake up and smell the future. 50082-001

Response for Document 50082

50082-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Edith Ogella.

The comment tracking number that has been assigned to your comment is OSTSD50087.

Comment Date: February 11, 2008 17:44:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD50087

First Name: Edith
Middle Initial:
Last Name: Ogella
Organization:
Address: 4868 Rhoads Avenue
Address 2:
Address 3:
City: Santa Barbara
State: CA
Zip: 93111
Country: USA
Email: edithogella@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I do not believe any mining of any kind should be held on public property, under any circumstance.

Alternative energy is available, and cheaper, with less environmentally damaging results. That is where the money and time should be spent. 50087-001

Do not alter our God-given earth for the greed of a few.

Response for Document 50087

50087-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50088.

Comment Date: February 11, 2008 17:44:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD50088

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

This is an important issue. Please consider the importance of addressing this issue now in a time-urgent manner. | 50088-001

Response for Document 50088

50088-001: Thank you for your comment.

Thank you for your comment, David Nichols.

The comment tracking number that has been assigned to your comment is OSTSD50089.

Comment Date: February 11, 2008 17:45:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD50089

First Name: David
Middle Initial: S
Last Name: Nichols
Organization:
Address: 5107 NE Couch Street
Address 2:
Address 3:
City: Portland
State: OR
Zip: 97213
Country: USA
Email: Davemult@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Ms. Sherry Thompson BLM Project Manager

Dear Ms. Thompson:

I write to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should abandon the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.	50089-001 50089-002 50089-003
The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.	50089-004
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	50089-001 (cont.)

Sincerely,

David S. Nichols

Responses for Document 50089

50089-001: The BLM acknowledges the commentor's preference for Alternative A.

50089-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50089-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50089-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, APRIL DAWSON.

The comment tracking number that has been assigned to your comment is OSTSD50094.

Comment Date: February 11, 2008 17:45:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD50094

First Name: APRIL
Middle Initial: M
Last Name: DAWSON
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

SAVE OUR LAND,DON"T OPEN IT UP FOR OIL DRILLING ETC. | 50094-001

Response for Document 50094

50094-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Joy Bergstrom.

The comment tracking number that has been assigned to your comment is OSTSD50095.

Comment Date: February 11, 2008 17:45:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD50095

First Name: Joy
Middle Initial: D
Last Name: Bergstrom
Organization:
Address: 2740 Purnell Rd.
Address 2:
Address 3:
City: Wake Forest
State: NC
Zip: 27587
Country: USA
Email: bergstromjoy@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please stop the destruction to more land and wildlife. So many acer's of land and wildlife have been destroyed for every tree that is taken down more damage is done to our climate, also to the creatures in the wild for there food source. Stop the destruction now.	50095-001

Response for Document 50095

50095-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, james hughes.

The comment tracking number that has been assigned to your comment is OSTSD50096.

Comment Date: February 11, 2008 17:46:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD50096

First Name: james
Middle Initial: a
Last Name: hughes
Organization:
Address: 1317 leugene ave
Address 2:
Address 3:
City: forked river
State: NJ
Zip: 08731
Country: USA
Email: starman22461@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

this sounds very much like what bush is doing to the enviorment. this week delaying the polar bear being declared endangered thereby letting oil companies tear up pristine land . and besides camping and hiking bush added mining to the parks charter . whens the last time you went mining with the family?	50096-001

Response for Document 50096

50096-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Julie Redman.

The comment tracking number that has been assigned to your comment is OSTSD50099.

Comment Date: February 11, 2008 17:46:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD50099

First Name: Julie
Middle Initial:
Last Name: Redman
Organization:
Address: 11 Audubon Lane
Address 2:
Address 3:
City: Madisonville
State: LA
Zip: 70447
Country: USA
Email: juliered@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We must not destroy our most precious resources - our public land for a little oil. We have some of the most pristine land in the world - let's preserve our wilderness for future generations! | 50099-001

Response for Document 50099

50099-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Annette Rauch.

The comment tracking number that has been assigned to your comment is OSTSD50100.

Comment Date: February 11, 2008 17:46:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD50100

First Name: Annette
Middle Initial: F
Last Name: Rauch
Organization:
Address: 15 Summit Farm Dr
Address 2:
Address 3:
City: East Greenwich
State: RI
Zip: 02818
Country: USA
Email: annette.rauch@tufts.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am very concerned about the environmental effects of oil and gas exploration. These projects produce limited amounts of fuel, but they destroy habitat that animals and plants need to survive. We need to develop more earth friendly energy projects. | 50100-001

Response for Document 50100

50100-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, david pittman.

The comment tracking number that has been assigned to your comment is OSTSD50101.

Comment Date: February 11, 2008 17:46:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD50101

First Name: david
Middle Initial: g
Last Name: pittman
Organization:
Address: 2422 west moss avenue
Address 2:
Address 3:
City: west peoria
State: IL
Zip: 61604
Country: USA
Email: dvdpttmn@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please choose the NO ACTION OPTION regarding this development. No other option is an acceptable use for taxpayer funds. Until this project can demonstrate sustainable and safe ecological practices, NO ACTION OPTION shold be chosen. 50101-001

sincerely, David Pittman

Response for Document 50101

50101-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, David Kollen.

The comment tracking number that has been assigned to your comment is OSTSD50102.

Comment Date: February 11, 2008 17:46:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD50102

First Name: David
Middle Initial: M
Last Name: Kollen
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I strongly urge support for the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. We do not need the wholesale destruction currently plaguing Alberta, Canada, nor can the western states afford the diversion of declining water resources.	50102-001

Response for Document 50102

50102-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Diann MacRae.

The comment tracking number that has been assigned to your comment is OSTSD50105.

Comment Date: February 11, 2008 17:47:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD50105

First Name: Diann
Middle Initial:
Last Name: MacRae
Organization:
Address:
Address 2:
Address 3:
City: Bothell
State: WA
Zip: 98021
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil shale and tar sands should not be developed on any public lands. 50105-001

Response for Document 50105

50105-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sharon Philips.

The comment tracking number that has been assigned to your comment is OSTSD50108.

Comment Date: February 11, 2008 17:47:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD50108

First Name: Sharon
Middle Initial: K
Last Name: Philips
Organization:
Address: 3510 Brackenfern Rd.
Address 2:
Address 3:
City: Katy
State: TX
Zip: 77449
Country: USA
Email: sphilips@gxt.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Preserve our natural areas and keep them pristine. I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 50108-001

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 50108-002

The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 50108-003

Responses for Document 50108

50108-001: The BLM acknowledges the commentor's preference for Alternative A.

50108-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50108-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Rosemary Dreger.

The comment tracking number that has been assigned to your comment is OSTSD50112.

Comment Date: February 11, 2008 17:48:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD50112

First Name: Rosemary
Middle Initial:
Last Name: Dreger
Organization:
Address: 698 Alexander Court
Address 2:
Address 3:
City: River Vale
State: NJ
Zip: 07675
Country: USA
Email: rdreger@optonline.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I do not believe our government should be investing in or allowing the use of tar sands for our energy needs. Tar sands ravage the land and produce unacceptable levels of greenhouse gas. | 50112-001

Response for Document 50112

50112-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50116.

Comment Date: February 11, 2008 17:48:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD50116

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. We need to stop subsidizing corporate welfare with wholesale giveaways of our public lands and the development necessary to support them. The time for embracing alternative energy and energy efficiency has come.	50116-001 50116-002 50116-003
The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.	50116-004
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	50116-001 (cont.)

Sincerely,

Responses for Document 50116

50116-001: The BLM acknowledges the commentor's preference for Alternative A.

50116-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50116-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50116-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Maricela Elizondo.

The comment tracking number that has been assigned to your comment is OSTSD50124.

Comment Date: February 11, 2008 17:49:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD50124

First Name: Maricela
Middle Initial:
Last Name: Elizondo
Organization:
Address: 7851 University Avenue,
Address 2: Suiet 103
Address 3:
City: La Mesa
State: CA
Zip: 91941
Country: USA
Email: menagy@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Do not mar public lands for profit. Leave these lands for future generations to enjoy. 50124-001

Response for Document 50124

50124-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50125.

Comment Date: February 11, 2008 17:49:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD50125

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

This is a very destructive idea. The last thing that we need is to go on with traditional fuel sources. It's time to look in new directions to clean energy. We don't have much time. | 50125-001

Response for Document 50125

50125-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Ann Roberts.

The comment tracking number that has been assigned to your comment is OSTSD50127.

Comment Date: February 11, 2008 17:50:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD50127

First Name: Ann
Middle Initial: R
Last Name: Roberts
Organization:
Address: 757 LeGrande Hwy
Address 2:
Address 3:
City: Horse Cave
State: KY
Zip: 42749
Country: USA
Email: ostapack@scrtc.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I think we have to find other options to save the environment. | 50127-001

Response for Document 50127

50127-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Leslie Lowe.

The comment tracking number that has been assigned to your comment is OSTSD50128.

Comment Date: February 11, 2008 17:50:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD50128

First Name: Leslie
Middle Initial:
Last Name: Lowe
Organization:
Address: 191 Murray Taylor Court
Address 2:
Address 3:
City: Inman
State: SC
Zip: 29349
Country: USA
Email: slowe@extendedstay.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.	50128-001 50128-002 50128-003
The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.	50128-004
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. Why would we choose to use a substance that emits huge amounts of greenhouse gases and is again a fossil fuel that we are trying to get away from as rapidly as possible.	50128-001 (cont.)
Oil shale and tar sands require power plants that burn other unclean fossil fuels and use huge amounts of water which is also a commodity we need to be conserving. This is not a valid use of the tax payers money and the BLM should be aware of the wishes of the American people and not act in the interests of big business. This mining will destroy more species through habitat destruction, pollution and ruin the landscape - something Americans have had enough of. Please make a decision that will benefit future generations and save our wild places for the species that still remain.	50128-005

Response for Document 50128

50128-001: The BLM acknowledges the commentor's preference for Alternative A.

50128-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50128-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50128-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

50128-005: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision making process.

Thank you for your comment, Allen Wall.

The comment tracking number that has been assigned to your comment is OSTSD50130.

Comment Date: February 11, 2008 17:50:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD50130

First Name: Allen
Middle Initial: J
Last Name: Wall
Organization:
Address: pob 1641
Address 2:
Address 3:
City: Lucerne
State: CA
Zip: 95458
Country: USA
Email: agypsyrock@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

DON'T IMAGINE A DENUDED WILDERNESS. | 50130-001

Response for Document 50130

50130-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Paul Szymanowski.

The comment tracking number that has been assigned to your comment is OSTSD50134.

Comment Date: February 11, 2008 17:51:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD50134

First Name: Paul
Middle Initial:
Last Name: Szymanowski
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am opposed to any oil shale/tar sands drilling in Colorado, Wyomin,g and Utah. The harm done to the environment and ecology of this region outweighs the minimal gain in oil production.	50134-001

Response for Document 50134

50134-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Michelle Palmer.

The comment tracking number that has been assigned to your comment is OSTSD50135.

Comment Date: February 11, 2008 17:51:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD50135

First Name: Michelle
Middle Initial:
Last Name: Palmer
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please don't allow more devastation of beautiful land. We have to try to save the planet, not destroy it. Thank you | 50135-001

Response for Document 50135

50135-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50136.

Comment Date: February 11, 2008 17:51:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD50136

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

This is a terrible project. You need to focus on responsible, sane, renewable energy programs. | 50136-001

Response for Document 50136

50136-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50140.

Comment Date: February 11, 2008 17:52:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD50140

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

go green

50140-001

Response for Document 50140

50140-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Mary Ann Smale.

The comment tracking number that has been assigned to your comment is OSTSD50142.

Comment Date: February 11, 2008 17:52:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD50142

First Name: Mary Ann
Middle Initial:
Last Name: Smale
Organization:
Address: 37 Dyers Bay Rd.
Address 2:
Address 3:
City: Steuben
State: ME
Zip: 046803110
Country: USA
Email: cryfreedomnow@localnet.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We have already lost so many precious recourses to the Bush administration. This is such a damaging and bad alternative for these priceless public lands! So many species of flora and fauna are threatened. What is the legacy you want to leave your children? More pollution, melting arctic flows, asthma, respiratory diseases and cancers? It is time to stand up to this administrations pandemic greed. Please do the right thing. Do not allow this gross miscarriage of power.	50142-001

Response for Document 50142

50142-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Michelle Palmer.

The comment tracking number that has been assigned to your comment is OSTSD50144.

Comment Date: February 11, 2008 17:52:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD50144

First Name: Michelle
Middle Initial:
Last Name: Palmer
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please don't allow more devastation of beautiful land. We have to try to save the planet, not destroy it. Thank you | 50144-001

Response for Document 50144

50144-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Adam Keats.

The comment tracking number that has been assigned to your comment is OSTSD50146.

Comment Date: February 11, 2008 17:52:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD50146

First Name: Adam
Middle Initial:
Last Name: Keats
Organization:
Address:
Address 2:
Address 3:
City: San Francisco
State: CA
Zip: 94114
Country: USA
Email: adamkeats@myrealbox.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support the "No Action" alternative. We have to cut our reliance on dirty and non-renewable fossil fuels and stop destroying what is left of our public lands just for a quick profit. | 50146-001

Sincerely,

Adam Keats

Response for Document 50146

50146-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Kathleen Eaton.

The comment tracking number that has been assigned to your comment is OSTSD50148.

Comment Date: February 11, 2008 17:52:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD50148

First Name: Kathleen
Middle Initial:
Last Name: Eaton
Organization:
Address: 1035 Schagrin Dr.
Address 2:
Address 3:
City: Middletown
State: DE
Zip: 19709
Country: USA
Email: sce9590@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. The extraction and development of oil shale and tar sands for the production of fossil fuels in Colorado, Utah, and Wyoming would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 50148-001

Response for Document 50148

50148-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, victor limon.

The comment tracking number that has been assigned to your comment is OSTSD50157.

Comment Date: February 11, 2008 17:54:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD50157

First Name: victor
Middle Initial: r
Last Name: limon
Organization:
Address: 2348 viewridge pl
Address 2:
Address 3:
City: escondido
State: CA
Zip: 92026
Country: USA
Email: pga4ric@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I approve of any method that will extract oil from OUR OWN resourses. Please cut the funding of foreign oil dependcy. DRILL IN ALASKA AND ANY PLACE ELSE IN THE US TERERORTIES, and in the gulf of mexico and off the holy california coast, get ofF your eviormental band wagon and DRILL, DAMN IT	50157-001

Response for Document 50157

50157-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Thomas Artin.

The comment tracking number that has been assigned to your comment is OSTSD50159.

Comment Date: February 11, 2008 17:54:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD50159

First Name: Thomas
Middle Initial:
Last Name: Artin
Organization:
Address: 240 King's Highway
Address 2:
Address 3:
City: Sparkill
State: NY
Zip: 10976
Country: USA
Email: tom@artinarts.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strenuously oppose the plans of the Bush administration to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 50159-001

Response for Document 50159

50159-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jenifer Gibson.

The comment tracking number that has been assigned to your comment is OSTSD50160.

Comment Date: February 11, 2008 17:54:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD50160

First Name: Jenifer
Middle Initial: A
Last Name: Gibson
Organization:
Address: 9703 Ed Street
Address 2:
Address 3:
City: Hudson
State: FL
Zip: 34669
Country: USA
Email: padchome@iinet.net.au
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Humans are a foolish and failed species. | 50160-001

Response for Document 50160

50160-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Dan Quinn.

The comment tracking number that has been assigned to your comment is OSTSD50161.

Comment Date: February 11, 2008 17:54:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD50161

First Name: Dan
Middle Initial:
Last Name: Quinn
Organization: none
Address: 10 Bear Paw St
Address 2:
Address 3:
City: Portola Valley
State: CA
Zip: 940288014
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please select the "no action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Such development, if begun, will take years and add hugely to the greenhouse gasses this country produces. By the time production is ready to ramp up, if not sooner, we will have realized the folly of planning to endlessly increase our greenhouse-gas production. Conservation is a much better alternative in the long run. Please do not make these lands and ecosystems our last sacrifice on the altar of unending, unsustainable growth. Take account of the impact on the release of greenhouse gasses, and the growing global need to limit such release.	50161-001

Response for Document 50161

50161-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Lee Hunt.

The comment tracking number that has been assigned to your comment is OSTSD50167.

Comment Date: February 11, 2008 17:55:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD50167

First Name: Lee
Middle Initial:
Last Name: Hunt
Organization:
Address: 2 Bunker Hill Ct.
Address 2:
Address 3:
City: Longview
State: TX
Zip: 75601
Country: USA
Email: lachunt@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I fully endorse the "NO ACTION" alternative to Oil Shale and Tar Sands mining.

We must not continue to abuse our environment, and be willing to pay for alternatives.

Lee Hunt

50167-001

Response for Document 50167

50167-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Christopher Pelham.

The comment tracking number that has been assigned to your comment is OSTSD50170.

Comment Date: February 11, 2008 17:56:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD50170

First Name: Christopher
Middle Initial:
Last Name: Pelham
Organization:
Address: 150 E 7th St #C7
Address 2:
Address 3:
City: New York
State: NY
Zip: 10009
Country: USA
Email: cpelham@mindspring.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Public lands belong to all of us. In my mind, if you give the land or land rights to private companies to mine or use, then you are basically stealing from us. In this case, not only would you be stealing but you would be doing so to use the land in a way that especially flouts the public will and in a way that is absolutely short-sited and self-defeating. Remember who you are and stop it.	50170-001

Response for Document 50170

50170-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Eileen Hennessy.

The comment tracking number that has been assigned to your comment is OSTSD50172.

Comment Date: February 11, 2008 17:57:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD50172

First Name: Eileen
Middle Initial: F
Last Name: Hennessy
Organization:
Address: 54 Middlesex Street
Address 2:
Address 3:
City: Chelmsford
State: MA
Zip: 01863
Country: USA
Email: EilMadFrda@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We are way behind on developing alternative, clean renewable sources of fuel. That said we need to use every available source we have, including oil shale, tar sands, & liquified coal. We just happen to sitting on the world's largest deposits of coal. We need to develop the means of using it in a cleaner fashion. I can be done & we need to do it. I am tired of being at the whim of some sand-kicking shiek. Just wait until the populace of China & India start driving more. This economy is based upon mobility. You'll be crying about a lot more about $5 per gallon gas & goods that cost a third more when that happens. Take off your blinders & start pushing for better ways to use what we have. If Hitler could run the last 9 months of the war effort without oil - we can manage. Our markets need to get used to numerous sources of energy. There's no one single silver bullet here, so stop being so obstructionistic & short-sighted. May I suggest thinking outside of the box? 50172-001

Response for Document 50172

50172-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, benny chien.

The comment tracking number that has been assigned to your comment is OSTSD50173.

Comment Date: February 11, 2008 17:57:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD50173

First Name: benny
Middle Initial:
Last Name: chien
Organization:
Address: 2615 ellentown road
Address 2:
Address 3:
City: la jolla
State: CA
Zip: 92037
Country: USA
Email: benny.chien@stanfordalumni.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The shale conversion process will cause vast damage to the long-term environment and benefits only a small group of energy companies. | 50173-001

Response for Document 50173

50173-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Tricia Heidemann.

The comment tracking number that has been assigned to your comment is OSTSD50174.

Comment Date: February 11, 2008 17:57:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD50174

First Name: Tricia
Middle Initial:
Last Name: Heidemann
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Stop depleting our natural resources! Once they're gone they won't be back... | 50174-001

Response for Document 50174

50174-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, John Hurst.

The comment tracking number that has been assigned to your comment is OSTSD50176.

Comment Date: February 11, 2008 17:57:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD50176

First Name: John
Middle Initial:
Last Name: Hurst
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

leave the office with a bit of dignity President Bush. Don't do this.

If this happens I will never vote for another Republican for the next 20 years!

50176-001

Response for Document 50176

50176-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Audrey Higbee.

The comment tracking number that has been assigned to your comment is OSTSD50183.

Comment Date: February 11, 2008 17:58:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD50183

First Name: Audrey
Middle Initial:
Last Name: Higbee
Organization:
Address: 82 Batchelor Street
Address 2:
Address 3:
City: Granby
State: MA
Zip: 01033
Country: USA
Email: greendolphin@gogtt.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. 50183-001

Response for Document 50183

50183-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Robert Fryer.

The comment tracking number that has been assigned to your comment is OSTSD50184.

Comment Date: February 11, 2008 17:58:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD50184

First Name: Robert
Middle Initial: W
Last Name: Fryer
Organization:
Address: 1692 Camberwell Place
Address 2:
Address 3:
City: Westlake Village
State: CA
Zip: 91361
Country: USA
Email: bob@pop-ink.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As a businessman, I'm firmly convinced that destroying resources for future generations isn't a well-thought out plan. Instead, resource aquisition should also consider long-term affects. I've never seen any proof that this type of mining is good for anything other than short-term gain. STRIP MINING STRIPS THE FUTURE TOO. 50184-001

Let's instead pursue solar, wind, geothermal.

Response for Document 50184

50184-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Elaine Padilla.

The comment tracking number that has been assigned to your comment is OSTSD50185.

Comment Date: February 11, 2008 17:58:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD50185

First Name: Elaine
Middle Initial: R
Last Name: Padilla
Organization:
Address:
Address 2:
Address 3:
City: Encino
State: CA
Zip: 91436
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It seems as if the Bush Administration does not care about preserving our environment and money is the root. When will this stop? Do we not car about preserving nature for our future generations to enjoy? | 50185-001

Response for Document 50185

50185-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, stephen montgomery.

The comment tracking number that has been assigned to your comment is OSTSD50188.

Comment Date: February 11, 2008 17:58:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD50188

First Name: stephen
Middle Initial: j
Last Name: montgomery
Organization:
Address: 7071 chapala canyon court
Address 2:
Address 3:
City: san diego
State: CA
Zip: 92129
Country: USA
Email: sjmbioconsult@san.rr.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

IT IS A TRAVESTY THAT YOU ARE EVEN CONSIDERING OPENING UP THESE BEAUTIFUL IRREPLACEABLE LANDS FOR PROFIT TAKING.
WE EXPECT THIS FROM THE BUSH ADMINISTRATION AND SUCH REPUBLICAN SOURCES, AS THEY ARE FULLY BASED IN CORPORATE GREED AND LAND DEVELOPMENT.

THESE LANDS WILL NEVER RETURN TO THEIR INCREDIBLE STATE ONCE YOU ALLOW THE DEVELOPERS IN TO TAKE THEIR PROFITS AND RESOURCES AND THEN LEAVE.

AS A LAND MANAGER, SUPPOSEDLY CONCERNED FOR MANAGING THE LAND RESOURCE....HOW CAN YOU EVEN CONSIDER GIVING IN TO THIS OUTRAGEOUS ATTEMPT TO SCORE EVEN MORE PROFITS FOR THE CORPORATE ENTITIES THAT NOW HAVE BEEN ALLOWED TO RUN THIS COUNTRY!! DO YOUR PART TO STOP IT NOW!! 50188-001

NO DEVELOPMENT IN OUR PUBLIC LANDS.

ENOUGH IS ENOUGH.

NO MORE.

THANK YOU .

STEVE MONTGOMERY
SAN DIEGO, CA 92129

Response for Document 50188

50188-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Carl Howard.

The comment tracking number that has been assigned to your comment is OSTSD50189.

Comment Date: February 11, 2008 17:58:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD50189

First Name: Carl
Middle Initial:
Last Name: Howard
Organization:
Address: 19 King Avenue
Address 2:
Address 3:
City: Columbus
State: OH
Zip: 432012721
Country: USA
Email: litlgrey@ix.netcom.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Leave our public lands alone! | 50189-001

Response for Document 50189

50189-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, red lewis.

The comment tracking number that has been assigned to your comment is OSTSD50190.

Comment Date: February 11, 2008 17:59:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD50190

First Name: red
Middle Initial: f
Last Name: lewis
Organization:
Address: 263 copper kettle
Address 2:
Address 3:
City: east dubuque
State: IL
Zip: 61025
Country: USA
Email: red@mwci.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Why destroy for the sake of greed? | 50190-001

Response for Document 50190

50190-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Garry Doll.

The comment tracking number that has been assigned to your comment is OSTSD50192.

Comment Date: February 11, 2008 17:59:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD50192

First Name: Garry
Middle Initial: M
Last Name: Doll
Organization:
Address: 400 Lycoming St
Address 2: Apt 201
Address 3:
City: Williamsport
State: PA
Zip: 177014957
Country: USA
Email: gmadoll789@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose ALL oil shale and tar sands development, especially on public lands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. And, oil is dead!!!	50192-001

Response for Document 50192

50192-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Suzanne Lindsey.

The comment tracking number that has been assigned to your comment is OSTSD50196.

Comment Date: February 11, 2008 18:00:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD50196

First Name: Suzanne
Middle Initial:
Last Name: Lindsey
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am opposed to the development of BLM, public lands for finding oil. I am especially opposed to oil sands exploration and the defacement of land as is done in Canada. | 50196-001

Response for Document 50196

50196-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jaimi Haig.

The comment tracking number that has been assigned to your comment is OSTSD50197.

Comment Date: February 11, 2008 18:00:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD50197

First Name: Jaimi
Middle Initial:
Last Name: Haig
Organization:
Address:
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip:
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. | 50197-001

Response for Document 50197

50197-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Storm Cunningham.

The comment tracking number that has been assigned to your comment is OSTSD50199.

Comment Date: February 11, 2008 18:00:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD50199

First Name: Storm
Middle Initial:
Last Name: Cunningham
Organization: Resolution Fund, LLC
Address: 1300 Pennsylvania Ave. NW, Suite 700
Address 2:
Address 3:
City: Washington
State: DC
Zip: 20004
Country: USA
Email: storm@resolutionfund.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not support tar sands development! | 50199-001

Response for Document 50199

50199-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, Linda Harlow.

The comment tracking number that has been assigned to your comment is OSTSD50203.

Comment Date: February 11, 2008 18:01:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD50203

First Name: Linda
Middle Initial: M
Last Name: Harlow
Organization:
Address: 1001 Clark Street
Address 2:
Address 3:
City: Santa Rosa
State: CA
Zip: 95404
Country: USA
Email: lmh1937@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please think of your children and grandchildren so we can leave them a livable planet! | 50203-001

Response for Document 50203

50203-001: Thank you for your comment.

Thank you for your comment, Connie Crusha.

The comment tracking number that has been assigned to your comment is OSTSD50204.

Comment Date: February 11, 2008 18:01:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD50204

First Name: Connie
Middle Initial: B
Last Name: Crusha
Organization:
Address: 1077 Vista Madera Lane
Address 2:
Address 3:
City: El Cajon
State: CA
Zip: 92019
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Our public lands are NOT here just for the profit of multi-nationals. They are OUR lands and should be held in trust, not destroyed and squandered for short-term profits. | 50204-001

Response for Document 50204

50204-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Joan Tweit.

The comment tracking number that has been assigned to your comment is OSTSD50205.

Comment Date: February 11, 2008 18:01:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD50205

First Name: Joan
Middle Initial:
Last Name: Tweit
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I oppose oil shale and tar sands development on the public lands of Colorado and Utah. Such development destroys habitat and wildlife, produces massive air and water pollution, wastes scarce water, and destroys the quality of life in our rural areas. We need to learn to conserve energy before destroying the world around us and adding to global warming. Thank you for considering my comment. 50205-001

Response for Document 50205

50205-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50206.

Comment Date: February 11, 2008 18:01:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD50206

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. We need to transition to non-polluting, renewable energy sources, not pollute the environment even more. | 50206-001

Response for Document 50206

50206-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jack Scism.

The comment tracking number that has been assigned to your comment is OSTSD50212.

Comment Date: February 11, 2008 18:04:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD50212

First Name: Jack
Middle Initial: L
Last Name: Scism
Organization:
Address: 150 Ashewoode Downs Lane
Address 2:
Address 3:
City: Alpharetta
State: GA
Zip: 30005
Country: USA
Email: jay.scism@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to OPPOSE the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when we desperately need to be seeking more native fossil fuels and reducing our reliance on foreign oil sources. The Bureau of Land Management should speed ahead with the proposed development completely, and, in fact, should seek to open more options for oil shale development. 50212-001

I urge the Bureau of Land Management to reject the No Action alternative and to accelerate plans to develop oil shale and tar sands on public lands in the Rockies.

Response for Document 50212

50212-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50222.

Comment Date: February 11, 2008 18:07:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD50222

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to oppose the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our economy is already bearing the brunt of the current global warming nonsense, and significant birth-rate declines across the West and when we desperately need to be building up our domestic oil reserves and reducing our dependence on foreign oil. This proposal is feasible both environmentally and economically. The Bureau of Land Management should move forward with the proposed development completely. 50222-001

I urge the Bureau of Land Management to oppose the No Action alternative and embrace plans to develop oil shale and tar sands on public lands in the Rockies.

Sincerely,

Response for Document 50222

50222-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Andrew Long.

The comment tracking number that has been assigned to your comment is OSTSD50225.

Comment Date: February 11, 2008 18:07:59PM
Oil Shale and Tar Sands
Comment ID: OSTSD50225

First Name: Andrew
Middle Initial: B
Last Name: Long
Organization:
Address: [Withheld by requestor]
Address 2: [Withheld by requestor]
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

What a horrible idea. I trust you are job hunting. We can hardly wait. | 50225-001

Response for Document 50225

50225-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Paula Phillips.

The comment tracking number that has been assigned to your comment is OSTSD50226.

Comment Date: February 11, 2008 18:08:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD50226

First Name: Paula
Middle Initial: L
Last Name: Phillips
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am sick and tired of explaining to my 11 year old daughter that her future has been sold to the highest bidder. Enough is enough!! 50226-001

Response for Document 50226

50226-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, David Moore.

The comment tracking number that has been assigned to your comment is OSTSD50227.

Comment Date: February 11, 2008 18:08:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD50227

First Name: David
Middle Initial: N
Last Name: Moore
Organization:
Address: 69 Harbor Avenue Unit B3
Address 2:
Address 3:
City: Bridgeport
State: CT
Zip: 06605
Country: USA
Email: davemoore1@mindspring.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We don't need more fossil fuel development. | 50227-001

Response for Document 50227

50227-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Ken Dexter.

The comment tracking number that has been assigned to your comment is OSTSD50228.

Comment Date: February 11, 2008 18:08:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD50228

First Name: Ken
Middle Initial:
Last Name: Dexter
Organization:
Address: 463 Summit Circle
Address 2:
Address 3:
City: Fredericksburg
State: TX
Zip: 78624
Country: USA
Email: kd8718@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

There is plenty of oil shale on private land. There is no need to open up public lands. | 50228-001

Response for Document 50228

50228-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, richard schwartz.

The comment tracking number that has been assigned to your comment is OSTSD50234.

Comment Date: February 11, 2008 18:09:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD50234

First Name: richard
Middle Initial:
Last Name: schwartz
Organization:
Address: 1676 tacoma ave
Address 2:
Address 3:
City: berkeley
State: CA
Zip: 94707
Country: USA
Email: AMRSB@WORLDNET.ATT.NET
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

DO NOT open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. PUT YOUR ENERGIES INTO CONCERVATION MEASURES.

50234-001

Response for Document 50234

50234-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Kathy Kibbie.

The comment tracking number that has been assigned to your comment is OSTSD50238.

Comment Date: February 11, 2008 18:09:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD50238

First Name: Kathy
Middle Initial:
Last Name: Kibbie
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Native Americans have a saying - about how we must protect the land for our children 7 generations into the future. We must cherish the beauty of this land, we must be the caretakers of the wildlife. What you plan shows total disregard for all that is sacred.	50238-001

Response for Document 50238

50238-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Robert Hall.

The comment tracking number that has been assigned to your comment is OSTSD50239.

Comment Date: February 11, 2008 18:09:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD50239

First Name: Robert
Middle Initial:
Last Name: Hall
Organization:
Address: 8053 Hwy 87 N
Address 2:
Address 3:
City: Orange
State: TX
Zip: 77632
Country: USA
Email: luckydogjunk@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I urge the Bureau of Land Management to support plans to develop oil shale and tar sands on public lands in the Rockies. | 50239-001

Response for Document 50239

50239-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, David Collins.

The comment tracking number that has been assigned to your comment is OSTSD50240.

Comment Date: February 11, 2008 18:10:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD50240

First Name: David
Middle Initial: A
Last Name: Collins
Organization:
Address: 115 E Main St
Address 2:
Address 3:
City: Flemingsburg
State: KY
Zip: 41041
Country: USA
Email: dacollins46@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I would hope you will promote a "no action" proposal regarding tar sands and oil shale within Federal controlled lands. Please make the case for protecting the environment. | 50240-001

Response for Document 50240

50240-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Nancy Stamper.

The comment tracking number that has been assigned to your comment is OSTSD50242.

Comment Date: February 11, 2008 18:10:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD50242

First Name: Nancy
Middle Initial:
Last Name: Stamper
Organization:
Address: 1417 Elliott Drive
Address 2:
Address 3:
City: Munster
State: IN
Zip: 46321
Country: USA
Email: njsprof@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Destroying more of America's irreplaceable natural wonders is an act of terror impelled by greed. The few benefits are far outweighed by the loss of our sacred pristine natural wonders. | 50242-001

Response for Document 50242

50242-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Irene Sullivan.

The comment tracking number that has been assigned to your comment is OSTSD50244.

Comment Date: February 11, 2008 18:10:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD50244

First Name: Irene
Middle Initial: F
Last Name: Sullivan
Organization:
Address: 71 Aspen Lane
Address 2: Coal Creek canyon
Address 3:
City: Golden
State: CO
Zip: 80403
Country: USA
Email: Ireneequin@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As a long-time resident of Colorado and someone deeply involved in enviornmental protection and ethics I am strongly opposedto this irresponsible action. | 50244-001

Response for Document 50244

50244-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, rich moser.

The comment tracking number that has been assigned to your comment is OSTSD50246.

Comment Date: February 11, 2008 18:11:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD50246

First Name: rich
Middle Initial:
Last Name: moser
Organization:
Address: 1645 Miramesa Dr
Address 2:
Address 3:
City: santa Barbara
State: CA
Zip: 93109
Country: USA
Email: rich@transcendentalastrology.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I believe our national interests will be best served if we preserve all of our existing undeveloped resources and concentrate on developing alternative technologies to meet our future energy needs. So let's leave the oil shale and tar sands where they are...in the ground. Thank you. | 50246-001

Response for Document 50246

50246-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jason Davis.

The comment tracking number that has been assigned to your comment is OSTSD50250.

Comment Date: February 11, 2008 18:12:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD50250

First Name: Jason
Middle Initial:
Last Name: Davis
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not open public lands for oil or shale exploration. These resources will provide only minimal energy return that would be much better obtained through an agressive program of energy conservation. The environmental damage from physical destruction of the land, air pollution and climate change are definitely not worth the small benefit from exploiting these resources. | 50250-001

Response for Document 50250

50250-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jessie Wilkins.

The comment tracking number that has been assigned to your comment is OSTSD50253.

Comment Date: February 11, 2008 18:12:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD50253

First Name: Jessie
Middle Initial:
Last Name: Wilkins
Organization:
Address: PO Box 580
Address 2: 6830 Ira L. Smith RD
Address 3:
City: Shady Grove
State: FL
Zip: 32357
Country: USA
Email: jessie45@fairpoint.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I'm glad they are finally going to utilize this resource. They should have done it years ago. I just wish they would drill in Alaska and off the coasts of Florida, Louisana and Texas. What took so long. | 50253-001

Response for Document 50253

50253-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Mike Vandeman.

The comment tracking number that has been assigned to your comment is OSTSD50254.

Comment Date: February 11, 2008 18:12:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD50254

First Name: Mike
Middle Initial: J
Last Name: Vandeman
Organization:
Address: 2600 Camino Ramon # 2E950I
Address 2:
Address 3:
City: San Ramon
State: CA
Zip: 945835099
Country: USA
Email: mjvande@pacbell.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Wildlife MUST be given top priority, because they can't protect themselves from us. Energy conservation can supply all the energy we need. Wildlife conservation is FARE more important than getting more oil, which only worsens global warming. | 50254-001

Response for Document 50254

50254-001: The BLM acknowledges the commentor's preference to not support oil shale and tar sands development.

Thank you for your comment, Kathryn Wolfe.

The comment tracking number that has been assigned to your comment is OSTSD50256.

Comment Date: February 11, 2008 18:12:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD50256

First Name: Kathryn
Middle Initial: D
Last Name: Wolfe
Organization:
Address: 301 Baxter Acres Drive
Address 2:
Address 3:
City: Manchester
State: MO
Zip: 63011
Country: USA
Email: kwolfe@hdbinc.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bureau of Land Management's controversial proposal would fuel an outdated, fossil-fuel-intensive energy infrastructure and comes at a time when we need to be rapidly transitioning away from fossil fuels-based energy production. If "business as usual" greenhouse gas emissions continue, over one third of the world's plants and animals will be committed to extinction by the middle of this century or before.

I am stating to the Bureau of Land Management that the environmental catastrophe known as oil shale and tar sands development will never be viable. I am totally opposed to this ill-conceived proposal. STOP!!!!

50256-001

Response for Document 50256

50256-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Barbara Baer.

The comment tracking number that has been assigned to your comment is OSTSD50258.

Comment Date: February 11, 2008 18:13:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD50258

First Name: Barbara
Middle Initial: L
Last Name: Baer
Organization:
Address: 6195 Anderson Road
Address 2:
Address 3:
City: Forestville
State: CA
Zip: 95436
Country: USA
Email: bbforest@monitor.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. barbara baer

50258-001

50258-002

50258-003

Responses for Document 50258

50258-001: The BLM acknowledges the commentor's preference for Alternative A.

50258-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50258-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Rich Brown.

The comment tracking number that has been assigned to your comment is OSTSD50261.

Comment Date: February 11, 2008 18:13:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD50261

First Name: Rich
Middle Initial:
Last Name: Brown
Organization:
Address: 633 Military Rd.
Address 2:
Address 3:
City: Lemay
State: MO
Zip: 63125
Country: USA
Email: b42n81@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We do not need to be investing in non-renewable energy sources. Those are literally dead ends. Wind, solar, hydrogen, and pebble reactors are our only hope for the future. | 50261-001

Response for Document 50261

50261-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Donna Tartt.

The comment tracking number that has been assigned to your comment is OSTSD50263.

Comment Date: February 11, 2008 18:14:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD50263

First Name: Donna
Middle Initial:
Last Name: Tartt
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing in support of the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Population growth in the west, and the current energy boom, are already having a negative environmental impact on public lands, and this proposal seems particularly unwise at a time when we need to be moving away from fossil fuels and reducing our greenhouse gas emissions. It is inefficent both environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 50263-001 50263-002

The Bureau of Land Management must also adequately consider the impacts of the proposed development to all of the plants and animals that will be affected. 50263-003

I urge the Bureau of Land Management to get rid of the current plan, choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 50263-001 (cont.)

Sincerely, Donna Tartt

Responses for Document 50263

50263-001: The BLM acknowledges the commentor's preference for Alternative A.

50263-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50263-003: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

Thank you for your comment, Michael Dauer.

The comment tracking number that has been assigned to your comment is OSTSD50266.

Comment Date: February 11, 2008 18:14:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD50266

First Name: Michael
Middle Initial: B
Last Name: Dauer
Organization:
Address: 8830 Glencoe Dr
Address 2:
Address 3:
City: Riverside
State: CA
Zip: 92503
Country: USA
Email: mdauer2002@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am opposed to oil shale and tar sands reclamation proposal. I feel very strongly that our govenment needs to be promoting viable alternatives to fossil fuel production, and that we need to cap and drastically reduce the use of fossil fuels. As a citizen of this great nation, I am very publicly opposed to this land use action and will pursue all means to bring this matter to light in the public circle and stop the destruction of public lands. The action that you are deciding upon will impact the world that we pass on to our children and grandchildren. By opening this land, you are not only allowing for the destruction of great areas of PUBLIC land, but also facilitating the continued use of fossil fuels which is irresponsible. I disagree wholeheartedly with this proposal and urge this committee to turn down this proposal full stop. 50266-001

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 50266-002 The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 50266-003

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 50266-004

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to 50266-001 (cont.)

develop oil shale and tar sands on public lands in the Rockies.

Sincerely,

Michael Dauer Concerned Citizen of America

50266-001
(cont.)

Responses for Document 50266

50266-001: The BLM acknowledges the commentor's preference to not support oil shale and tar sands development on public lands.

50266-002: The BLM acknowledges the commentor's preference for Alternative A.

50266-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50266-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which

lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Heather Marsh.

The comment tracking number that has been assigned to your comment is OSTSD50267.

Comment Date: February 11, 2008 18:14:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD50267

First Name: Heather
Middle Initial:
Last Name: Marsh
Organization:
Address: 6710 Lake Park Drive Apt. 201C
Address 2:
Address 3:
City: Greenbelt
State: MD
Zip: 20770
Country: USA
Email: hmarsh16@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 50267-001

I oppose all development of oil shale and tar sands on public lands.

Response for Document 50267

50267-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Kathy Richmond.

The comment tracking number that has been assigned to your comment is OSTSD50268.

Comment Date: February 11, 2008 18:14:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD50268

First Name: Kathy
Middle Initial: K
Last Name: Richmond
Organization:
Address: HC 67
Address 2: Box 680
Address 3:
City: Clayton
State: ID
Zip: 83227
Country: USA
Email: fowest@custertel.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I adamantly oppose all development of oil shale and tar sands on public lands. We must work to protect the public lands that we have and no exploit and polute them. | 50268-001

Response for Document 50268

50268-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Ian Noah.

The comment tracking number that has been assigned to your comment is OSTSD50270.

Comment Date: February 11, 2008 18:16:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD50270

First Name: Ian
Middle Initial: S
Last Name: Noah
Organization:
Address: 939 S. Dunsmuir
Address 2:
Address 3:
City: Los Angeles
State: CA
Zip: 90036
Country: USA
Email: ian@noahfamily.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am opposed to opening up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands.

The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to nonpolluting, renewable energy sources. 50270-001

Response for Document 50270

50270-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Bonita Sivi.

The comment tracking number that has been assigned to your comment is OSTSD50271.

Comment Date: February 11, 2008 18:16:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD50271

First Name: Bonita
Middle Initial:
Last Name: Sivi
Organization:
Address: 31640 Wekiva R Rd
Address 2:
Address 3:
City: Sorrento
State: FL
Zip: 32776
Country: USA
Email: BoniSivi@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands.

The production of these fossil fuels would ruin the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 50271-001

Response for Document 50271

50271-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Paula Fan.

The comment tracking number that has been assigned to your comment is OSTSD50273.

Comment Date: February 11, 2008 18:16:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD50273

First Name: Paula
Middle Initial:
Last Name: Fan
Organization:
Address: 1542 E Lester St
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 85719
Country: USA
Email: fanp@u.arizona.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The pictures of lands that have been "developed" by opening them up to Oil Shale and Tar Sands say it all.

What Americans want are alternative sources of energy that do not trash the beautiful lands of which we are steward.

Surely there is a better solution!

50273-001

Response for Document 50273

50273-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Susan Goldberg.

The comment tracking number that has been assigned to your comment is OSTSD50274.

Comment Date: February 11, 2008 18:16:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD50274

First Name: Susan
Middle Initial:
Last Name: Goldberg
Organization:
Address: 148 State Route 36 #4
Address 2:
Address 3:
City: Highlands
State: NJ
Zip: 07732
Country: USA
Email: goldberg@millburn.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. We need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions as quickly as possible. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.

50274-001

50274-002

50274-003

Responses for Document 50274

50274-001: The BLM acknowledges the commentor's preference for Alternative A.

50274-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50274-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Sheila Foreman.

The comment tracking number that has been assigned to your comment is OSTSD50276.

Comment Date: February 11, 2008 18:17:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD50276

First Name: Sheila
Middle Initial: M
Last Name: Foreman
Organization:
Address: 6407 Velasco Ave
Address 2:
Address 3:
City: Dallas
State: TX
Zip: 75214
Country: USA
Email: sheila.foreman@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Ms. Thompson:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

The proposed development comes at a time when when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions and being soft on the planet - why not wind, solar or geothermal? 50276-001

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 50276-002

I think proposed development is desperate, last resort approach that could pose tremendous, irreversible harm to the environment when alternative approaches exist or should be explored - just think, green jobs!

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 50276-001 (cont.)

Sincerely,

Responses for Document 50276

50276-001: The BLM acknowledges the commentor's preference for Alternative A.

50276-002: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, paul howes.

The comment tracking number that has been assigned to your comment is OSTSD50280.

Comment Date: February 11, 2008 18:18:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD50280

First Name: paul
Middle Initial:
Last Name: howes
Organization:
Address:
Address 2:
Address 3:
City:
State: CO
Zip: 80305
Country: USA
Email: crankbite@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.

50280-001

50280-002

50280-003

Responses for Document 50280

50280-001: The BLM acknowledges the commentor's preference for Alternative A.

50280-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50280-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Aaron Turkewitz.

The comment tracking number that has been assigned to your comment is OSTSD50281.

Comment Date: February 11, 2008 18:18:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD50281

First Name: Aaron
Middle Initial: P
Last Name: Turkewitz
Organization:
Address: 5410 S. Blackstone Avenue
Address 2:
Address 3:
City: Chicago
State: IL
Zip: 60615
Country: USA
Email: apturkew@uchicago.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

To the BLM Project Manager Sherry Thompson:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Rather than continuing to "develop" public lands with such projects, we need to be looking beyond fossil fuels toward truly sustainable technologies. The proposal would therefore represent a truly backward-looking initiative, in which the impacts on plants and animals have not been fully considered. The proposed development should therefore be discarded in favor of the No Action alternative. At a minimum, the proposal should be considered in the context of alternatives that take into consideration such essential issues as energy conservation and efficiency. I urge the Bureau to devote far more thought to this before undertaking any such environmentally destructive course of action in the Rockies. 50281-001 50281-002 50281-001 (cont.)

Thank you for considering these comments.

Responses for Document 50281

50281-001: The BLM acknowledges the commentor's preference for Alternative A.

50281-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, John Steiner.

The comment tracking number that has been assigned to your comment is OSTSD50283.

Comment Date: February 11, 2008 18:19:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD50283

First Name: John
Middle Initial:
Last Name: Steiner
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

this kind of mining permanently destroys our beautiful lands. I oppose this in its entirety. Thank you. John Steiner	50283-001

Response for Document 50283

50283-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50284.

Comment Date: February 11, 2008 18:19:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD50284

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Stop destroying our land! | 50284-001

Response for Document 50284

50284-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Nancy Lovejoy.

The comment tracking number that has been assigned to your comment is OSTSD50287.

Comment Date: February 11, 2008 18:20:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD50287

First Name: Nancy
Middle Initial: S
Last Name: Lovejoy
Organization:
Address: 425 Mountain Road
Address 2: P.O. Box 158
Address 3:
City: Wilbraham
State: MA
Zip: 010950158
Country: USA
Email: lovejoy@crocker.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The mere notion of invading oil shale and tar sands is ridiculously bad from the point of view of the planet as a whole. I do hope you will not go forward with this plan. | 50287-001

Response for Document 50287

50287-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, James Glover.

The comment tracking number that has been assigned to your comment is OSTSD50289.

Comment Date: February 11, 2008 18:20:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD50289

First Name: James
Middle Initial:
Last Name: Glover
Organization:
Address: 509 West Thompson Ave
Address 2:
Address 3:
City: Temple
State: TX
Zip: 76501
Country: USA
Email: traveller@hot.rr.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the exploration for Oil Shale and Tar Sands. This proposed development comes at a time when our nation desperately needs an energy alternative. Public lands should be used for the GOOD of the entire nation not locked away for selfish simple minded groups like the Center for Biological Diversity. This proposal is may be feasible environmentally and economically, and could result in our energy solution being resolved.

50289-001

I urge the Bureau of Land Management to choose the development of oil shale and tar sands on public lands in the Rockies.

Sincerely,

James Glover Temple, TX

Response for Document 50289

50289-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50291.

Comment Date: February 11, 2008 18:20:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD50291

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

With the cost of energy soaring, the increasing amount of the energy supply in hostle or neutral hands, and the increasing negative balance of payments resulting in the weakness of the dollar, it is crucial that the United States start projects such as this to decrease its energy dependence on outside sources and to take advantage of its own untapped, rich natural resources. This is a very wise and timely move and I fully support it as a necessary step to address our growing future energy needs. 50291-001

Response for Document 50291

50291-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50292.

Comment Date: February 11, 2008 18:20:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD50292

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager

It makes absolutely no sense to activate Oil Shale and Tar Sands operations in the West. They would be contrary to all efforts to really reduce greenhouse gases and preserve essential wild areas. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 50292-001 50292-002

I urge you to choose No Action on this proposal 50292-001 (cont.)

Responses for Document 50292

50292-001: The BLM acknowledges the commentor's preference for Alternative A.

50292-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment, Elin Defrin.

The comment tracking number that has been assigned to your comment is OSTSD50294.

Comment Date: February 11, 2008 18:21:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD50294

First Name: Elin
Middle Initial:
Last Name: Defrin
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am adamently oppose to the Bush administration's plan to prepare to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. Please consider these objections. Thank you. Elin Defrin,

50294-001

Response for Document 50294

50294-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, E. Jennifer Weil.

The comment tracking number that has been assigned to your comment is OSTSD50295.

Comment Date: February 11, 2008 18:21:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD50295

First Name: E. Jennifer
Middle Initial:
Last Name: Weil
Organization:
Address: 3432 E. Las Rocas Drive
Address 2:
Address 3:
City: Phoenix
State: AZ
Zip: 85028
Country: USA
Email: weilj@mail.nih.gov
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Have a look at Canada and see the environmental consequences of oil shale and oil sands extraction. We must protect the environment and seek more sustainable forms of energy. | 50295-001

Response for Document 50295

50295-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Nancy Kissock.

The comment tracking number that has been assigned to your comment is OSTSD50296.

Comment Date: February 11, 2008 18:21:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD50296

First Name: Nancy
Middle Initial:
Last Name: Kissock
Organization:
Address: 10792 Rochester Avenue
Address 2:
Address 3:
City: Los Angeles
State: CA
Zip: 90024
Country: USA
Email: zensat@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is an act by an out-going president who no longer has any power; so he'll continue doing what he did throughout his 2-term tenure, and that is to provide for the wealthy, protect corporations, and ignore any issues regarding the preservation of our environment. Whtta guy!! He'll destroy our land/country to enrich his cohorts. What a legacy!! But does he really care? Don't think so... 50296-001

Response for Document 50296

50296-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mary Steele.

The comment tracking number that has been assigned to your comment is OSTSD50298.

Comment Date: February 11, 2008 18:22:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD50298

First Name: Mary
Middle Initial:
Last Name: Steele
Organization:
Address:
Address 2:
Address 3:
City:
State: CA
Zip:
Country: USA
Email: online-activist@stanfordalumni.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil exploration, drilling, and mining of any kind are not appropriate for public lands. | 50298-001

Response for Document 50298

50298-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Claudia Bloom.

The comment tracking number that has been assigned to your comment is OSTSD50299.

Comment Date: February 11, 2008 18:22:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD50299

First Name: Claudia
Middle Initial:
Last Name: Bloom
Organization:
Address: 1623 N. Avoca
Address 2:
Address 3:
City: mesa
State: AZ
Zip: 85207
Country: USA
Email: greytdogs@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Stop the destruction and start conserving!

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. Stop the destruction and start conserving!

50299-001

50299-002

50299-003

Responses for Document 50299

50299-001: The BLM acknowledges the commentor's preference for Alternative A.

50299-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50299-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Bill Dixon.

The comment tracking number that has been assigned to your comment is OSTSD50303.

Comment Date: February 11, 2008 18:24:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD50303

First Name: Bill
Middle Initial: E
Last Name: Dixon
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the exploration of oil shales and Tar Sands. Don't let the left-wing loonies destroy our economy with their misinformation campaign. | 50303-001

Response for Document 50303

50303-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Lincoln Taiz.

The comment tracking number that has been assigned to your comment is OSTSD50307.

Comment Date: February 11, 2008 18:24:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD50307

First Name: Lincoln
Middle Initial:
Last Name: Taiz
Organization:
Address: 328 Oxford Way
Address 2:
Address 3:
City: Santa Cruz
State: CA
Zip: 95060
Country: USA
Email: taiz@biology.ucsc.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

Trying to extract fuel from tar sands and shale is absolutely crazy. The energy yield is simply noty great enough to justify the enormous environmental damage it will bring about.

Moreover, we should NOT be emphasizing carbon dioxide-releasing fuels into the atmosphere, hastening global warming. Are we simply going to go down the path that CHINA is taking, and saying "to hell with the planet?"

We need to invest in alternative energy and conservation. Why hasn't the Bush administration subsidized the auto industry to produce high mileage cars?

PLEASE DO NOT SUPPORT ANY FURTHER DESTRUCTION OF PUBLIC LANDS. IF YOU DO HISTORY WILL NOT BE KIND TO YOUR FAILURE TO BE A STEWARD OF AMERICAN LAND.

50307-001

Sincerely,

Lincoln Taiz Professor of Biology UC Santa Cruz

Response for Document 50307

50307-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Deborah Meckler.

The comment tracking number that has been assigned to your comment is OSTSD50308.

Comment Date: February 11, 2008 18:25:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD50308

First Name: Deborah
Middle Initial:
Last Name: Meckler
Organization:
Address: 3948 Stein Court
Address 2:
Address 3:
City: South San Francisco
State: CA
Zip: 94080
Country: USA
Email: deborahmeckler@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Every bit of ancient carbon that we extract from the earth and burn in the atmosphere contributes to the unnatural increase of CO2. Adding the carbon from shale oil and tar sands is not only no solution to anything, it would move us more rapidly toward all the chaos and collapse we face if we continue heating up the atmosphere. Humanity can more easily deal with energy shortages than the results of yet more carbon-based energy.	50308-001

Response for Document 50308

50308-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Richard Beal.

The comment tracking number that has been assigned to your comment is OSTSD50309.

Comment Date: February 11, 2008 18:26:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD50309

First Name: Richard
Middle Initial:
Last Name: Beal
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: coach1@rochester.rr.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. | 50309-001

Response for Document 50309

50309-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Richard Low.

The comment tracking number that has been assigned to your comment is OSTSD50312.

Comment Date: February 11, 2008 18:27:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD50312

First Name: Richard
Middle Initial:
Last Name: Low
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The environmental catastrophe known as oil shale and tar sands development will never be viable.

So I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 50312-001

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 50312-002 50312-003

Sincerely, Richard Low

Responses for Document 50312

50312-001: The BLM acknowledges the commentor's preference for Alternative A.

50312-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50312-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation

alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Margaret Welke.

The comment tracking number that has been assigned to your comment is OSTSD50315.

Comment Date: February 11, 2008 18:28:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD50315

First Name: Margaret
Middle Initial: J
Last Name: Welke
Organization:
Address: 410 Clemons Avenue
Address 2:
Address 3:
City: Madison
State: WI
Zip: 53704
Country: USA
Email: mwelke@tds.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I find it absolutely unconscionable that the Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources.

And as they are PUBLIC lands, they belong to all of us -- not just to the oil and gas companies who would ravage them for profit and leave a wasteland behind. And please do not use the tired argument that we need to do this -- we don't. Using current efficiency knowledge and making a concentrated political and economically supported program to research and fund clean, sustainable energy, we could get out from under the dangerous, polluting fossil fuel beast -- if only we had the will to do so. 50315-001

Response for Document 50315

50315-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Ganapathy Durgadas.

The comment tracking number that has been assigned to your comment is OSTSD50318.

Comment Date: February 11, 2008 18:28:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD50318

First Name: Ganapathy
Middle Initial: S
Last Name: Durgadas
Organization:
Address: 261 New Scotland Avenue, Apt. 2
Address 2:
Address 3:
City: Albany
State: NY
Zip: 122083143
Country: USA
Email: cybersadhu@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

DON'T despoil our habitat for the oil companies' benefit. | 50318-001

Response for Document 50318

50318-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Norma Harrison.

The comment tracking number that has been assigned to your comment is OSTSD50321.

Comment Date: February 11, 2008 18:29:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD50321

First Name: Norma
Middle Initial: J
Last Name: Harrison
Organization:
Address: 1312 Cornell
Address 2:
Address 3:
City: Berkeley
State: CA
Zip: 94702
Country: USA
Email: normaha@pacbell.net
Privacy Preference: Don't withhold name or address from public record
Attachment: peACE AND FREEDOM PARTY Summary platf 2003.doc

Comment Submitted:

It has come to my attention that yet another destructive, ruining extraction of material to continue present standards of living is being proposed here. This, like the others, should not be done. The proposed standard of living needing to be maintained is, like obesity, living in excess of our actual needs, to our destruction. Obviously, recourse needs to be to alternative energy efforts, but also to alternative ways of living - where we work, play, get our necessities and enjoyment, and how we travel or stay in our communities. See Attachment.	50321-001

PEACE AND FREEDOM PARTY

Read 'The Partisan,' P&FP's newspaper at
http://www.geocities.com/CapitolHill/Lobby/3666

Join us on the streets and in the meeting halls as well as at the electoral podia.

CAMPAIGN FOR OFFICE ON OUR TICKET!!

We do not expect to win justice at the ballot box.

SUMMARY PLATFORM

Adopted March 22, 2003

The Peace and Freedom Party of California, founded in 1967, is committed to socialism, democracy, ecology, feminism and racial equality. We organize toward a world where cooperation replaces competition, a world where all people are well fed, clothed and housed; where all women and men have equal status; where all individuals may freely endeavor to fulfill their own talents and desires; a world of freedom and peace where every community retains its cultural integrity and lives with all others in harmony. We offer this summary of our immediate and long-range goals:

& Double the minimum wage, and index it to the cost of living.
& Guarantee the right of all workers to organize and to strike; forbid striker replacement.
& Socially useful jobs for all at union pay levels.
& Equal pay for equal work, and for work of comparable worth.
& A 30-hour work week with no cut in weekly pay; longer paid vacations.
& Guaranteed dignified income for those who cannot work.
& A Universal Basic Income to alleviate poverty and homelessness.
& Tax the income and assets of the rich to meet human needs.
& International trade agreements must guarantee the protection of workers and the environment in all participating countries; abolish NAFTA, GATT and the World Trade Organization (WTO).
& End homelessness; abolish vagrancy laws; provide decent affordable housing for all.
& Social ownership and democratic control of industry, financial institutions, and natural resources.
& The United States should take the initiative toward global disarmament (BOLD) by eliminating nuclear, chemical and biological weapons. Withdraw U. S. troops and weapons from other countries, and reallocate the resulting "peace dividend" for social benefit.
& Abolish the CIA, NSA, AID and other agencies for interference in other countries' internal affairs.
& Convert from a military to a peace-oriented economy, with jobs for displaced workers.
& Self-determination for all nations and peoples of the world, including Puerto Rico and all U.S. territories.
& Defend and extend liberties guaranteed in the Bill of Rights.
& End discrimination based on race, sex, age, sexual orientation, or disability.
& Restore affirmative action, guarantee full education and employment rights for all.
& Abolish the death penalty.
& No prison labor for private profit.
& Support the right of working people to keep and bear arms.
& Democratic elections through proportional representation; full political, social and economic rights for resident non-citizens.
& Honor treaties with Native American nations, recognize California's Native American nations. Defend and extend Native American rights and sovereignty.
& Provide full free quality public education through university level. Teach the history of workers' struggles and labor's creation of society's wealth and progress. & Restore and strengthen bilingual education.

& Uncensored government funding for ordinary people to create and enjoy art.
& Scientific and technological research to benefit ordinary people, not the capitalists.
& Free high-quality health care for everyone, including birth control, abortion, pre-natal and childhood health care. No forced sterilizations.
& Legalize marijuana, decriminalize drug use, and make substance abuse treatment freely available.
& Give special attention to preventing epidemics of, communicable diseases such as AIDS. Guarantee the rights of people living with AIDS.
& Restore and protect air, water, land and ecosystems.
& Promote conservation and develop solar and other renewable energy to replace nuclear power and fossil fuels.
& End environmental racism: no toxic dumping in anyone's back yard.
& Massive development of public transportation available free or at nominal fares.
& Outlaw clear cutting and protect remaining old-growth forests.
& Promote an environmentally sound agricultural system which meets human needs and protects farm workers' labor rights and standard of living.

WE DO NOT EXPECT TO WIN JUSTICE AT THE BALLOT BOX.

Peace & Freedom Party P.O.Box 24764 Oakland, California 94623
(510) 465-9414; P.O. Box 741270 Los Angeles, CA 90004 (323) 759-9737
http://www.peaceandfreedom.org Norma Harrison 510.527.9584

Response for Document 50321

50321-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Stamatios Varias.

The comment tracking number that has been assigned to your comment is OSTSD50323.

Comment Date: February 11, 2008 18:30:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD50323

First Name: Stamatios
Middle Initial: H
Last Name: Varias
Organization:
Address: 321 Attig Road
Address 2:
Address 3:
City: Selinsgrove
State: PA
Zip: 178707504
Country: USA
Email: stamatiosv@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. We desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.	50323-001 50323-002 50323-003
The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.	50323-004
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	50323-001 (cont.)

Sincerely,

Stamatios Varias

Responses for Document 50323

50323-001: The BLM acknowledges the commentor's preference for Alternative A.

50323-002: Thank you for your comment.

50323-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50323-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses

additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50324.

Comment Date: February 11, 2008 18:30:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD50324

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.

50324-001

50324-002

50324-003

Responses for Document 50324

50324-001: The BLM acknowledges the commentor's preference for Alternative A.

50324-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50324-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50328.

Comment Date: February 11, 2008 18:32:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD50328

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

The Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. To sum: I oppose all development of oil shale and tar sands on public lands! 50328-001

Response for Document 50328

50328-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Michael Tomczyszyn.

The comment tracking number that has been assigned to your comment is OSTSD50329.

Comment Date: February 11, 2008 18:32:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD50329

First Name: Michael
Middle Initial:
Last Name: Tomczyszyn
Organization:
Address: 555 Arguello Blvd #205
Address 2:
Address 3:
City: San Francisco
State: CA
Zip: 94118
Country: USA
Email: mtomczyszyn@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The proposal to process "tar sands" in Colorado, Utah, and Wyoming is a terribly misguided one--to engage in such an inefficient and environmentally "dirty" process at exactly the time when we should be transitioning away from fossil fuels with all due haste makes no sense and will only contribute to global warming, bring devastation to the wilds of these states, and reinforce our addiction to self-destructive energy sources. Please reconsider this disastrous proposal...	50329-001

Response for Document 50329

50329-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, rachel wieland.

The comment tracking number that has been assigned to your comment is OSTSD50330.

Comment Date: February 11, 2008 18:33:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD50330

First Name: rachel
Middle Initial: g
Last Name: wieland
Organization:
Address: 33 ruckman ave
Address 2:
Address 3:
City: hillsdale
State: NJ
Zip: 07642
Country: USA
Email: rwieland@bergen.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

enough with the oil. we need electrical energy from solar power and harnassing the jet stream with turbines. | 50330-001

Response for Document 50330

50330-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50331.

Comment Date: February 11, 2008 18:33:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD50331

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Hello, I am submitting these comments to express my opinion on the oil shale and tar sands energy proposal. Please select the "no action" option. | 50331-001

Your own webpage states "Shell's process is currently unproven at a commercial scale" --so why risk the ecosystem integrity of all these lands for an unproven product? | 50331-002

The 1976 Federal Land Policy and Management Act was pretty clear in its multiple-use mandate, and this is a proposal that will surely preclude other legitimate land uses as well as forfeiting the health of the land, which the FLPMA and many other laws are clearly designed to protect. This proposal will generate nothing but litigation and a waste of a lot of people's time and money. | 50331-003

Responses for Document 50331

50331-001: The BLM acknowledges the commentor's preference for Alternative A.

50331-002: Congress articulated in the Energy Policy Act of 2005 that oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed to reduce the reliance of the United States on foreign sources of oil; that these resources should be developed in an environmentally sound manner; and that these resources should be developed with an emphasis on sustainability to benefit the United States while taking into account affected states and communities. The Secretary of the Interior was given the charge to implement this direction from Congress and initiated this PEIS along with other actions to implement that direction.

Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document and all subsequent NEPA documents will analyze the direct, indirect, and cumulative effects of the proposed action.

50331-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating

permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

Thank you for your comment, Tom Perkins.

The comment tracking number that has been assigned to your comment is OSTSD50332.

Comment Date: February 11, 2008 18:33:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD50332

First Name: Tom
Middle Initial:
Last Name: Perkins
Organization:
Address: 202 Huffer St.
Address 2: PO Box 123
Address 3: 202 Huffer St.
City: Smiley
State: TX
Zip: 781590123
Country: USA
Email: tperk@the-cia.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Do not develop tar sands and oil Shale. | 50332-001

Response for Document 50332

50332-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Cindy Lyle.

The comment tracking number that has been assigned to your comment is OSTSD50333.

Comment Date: February 11, 2008 18:33:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD50333

First Name: Cindy
Middle Initial:
Last Name: Lyle
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: cindy.lyle@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not ruin any more lands by mining for oil shale. | 50333-001

Response for Document 50333

50333-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Chadwick Cox.

The comment tracking number that has been assigned to your comment is OSTSD50334.

Comment Date: February 11, 2008 18:34:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD50334

First Name: Chadwick
Middle Initial:
Last Name: Cox
Organization:
Address: 2241 Ravenwood Ln
Address 2:
Address 3:
City: Norman
State: OK
Zip: 730717427
Country: USA
Email: chadwick.cox@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We can do so much better by conservation measures to decrease our dependency on foreign oil than by tearing up so much of our wild areas. Further, this type of fuel oil harvesting is one of the worst methods for the environment. The proposal is a lose-lose proposition.	50334-001

Response for Document 50334

50334-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Ed Morin.

The comment tracking number that has been assigned to your comment is OSTSD50336.

Comment Date: February 11, 2008 18:34:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD50336

First Name: Ed
Middle Initial:
Last Name: Morin
Organization:
Address: 2952 Glen Albyn
Address 2:
Address 3:
City: Santa Barbara
State: CA
Zip: 931052220
Country: USA
Email: edmorin@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Everything that I have read on developing Oil Shale and Tar Sands indicates that this is one of the dirtiest environmentally and the most polluting with regards to greenhouse gasses of any of the solutions for producing gasoline and fuel oil. Lets not use it until we have better processes in place to protect the environment	50336-001

Response for Document 50336

50336-001: The BLM acknowledges the commentor's preference to not support oil shale and tar sands development.

Thank you for your comment, sharon lacy.

The comment tracking number that has been assigned to your comment is OSTSD50338.

Comment Date: February 11, 2008 18:34:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD50338

First Name: sharon
Middle Initial:
Last Name: lacy
Organization:
Address: 660 so. main st.
Address 2:
Address 3:
City: sebastopol
State: CA
Zip: 95472
Country: USA
Email: earthhrt@sonic.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

the sadness of all the greed, is the loss of home planet in the name of senseless wanting. | 50338-001

Response for Document 50338

50338-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sarah Kupferberg.

The comment tracking number that has been assigned to your comment is OSTSD50340.

Comment Date: February 11, 2008 18:35:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD50340

First Name: Sarah
Middle Initial: J
Last Name: Kupferberg
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West. I am an aquatic ecologist working in California on the re-licensing of hydroelectric dams in the Sierra Nevada. I know from first hand experience how difficult it is to balance the needs and demands of many different stakeholders in a time of energy crisis. I work every day, in my own small capacity to help our country transition away from fossil fuels and reduce greenhouse gas emissions by figuring out how to generate carbon neutral electricity yet still preserve threatened and endangered aquatic species. 50340-001

The shale oil and tar sands proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 50340-002

I respectfully request that the Bureau of Land Management reject the proposed development completely. Please choose the No Action alternative. Alternatively, at a minium, the BLM should evaluate a full range of reasonable methods, including promotion of energy conservation and efficiency. 50340-003

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 50340-004

I am particularly concerned with federally protected fish species like the humpback chub, Colorado pikeminnow, razorback sucker, and others. 50340-005

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 50340-001 (cont.)

Sincerely,

Sarah Kupferberg, Ph.D.

Responses for Document 50340

50340-001: The BLM acknowledges the commentor's preference for Alternative A.

50340-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50340-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50340-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

50340-005: The comment expresses concern for impacts on a number of federally listed endangered fish species. The impacts of leasing and development on these and other listed species are presented and discussed in the PEIS.

The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the threatened or endangered species.

Thank you for your comment, Larry Buck.

The comment tracking number that has been assigned to your comment is OSTSD50342.

Comment Date: February 11, 2008 18:35:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD50342

First Name: Larry
Middle Initial: M
Last Name: Buck
Organization:
Address: 13172 SE Crooked Stick Lane
Address 2:
Address 3:
City: Hobe Sound
State: FL
Zip: 33455
Country: USA
Email: larrymb7@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Time for the Earth to use renewal resources, not non-renewable. | 50342-001

Response for Document 50342

50342-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Anthony Bell.

The comment tracking number that has been assigned to your comment is OSTSD50343.

Comment Date: February 11, 2008 18:36:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD50343

First Name: Anthony
Middle Initial:
Last Name: Bell
Organization:
Address: 5223A MT Bonnell Rd
Address 2:
Address 3:
City: Austin
State: TX
Zip: 78731
Country: USA
Email: abell2@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Greed and distruction are no way to search for our energy needs. | 50343-001

Response for Document 50343

50343-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Allan Levy.

The comment tracking number that has been assigned to your comment is OSTSD50351.

Comment Date: February 11, 2008 18:39:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD50351

First Name: Allan
Middle Initial: E
Last Name: Levy
Organization:
Address: 14 Boat House Ct
Address 2:
Address 3:
City: Gaithersburg
State: MD
Zip: 20878
Country: USA
Email: allan@his.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly oppose oil shale and tar sand leasing. 50351-001

Response for Document 50351

50351-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

Thank you for your comment, Karin Lannon.

The comment tracking number that has been assigned to your comment is OSTSD50352.

Comment Date: February 11, 2008 18:39:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD50352

First Name: Karin
Middle Initial:
Last Name: Lannon
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I oppose opening up public lands in Colorado, Utah, and Wyoming for developing or extracting oil shale and tar sands. Producing greenhouse gases via this process is the opposite of what we need to be doing to save our planet and protect us from global warming.	50352-001

Response for Document 50352

50352-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, David Beebe.

The comment tracking number that has been assigned to your comment is OSTSD50358.

Comment Date: February 11, 2008 18:40:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD50358

First Name: David
Middle Initial:
Last Name: Beebe
Organization:
Address: P.O.Box 148
Address 2:
Address 3:
City: Petersburg
State: AK
Zip: 99833
Country: USA
Email: fvjerryo@mac.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Reveiwer,

This proposed oil shale and tar sands project is among the more shocking forms of BLM agency denial of urgent recommendations made in the latest IPCC report on global warming.

At a time when there is no longer any doubt about the anthropogenic causes to global warming as a result of the use of fossil fuels, largescale open pit mining, and deforestation; and along with the cataclysmic threat of ocean acidification, and the present wave of species extinction unprecedented in the last 650,000 years, it is absolutely stunning that this agency would even consider such a proposal. 50358-001

A no action alternative is the only rational conclusion to arrive upon in this NEPA process. Please, save our taxpayer funds for correcting the present crisis of global warming, not exacerbating it.

Sincerely, David Beebe

Response for Document 50358

50358-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Sherrill Futrell.

The comment tracking number that has been assigned to your comment is OSTSD50359.

Comment Date: February 11, 2008 18:41:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD50359

First Name: Sherrill
Middle Initial:
Last Name: Futrell
Organization:
Address:
Address 2:
Address 3:
City:
State: CA
Zip: 956185421
Country: USA
Email: safutrell@ucdavis.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Ms. Thompson,

Our public lands are already bearing the brunt of the current energy boom when we desperately need to be reducing our greenhouse gas emissions. The oil shale proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants.	50359-001
The BLM should choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. Thank you very much.	50359-002

Sincerely,

Responses for Document 50359

50359-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50359-002: The BLM acknowledges the commentor’s preference for Alternative A.

Thank you for your comment, Julie Huebner.

The comment tracking number that has been assigned to your comment is OSTSD50361.

Comment Date: February 11, 2008 18:41:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD50361

First Name: Julie
Middle Initial:
Last Name: Huebner
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 50361-001

I oppose all development of oil shale and tar sands on public lands.

Response for Document 50361

50361-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, William Drake.

The comment tracking number that has been assigned to your comment is OSTSD50363.

Comment Date: February 11, 2008 18:41:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD50363

First Name: William
Middle Initial: T
Last Name: Drake
Organization:
Address: 1036 Overland Place
Address 2:
Address 3:
City: Vacaville
State: CA
Zip: 956874362
Country: USA
Email: wtdrake@bildrake.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly oppose the mining of oil and tar sands on public lands. The process destroys ecology and native animals feeding and mating grounds. I have seen the results of this type of mining in areas where land and river beds were dragged for gold and coal.

The land is now virtually worthless.

We must find some other alternatives for fuel, but as long as we allow the destruction of the land to obtain oil and tar sands, there is no real pressure to move forward with other alternatives.

50363-001

Response for Document 50363

50363-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gerald Smolinsky.

The comment tracking number that has been assigned to your comment is OSTSD50366.

Comment Date: February 11, 2008 18:42:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD50366

First Name: Gerald
Middle Initial:
Last Name: Smolinsky
Organization:
Address: 2125 Melridge Place
Address 2:
Address 3:
City: Austin
State: TX
Zip: 787042019
Country: USA
Email: gsmolinsky@cal.berkeley.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am opposed to the Bush administration opening up public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources.	50366-001

Response for Document 50366

50366-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50368.

Comment Date: February 11, 2008 18:43:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD50368

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I do not think there is a shortage of public lands for resource extraction. I do feel there is a shortage of public lands under federal protection. I would favor greater protection for public lands. | 50368-001

Response for Document 50368

50368-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Patty Bonney.

The comment tracking number that has been assigned to your comment is OSTSD50370.

Comment Date: February 11, 2008 18:44:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD50370

First Name: Patty
Middle Initial:
Last Name: Bonney
Organization:
Address: 8625 SW Oleson Road
Address 2:
Address 3:
City: Portland
State: OR
Zip: 97223
Country: USA
Email: pattybonney@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is impossible to process tar and oil without despoiling the area. We need to concentrate on renwable, CLEAN, energy that doesn't damage our planet, instead of allowing big business to lay waste to yet more areas.	50370-001

Response for Document 50370

50370-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50374.

Comment Date: February 11, 2008 18:44:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD50374

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Do not approve use of Tar Sands & oil sands on federal lands. It takes more energy than you can produce & it requires 4 to 5 barrals of water for each barrall of oil, which become hazerdous waist. We are more short of water than we are of oil. The only solution to our energy problem is Nuclear energy, which does not have to be a haserdous waste. All waste can be recycled. | 50374-001

Response for Document 50374

50374-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, maggi dunn.

The comment tracking number that has been assigned to your comment is OSTSD50375.

Comment Date: February 11, 2008 18:44:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD50375

First Name: maggi
Middle Initial:
Last Name: dunn
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I want the no action plan in the Draft Programmatic Envvironment Impact Statemen t For Oil Shale and Tar Sands supported. Public lands keep being invaded in our last gasps to consider energy in the old way. I understand that this "mining" would not only be detrimental to the the environment in Colorado, Utah and Wyoming but is anything but cost effective. It adds to the greenhouse gases. I have seen pictures of this treatment in Alberta. Support no action.	50375-001

Response for Document 50375

50375-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Phyl Morello.

The comment tracking number that has been assigned to your comment is OSTSD50376.

Comment Date: February 11, 2008 18:45:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD50376

First Name: Phyl
Middle Initial:
Last Name: Morello
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Never ever should our public lands be up for grabs to any business, especially oil, gas or lumber companies.	50376-001

Response for Document 50376

50376-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Douglas Major Ryan.

The comment tracking number that has been assigned to your comment is OSTSD50377.

Comment Date: February 11, 2008 18:46:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD50377

First Name: Douglas
Middle Initial:
Last Name: Major Ryan
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Federal policy should be focused on finding sustainable and responsible energy solutions to support nation's needs and growing westeern United States rather than on an environmentally and economically infeasible proposal, which would yield massive quantities of greenhouse gas and other pollutants. The Bureau of Land Management should abandon the plan altogether, select the No Action alternative, or, at least, evaluate reasonable alternatives, including those based on energy conservation and efficiency.	50377-001 50377-002 50377-003
The Bureau of Land Management must also adequately consider the impacts of the proposed development wildlife throughout the proposal's site.	50377-004
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	50377-001 (cont.)

Responses for Document 50377

50377-001: The BLM acknowledges the commentor's preference for Alternative A.

50377-002: Thank you for your comment.

50377-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50377-004: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

Thank you for your comment, Irma Call.

The comment tracking number that has been assigned to your comment is OSTSD50378.

Comment Date: February 11, 2008 18:46:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD50378

First Name: Irma
Middle Initial: O
Last Name: Call
Organization:
Address: 4139-102 N. Stone Avenue
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 85705
Country: USA
Email: irmacall@mindspring.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

There is no clean,easy useful technology to extract oil from the shales in which it is bound without a net loss to our civilization when all parameters are considered. We all must begin considering the largest perspective when decisions need to be made	50378-001

Response for Document 50378

50378-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Denise Kobylarz.

The comment tracking number that has been assigned to your comment is OSTSD50379.

Comment Date: February 11, 2008 18:46:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD50379

First Name: Denise
Middle Initial:
Last Name: Kobylarz
Organization:
Address: 313 Nwk Pompton Tpk, Pequannock, NJ 07440
Address 2:
Address 3:
City: Pequannock
State: NJ
Zip: 07440
Country: USA
Email: denisekoby@optonline.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

If President Bush has his way we would have nothing but barren, raped lands with no natural vegetation or animal life. All in the name of OIL! Enough is enough already. I have yet to see Bush do anything constructive for the citizens of the United States except leave us with few jobs, high taxes and plundered lands.	50379-001

Response for Document 50379

50379-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gary Lampman.

The comment tracking number that has been assigned to your comment is OSTSD50380.

Comment Date: February 11, 2008 18:47:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD50380

First Name: Gary
Middle Initial:
Last Name: Lampman
Organization:
Address: 593 Walton Ferry Rd
Address 2:
Address 3:
City: Hendersonville
State: TN
Zip: 370754747
Country: USA
Email: Lamppost@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Once you develop the land and allow the drilling. Their is little chance to restore the reckless behavior of Business. | 50380-001

Response for Document 50380

50380-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sherry Marsh.

The comment tracking number that has been assigned to your comment is OSTSD50381.

Comment Date: February 11, 2008 18:47:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD50381

First Name: Sherry
Middle Initial:
Last Name: Marsh
Organization:
Address: 5030 Alicante Way
Address 2:
Address 3:
City: Oceanside
State: CA
Zip: 92056
Country: USA
Email: MTASJ@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

No more drilling on public land, enough is enough | 50381-001

Response for Document 50381

50381-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Cheri Langlois.

The comment tracking number that has been assigned to your comment is OSTSD50385.

Comment Date: February 11, 2008 18:50:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD50385

First Name: Cheri
Middle Initial:
Last Name: Langlois
Organization:
Address:
Address 2:
Address 3:
City:
State: CA
Zip: 95460
Country: USA
Email: clang@mcn.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

we do not need more coal, shale or oil. We do not need to devastate more land to get to these things. We need to spend all of this money, time and effort on wind, solar and water power. Alternatives that will not screw up our land and will last longer than the fossil fuels we have used up in less than two centuries.	50385-001

Response for Document 50385

50385-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, andrew froehle.

The comment tracking number that has been assigned to your comment is OSTSD50386.

Comment Date: February 11, 2008 18:50:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD50386

First Name: andrew
Middle Initial: m
Last Name: froehle
Organization:
Address: 28453 ottawa dr
Address 2:
Address 3:
City: browerville
State: MN
Zip: 56438
Country: USA
Email: animal@twecwb.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

How stupid arw you the big oil is just out to makew a mess of this country it is time for renewable energy and forget about oil.	50386-001

Response for Document 50386

50386-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, james dildine.

The comment tracking number that has been assigned to your comment is OSTSD50389.

Comment Date: February 11, 2008 18:51:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD50389

First Name: james
Middle Initial: l
Last Name: dildine
Organization:
Address: 683 orchard vista
Address 2:
Address 3:
City: midvale
State: UT
Zip: 84047
Country: USA
Email: dildinejim@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Trying to mine oil from sand and shale deposits is like digging multiple graves for ones self. Given the current technology, it isn't an energy effective process; the effort put into making that process more efficient will undercut funding for more efficient, cleaner energy resources; more oil reserves will only encourage the use of a resource that has already proven dangerous to the survival of mammalian life. This is literally a dead end solution to the energy crisis!	50389-001

Response for Document 50389

50389-001: The BLM acknowledges the commentor's preference to not support oil shale and tar sands development.

Thank you for your comment, Barbara Green.

The comment tracking number that has been assigned to your comment is OSTSD50391.

Comment Date: February 11, 2008 18:51:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD50391

First Name: Barbara
Middle Initial: L
Last Name: Green
Organization:
Address: 17078 Hall Rd
Address 2:
Address 3:
City: Clatskanie
State: OR
Zip: 97016
Country: USA
Email: cgbg@clatskanie.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

GO Green | 50391-001

Response for Document 50391

50391-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Robert Kaplan.

The comment tracking number that has been assigned to your comment is OSTSD50393.

Comment Date: February 11, 2008 18:52:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD50393

First Name: Robert
Middle Initial: B
Last Name: Kaplan
Organization:
Address: P. O. Box 577
Address 2:
Address 3:
City: Port Angeles
State: WA
Zip: 983620105
Country: USA
Email: rkaplan@olypen.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 50393-001

I oppose all development of oil shale and tar sands on public lands.

Response for Document 50393

50393-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Stewart Wiggers.

The comment tracking number that has been assigned to your comment is OSTSD50396.

Comment Date: February 11, 2008 18:53:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD50396

First Name: Stewart
Middle Initial: E
Last Name: Wiggers
Organization:
Address: 429-A Atkinson Dr. #708
Address 2:
Address 3:
City: Honolulu
State: HI
Zip: 96814
Country: USA
Email: wiggers@hawaii.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I think our focus for energy should be on finding alternatives to fossil fuels. We don't have to destroy our lands in order to satisfy our fuel needs.

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

50396-001

Response for Document 50396

50396-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, lOIS Bustler.

The comment tracking number that has been assigned to your comment is OSTSD50397.

Comment Date: February 11, 2008 18:53:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD50397

First Name: lOIS
Middle Initial: A
Last Name: Bustler
Organization:
Address: 25 So. Ashland Ave
Address 2:
Address 3:
City: Palatine
State: IL
Zip: 600746301
Country: USA
Email: palbutlers1@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not spen to leasing these special public lands to oil shale and tar sands for fossil fuel production. This special land would forever be environmentally devasted. Thank You. | 50397-001

Response for Document 50397

50397-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50398.

Comment Date: February 11, 2008 18:53:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD50398

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Oil Shale and Tar Sands Public Comment:

Please do not allow development of oil shale and tar sands on public lands. | 50398-001

Thank you for your attention.

Response for Document 50398

50398-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Maureen Schulze.

The comment tracking number that has been assigned to your comment is OSTSD50402.

Comment Date: February 11, 2008 18:54:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD50402

First Name: Maureen
Middle Initial: D
Last Name: Schulze
Organization:
Address: 170 Beach Drive
Address 2:
Address 3:
City: Atco
State: NJ
Zip: 08004
Country: USA
Email: maureens5656@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please protect our environment. | 50402-001

Response for Document 50402

50402-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Pam Scoggins.

The comment tracking number that has been assigned to your comment is OSTSD50403.

Comment Date: February 11, 2008 18:54:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD50403

First Name: Pam
Middle Initial:
Last Name: Scoggins
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil Shale and Tar Sands? You've got to be kidding, right? No, No, No, emphatically no, we don't need that and neither do the plants and animals who will have their portion of earth mined in this despicable plan. Will the Bush administration never stop it's relentless raping and pillaging of our natural resources?	50403-001

Response for Document 50403

50403-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Joel Savitz.

The comment tracking number that has been assigned to your comment is OSTSD50406.

Comment Date: February 11, 2008 18:55:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD50406

First Name: Joel
Middle Initial:
Last Name: Savitz
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

My Dear Ms. Thompson, As an Oil & Gas Broker the past 7 years, I must bring to your attention certain facts. 1. We do not need to destroy the planet to survive. 2. What you are attempting to do with Natural Resouces is no different than what Hitler atempted to do with Human Resouces. 3. My God, must GREED be the driving force behind all that we do? Have you no shame that you are helping to accelerate the ecological disasters, which the Bush Administration takes pride in? 4. Bush doesn't know the difference between a Polar Bear (a large white member of the bear family) and a Polar Beer (a nicely brewed beer sold in Venezuela). 5. The only revenge I can imagine (what goes around comes around) which might eventually bring justice to your crime is that your grandchildren should suffer a slow and lingering and painful death such as you are so calously affording to other species of life as our planet implodes around us. 6. Put that in your pollution pipe and smoke it! 50406-001

Response for Document for 50406

50406-001: Thank you for your comment.

Thank you for your comment, Bina Robinson.

The comment tracking number that has been assigned to your comment is OSTSD50407.

Comment Date: February 11, 2008 18:55:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD50407

First Name: Bina
Middle Initial:
Last Name: Robinson
Organization: CIVITAS
Address: POB 26
Address 2:
Address 3:
City: Swain
State: NY
Zip: 14884
Country: USA
Email: civitas@linkny.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

1. We need to preserve rather than exploit what's left of our natural wild lands.

2. We need to invest our efforts in energy sources that do not produce greenhouse gases or otherwise contribute to global waarming.

50407-001

Response for Document 50407

50407-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, David Barrett.

The comment tracking number that has been assigned to your comment is OSTSD50414.

Comment Date: February 11, 2008 18:57:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD50414

First Name: David
Middle Initial: M
Last Name: Barrett
Organization:
Address: 129 Strand Avenue
Address 2:
Address 3:
City: Missoula
State: MT
Zip: 59801
Country: USA
Email: zorrobozo@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please protect American soil. . .Stop the vicious spiral of addiction, etc. | 50414-001

Response for Document 50414

50414-001: Thank you for your comment.

Thank you for your comment, Preston Forsythe.

The comment tracking number that has been assigned to your comment is OSTSD50415.

Comment Date: February 11, 2008 18:57:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD50415

First Name: Preston
Middle Initial:
Last Name: Forsythe
Organization:
Address: PO Box 1128
Address 2:
Address 3:
City: Browder
State: KY
Zip: 42326
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am opposed to opening up our public lands in the west for tar sand development. This is too controversal to subject our public lands to possible misuse and abuse. Please protect our public lands for the future. sincerely, | 50415-001

Preston Forsythe

Response for Document 50415

50415-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Catherine Hirsch.

The comment tracking number that has been assigned to your comment is OSTSD50422.

Comment Date: February 11, 2008 18:58:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD50422

First Name: Catherine
Middle Initial:
Last Name: Hirsch
Organization:
Address: PO Box 755
Address 2:
Address 3:
City: Anahola
State: HI
Zip: 96703
Country: USA
Email: chkh@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We shouldn't be raping the Earth more with actions like this to get the very last drop out of the shale. Stop things like this happening and put the energy into alternatives to oil...!!!	50422-001

Response for Document 50422

50422-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, DEBORAH SMITH.

The comment tracking number that has been assigned to your comment is OSTSD50424.

Comment Date: February 11, 2008 18:58:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD50424

First Name: DEBORAH
Middle Initial:
Last Name: SMITH
Organization:
Address: 3044 N.W. 30TH
Address 2:
Address 3:
City: OKLAHOMA CITY
State: OK
Zip: 73112
Country: USA
Email: deborah993@ocx.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

BLM IS WAS SET UP TO PROTECT AMERICA'S LANDS, NOT AS A REAL ESTATE AGENT FOR POLITICANS!!!!!	50424-001

Response for Document 50424

50424-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Paula Bourgeois.

The comment tracking number that has been assigned to your comment is OSTSD50425.

Comment Date: February 11, 2008 18:58:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD50425

First Name: Paula
Middle Initial:
Last Name: Bourgeois
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I do so oppose this. 50425-001

Response for Document 50425

50425-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Theresa Hobmeier.

The comment tracking number that has been assigned to your comment is OSTSD50428.

Comment Date: February 11, 2008 18:59:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD50428

First Name: Theresa
Middle Initial: M
Last Name: Hobmeier
Organization:
Address: 10700 NW 71st PL
Address 2:
Address 3:
City: Tamarac
State: FL
Zip: 333212214
Country: USA
Email: geohob@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We have such beautiful land in this country & it is not necessary to have oil shale as the animals need land to live on & get food from the water. Our lands must not have pollution it should be clean & great for all of us to have a wonderful vacation w/o wrong materials on our land.	50428-001

Response for Document 50428

50428-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, William Hoffmann.

The comment tracking number that has been assigned to your comment is OSTSD50430.

Comment Date: February 11, 2008 18:59:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD50430

First Name: William
Middle Initial:
Last Name: Hoffmann
Organization:
Address: 962 E. Lowell Ave
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84102
Country: USA
Email: ahoffmann@sisna.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please don't allow development of shale and tar sands. Conservation has yet to be implemented. Without a serious attempt at conservation, there should be no further development. | 50430-001

Response for Document 50430

50430-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Russell Weisz.

The comment tracking number that has been assigned to your comment is OSTSD50431.

Comment Date: February 11, 2008 19:00:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD50431

First Name: Russell
Middle Initial: B
Last Name: Weisz
Organization:
Address: 319 Laguna St.
Address 2:
Address 3:
City: Santa Cruz
State: CA
Zip: 95060
Country: USA
Email: russweisz@baymoon.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. | 50431-001

Response for Document 50431

50431-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sharon Hultquist.

The comment tracking number that has been assigned to your comment is OSTSD50433.

Comment Date: February 11, 2008 19:00:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD50433

First Name: Sharon
Middle Initial: S
Last Name: Hultquist
Organization:
Address: 13332 Redding Dr.
Address 2:
Address 3:
City: Fort Wayne
State: IN
Zip: 46814
Country: USA
Email: mybettersetter@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not destroy another beautiful area for the benefit of so few! | 50433-001

Response for Document 50433

50433-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Alexander Mouton.

The comment tracking number that has been assigned to your comment is OSTSD50435.

Comment Date: February 11, 2008 19:01:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD50435

First Name: Alexander
Middle Initial: C
Last Name: Mouton
Organization:
Address: 339 W Elm St
Address 2:
Address 3:
City: GRANVILLE
State: OH
Zip: 43023
Country: USA
Email: moutona@denison.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Both mining and processing of oil shale and tar sands involve a variety of environmental impacts, such as global warming and greenhouse gas emissions, disturbance of mined land; impacts on wildlife and air and water quality. The development of a commercial oil shale industry in the U.S. would also have significant social and economic impacts on local communities. Of special concern in the relatively arid western United States is the large amount of water required for oil shale processing; currently, oil shale extraction and processing require several barrels of water for each barrel of oil produced, though some of the water can be recycled.	50435-001

Response for Document 50435

50435-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

Thank you for your comment, Mel Dickerson.

The comment tracking number that has been assigned to your comment is OSTSD50440.

Comment Date: February 11, 2008 19:02:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD50440

First Name: Mel
Middle Initial:
Last Name: Dickerson
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The current administration needs to put its money where its mouth is. Bush et al. claim to want to curb global warming but with every day they attempt to march in the opposite direction leading the world deeper and deeper into the morass of fossil fuel failure. Instead of offering a way towards a cleaner and brighter future they continue to offer failed policies and programs that complicate and exacerbate global warming and all its attendant negative effects. It's time to cut the plans short now and end this outrageous charade and avoid another disaster. No more destruction of public lands to feed corporate coffers. No more licenses to pollute and despoil an already over-burdened earth. Stop this utter nonsense now!

50440-001

Response for Document 50440

50440-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Raymond Waters.

The comment tracking number that has been assigned to your comment is OSTSD50441.

Comment Date: February 11, 2008 19:03:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD50441

First Name: Raymond
Middle Initial: L
Last Name: Waters
Organization:
Address: 615 24th Place
Address 2:
Address 3:
City: Hermosa Beach,
State: CA
Zip: 902542202
Country: USA
Email: rlwater35@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I believe the environmental costs far exceed any benefits to be derived from degrading the wilderness areas in our country. | 50441-001

Response for Document 50441

50441-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Brett Pike.

The comment tracking number that has been assigned to your comment is OSTSD50448.

Comment Date: February 11, 2008 19:04:46PM
Oil Shale and Tar Sands
Comment ID: OSTSD50448

First Name: Brett
Middle Initial: R
Last Name: Pike
Organization:
Address: 1916 Pike Place #12-223
Address 2:
Address 3:
City: Seattle
State: WA
Zip: 98101
Country: USA
Email: brett.pike@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We must immediately stop seeking new sources of hydrocarbons. It is necessary to visualize a post-carbon energy economy, and move swiftly and strongly towards that goal, if we wish to avoid sudden, large-scale changes in climate, coastlines, and biological diversity and abundance. | 50448-001

Response for Document 50448

50448-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Miriam Pollack.

The comment tracking number that has been assigned to your comment is OSTSD50451.

Comment Date: February 11, 2008 19:05:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD50451

First Name: Miriam
Middle Initial:
Last Name: Pollack
Organization:
Address: 3105 Fremont Street
Address 2:
Address 3:
City: Boulder
State: CO
Zip: 80304
Country: USA
Email: M3pollack@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am deeply dismayed that our public officials are violating the public trust with plans to exploit fossil fuels in Colorado and neighboring states rather than pursuing sources of sustainable energy. While this strategy may solve short term goals and profit certain individuals, it will do enormous harm to our land, air and future generations of our states. I urge you to take this public trust with utmost gravity and choose to protect our land and our future by directing your efforts towards sustainable enrgy development. 50451-001

Response for Document 50451

50451-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, David Wappler.

The comment tracking number that has been assigned to your comment is OSTSD50452.

Comment Date: February 11, 2008 19:05:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD50452

First Name: David
Middle Initial:
Last Name: Wappler
Organization:
Address: 1809 Azalea Drive
Address 2:
Address 3:
City: West Point
State: GA
Zip: 31833
Country: USA
Email: david.wappler@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Due to the significant environmental destruction caused by oil shale and tar sands extraction, and the resultant air pollution caused by the burning of these fossil fuels, I urge the BLM to deny all applications for oil shale and tar sands extraction.

Energy conservation and the development of clean, renewable energy sources offers the best approach for long term environmental, economic and national security.

50452-001

Response for Document 50452

50452-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Deborah Welsh.

The comment tracking number that has been assigned to your comment is OSTSD50454.

Comment Date: February 11, 2008 19:06:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD50454

First Name: Deborah
Middle Initial: D
Last Name: Welsh
Organization:
Address: 1110 Highland Avenue
Address 2:
Address 3:
City: Bremerton
State: WA
Zip: 98337
Country: USA
Email: dewelsh444@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Allowing this type of destructive, inefficient mining at a time when we can ill afford environmental destruction and additional massive release/production of greenhouse gases is insanity. No one profits from this but oil companies.

Why are you not concentrating on completely benign and endless supplies of energy that guarantee our independence from foreign countries and end our dependence on fossil fuels? Massive solar and wind projects should be your main focus. Oil company greed should not be swaying your decisions.

50454-001

Response for Document 50454

50454-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Colleen Rodger.

The comment tracking number that has been assigned to your comment is OSTSD50455.

Comment Date: February 11, 2008 19:07:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD50455

First Name: Colleen
Middle Initial:
Last Name: Rodger
Organization:
Address: 3450 Market St. #401
Address 2:
Address 3:
City: San Francisco
State: CA
Zip: 94114
Country: USA
Email: cmstudio2@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The sooner we invest in renewable energy sources, the less our survival will cost. Stop wasting our precious wilderness on low return, deadend oil field development. | 50455-001

Response for Document 50455

50455-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Randall Notgrass.

The comment tracking number that has been assigned to your comment is OSTSD50456.

Comment Date: February 11, 2008 19:07:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD50456

First Name: Randall
Middle Initial: N
Last Name: Notgrass
Organization:
Address: 8604 F.M. 969
Address 2:
Address 3:
City: Austin
State: TX
Zip: 787246200
Country: USA
Email: randyneil@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We NEED to transition to alternative fuels rather than ruin our environment and guarantee our grandchildren will NOT HAVE A CHANCE to live a decent life if they live at all. THE BIBLE SPEAKS EXPRESSLY ABOUT GREED AND THE END GREEDY PEOPLE COME TO. THERE IS NO GUARANTEE THAT THE RAPTURE WILL HAPPEN WITHIN THE NEXT THOUSAND YEARS, BUT WE ARE VERY SURE THAT LIFE AS WE KNOW IT CANNOT CONTINUE AT THIS PRESENT PACE OF GREEDY POLUTION!!!	50456-001

Response for Document 50456

50456-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Richard Sam Salmon.

The comment tracking number that has been assigned to your comment is OSTSD50458.

Comment Date: February 11, 2008 19:09:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD50458

First Name: Richard Sam
Middle Initial: S
Last Name: Salmon
Organization:
Address: 1331 Bellevue Street
Address 2: Lot #G
Address 3:
City: Green Bay
State: WI
Zip: 54302
Country: USA
Email: lasam@itol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

No to using our precious wild lands for oil development. We need to develop alternate energy now! Also start building desalination plants in the Gulf and off the south east coast. | 50458-001

Response for Document 50458

50458-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Raymond Collins.

The comment tracking number that has been assigned to your comment is OSTSD50459.

Comment Date: February 11, 2008 19:09:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD50459

First Name: Raymond
Middle Initial: T
Last Name: Collins
Organization:
Address: 19700 sw 118 pl
Address 2:
Address 3:
City: Miami
State: FL
Zip: 33177
Country: USA
Email: Raycollins3@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Selling out our natural resources is very shortsighted especially if they are needed later. | 50459-001

Response for Document 50459

50459-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Rachel McAnallen.

The comment tracking number that has been assigned to your comment is OSTSD50463.

Comment Date: February 11, 2008 19:11:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD50463

First Name: Rachel
Middle Initial: R
Last Name: McAnallen
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Do this now and there will be no beauty for your grandchildren to enjoy. 50463-001

Response for Document 50463

50463-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Don Richardson.

The comment tracking number that has been assigned to your comment is OSTSD50464.

Comment Date: February 11, 2008 19:11:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD50464

First Name: Don
Middle Initial: H
Last Name: Richardson
Organization:
Address: 577 Windover Drive
Address 2:
Address 3:
City: Brevard
State: NC
Zip: 287129383
Country: USA
Email: gaia@citcom.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil shale and tar sands are a net energy loser, like nuclear power. WE MUST have a crash Apollo program to bring renewables on line NOW. Greedy corporations and their political lap dogs are intent on killing us all for their own immediate gains. They show contempt for their own children. This is treason and can only lead to mass civil disobedience and then revolution.	50464-001

Response for Document 50464

50464-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sandra Woodall.

The comment tracking number that has been assigned to your comment is OSTSD50465.

Comment Date: February 11, 2008 19:11:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD50465

First Name: Sandra
Middle Initial: S
Last Name: Woodall
Organization:
Address: 4960 Allan Rd.
Address 2:
Address 3:
City: Bethesda
State: MD
Zip: 20816
Country: USA
Email: lswoodall@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am dismayed that in this time when we must recognize the imminent dangers of climate change, you are considering ruining some of the most fragile and iconic landscapes in the country for a temporary gain . . . and in doing so are undercutting the research and development necessary to develop clean energy sources. 50465-001

Response for Document 50465

50465-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, cynthia wicker.

The comment tracking number that has been assigned to your comment is OSTSD50468.

Comment Date: February 11, 2008 19:13:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD50468

First Name: cynthia
Middle Initial: l
Last Name: wicker
Organization:
Address: PMB 283
Address 2: 9121 E. Tanque Verde Rd.
Address 3:
City: Tucson
State: AZ
Zip: 85749
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am absolutely opposed to the development of the proposed lands for the purpose of obtaining oil from the shale and sands. This will do irreparable damage to the environment and the wildlife that depend on it.

This is a short time approach to a long term problem. Oil is not the answer, and we should not be tearing up precious natural resources in this last ditch effort to wring out a few more barrels.

50468-001

Response for Document 50468

50468-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Lisa de Vincent.

The comment tracking number that has been assigned to your comment is OSTSD50470.

Comment Date: February 11, 2008 19:13:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD50470

First Name: Lisa
Middle Initial:
Last Name: de Vincent
Organization:
Address: 6700 Warner Ave. #15H
Address 2:
Address 3: 6700 Warner Ave. #15H
City: Huntington Beach
State: CA
Zip: 92647
Country: USA
Email: divadevincent@mac.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is a no brainer, no development on park's property. The reason that the land has been set aside is so it can not be developed, what doesn't your industry understand about that? It's just disgusting that you would even ask to destroy these last few places. I can only assume that Bush and his cronies made the suggestion and you're jumping on it. At what point do you not care about nature and preserving something and can live with yourselves?	50470-001

Response for Document 50470

50470-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50471.

Comment Date: February 11, 2008 19:14:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD50471

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am a biologist and I am writing to urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

This development will only increase problems of excessive release of green house gases. We should be moving away from such measures, not toward them. In the long run the cost is too great.

I am also very much concerned about the loss of habitat and the resulting loss of biodiversity in the area. We have so little of our country left to lose.

Please, consider the true costs of this measure.

50471-001

Response for Document 50471

50471-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Rick Flory.

The comment tracking number that has been assigned to your comment is OSTSD50472.

Comment Date: February 11, 2008 19:14:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD50472

First Name: Rick
Middle Initial: L
Last Name: Flory
Organization:
Address: PO Box 11217
Address 2:
Address 3:
City: Jackson
State: WY
Zip: 83002
Country: USA
Email: rick@earthfriends.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

WE ARE ONLY GOING TO MAKE THE ALREADY OBVIOUS IMPACTS OF CLIMATE CHANGE WORSE AND ACCELERATED BY WASTING SO MUCH ENERGY TO PROCESS OIL SHALE AND TAR SANDS. WE NEED TO SPEND THESE FUNDS ON MOVING INTO RENEWABLES INSTEAD! THE AMERICAN PUBLIC IS NOT WILLING TO ACCEPT THE DAMAGE TO OUR PUBLIC LANDS AND THE LOSS OF PRIME AREAS TO OTHER USERS THAT DO NOT DESTROY THESE LANDS.	50472-001

Response for Document 50472

50472-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Natasha Reichle.

The comment tracking number that has been assigned to your comment is OSTSD50474.

Comment Date: February 11, 2008 19:14:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD50474

First Name: Natasha
Middle Initial:
Last Name: Reichle
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	50474-001

Response for Document 50474

50474-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Michael Adler.

The comment tracking number that has been assigned to your comment is OSTSD50477.

Comment Date: February 11, 2008 19:15:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD50477

First Name: Michael
Middle Initial:
Last Name: Adler
Organization:
Address: 2704 NW 48th pl
Address 2:
Address 3:
City: Gainesville
State: FL
Zip: 32605
Country: USA
Email: UFDionysus@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We need to change our lifestyles to prepare for the prtroleum free future. More destruction of our life-support systems will not solve our problems, they are our problems | 50477-001

Response for Document 50477

50477-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, joe swierkosz.

The comment tracking number that has been assigned to your comment is OSTSD50479.

Comment Date: February 11, 2008 19:16:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD50479

First Name: joe
Middle Initial: w
Last Name: swierkosz
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

why don't you preach losing our dependence on oil instead of chopping up more of nature for a temporary fix? | 50479-001

Response for Document 50479

50479-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jean Lewandowski.

The comment tracking number that has been assigned to your comment is OSTSD50483.

Comment Date: February 11, 2008 19:17:46PM
Oil Shale and Tar Sands
Comment ID: OSTSD50483

First Name: Jean
Middle Initial: A
Last Name: Lewandowski
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The plan to open up previously protected land for oil shale mining is a plan to continue the same devastating practices that have scarred the land, polluted the water, and released tons of greenhouse gasses into the atmosphere. We know better by now than to make the same mistakes again. Additionally, doing more of the same will only retard efforts to put resources into the kind of creative exploration that will result in clean, efficient, renewable energy sources. The age we find ourselves in calls for creativity and boldness. The proposals to open up these areas for mining represent old, worn out ideas and technologies. Please help lead us into a better future by opposing these mining proposals.	50483-001

Response for Document 50483

50483-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Phyllis R. CAzares.

The comment tracking number that has been assigned to your comment is OSTSD50485.

Comment Date: February 11, 2008 19:18:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD50485

First Name: Phyllis R.
Middle Initial:
Last Name: CAzares
Organization:
Address: PO BOX 2707
Address 2:
Address 3:
City: Tifton
State: GA
Zip: 31793
Country: USA
Email: AfricanVioletLover@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please don't sell out. This is a critical issue. Bush won't be in office forever. Hopefully, if we work together, we can prevent more damage from being done. Thanks, PC	50485-001

Response for Document 50485

50485-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Bryan Wells.

The comment tracking number that has been assigned to your comment is OSTSD50488.

Comment Date: February 11, 2008 19:19:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD50488

First Name: Bryan
Middle Initial:
Last Name: Wells
Organization:
Address:
Address 2:
Address 3:
City:
State: ME
Zip: 04468
Country: USA
Email: bwells@oakleafs.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not damage the environment for the sake of short-term, near-sighted gain of fossil fuel. | 50488-001

Thank you

Bryan

Response for Document 50488

50488-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Phyllis Jacoby.

The comment tracking number that has been assigned to your comment is OSTSD50489.

Comment Date: February 11, 2008 19:20:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD50489

First Name: Phyllis
Middle Initial: M
Last Name: Jacoby
Organization:
Address: 8644 Stewarts Meadow
Address 2:
Address 3:
City: College Station
State: TX
Zip: 77845
Country: USA
Email: pmjacoby@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bureau of Land Management's controversial proposal would fuel an outdated, fossil-fuel-intensive energy infrastructure and comes at a time when we need to be rapidly transitioning away from fossil fuels-based energy production. If "business as usual" greenhouse gas emissions continue, over one third of the world's plants and animals will be committed to extinction by the middle of this century or before.

It is time to tell the Bureau of Land Management that the environmental catastrophe known as oil shale and tar sands development will never be viable. Please write today to voice your opposition to this ill-conceived proposal.

50489-001

Response for Document 50489

50489-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Andrew Ireland.

The comment tracking number that has been assigned to your comment is OSTSD50492.

Comment Date: February 11, 2008 19:21:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD50492

First Name: Andrew
Middle Initial: D
Last Name: Ireland
Organization:
Address: 7525 Hampden Lane
Address 2:
Address 3:
City: Bethesda
State: MD
Zip: 20814
Country: USA
Email: andrewireland@mac.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Why does the Bush administration insist on trying to waste our nations natural resources and fossil fuel stores so that we can put off alternative energy source development for a few more years? | 50492-001

Response for Document 50492

50492-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, John Petersen.

The comment tracking number that has been assigned to your comment is OSTSD50494.

Comment Date: February 11, 2008 19:22:44PM
Oil Shale and Tar Sands
Comment ID: OSTSD50494

First Name: John
Middle Initial:
Last Name: Petersen
Organization:
Address: 9502 184th Ave. E.
Address 2:
Address 3:
City: Bonney Lake
State: WA
Zip: 98391
Country: USA
Email: petersje@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly oppose all development of oil shale and tar sands on public lands. Save our earth and natural resources! | 50494-001

Response for Document 50494

50494-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, les rout.

The comment tracking number that has been assigned to your comment is OSTSD50496.

Comment Date: February 11, 2008 19:23:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD50496

First Name: les
Middle Initial:
Last Name: rout
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I oppose developing tar and shale on public lands. | 50496-001

Response for Document 50496

50496-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Naomi Sobo.

The comment tracking number that has been assigned to your comment is OSTSD50500.

Comment Date: February 11, 2008 19:26:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD50500

First Name: Naomi
Middle Initial:
Last Name: Sobo
Organization:
Address: 2838 Juniper St.
Address 2:
Address 3:
City: San Diego
State: CA
Zip: 92104
Country: USA
Email: gramnome@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We need to get off of cabon based fuels and develop clean energy such as solar, tidal and geothermal eneregy. Please do not persue the use of tar sands and shale oil. | 50500-001

Response for Document 50500

50500-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Nelson Dowler.

The comment tracking number that has been assigned to your comment is OSTSD50501.

Comment Date: February 11, 2008 19:26:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD50501

First Name: Nelson
Middle Initial: L
Last Name: Dowler
Organization:
Address: 1533 Ritchie rd
Address 2:
Address 3:
City: Stow
State: OH
Zip: 44224
Country: USA
Email: lovedogpets@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dont destroy anymore earth. 50501-001

Response for Document 50501

50501-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Shirley Jin.

The comment tracking number that has been assigned to your comment is OSTSD50508.

Comment Date: February 11, 2008 19:31:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD50508

First Name: Shirley
Middle Initial:
Last Name: Jin
Organization:
Address: 335 Eutau Court
Address 2:
Address 3:
City: Indian Harbour Beach
State: FL
Zip: 32937
Country: USA
Email: smjin@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am opposed to all development of oil shale and tar sands on public lands. The money should be spent on developing renewable energy sources. Please make decisions based on for what is right and best for our Country. | 50508-001

Response for Document 50508

50508-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, pam wright.

The comment tracking number that has been assigned to your comment is OSTSD50510.

Comment Date: February 11, 2008 19:32:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD50510

First Name: pam
Middle Initial:
Last Name: wright
Organization:
Address: 1185 del rey ave
Address 2:
Address 3:
City: pasadena
State: CA
Zip: 911071812
Country: USA
Email: pasapdub@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Is nothing sacred? Keep mining out of public lands. Spend resources finding alternative energy sources....not public spaces! | 50510-001

Response for Document 50510

50510-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, connie fletcher.

The comment tracking number that has been assigned to your comment is OSTSD50513.

Comment Date: February 11, 2008 19:33:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD50513

First Name: connie
Middle Initial:
Last Name: fletcher
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

NO,NO,NO!! | 50513-001

Response for Document 50513

50513-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sara Wan.

The comment tracking number that has been assigned to your comment is OSTSD50514.

Comment Date: February 11, 2008 19:33:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD50514

First Name: Sara
Middle Initial:
Last Name: Wan
Organization:
Address: 22350 Carbon Mesa Rd
Address 2:
Address 3:
City: Malibu
State: CA
Zip: 90265
Country: USA
Email: Lwan22350@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

A full and unbiased alternatives analysis must be part of the Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The No Project Alternative is the correct alternative if all factors are considered, particularly the impacts of the use of public lands and their use for energy resources. Our public lands must be preserved for future generations and cannot be sacrificed for short term gain. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected and on the availability of public lands to an increasing populations need for recreation and enjoyment away from crowded cities. 50514-001 50514-002 50514-003

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 50514-001 (cont.)

Responses for Document 50514

50514-001: The BLM acknowledges the commentor's preference for Alternative A.

50514-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50514-003: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. This information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. When applications to lease are received and additional information becomes available, the BLM will conduct further NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

Thank you for your comment, Michael Serengeti.

The comment tracking number that has been assigned to your comment is OSTSD50515.

Comment Date: February 11, 2008 19:33:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD50515

First Name: Michael
Middle Initial:
Last Name: Serengeti
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

We've got to move away from carbon based sources of energy. Oil shale and tar sand extraction is one of the most environmentally damaging means of extracting carbon based energy. I recommend that BLM take no action on requests for permits related to such destructive processes.	50515-001

Response for Document 50515

50515-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50519.

Comment Date: February 11, 2008 19:36:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD50519

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please do not further destroy our environment. Please forward the creation of fossil fuel alternatives. The women and men in our country are ingenious when they are supported and encouraged to develop smart, healthy options. | 50519-001

Response for Document 50519

50519-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, John Deal.

The comment tracking number that has been assigned to your comment is OSTSD50520.

Comment Date: February 11, 2008 19:36:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD50520

First Name: John
Middle Initial: R
Last Name: Deal
Organization:
Address: 6A Edward St.
Address 2:
Address 3:
City: Medford
State: MA
Zip: 02155
Country: USA
Email: scholargipsy@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am vigorously opposed to the BLM's plans to open up oil shale and tar sands for development. At a time when we need to be pursuing energy independence and weaning ourselves off of our dependence on oil, this sort of prospecting is, at best, retrogressive. I urge you strongly to take no action in regard to these public lands. | 50520-001

Response for Document 50520

50520-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Teresa Boyer.

The comment tracking number that has been assigned to your comment is OSTSD50521.

Comment Date: February 11, 2008 19:37:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD50521

First Name: Teresa
Middle Initial: A
Last Name: Boyer
Organization:
Address: 5045 Lakeview Blvd
Address 2:
Address 3:
City: Lake Oswego
State: OR
Zip: 97035
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

Recovering non-renewable energy in this way should not be our priority at a time when the government's financial resources need to be forward-focused on the development of renewable energy technologies.

Hopefully, you are in a position of leadership at this time to recognize this type of searching for non-renewable energy is an approach that should be hospiced. It is a dying approach. 50521-001

Please consider the impact on greenhouse gases in everything you do as a leader at BLM.

Please set an example with a different type of leadership inseparable from stewardship and independent from those in power who see this great nation's public lands as if they were their own and free to sell access to, in order to satisfy less than honorable agreements.

Response for Document 50521

50521-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50525.

Comment Date: February 11, 2008 19:40:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD50525

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. Oil shale rock must be heated up to about 900 degrees F to release the oil, and at least 40 percent of the energy value of the shale is consumed in production. Producing 1 million barrels of shale oil a day, as some have proposed, would require 10 new (and likely coal-fired) power plants and five new coal mines just to serve them, costing taxpayers billions, consuming millions of tons of coal and acre-feet of water each year, and producing an astronomical amount of greenhouse pollution.	50525-001
Development of oil shale and tar sands in the Rocky Mountains would also hurt species that depend on our public lands and waters for survival, including migratory birds, endangered plants, and federally protected fish species like the humpback chub, Colorado pikeminnow, razorback sucker, and others.	50525-002
I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions.	50525-003
This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants.	50525-004
The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.	50525-005
The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.	50525-006
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	50525-003 (cont.)

Responses for Document 50525

50525-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision making process.

50525-002: The comment expresses concern for impacts on a number of federally protected species including migratory birds and threatened and endangered species. The impacts of leasing and development on these species are presented and discussed in the PEIS.

The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that could be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on migratory birds or threatened or endangered species.

50525-003: The BLM acknowledges the commentor’s preference for Alternative A.

50525-004: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety

of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50525-005: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional

information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50525-006: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Helen McGinnis.

The comment tracking number that has been assigned to your comment is OSTSD50526.

Comment Date: February 11, 2008 19:40:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD50526

First Name: Helen
Middle Initial: J
Last Name: McGinnis
Organization:
Address: PO Box 300
Address 2:
Address 3:
City: Harman
State: WV
Zip: 26270
Country: USA
Email: helenmcginnis@frontiernet.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I have been aware of the potentially devastating effects of mining oil shale and tar sands since the 1970s. This is not the time to destroy our land to put off the inevitable change from fossil fuels to renewable energy sources. I live in West Virginia, parts of which are a "national sacrifice" area given over to mountain top removal. Don't let the same thing happen in the West.	50526-001

Response for Document 50526

50526-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Rudolph Radau Jr..

The comment tracking number that has been assigned to your comment is OSTSD50527.

Comment Date: February 11, 2008 19:40:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD50527

First Name: Rudolph
Middle Initial: E
Last Name: Radau Jr.
Organization:
Address: 1025 E. Alta Vista
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 85719
Country: USA
Email: skip.radau@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Extracting fuels from oil shale and tar sands will be extremely enviromentally destructive as well as inefficient due to the large amount of energy and water needed to mine and process these materials. It's time we moved into the 21st century by developing new energy technologies that are much more enviromentally friendly such as solar, geothermal, and wind energy (for an example of a breakthrough solar technology google www.nanosolar.com). In doing so we could recreate our economy and make it a powerhouse again. But we will never do so as long as the old enviromentally destructive 19th and 20th century techologies are pushed by the big money interests. Very short term returns are the only concerns to them.	50527-001

Response for Document 50527

50527-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, chris safos.

The comment tracking number that has been assigned to your comment is OSTSD50528.

Comment Date: February 11, 2008 19:40:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD50528

First Name: chris
Middle Initial: n
Last Name: safos
Organization:
Address: 6654 n. silverbell terr.
Address 2:
Address 3:
City: hernando
State: FL
Zip: 34442
Country: USA
Email: chrissafos@embarqmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I STRONGLY OPPOSE ALL DEVELOPMENT OF OUR PUBLIC LANDS FOR THE DEVELOPMENT OF OIL SHALE AND TAR SANDS THAT WOULD RAVISH THE BEAUTY OF THE LANDSCAPE.WE MUST PRESERVE OUR PUBLIC LANDS FOR ITS BEAUTY,NOT FOR ADDING MORE GREENHOUSE GASES AND OTHER POLLUTANTS. | 50528-001

Response for Document 50528

50528-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, maria vivo.

The comment tracking number that has been assigned to your comment is OSTSD50531.

Comment Date: February 11, 2008 19:41:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD50531

First Name: maria
Middle Initial:
Last Name: vivo
Organization: none
Address: 3300 clemwood drive
Address 2:
Address 3:
City: orlando
State: FL
Zip: 32803
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

Frankly over the years I have read with irritation all the different projects proposed that destroy the wonderful lands of the US. It is time to pay attention to the lands we have inherited and the air we breathe. 50531-001

Economically we are not paying the true cost of our standard of living; leave the land as is; and let's develop alternative to fossil fuel.

Thank you for your attention to this letter.

Sincerely,

M. Vivo

Response for Document 50531

50531-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Luis Sanchez.

The comment tracking number that has been assigned to your comment is OSTSD50532.

Comment Date: February 11, 2008 19:41:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD50532

First Name: Luis
Middle Initial: F
Last Name: Sanchez
Organization:
Address: 1314 Boston ave.
Address 2:
Address 3:
City: Bay Shore
State: NY
Zip: 11706
Country: USA
Email: LeosDenii@optonline.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

One hand doesnot wash the other,why distroy our would one way to attemp to stop distruction another way. | 50532-001

Response for Document 50532

50532-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Ann Cantrell.

The comment tracking number that has been assigned to your comment is OSTSD50534.

Comment Date: February 11, 2008 19:43:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD50534

First Name: Ann
Middle Initial: M
Last Name: Cantrell
Organization:
Address: 3106 Claremore Ave.
Address 2:
Address 3:
City: Long Beach
State: CA
Zip: 90808
Country: USA
Email: AnnGadfly@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I urge you to reject the plan to extract oil from shale and tar sands. This will cause more pollution for our already polluted air and water.

Please accept the NO CHANGE alternative.

50534-001

Response for Document 50534

50534-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, jerry gillissen.

The comment tracking number that has been assigned to your comment is OSTSD50535.

Comment Date: February 11, 2008 19:43:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD50535

First Name: jerry
Middle Initial: g
Last Name: gillissen
Organization:
Address: 2406 mark avenue
Address 2:
Address 3:
City: lansing
State: MI
Zip: 48912
Country: USA
Email: jgillissen@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

spend more money on reducing use. 50535-001

Response for Document 50535

50535-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Kristen Osman.

The comment tracking number that has been assigned to your comment is OSTSD50537.

Comment Date: February 11, 2008 19:43:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD50537

First Name: Kristen
Middle Initial:
Last Name: Osman
Organization:
Address: 222 Miramar St.
Address 2:
Address 3:
City: Upland
State: CA
Zip: 91784
Country: USA
Email: k.osman@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. 50537-001

Response for Document 50537

50537-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, glen Dey.

The comment tracking number that has been assigned to your comment is OSTSD50538.

Comment Date: February 11, 2008 19:43:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD50538

First Name: glen
Middle Initial: r
Last Name: Dey
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

It is shamefull to have to remind you and your organization that the public expects you to conserve the earth in all areas in order to protect the peoples trust. | 50538-001

Response for Document 50538

50538-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Korina Drenon.

The comment tracking number that has been assigned to your comment is OSTSD50541.

Comment Date: February 11, 2008 19:44:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD50541

First Name: Korina
Middle Initial:
Last Name: Drenon
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please stop the Bush adinistration from the production of these fossil fuels. This would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources.	50541-001

Response for Document 50541

50541-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Bonnie MacRaith.

The comment tracking number that has been assigned to your comment is OSTSD50542.

Comment Date: February 11, 2008 19:44:59PM
Oil Shale and Tar Sands
Comment ID: OSTSD50542

First Name: Bonnie
Middle Initial:
Last Name: MacRaith
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Ms. Thompson, BLM Project Manager:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact State for Oil Shale and Tar Sands. Everyone on the planet needs to be moving away from fossil fuels and reducing our greenhouse gas emissions. This proposal is environmentally and economically irresponsible. 50542-001

Please choose No Action alternative, abandon plans to develop oil shale and tar sands on public land.

Thank you, Bonnie MacRaith

Response for Document 50542

50542-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Mary Barbara Walters.

The comment tracking number that has been assigned to your comment is OSTSD50544.

Comment Date: February 11, 2008 19:45:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD50544

First Name: Mary Barbara
Middle Initial:
Last Name: Walters
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

We cannot be using our natural resources as tho they were limitless. They are not and we must think of future generations. | 50544-001

Response for Document 50544

50544-001: Thank you for your comment.

Thank you for your comment, Karen Fedorov.

The comment tracking number that has been assigned to your comment is OSTSD50547.

Comment Date: February 11, 2008 19:47:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD50547

First Name: Karen
Middle Initial: L
Last Name: Fedorov
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please do not allow the distructive practices which are used to retrieve oil from shale and tar sands on OUR public lands. They are not the personal property of leaders in Washington, but belong to all of us. The harm to the environment and the plants and animals that live there is NOT WORTH THE COST!!	50547-001

Response for Document 50547

50547-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Joy Lesperance.

The comment tracking number that has been assigned to your comment is OSTSD50550.

Comment Date: February 11, 2008 19:47:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD50550

First Name: Joy
Middle Initial: C
Last Name: Lesperance
Organization:
Address: 3063 N El Capitan Ave
Address 2:
Address 3:
City: Fresno
State: CA
Zip: 937224654
Country: USA
Email: iamjoyous@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It's important to keep our public lands pristine. I oppose all development of oil shale and tar sands on public lands. | 50550-001

Response for Document 50550

50550-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Marcia Berman.

The comment tracking number that has been assigned to your comment is OSTSD50551.

Comment Date: February 11, 2008 19:47:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD50551

First Name: Marcia
Middle Initial:
Last Name: Berman
Organization:
Address: 2333 Rose Street
Address 2:
Address 3:
City: Berkeley
State: CA
Zip: 947081807
Country: USA
Email: nura33@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please leave our land alone. You are on your way out. Let the next administration find other ways of fueling our homes, our cars, our industries. It is time to preserve, tend, take good care of our lands. Rather walk or ride bikes than keep digging and destroying to keep our machines alive. Keep the earth alive and thriving. keep the people on it doing the same.	50551-001

Response for Document 50551

50551-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, James Vogas.

The comment tracking number that has been assigned to your comment is OSTSD50556.

Comment Date: February 11, 2008 19:50:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD50556

First Name: James
Middle Initial: L
Last Name: Vogas
Organization:
Address: 614 W. Castle Harbour
Address 2:
Address 3: 614 W. Castle Harbour
City: Friendswood
State: TX
Zip: 775465626
Country: USA
Email: jimvogas@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. I oppose all development of oil shale and tar sands on public lands.	50556-001

Response for Document 50556

50556-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Robert Young.

The comment tracking number that has been assigned to your comment is OSTSD50557.

Comment Date: February 11, 2008 19:51:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD50557

First Name: Robert
Middle Initial: J
Last Name: Young
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3: [Withheld by requestor]
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Opening up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands is the political/environmental equivalent of rape. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 50557-001

This is not the answer, and I am joining with other Americans to make sure it doesn't happen.

Response for Document 50557

50557-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, James Conway.

The comment tracking number that has been assigned to your comment is OSTSD50558.

Comment Date: February 11, 2008 19:52:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD50558

First Name: James
Middle Initial:
Last Name: Conway
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Destroy the world some more , fucking idiots ! Why should you care ..... it's just more money & benifit s to you ..... right ?	50558-001

Response for Document 50558

50558-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, emilia lausz.

The comment tracking number that has been assigned to your comment is OSTSD50559.

Comment Date: February 11, 2008 19:52:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD50559

First Name: emilia
Middle Initial: e
Last Name: lausz
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This is wrong. We need to cherish and preserve such beautiful area, not destroy it. 50559-001

Response for Document 50559

50559-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jane Smith.

The comment tracking number that has been assigned to your comment is OSTSD50562.

Comment Date: February 11, 2008 19:52:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD50562

First Name: Jane
Middle Initial: R
Last Name: Smith
Organization:
Address: 136 White Oaks Canyon Rd
Address 2:
Address 3:
City: White Oaks
State: NM
Zip: 88301
Country: USA
Email: jrsnaturalhorses@tularosa.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We do not need to tear up our unspoiled landscape in the quest to find more fossil fuels to deplete. We need instead to spend funds on the scientific study of alternate fuels which are renewable. We need to plan for the long range future, not for the short term solution. | 50562-001

Response for Document 50562

50562-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Stephen Schmidt.

The comment tracking number that has been assigned to your comment is OSTSD50569.

Comment Date: February 11, 2008 19:55:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD50569

First Name: Stephen
Middle Initial:
Last Name: Schmidt
Organization:
Address: 21 Calle Debra
Address 2:
Address 3:
City: Santa Fe
State: NM
Zip: 875074264
Country: USA
Email: lwob@mac.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. It is past time we stopped subsidising fossil fuel development. When wind power cost 5-8 cents a kwh, when solar costs are 13-18 cents/kwh, it is time to realize the future is in renewable non-fossil fuel power. The heavily industrial polluting industries, such as oil shale and tar sands are attempts at preserving past power structures. 50569-001

The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 50569-002

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 50569-003

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 50569-001 (cont.)

Sincerely, Stephen Schmidt 21 Calle Debra Santa Fe, NM 87507

Responses for Document 50569

50569-001: The BLM acknowledges the commentor's preference for Alternative A.

50569-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50569-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and

3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, David Parker.

The comment tracking number that has been assigned to your comment is OSTSD50571.

Comment Date: February 11, 2008 19:57:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD50571

First Name: David
Middle Initial:
Last Name: Parker
Organization:
Address: 8211 Hatcher Lk. Rd.
Address 2:
Address 3:
City: Sherwood
State: AR
Zip: 72120
Country: USA
Email: greenbirdtouch@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Hello,

I oppose all development of oil shale and tar sands on public lands. The public's wilderness is already under seige for exploitation by greedy special interests. I want our beautiful wilderness kept pristine, healthy and beneficial for wildlife, and to offer people recreation and refreshment of spirit, as God intended. If this planet and its inhabitants are to survive, we must move to renewable, clean alternative energy without delay. The extraction of filthy fossil fuels is devastating our home the Earth, and the continued use of fossil fuels will mean the demise of Earth's precious life. 50571-001

Thank you for considering my comment,

David Parker

Response for Document 50571

50571-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Eric West.

The comment tracking number that has been assigned to your comment is OSTSD50573.

Comment Date: February 11, 2008 19:58:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD50573

First Name: Eric
Middle Initial: R
Last Name: West
Organization:
Address:
Address 2:
Address 3:
City:
State: FL
Zip:
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It just doesn't make sense to destroy the planet for a few drops of oil when we can use technology to transport us without oil.

The BLM should manage the land for all of us, not just the extractive industries.

50573-001

Response for Document 50573

50573-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Stephen Zettel.

The comment tracking number that has been assigned to your comment is OSTSD50575.

Comment Date: February 11, 2008 19:58:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD50575

First Name: Stephen
Middle Initial: M
Last Name: Zettel
Organization:
Address: 634 Rawlings Rd
Address 2:
Address 3:
City: Libby
State: MT
Zip: 59923
Country: USA
Email: smzettel@frontiernet.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am strongly opposed to the opening of public lands to oil shale and oil sand development. This would ravage lands that are held in trust for all Amercians, and at a time when we should be exploring alternative means of providing clean, non-greenhouse gas polluting energy, flies in the face of good sense and wise stewardship. 50575-001

Stephen M. Zettel Libby, Montana USA

Response for Document 50575

50575-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Michelle Ognjanovic.

The comment tracking number that has been assigned to your comment is OSTSD50576.

Comment Date: February 11, 2008 19:59:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD50576

First Name: Michelle
Middle Initial:
Last Name: Ognjanovic
Organization:
Address: 7 West 104 St #1A
Address 2:
Address 3:
City: New York
State: NY
Zip: 10025
Country: USA
Email: ThePoohka@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands as we MUST transition away from fossil fuels and reduce greenhouse gas emissions. This proposal is neither environmentally or economically feasible, as it would consume millions of tons of coal and water annually, and result in unacceptable and horrific quantities of greenhouse gas and other pollutants. 50576-001 50576-002

The Bureau of Land Management MUST scrap the proposed development completely, choose the No Action alternative, or, at the least, develop and evaluate a full range of reasonable alternatives based on energy conservation/efficiency and protection of the land and its wildlife. 50576-003

The Bureau of Land Management must simply choose the No Action alternative, so that our West stays wild -- and does not turn into the likes of Alberta, which would be an unspeakable travesty. 50576-001 (cont.)

We must act like a responsible democracy and loyal citizens of the earth.

Sincerely, Michelle Ognjanovic

Responses for Document 50576

50576-001: The BLM acknowledges the commentor's preference for Alternative A.

50576-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50576-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Alicia Symms-Taylor.

The comment tracking number that has been assigned to your comment is OSTSD50583.

Comment Date: February 11, 2008 20:04:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD50583

First Name: Alicia
Middle Initial: N
Last Name: Symms-Taylor
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please save our land | 50583-001

Response for Document 50583

50583-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Charmaine Hartman.

The comment tracking number that has been assigned to your comment is OSTSD50584.

Comment Date: February 11, 2008 20:04:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD50584

First Name: Charmaine
Middle Initial:
Last Name: Hartman
Organization:
Address:
Address 2:
Address 3:
City:
State: VT
Zip: 05143
Country: USA
Email: wesleyc@mjc.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

Don't cause further problems with our enviornment by doing this.

Our country needs to be mandated to use less energy by congress.

50584-001

Response for Document 50584

50584-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, David podietz.

The comment tracking number that has been assigned to your comment is OSTSD50585.

Comment Date: February 11, 2008 20:04:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD50585

First Name: David
Middle Initial: S
Last Name: podietz
Organization:
Address: 23410 Ann's Choice Way
Address 2:
Address 3:
City: warminster
State: PA
Zip: 18974
Country: USA
Email: Evade2@Juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We must do all that is possible to maintain a healthy planet. | 50585-001

Response for Document 50585

50585-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Melva Hackney.

The comment tracking number that has been assigned to your comment is OSTSD50586.

Comment Date: February 11, 2008 20:05:46PM
Oil Shale and Tar Sands
Comment ID: OSTSD50586

First Name: Melva
Middle Initial:
Last Name: Hackney
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

We should be reducing pollution and industries that create more global warming. Please do not continue to add to our problems by carrying out this oil shale and tar sands destruction. | 50586-001

Response for Document 50586

50586-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Crista WORTHY.

The comment tracking number that has been assigned to your comment is OSTSD50588.

Comment Date: February 11, 2008 20:06:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD50588

First Name: Crista
Middle Initial:
Last Name: WORTHY
Organization:
Address: 12021 Wilshire Blvd. #663
Address 2:
Address 3:
City: los angeles
State: CA
Zip: 90025
Country: USA
Email: cristaworthy@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am totally, completely, 1000% opposed to opening wildlands in Utah, Wyoming and Colorado to the extraction of Oil Shale and Tar Sands. No Way do I wish to sacrifice the most beautiful landscapes in America to this blight.

The processes used are incredibly wasteful, adding still more to global climate change.

Stop giving away MY PUBLIC LANDS to energy companies. Let's go for solar and wind power instead---AND CONSERVATION!!!!!!!

50588-001

Response for Document 50588

50588-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Lynda Winslow.

The comment tracking number that has been assigned to your comment is OSTSD50590.

Comment Date: February 11, 2008 20:07:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD50590

First Name: Lynda
Middle Initial:
Last Name: Winslow
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Sherry Thompson, BLM Project Manager BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory 9700 S. Cass Ave. Argonne IL 60439

Dear Ms. Thompson,

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

50590-001

Sincerely,

Response for Document 50590

50590-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, James Drescher.

The comment tracking number that has been assigned to your comment is OSTSD50594.

Comment Date: February 11, 2008 20:07:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD50594

First Name: James
Middle Initial: W
Last Name: Drescher
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please don't go down this oil shale road. It is a dead end. Move forward into a sustainable future, not backward into more pain and suffering for all people everywhere. Please wake up and manifest the greatness of American creativity.	50594-001

Response for Document 50594

50594-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Joseph Cox.

The comment tracking number that has been assigned to your comment is OSTSD50596.

Comment Date: February 11, 2008 20:08:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD50596

First Name: Joseph
Middle Initial: S
Last Name: Cox
Organization:
Address: 25885 Trabuco Rd. #242
Address 2:
Address 3:
City: Lake Forest
State: CA
Zip: 92630
Country: USA
Email: josephcox1@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I urge you, the Bureau of Land Mnagement to choose the NO ACTION alternative and completely abandon the plans to develop oil shale and tar sands on our public lands in the Rockies. And this critical time in Earth's history, where we are tinkering on the verge of environmental collapse, I find it extremely irresponsible of the department that's entrusted with caring for our America's public lands, to even consider this proposal, which is neither economically or environmentally feasible. Our public lands have already seen the negative impacts of the current administration's distaste for nature left unchecked, and explosive population growth across the West. And at a time when we need to transition away from fossil fuels and the damaging effects caused by burning them, I think you would be less than willing to even consider such a proposal that would also leave the area developed in ruins and have a major impact on all the areas plants and animals. Again, I urge you to choose the NO ACTION alternative to oil shale and tar sands development in the Rockies. 50596-001

Response for Document 50596

50596-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Jay Neutzler.

The comment tracking number that has been assigned to your comment is OSTSD50598.

Comment Date: February 11, 2008 20:11:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD50598

First Name: Jay
Middle Initial:
Last Name: Neutzler
Organization:
Address:
Address 2:
Address 3:
City: Palm Beach Gardens
State: FL
Zip: 33418
Country: USA
Email: JayNeut@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

You are responsible for your actions, and these actions are reprehensible. DO NOT DEVELOP OR DESTROY OR TAKE/STEAL FROM THE PUBLIC LANDS. | 50598-001

Response for Document 50598

50598-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Madelon Kelly.

The comment tracking number that has been assigned to your comment is OSTSD50602.

Comment Date: February 11, 2008 20:17:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD50602

First Name: Madelon
Middle Initial: T
Last Name: Kelly
Organization:
Address: 764 Old County Road
Address 2:
Address 3:
City: Washington
State: ME
Zip: 045744412
Country: USA
Email: madelonkelly@fairpoint.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

With the increasing demand for oil from India and China and the climate of the planet changing precipitously, we can no longer continue to destroy our environment to seek the remaining few drops of oil. We must put a major effort into developing renewable sources of energy that will divorce us completely from our addiction to fossil fuels and which will not emit more carbon dioxide. I strongly oppose the use of oil shale and tar sands which will provide only a very temporary solution at huge expense to our environment. We can no longer tolerate the selfish greed of the few at the expense of the habitability of the entire planet.

50602-001

Response for Document 50602

50602-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Ray Legault.

The comment tracking number that has been assigned to your comment is OSTSD50603.

Comment Date: February 11, 2008 20:17:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD50603

First Name: Ray
Middle Initial: d
Last Name: Legault
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

We need to getting off of OIL now. Bio Diesel and solar and hydrogen. The science channel shows many ways that are developed and being put into use. Stop being paid off by big oil, big drugs, big insurance co, etc. Lets be real leaders again. Lead by example. Time to wake up. The time is now. | 50603-001

Response for Document 50603

50603-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Howard Booth.

The comment tracking number that has been assigned to your comment is OSTSD50605.

Comment Date: February 11, 2008 20:18:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD50605

First Name: Howard
Middle Initial: G
Last Name: Booth
Organization:
Address: 1518 Sandra Drive
Address 2:
Address 3:
City: Boulder City
State: NV
Zip: 89005
Country: USA
Email: boothwilson@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Thankyou for the opportunity to comment on the Oil Sands development DEIS.

I find it almost unbelievable that the Bush administration, through the BLM, is considering opening up vast tracts of land in these Rocky Mtn states for development of tar sands strip mining. The costs of this are simply staggering in terms of ravaged lands, carbon releases at a time of nearly desperate efforts to curb global warming, and critical needs to protect wildlife habitat. The net energy made available above that of production energy inputs in the course of such mining is too small, in my view, to ever make the sacrifices mentioned above acceptable. The monetary price to the consumer from such energy will be too great to warrant the huge costs in environmental and social impacts that result. Unlike the thinly populated lands surrounding tar sands of Canada, the western US lands are becoming ever more needed to accomodate other needs of a mushrooming population. Of what avail is the energy obtained from such production if there be no more natural environments left to make life s pleasure. Please consider the relatively cheaper (by environmental aspects and probably cost to the consumer as well) that renewable energy development would produce. 50605-001

I ask that this proposal be entirely held to the no change alternative.

Response for Document 50605

50605-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50606.

Comment Date: February 11, 2008 20:18:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD50606

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization: College Instructor
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am extremely concern about the proposals to open more public lands to Oil Shale, natural gas and oil exploration without a much more through process being in place to review both the long term and immediate impact on these public lands. It seems that over the last 8 years there has been a knee-jerk approval of such proposals without evaluating the possible impact on the flora, fauna of the areas as well as the possible economic, health, and social consequences for the regional populace. These processes are seemingly dysfunctional in the sense that there are often immediate decisions for this development without a long term schema for the consequences of this development. Apparently one must just "follow the money" to find out how these decisions are being made....

50606-001

Response for Document 50606

50606-001: Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sands resources among other unconventional fuels, if it can be done in an environmentally sound manner. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives when considering whether lands should be opened or closed for application for commercial oil shale or tar sands leasing. The PEIS analyzes the environmental consequences of this allocation decision. The PEIS also describes the requirement for additional site-specific NEPA analysis prior to both issuance of commercial leases and approval of proposed exploration or development project. The BLM believes that this phased or staged approach ensures that commercial oil shale and tar sands development programs meet the intent of Congress and make areas available for oil shale and tar sands development while taking advantage of the best available practices to minimize impacts and offering opportunities for states, local communities, and the public to participate in the process.

Thank you for your comment, Catherine Critz.

The comment tracking number that has been assigned to your comment is OSTSD50610.

Comment Date: February 11, 2008 20:21:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD50610

First Name: Catherine
Middle Initial: E
Last Name: Critz
Organization:
Address: 122 Avalon
Address 2:
Address 3:
City: Creve Coeur
State: IL
Zip: 616104013
Country: USA
Email: ccritz@insightbb.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We need to develop alternative forms of energy--not destroy the earth to acquire oil! | 50610-001

Response for Document 50610

50610-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Diane Whitmire.

The comment tracking number that has been assigned to your comment is OSTSD50611.

Comment Date: February 11, 2008 20:21:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD50611

First Name: Diane
Middle Initial:
Last Name: Whitmire
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

We CANNOT continue to rape the American landscape in order to line the pockets of the special interest groups. America belongs to ALL citizens and not the few in oil and gas, logging, and mining.	50611-001
We have the awareness and knowledge of the effects of global warming. We also already (and for some time) possess the technology that makes us completely oil & gas free - not just internationally, but domestically as ion batteries provide 250 miles on a single charge; TRUE diesel (as opposed to what passes for it. The patent was bought and suppressed after the death of its inventor whose surname was Diesel by Chevron!) Bio-diesels, and ethanols.	50611-002
Commercial bldgs have never been erected with wooden timbers, but steel. There is no reason to construct residences with wood and there are many, many alternatives such as strawbale, rammed earth, and cobb to name but three.	50611-003
Our National Parks have the title National to indicate that they belong to the American PEOPLE - not the corporations, not the investors, not the lobbyists, not the special interest groups - by all the People.	
There is really no way to undo and reclaim the damage logging in wilderness areas does nor strip mining to the land.	50611-001 (cont.)
We simply cannot continue on this path. Please do NOT allow the continued and extended rape of America's landscape by approving ANY legislation that includes oil shale and sand tars extrication.	

Thank you.

Responses for Document 50611

50611-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

50611-002: Thank you for your comment

50611-003: Thank you for your comment.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50614.

Comment Date: February 11, 2008 20:24:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD50614

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please do not let Bush open up Colorado, Utah, and Wyoming for extracting oil. We also don't oil, because we can use alternative sources of energy. Also, with the serious problem with global warming, we need to switch to another source of energy that does not release CO2 into the atmosphere. Bush has already done huge damage to our wilderness!!!!	50614-001

Response for Document 50614

50614-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, judy desreuisseau.

The comment tracking number that has been assigned to your comment is OSTSD50615.

Comment Date: February 11, 2008 20:24:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD50615

First Name: judy
Middle Initial:
Last Name: desreuisseau
Organization:
Address: 2 myrtle street
Address 2:
Address 3:
City: Gill
State: MA
Zip: 013549615
Country: USA
Email: juddes@wildmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Stop taking from our mother earth | 50615-001

Response for Document 50615

50615-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Robert Norris.

The comment tracking number that has been assigned to your comment is OSTSD50616.

Comment Date: February 11, 2008 20:24:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD50616

First Name: Robert
Middle Initial: J
Last Name: Norris
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am completely against all oil shale and tar sands development in North America. This is a short sighted and highly costly method of obtaining fuel at the expense of the environment and future generations well being. | 50616-001

Response for Document 50616

50616-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mireya Landin.

The comment tracking number that has been assigned to your comment is OSTSD50618.

Comment Date: February 11, 2008 20:24:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD50618

First Name: Mireya
Middle Initial: L
Last Name: Landin
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I strongly oppose the development of oil shale and tar sands in public lands. It will ravage our beleaguered environment and produce no benefits. My comments are for NO ACTION in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. We have to move towards other sources of energy and stop the destruction of our last wild places.	50618-001

Response for Document 50618

50618-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50624.

Comment Date: February 11, 2008 20:27:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD50624

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager: I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. Mercury emmissions from Coal power plants have impacted numerous fish eating populations, especially Native Americans. I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. Not only should we preserve the land for it's natural beauty, but also because we cannot afford to continue polluting and contributing to global warming. Sincerely,

50624-001

50624-002

50624-003

50624-004

50624-005

50624-001 (cont.)

Responses for Document 50624

50624-001: The BLM acknowledges the commentor's preference for Alternative A.

50624-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50624-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50624-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

50624-005: The potential emissions of any air pollutant (including mercury) would not result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

See also the response to Comment 50624-002.

Thank you for your comment, andrew bellak.

The comment tracking number that has been assigned to your comment is OSTSD50627.

Comment Date: February 11, 2008 20:30:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD50627

First Name: andrew
Middle Initial:
Last Name: bellak
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil independence is not worth this cost. Please make more serious efforts at conservation and investment in alternative & renewable energy. | 50627-001

Response for Document 50627

50627-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Jeffrey depew.

The comment tracking number that has been assigned to your comment is OSTSD50628.

Comment Date: February 11, 2008 20:31:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD50628

First Name: Jeffrey
Middle Initial: C
Last Name: depew
Organization:
Address: 921 newport
Address 2:
Address 3:
City: St. Louis
State: MO
Zip: 63119
Country: USA
Email: jcdepew@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I think we are getting pretty sick of this and the Bush Administration | 50628-001

Response for Document 50628

50628-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50630.

Comment Date: February 11, 2008 20:31:46PM
Oil Shale and Tar Sands
Comment ID: OSTSD50630

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Stop oil shale and tar sands development on public lands | 50630-001

Response for Document 50630

50630-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Katherine O'Sullivan.

The comment tracking number that has been assigned to your comment is OSTSD50635.

Comment Date: February 11, 2008 20:33:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD50635

First Name: Katherine
Middle Initial:
Last Name: O'Sullivan
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Enough pillaging of the public coffers. Impeachment is in order for all the blatant flouting of the laws of our land. Hands off the public domain thieves and scoundrals!!!	50635-001

Response for Document 50635

50635-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Karen Gray.

The comment tracking number that has been assigned to your comment is OSTSD50640.

Comment Date: February 11, 2008 20:37:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD50640

First Name: Karen
Middle Initial:
Last Name: Gray
Organization:
Address: 5749 Arlington Drive
Address 2:
Address 3:
City: Plainfield
State: IN
Zip: 461689029
Country: USA
Email: kcgii2@care2.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. 50640-001

Response for Document 50640

50640-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jack Reynolds.

The comment tracking number that has been assigned to your comment is OSTSD50642.

Comment Date: February 11, 2008 20:38:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD50642

First Name: Jack
Middle Initial:
Last Name: Reynolds
Organization:
Address: 125 Omega Ln.
Address 2:
Address 3:
City: Melbourne
State: FL
Zip: 32934
Country: USA
Email: hjr9494@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am in full accord with opening up the shale oil projects. | 50642-001

Response for Document 50642

50642-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Joanne Granzow.

The comment tracking number that has been assigned to your comment is OSTSD50643.

Comment Date: February 11, 2008 20:38:59PM
Oil Shale and Tar Sands
Comment ID: OSTSD50643

First Name: Joanne
Middle Initial: H
Last Name: Granzow
Organization:
Address: 535 Garden Road
Address 2:
Address 3:
City: Dayton
State: OH
Zip: 454193804
Country: USA
Email: jhgranzow@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is unconscionable to violate our national lands....to further pollute the planet for profit....to contribute to increased global warming. It is our moral responsibility to begin to conserve energy and to invest in alternative fuel. This is a national priority. The resource thieves must be stopped.	50643-001

Response for Document 50643

50643-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Julie Sears.

The comment tracking number that has been assigned to your comment is OSTSD50646.

Comment Date: February 11, 2008 20:40:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD50646

First Name: Julie
Middle Initial: C
Last Name: Sears
Organization:
Address: 320 Canyon Ridge Drive
Address 2:
Address 3:
City: Richardson
State: TX
Zip: 75080
Country: USA
Email: jcsears@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am disturbed to hear that the Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. I very much oppose all development of oil shale and tar sands on public lands. Please do not let this happen. 50646-001

Response for Document 50646

50646-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Tammy Martin.

The comment tracking number that has been assigned to your comment is OSTSD50648.

Comment Date: February 11, 2008 20:43:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD50648

First Name: Tammy
Middle Initial: J
Last Name: Martin
Organization:
Address: 115 Clover Court
Address 2:
Address 3:
City: Lebanon
State: IN
Zip: 46052
Country: USA
Email: Genteel41@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I lived in Wyoming for a few years ago and it's a beautiful state - please leave these public lands alone for all the generations to come and enjoy! | 50648-001

Response for Document 50648

50648-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Amy Ganahl.

The comment tracking number that has been assigned to your comment is OSTSD50650.

Comment Date: February 11, 2008 20:44:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD50650

First Name: Amy
Middle Initial: C
Last Name: Ganahl
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

To allow such a destructive program is the wrong way to address our energy needs. 50650-001

Response for Document 50650

50650-001: The BLM acknowledges the commentor's preference to not support oil shale and tar sands development.

Thank you for your comment, John Miller.

The comment tracking number that has been assigned to your comment is OSTSD50653.

Comment Date: February 11, 2008 20:47:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD50653

First Name: John
Middle Initial: D
Last Name: Miller
Organization: Homosapiens.ki
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am the author of a report on the potential for shale oil development in Wsstern Colorado as a consultant to Socony Mobil in the mid-1960s. The conclusions were overall negative in all major aspects. The report waa never released to the public. Without going into the details, I must say that the conclusions were devastating. The leasing of these lands for shale oil extraction and processing must not be permitted.

See an article. "Global warming threatens alternative-oil projects." on my website, http://homosapiens.ki/modules/smartsection/item.php?itemid=256&keywords=shale+oil

50653-001

I encourage you to get serious about this matter. We cannot withstand the consequences of ANY further miscalculations equal or greater than those already inflicted on the nation and planet by our government.

"Walk, don't run, think, liberate your mind."

Response for Document 50653

50653-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

Thank you for your comment, Jim. Gray.

The comment tracking number that has been assigned to your comment is OSTSD50656.

Comment Date: February 11, 2008 20:51:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD50656

First Name: Jim.
Middle Initial:
Last Name: Gray
Organization:
Address: 40492 Marsha Ct.
Address 2:
Address 3:
City: Hemet
State: CA
Zip: 92544
Country: USA
Email: jbrgray@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. We need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions, not destroying our precious environment to get at every last drop of oil. 50656-001

The Bureau of Land Management should scrap the proposed development completely and choose the No Action alternative.

Sincerely,

Response for Document 50656

50656-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Meb Bolin.

The comment tracking number that has been assigned to your comment is OSTSD50662.

Comment Date: February 11, 2008 20:53:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD50662

First Name: Meb
Middle Initial:
Last Name: Bolin
Organization:
Address: 821 W. 18th St.
Address 2:
Address 3:
City: Portales
State: NM
Zip: 88130
Country: USA
Email: bolinm@enmu.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I vigorously oppose all development of oil shale and tar sands on public lands. Please put the health and safety of people ahead of profits of energy companies. Please listen to governmental, and climate scientists(virtually all) who doing all they can to warn American people about the dangers of global warming. 50662-001

We must not allow this to happen. Meb

Response for Document 50662

50662-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Clait Braun.

The comment tracking number that has been assigned to your comment is OSTSD50667.

Comment Date: February 11, 2008 20:55:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD50667

First Name: Clait
Middle Initial: E
Last Name: Braun
Organization:
Address: 5572 N. Ventana Vista Rd.
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 85750
Country: USA
Email: sg-wtp@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly oppose unregulated and poorly planned oil shale development in Colorado and elsewhere as wildlife and wildlife habitats are always the loser, | 50667-001

Response for Document 50667

50667-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Shannon Minor.

The comment tracking number that has been assigned to your comment is OSTSD50669.

Comment Date: February 11, 2008 20:55:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD50669

First Name: Shannon
Middle Initial:
Last Name: Minor
Organization:
Address: 115 12th Avenue NE
Address 2:
Address 3:
City: St. Petersburg
State: FL
Zip: 33701
Country: USA
Email: poot1_98@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. These lands were set aside a long time ago for the use of ALL Americans as WILD places; it is not for you to decide to sell it to oil companies. | 50669-001

Response for Document 50669

50669-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mitchell Friedman.

The comment tracking number that has been assigned to your comment is OSTSD50674.

Comment Date: February 11, 2008 20:57:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD50674

First Name: Mitchell
Middle Initial: s
Last Name: Friedman
Organization:
Address: 1461 Creekside Drive
Address 2: Apt. 3003
Address 3:
City: Walnut Creek
State: CA
Zip: 94596
Country: USA
Email: Mitchell@Taxheart.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We must demand that tar sands and oil shale not be mined. Oil/gasoline based fuels will cause more greenhouse gases, thereby increasing global warming and making our planet a far more dangerous place to live. 50674-001

Response for Document 50674

50674-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50678.

Comment Date: February 11, 2008 20:58:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD50678

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources.	50678-001

Response for Document 50678

50678-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, diane kristoff.

The comment tracking number that has been assigned to your comment is OSTSD50686.

Comment Date: February 11, 2008 21:05:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD50686

First Name: diane
Middle Initial: c
Last Name: kristoff
Organization:
Address: 4846 indian cabin road
Address 2:
Address 3:
City: egg harbor city
State: NJ
Zip: 08215
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the no action alternetive.Please do not destroy millions of acres of public lands in Colorado, Utah, and Wyoming for extraction of oil shale and tar sand. The processing of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutant at a time when we need to transition to non-polluting energy sources.Thank you for your attention.	50686-001

Response for Document 50686

50686-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Peter Crabtree.

The comment tracking number that has been assigned to your comment is OSTSD50694.

Comment Date: February 11, 2008 21:11:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD50694

First Name: Peter
Middle Initial:
Last Name: Crabtree
Organization:
Address: 143 Vierra Way
Address 2:
Address 3:
City: Hercules
State: CA
Zip: 94547
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed energy strategy represented by this initiative comes at a time when the United States should be taking a strong policy on energy conservation, improved fuel efficieny, and reduction of energy use rather than inefficiently producing new energy at enormous to the land as well as the overall health of the planet. Shale and Tar Sands production would propel millions of tons of new CO2 into the atmosphere with limited output of new energy. Such a policy is simply wrongheaded and, quite frankly, monumentally stupid and immoral. We urgently need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions instead of increasing them. These proposed activity will advance global warming and speed its catastrophic impact. The Bureau of Land Management should abandon the proposed development completely, choose the No Action alternative, and support a broader policy shift toward energy conservation and efficiency.

50694-001

50694-002

50694-003

I urge the Bureau of Land Management to choose the No Action alternative and reject plans to develop oil shale and tar sands on public lands in the Rockies.

50694-001 (cont.)

Sincerely,

Peter Crabtree Hercules, CA

Responses for Document 50694

50694-001: The BLM acknowledges the commentor's preference for Alternative A.

50694-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

50694-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating

agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Brett Wilson.

The comment tracking number that has been assigned to your comment is OSTSD50698.

Comment Date: February 11, 2008 21:14:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD50698

First Name: Brett
Middle Initial: S
Last Name: Wilson
Organization:
Address: 5340 Silo Ridge
Address 2:
Address 3:
City: Colorado Springs
State: CO
Zip: 80917
Country: USA
Email: brett@barleydog.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is very shortsighted to pursue further development of fossil fuels during a time when the technology is available to begin transitioning away from them. Do we really need to ravage more of our natural lands in order to obtain slightly cheaper energy? We've recently seen in the mortgage market what happens when your focus is on living cheaply in the present with no long term plan for what happens when the "interest rate" adjusts. Don't bankrupt our future!	50698-001

Response for Document 50698

50698-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, William Sheppard.

The comment tracking number that has been assigned to your comment is OSTSD50699.

Comment Date: February 11, 2008 21:14:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD50699

First Name: William
Middle Initial: D
Last Name: Sheppard
Organization:
Address: P.O. Box 103
Address 2:
Address 3:
City: FLAGSTAFF
State: AZ
Zip: 86002
Country: USA
Email: bill.sheppard@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose the opening up of millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 50699-001

I oppose all development of oil shale and tar sands on public lands.

Response for Document 50699

50699-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mindy Pfeiffer.

The comment tracking number that has been assigned to your comment is OSTSD50700.

Comment Date: February 11, 2008 21:14:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD50700

First Name: Mindy
Middle Initial:
Last Name: Pfeiffer
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not squander our precious resources. We need to develop atlternative energy sources. | 50700-001

Response for Document 50700

50700-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50702.

Comment Date: February 11, 2008 21:15:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD50702

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

'You' are making environmental conditions worse by surfacemining in the West. 'You' are supposed to be managing the land not destroying it. People no longer want to hear that you are just 'doing yourjob'. It is not the anonymous 'government' making such counter-environmental decisions, it is the people who make up the government. | 50702-001

Response for Document 50702

50702-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Michael Wichman.

The comment tracking number that has been assigned to your comment is OSTSD50704.

Comment Date: February 11, 2008 21:16:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD50704

First Name: Michael
Middle Initial:
Last Name: Wichman
Organization:
Address: 1001 Arbor Lake Drive #407
Address 2:
Address 3:
City: Naples
State: FL
Zip: 34110
Country: USA
Email: michwich@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

To: Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

50704-001

Sincerely,

Response for Document 50704

50704-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Julie Ford.

The comment tracking number that has been assigned to your comment is OSTSD50707.

Comment Date: February 11, 2008 21:20:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD50707

First Name: Julie
Middle Initial:
Last Name: Ford
Organization:
Address: 16222 Monterey Lane #223
Address 2:
Address 3:
City: Huntington Beach
State: CA
Zip: 926492244
Country: USA
Email: jford29105@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am opposed to any development of oil shale or tar sands on our precious public lands. We need to rid ourselves of oil dependency, not cater to it. | 50707-001

Response for Document 50707

50707-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Andrea Fowler.

The comment tracking number that has been assigned to your comment is OSTSD50710.

Comment Date: February 11, 2008 21:23:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD50710

First Name: Andrea
Middle Initial:
Last Name: Fowler
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

There are evironmentally better ways to get at more energy than using either tar sands or oil shale. Use them. | 50710-001

Response for Document 50710

50710-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jeannie Battung.

The comment tracking number that has been assigned to your comment is OSTSD50712.

Comment Date: February 11, 2008 21:24:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD50712

First Name: Jeannie
Middle Initial:
Last Name: Battung
Organization:
Address: 6301 Deborah St.
Address 2:
Address 3:
City: Long Beach
State: CA
Zip: 908152252
Country: USA
Email: Idreamof@charter.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bush administration needs to quit thinking about what will benefit them and think about how the environment is going to negatively affect their grandchildren, because they were to selfish and narrow-minded to be kind to our earth.	50712-001

Response for Document 50712

50712-001: Thank you for your comment.

Thank you for your comment, John Miller.

The comment tracking number that has been assigned to your comment is OSTSD50715.

Comment Date: February 11, 2008 21:27:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD50715

First Name: John
Middle Initial: H
Last Name: Miller
Organization:
Address: 2832 Mt. Pleasant Road
Address 2:
Address 3:
City: Port Angeles
State: WA
Zip: 983629334
Country: USA
Email: jhmiller49@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not lease vast tracts of Wyoming, Utah and Colorado for oil sands development. The process ruins landscapes, uses too many millions of gallons of water and results in a net energy deficit with respect to the production of petroleum. Thank you! | 50715-001

Response for Document 50715

50715-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, kathryn spence.

The comment tracking number that has been assigned to your comment is OSTSD50717.

Comment Date: February 11, 2008 21:28:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD50717

First Name: kathryn
Middle Initial: k
Last Name: spence
Organization:
Address: 141a fairmount street
Address 2:
Address 3:
City: san francisco
State: CA
Zip: 94131
Country: USA
Email: kkspence@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

To Whom it Concerns,

Please choose "no action" and abandon plans for shale oil and tar sands development on our public lands. 50717-001

Thanks, Kathryn Spence

Response for Document 50717

50717-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Barbara Wilson.

The comment tracking number that has been assigned to your comment is OSTSD50719.

Comment Date: February 11, 2008 21:28:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD50719

First Name: Barbara
Middle Initial: N
Last Name: Wilson
Organization:
Address: 12820 SW 20th Court
Address 2:
Address 3:
City: Beaverton
State: OR
Zip: 970085153
Country: USA
Email: wilsonbn@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Regarding oil shale and tar sands: I am definitely opposed to destroying public lands in Colorado, Utah and Wyoming for the purposes of extracting minerals. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources.

The Bush Administration will be in office for only one more year. It is the hope of many that a more environmentally sensitive President will be elected in November. The Bush Administration has a long list of environmental atrocities. The proposal to destroy public lands in Colorado, Utah and Wyoming for mineral extraction is just one destructive activity the Bush Administration has proposed to make a small group of people very wealthy at the expense of the less powerful. I disagree with the Bush Administration on all issues of environmental degradation. 50719-001

Response for Document 50719

50719-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Terry Pitt.

The comment tracking number that has been assigned to your comment is OSTSD50721.

Comment Date: February 11, 2008 21:29:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD50721

First Name: Terry
Middle Initial: L
Last Name: Pitt
Organization:
Address: 5726 N.E. Detroit
Address 2:
Address 3:
City: Kansas City
State: MO
Zip: 64119
Country: USA
Email: t.pitt@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment: Shale and TarSands.doc

Comment Submitted:

The opening of millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources.
See Attachment.

50721-001

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 50721-002 50721-003 50721-004

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 50721-005

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 50721-002 (cont.)

Sincerely,

Mr. Terry L. Pitt
5726 N. E. Detroit
Kansas City, Missouri 64119
t.pitt@sbcglobal.net

Responses for Document 50721

50721-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

50721-002: The BLM acknowledges the commentor's preference for Alternative A.

50721-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50721-004: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best

addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50721-005: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is

presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50723.

Comment Date: February 11, 2008 21:30:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD50723

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am opposed to developing oil shale and tar sands on BLM land at the present time. I feel more should be done to conserve energy and reduce carbon emmisions at the current time. Please leave the BLM land for wildlife now and as a reserve for future generations to use for commercial development in the distant future.	50723-001

Response for Document 50723

50723-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, allison hamilton.

The comment tracking number that has been assigned to your comment is OSTSD50725.

Comment Date: February 11, 2008 21:31:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD50725

First Name: allison
Middle Initial:
Last Name: hamilton
Organization: angry American
Address: 18230 frost road
Address 2:
Address 3:
City: dallas
State: OR
Zip: 973389468
Country: USA
Email: dogmom@ecoisp.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

While I am sure you aren't using science as a basis for any decisions, you could at least consider the environment. Oil will still produce carbon and other greenhouse gases when burned. Regardless of where or how you get it, it still is leading us into extinction. Use some sense and JUST SAY NO.	50725-001

Response for Document 50725

50725-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, janet herbruck.

The comment tracking number that has been assigned to your comment is OSTSD50728.

Comment Date: February 11, 2008 21:32:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD50728

First Name: janet
Middle Initial:
Last Name: herbruck
Organization:
Address: 3098 rue d'orleans
Address 2:
Address 3:
City: san diego
State: CA
Zip: 92110
Country: USA
Email: janatraveler@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This greed is NOT JUSTIFIED in the long run!!!!! STOP NOW! | 50728-001

Response for Document 50728

50728-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Eleanore Thomas.

The comment tracking number that has been assigned to your comment is OSTSD50730.

Comment Date: February 11, 2008 21:33:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD50730

First Name: Eleanore
Middle Initial:
Last Name: Thomas
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Time for W and his cronies to leave office quietly without any more ravaging, polluting,.....and cashing in on our most precious resources. | 50730-001

Response for Document 50730

50730-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gabriel Graubner.

The comment tracking number that has been assigned to your comment is OSTSD50731.

Comment Date: February 11, 2008 21:35:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD50731

First Name: Gabriel
Middle Initial:
Last Name: Graubner
Organization:
Address: 7899 St. Helena Rd.
Address 2:
Address 3:
City: Santa Rosa
State: CA
Zip: 954048601
Country: USA
Email: elecmon@sonic.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please protect the environment. 50731-001

Response for Document 50731

50731-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Don Hynes.

The comment tracking number that has been assigned to your comment is OSTSD50734.

Comment Date: February 11, 2008 21:36:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD50734

First Name: Don
Middle Initial:
Last Name: Hynes
Organization:
Address: 429 NE 29th Ave.
Address 2:
Address 3:
City: Portland
State: OR
Zip: 97232
Country: USA
Email: donhynes@cnnw.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. | 50734-001

Response for Document 50734

50734-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Frances Chen.

The comment tracking number that has been assigned to your comment is OSTSD50736.

Comment Date: February 11, 2008 21:37:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD50736

First Name: Frances
Middle Initial: Y
Last Name: Chen
Organization:
Address: 518 W. V-W Ave.
Address 2:
Address 3:
City: McAllen
State: TX
Zip: 78501
Country: USA
Email: ziarin1990@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We cannot destroy out land like that. It is just reprehensible to even think about doing that to something so beautiful. | 50736-001

Response for Document 50736

50736-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, vince and sandi vanacore.

The comment tracking number that has been assigned to your comment is OSTSD50737.

Comment Date: February 11, 2008 21:38:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD50737

First Name: vince and sandi
Middle Initial: j
Last Name: vanacore
Organization:
Address: 1101 duncan circle # 104
Address 2:
Address 3:
City: palm beach gardens
State: FL
Zip: 33418
Country: USA
Email: vjvj@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

God created a wonderful world for us to protect and to manage wisely. At a time when global warming is becoming a problem for the entire earth, we must do all we can to stop the rapid increase in temperatures for our world in order to have good stewardship of our land and water. Permitting the beautiful land in Utah, Colorado and Wyoming to be ravaged by the extraction and developmnt of oil shale and tar sand that would produce great quantities of greenhouse gasses and pollutants. THIS USE OF THESE LANDS IS UNACCEPTABLE!!!!!!!!!!!!!!!!!!! DON'T DESTROY GOD'S WORLD IN THIS WAY!!!!!!!!!!! DON'T CONTRIBUTE TO POLLUTION AN DON'T CAUSE MORE GREENHOUSE GASSES FOR PROFIT BY A GREEDY GROUP OF PEOP AND BUSINESSES. OUR LAND IS NOT FOR SALE TO BIG BUSINESS OR RICH CONTRIBUTORS TO ELECTION CAMPAIGNS!!!!!!!	50737-001

Response for Document 50737

50737-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, JAMES SANJANA.

The comment tracking number that has been assigned to your comment is OSTSD50740.

Comment Date: February 11, 2008 21:40:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD50740

First Name: JAMES
Middle Initial:
Last Name: SANJANA
Organization:
Address: 14117 BOX
Address 2:
Address 3:
City: SURFSIDE BEACH
State: SC
Zip: 29587
Country: USA
Email: jasonjs@hurontel.on.ca
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The tar sands development in Alberta Canada contributes the majority of Canada's air pollution. The same will happen in the USA if they start doing the same here. | 50740-001

Response for Document 50740

50740-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, fred anderson.

The comment tracking number that has been assigned to your comment is OSTSD50743.

Comment Date: February 11, 2008 21:42:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD50743

First Name: fred
Middle Initial:
Last Name: anderson
Organization:
Address: 2555 East La Madera Drive
Address 2:
Address 3:
City: Tucson
State: AZ
Zip:
Country: USA
Email: freda7@mindspring.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

please keep the public land for the public and free from development. thank you fred | 50743-001

Response for Document 50743

50743-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Ruth Gabey.

The comment tracking number that has been assigned to your comment is OSTSD50745.

Comment Date: February 11, 2008 21:43:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD50745

First Name: Ruth
Middle Initial:
Last Name: Gabey
Organization:
Address: 880 Lewiston Road
Address 2:
Address 3:
City: West Gardiner
State: ME
Zip: 04345
Country: USA
Email: rrgab746@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am strongly opposed to the unconscienable plan to devastate millions of acres of land in Colorado, Utah and Wyoming. All you need do is view the region of Alberta, Canada where oil sands development occurred to deny this proposal. Are our leaders becoming mentally overwhelmed? Are they in need of help? If not, then what is the reasoning behind such foolishness? Hasn't the planet undergone enough abuse from "civilized" man? If we keep blocking out the sun, how is food supposed to grow to feed the billions of humans inhabiting this fragile biosphere? Already the bees are checking out in some areas. 50745-001

Thank you for the opportunity to comment.

Responses for Document 50745

50745-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gene Richardson.

The comment tracking number that has been assigned to your comment is OSTSD50750.

Comment Date: February 11, 2008 21:45:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD50750

First Name: Gene
Middle Initial: C
Last Name: Richardson
Organization:
Address: 2365 N. Dogwood Cir.
Address 2:
Address 3:
City: Eckerty
State: IN
Zip: 47116
Country: USA
Email: blues1@tds.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is not good,pleas rethink this idea ! 50750-001

Response for Document 50750

50750-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Elizabeth Walters.

The comment tracking number that has been assigned to your comment is OSTSD50752.

Comment Date: February 11, 2008 21:45:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD50752

First Name: Elizabeth
Middle Initial: A
Last Name: Walters
Organization:
Address: 1281 Oak Spring Road
Address 2:
Address 3:
City: Libertyville
State: IL
Zip: 600481689
Country: USA
Email: beth_walters7@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

These efforts to suck blood from a turnip are anything but conservative. You need to get off oil and the cartel that is extorting the entire world!!!! No more oil!! From anywhere!!!	50752-001

Response for Document 50752

50752-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Joseph Wiesner.

The comment tracking number that has been assigned to your comment is OSTSD50754.

Comment Date: February 11, 2008 21:46:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD50754

First Name: Joseph
Middle Initial:
Last Name: Wiesner
Organization:
Address:
Address 2:
Address 3:
City: Milwaukee
State: WI
Zip: 53212
Country: USA
Email: joewiesner@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. 50754-001

It's amazing that we continue to risk our natural heritage for the production of filthy fossil fuels, something which, given global warming, has to start being viewed for the anachronism it is.

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 50754-002 50754-003

Responses for Document 50754

50754-001: The BLM acknowledges the commentor's preference for Alternative A.

50754-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50754-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, James Melnychuk.

The comment tracking number that has been assigned to your comment is OSTSD50757.

Comment Date: February 11, 2008 21:48:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD50757

First Name: James
Middle Initial: B
Last Name: Melnychuk
Organization:
Address: 4616 N. Osage Avenue
Address 2:
Address 3:
City: Norridge
State: IL
Zip: 60706
Country: USA
Email: funblondeboy@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please don't allow development of the oil sands industry on public lands. It's a foolish and poorlythought out solution which will ultimately devastate more land and pollute our environment for a very short term gain.	50757-001

Response for Document 50757

50757-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Marie Mark.

The comment tracking number that has been assigned to your comment is OSTSD50758.

Comment Date: February 11, 2008 21:48:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD50758

First Name: Marie
Middle Initial:
Last Name: Mark
Organization:
Address: 304 Via El Cuadro
Address 2:
Address 3:
City: Santa Barbara
State: CA
Zip: 93111
Country: USA
Email: marie.bob@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support "no action" | 50758-001

Response for Document 50758

50758-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, William Drucker.

The comment tracking number that has been assigned to your comment is OSTSD50760.

Comment Date: February 11, 2008 21:50:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD50760

First Name: William
Middle Initial:
Last Name: Drucker
Organization:
Address: 2500 Johnson Ave. Apt. 9D
Address 2:
Address 3:
City: Riverdale
State: NY
Zip: 10463
Country: USA
Email: wdrucker@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public land. | 50760-001

Response for Document 50760

50760-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mary Wisniewski.

The comment tracking number that has been assigned to your comment is OSTSD50762.

Comment Date: February 11, 2008 21:50:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD50762

First Name: Mary
Middle Initial:
Last Name: Wisniewski
Organization:
Address: 1615 Crain
Address 2:
Address 3:
City: Evanston
State: IL
Zip: 60202
Country: USA
Email: jowiz@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is time for the bush administrarion to become responsible members of the world at large. Learn to develop the resources neccessary to do away with fossil fuels not new ways to mine them and pollute the land and atmosphere.Lets get busy and become members of the moral race. Quickly!	50762-001

Response for Document 50762

50762-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, David Stanley.

The comment tracking number that has been assigned to your comment is OSTSD50763.

Comment Date: February 11, 2008 21:52:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD50763

First Name: David
Middle Initial: w
Last Name: Stanley
Organization:
Address: 1505 Glenshire Drive
Address 2:
Address 3:
City: Champaign
State: IL
Zip: 618227704
Country: USA
Email: rubberducky1505@insightbb.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to nonpolluting, renewable energy sources. I oppose all development of oil shale and tar sands on public lands. Thank you for your attention to this matter. | 50763-001

Response for Document 50763

50763-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Patricia Williams.

The comment tracking number that has been assigned to your comment is OSTSD50765.

Comment Date: February 11, 2008 21:52:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD50765

First Name: Patricia
Middle Initial: M
Last Name: Williams
Organization:
Address: 9 Enfield Lane
Address 2:
Address 3:
City: Lewes
State: DE
Zip: 199589094
Country: USA
Email: urthsong@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants as well as abuse of precious water resources. | 50765-001 | 50765-002

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. | 50765-003

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. | 50765-001 (cont.)

Sincerely,

Patricia M. Williams

Responses for Document 50765

50765-001: The BLM acknowledges the commentor's preference for Alternative A.

50765-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50765-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which

lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Donna Knipp.

The comment tracking number that has been assigned to your comment is OSTSD50766.

Comment Date: February 11, 2008 21:52:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD50766

First Name: Donna
Middle Initial:
Last Name: Knipp
Organization:
Address: 60 Seaman Ave., #2E
Address 2:
Address 3:
City: New York
State: NY
Zip: 10034
Country: USA
Email: dknipp@rocketmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please don't allow oil shale and tar sands development! The environmental degradation is not necessary and is unconsciencable. | 50766-001

Response for Document 50766

50766-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Marsha Prezioso.

The comment tracking number that has been assigned to your comment is OSTSD50768.

Comment Date: February 11, 2008 21:53:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD50768

First Name: Marsha
Middle Initial: D
Last Name: Prezioso
Organization:
Address: 7701 Sierra Paseo Lane
Address 2:
Address 3:
City: Las Vegas
State: NV
Zip: 89128
Country: USA
Email: preziosodiann@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Stop the madness.

50768-001

Response for Document 50768

50768-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, michelle hutter.

The comment tracking number that has been assigned to your comment is OSTSD50771.

Comment Date: February 11, 2008 21:55:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD50771

First Name: michelle
Middle Initial:
Last Name: hutter
Organization:
Address: 158 cider brook dr
Address 2:
Address 3:
City: wethersfield
State: CT
Zip: 06109
Country: USA
Email: sunny723@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is not right to damage land and the enviornment in an irreversivale way just to get oil. There are many other countries in the world that have already damaged and ruined land whom also have oil. We should not become like them just for a little oil. Please think about our country and what the people want for it. Do you want your grandchildren to grow up in a paved over country with man made trees? Please reconsider ruining our land for oil. Thank you for your time. 50771-001

Response for Document 50771

50771-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Meg Keoppen.

The comment tracking number that has been assigned to your comment is OSTSD50772.

Comment Date: February 11, 2008 21:57:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD50772

First Name: Meg
Middle Initial:
Last Name: Keoppen
Organization:
Address: PO Box 415
Address 2:
Address 3:
City: Arivaca
State: AZ
Zip: 85601
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely. 50772-001 50772-002

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 50772-001 (cont.)

Responses for Document 50772

50772-001: The BLM acknowledges the commentor's preference for Alternative A.

50772-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment, Fredrica Breidenstein.

The comment tracking number that has been assigned to your comment is OSTSD50774.

Comment Date: February 11, 2008 21:57:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD50774

First Name: Fredrica
Middle Initial: M
Last Name: Breidenstein
Organization:
Address: 139 Woodside Rd.
Address 2:
Address 3:
City: Ardmore
State: PA
Zip: 19003
Country: USA
Email: drfreddy@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Our public lands are NOT for private enterprise. They must remain under the protection of the public to preserve the little bit of valuable untainted land that is America's greatest resource and necessary for survival.	50774-001

Response for Document 50774

50774-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Ronald Brewer.

The comment tracking number that has been assigned to your comment is OSTSD50777.

Comment Date: February 11, 2008 21:59:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD50777

First Name: Ronald
Middle Initial:
Last Name: Brewer
Organization:
Address: 8200 Sunbury Lane
Address 2: Apt 808
Address 3:
City: Houston
State: TX
Zip: 77095
Country: USA
Email: rb2whrider@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It's time to stop the destruction of public lands for the wealthy corporate exec's and bankers. Time to change the direction from destroying the environment for minimal gain. Because the true cost isn't included in the for the shale or coal. What isn't for sale on the public's land? Ron Brewer

50777-001

Response for Document 50777

50777-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50778.

Comment Date: February 11, 2008 22:00:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD50778

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear BLM:

Instead of taking lots of your time w/ this email all I'd like to communicate is:

i oppose all development of oil shale and tar sands on public lands.

THE OTHER COMMENT IS:

WHAT THE HECK ARE YOU PEOPLE THINKING? HOW FOOLISH

50778-001

Response for Document 50778

50778-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gail Amalfitano.

The comment tracking number that has been assigned to your comment is OSTSD50782.

Comment Date: February 11, 2008 22:03:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD50782

First Name: Gail
Middle Initial:
Last Name: Amalfitano
Organization:
Address: 2517 s.w. Barber Lane
Address 2:
Address 3:
City: port saint lucie
State: FL
Zip: 34984
Country: USA
Email: amalfisales@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am very tired of greed making our future. We are supposed to be the smarter species, yet we risk the future of humanity for greed. It is time to act responsible for all of humanity and remember that all species and environments have become interdependent and interconnected over millions of years and if we remove one variable it has a wave affect throught the world. Do not destroy this land for more fossil fuels, it is time for us to stop the greedy and do what is right and responsible for all of mankind as well as the future, 50782-001

Response for Document 50782

50782-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Susan Chandler.

The comment tracking number that has been assigned to your comment is OSTSD50784.

Comment Date: February 11, 2008 22:04:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD50784

First Name: Susan
Middle Initial:
Last Name: Chandler
Organization:
Address: 1060 S US Hwy 1 #99
Address 2:
Address 3:
City: Vero Beach
State: FL
Zip: 329625681
Country: USA
Email: studio8@infionline.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We hold our public lands in trust for future generations of Americans. They are not ours to diminish or destroy.

Private industries should buy private land to pursue profits. Period. Oil, gas, coal, timber and mining operations will contribute more fairly to the economy if they are not given further benefit of corporate welfare -- cheap leases that allow them to destroy public land. 50784-001

Please keep private industries out of our parks.

Response for Document 50784

50784-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jon Anderholm.

The comment tracking number that has been assigned to your comment is OSTSD50785.

Comment Date: February 11, 2008 22:05:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD50785

First Name: Jon
Middle Initial:
Last Name: Anderholm
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Can you think of more ways to destroy Nature??? The Earth and Water.... Then the Sky will be ruined...	50785-001

Response for Document 50785

50785-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, kim linden.

The comment tracking number that has been assigned to your comment is OSTSD50790.

Comment Date: February 11, 2008 22:07:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD50790

First Name: kim
Middle Initial:
Last Name: linden
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This government has been a disgrace to the environment. Thank you for helping those who want to protect the earth organize more and step into the leadership.

Your time is up, This project really signals that. 50790-001

No more destruction for profit.

Kim Linden

Response for Document 50790

50790-001: Thank you for your comment.

Thank you for your comment, Alan Goggins.

The comment tracking number that has been assigned to your comment is OSTSD50791.

Comment Date: February 11, 2008 22:07:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD50791

First Name: Alan
Middle Initial: G
Last Name: Goggins
Organization:
Address: 18456 Vernon Court
Address 2:
Address 3:
City: Castro Valley
State: CA
Zip: 94546
Country: USA
Email: goggins@cal.berkeley.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of shale and tar sands on public lands. Undeveloped lands are a vital resource too, and it is time to transition to less polluting fuels. | 50791-001

Response for Document 50791

50791-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Carol Johnson.

The comment tracking number that has been assigned to your comment is OSTSD50792.

Comment Date: February 11, 2008 22:08:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD50792

First Name: Carol
Middle Initial: E
Last Name: Johnson
Organization:
Address: 402 Laurel,3W
Address 2:
Address 3:
City: Wilmette
State: IL
Zip: 60091
Country: USA
Email: photcj@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am against against opening the tar sands in Colorado and Utah for drilling . This action will damage the entire eco-system of these areas. Drilling in thsi area is hazaradous to the health of the people thatlive near thete. Sincerely, Carol Johnson | 50792-001

Response for Document 50792

50792-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, albert addison.

The comment tracking number that has been assigned to your comment is OSTSD50796.

Comment Date: February 11, 2008 22:10:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD50796

First Name: albert
Middle Initial: C
Last Name: addison
Organization: --
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I believe it is an ill conceived decision to allow any mining and processing of oil shale at this time, especially on federal lands. It is urgent to explore every avenue possible to find alternative sources of energy. | 50796-001

Response for Document 50796

50796-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Anna Jacus.

The comment tracking number that has been assigned to your comment is OSTSD50799.

Comment Date: February 11, 2008 22:12:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD50799

First Name: Anna
Middle Initial:
Last Name: Jacus
Organization:
Address: 1106-B N. Stiles St.
Address 2:
Address 3:
City: Linden
State: NJ
Zip: 07036
Country: USA
Email: wakened@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands...land that belongs to Americans, not the Bush administration's crony corporations.

The Bush administration's intent to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands is unacceptable. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 50799-001

Response for Document 50799

50799-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Thomas Fedorka.

The comment tracking number that has been assigned to your comment is OSTSD50800.

Comment Date: February 11, 2008 22:13:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD50800

First Name: Thomas
Middle Initial:
Last Name: Fedorka
Organization:
Address: 7472 Gordon Loop
Address 2:
Address 3:
City: Brooksville
State: FL
Zip: 34601
Country: USA
Email: fedorkat@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As usual, Bush is trying to destroy the environment, so disobey him, he is only a president (elected not by the majority) and not the God or Dictator he thinks he is. | 50800-001

Response for Document 50800

50800-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Patti Otto.

The comment tracking number that has been assigned to your comment is OSTSD50801.

Comment Date: February 11, 2008 22:14:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD50801

First Name: Patti
Middle Initial:
Last Name: Otto
Organization:
Address: 2919 84th Ave SE
Address 2:
Address 3:
City: Norm
State: OK
Zip: 73026
Country: USA
Email: potto@ou.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please move forward with this exploration. We need this to help secure energy sources for our future & economic future. Thank you!!!! | 50801-001

Response for Document 50801

50801-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Kristine Dempze.

The comment tracking number that has been assigned to your comment is OSTSD50802.

Comment Date: February 11, 2008 22:14:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD50802

First Name: Kristine
Middle Initial:
Last Name: Dempze
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Are you kidding me?! This is the kind of dumb crap we are trying to stop from happening and you actually want to go ahead with this distruction! Don't you watch Forcast Earth on the Weather Channel or watch the news or even know anything about what's going on with the world today? Seriously, how are you going to explain this to your kids and grandkids when they ask why you are so dumb that you let this happen? or, Why you let this happen to the earth? What will y ou tell them? Oh, my God! take a good hard look at yourself in the mirror sometime and ask yourself how you got to be like this!	50802-001

Response for Document 50802

50802-001: Thank you for your comment.

Thank you for your comment, Henry Bosch.

The comment tracking number that has been assigned to your comment is OSTSD50803.

Comment Date: February 11, 2008 22:15:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD50803

First Name: Henry
Middle Initial: A
Last Name: Bosch
Organization:
Address:
Address 2:
Address 3:
City:
State: MD
Zip: 21228
Country: USA
Email: habos@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Enough! Why must our public lands be pillaged for Exxon/Mobile and BP? How about alternative forms of energy. They are already in use and research will give us more. | 50803-001

Response for Document 50803

50803-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Heidi Arp-Adams.

The comment tracking number that has been assigned to your comment is OSTSD50804.

Comment Date: February 11, 2008 22:16:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD50804

First Name: Heidi
Middle Initial:
Last Name: Arp-Adams
Organization:
Address: 6233 Cielo Grande Dr
Address 2:
Address 3:
City: Rio Rancho
State: NM
Zip: 87144
Country: USA
Email: heidiarpadams@cableone.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Save your money, save our environment, drilling all over America is not going to sustain us. We need alternative fuel and practices.	50804-001

Response for Document 50804

50804-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, peter lockwood.

The comment tracking number that has been assigned to your comment is OSTSD50805.

Comment Date: February 11, 2008 22:17:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD50805

First Name: peter
Middle Initial: r
Last Name: lockwood
Organization:
Address: 5891 Sypes Canyon Road
Address 2:
Address 3:
City: bozeman
State: MT
Zip: 59715
Country: USA
Email: ranchosanmiguel@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We oppose development of oil shale and tar sands on public lands. It has been shown that this method is energy intensive and creates too much CO2 and is devastating to the landscape and land itself. 50805-001 50805-002

Responses for Document 50805

50805-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

50805-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

Thank you for your comment, Sabrina Napier.

The comment tracking number that has been assigned to your comment is OSTSD50812.

Comment Date: February 11, 2008 22:20:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD50812

First Name: Sabrina
Middle Initial:
Last Name: Napier
Organization:
Address: 3996 Ardmore Drive
Address 2:
Address 3:
City: San Diego
State: CA
Zip: 92111
Country: USA
Email: GNAPIER1@san.rr.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not take this short-sighted action to allow oil shard and tar sands development, which does not resolve our dependence on oil products but just pollutes the air further. | 50812-001

Response for Document 50812

50812-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Laura Cotts.

The comment tracking number that has been assigned to your comment is OSTSD50813.

Comment Date: February 11, 2008 22:22:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD50813

First Name: Laura
Middle Initial:
Last Name: Cotts
Organization:
Address:
Address 2:
Address 3:
City: Cedar City
State: UT
Zip:
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please choose the NO ACTION plan. the development of tar sands and oil shale, while initially sounding good, will actually cost too much in terms of energy spent for the energy gained. The	50813-001
resulting degradation of the public lands with plant and wildlife and the enormous release of greenhouse gases, make oil shale and tar sand development the least desirable option. We would	50813-002
be better off leasing the same land for solar arrays and wind farms - greater net gain and less damage.	50813-003

Responses for Document 50813

50813-001: The BLM acknowledges the commentor's preference for Alternative A.

50813-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

50813-003: The BLM acknowledges the commentor's preference for developing renewable energy sources.

Thank you for your comment, Rob Brinkman.

The comment tracking number that has been assigned to your comment is OSTSD50815.

Comment Date: February 11, 2008 22:23:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD50815

First Name: Rob
Middle Initial: W
Last Name: Brinkman
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

Developing additional fossil fuel resources at great cost to the environment is not the answer, renewable energy is what we should be investing in. The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.	50815-001 50815-002
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	50815-001 (cont.)

Sincerely,

Rob Brinkman, Chair Sierra Club Suwannee-St. John's group

Responses for Document 50815

50815-001: The BLM acknowledges the commentor's preference for Alternative A.

50815-002: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, James Rader.

The comment tracking number that has been assigned to your comment is OSTSD50819.

Comment Date: February 11, 2008 22:27:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD50819

First Name: James
Middle Initial: A
Last Name: Rader
Organization:
Address: 7832 Pipit Place
Address 2:
Address 3:
City: San Diego
State: CA
Zip: 92129
Country: USA
Email: raderj@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not allow the oil shale and tar sands exploitation to expand. The destruction this would cause on public lands would be unforgivable and as a member of the public you are supposed to represent I strongly oppose this. The oil shales and tar sands should not considered a viable fuel for the long term future and would be counterproductive to promoting the development of alternative energy sources. The economic and moral future of this country, and possibly our species, relies on transitioning to alternative energy and reducing greenhouse emissions as much as possible as soon as possible. Tearing up public lands is not what 'management' should entail. If you have ever read or heard a word Aldo Leopold wrote, please do not support in any way efforts to pursue the oil shales and tar sands. 50819-001

Sincerely,

James Rader

Response for Document 50819

50819-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, John Gregory.

The comment tracking number that has been assigned to your comment is OSTSD50820.

Comment Date: February 11, 2008 22:28:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD50820

First Name: John
Middle Initial:
Last Name: Gregory
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

In order to keep the Earth livable for breathing animals we MUST stop further development of hydrocarbon fuel and FUND renewable energy sources; period. If we don't, ALL air breathers will succumb, one way or another. That much we know from the facts we already know. How much longer must we kid our greedy, self-deceiving selves?	50820-001

Response for Document 50820

50820-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Martin Dreyfuss.

The comment tracking number that has been assigned to your comment is OSTSD50821.

Comment Date: February 11, 2008 22:28:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD50821

First Name: Martin
Middle Initial:
Last Name: Dreyfuss
Organization:
Address: 131 Embarcadero W. Apt.3114
Address 2:
Address 3:
City: Oakland
State: CA
Zip: 94607
Country: USA
Email: martdrey@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil Shale and tar sands development have no place in our national natural areas. To exacerbate ctions that will accelerate global warning is unacceptable | 50821-001

Response for Document 50821

50821-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Diane Shaughnessy.

The comment tracking number that has been assigned to your comment is OSTSD50824.

Comment Date: February 11, 2008 22:29:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD50824

First Name: Diane
Middle Initial: H
Last Name: Shaughnessy
Organization:
Address: 1528 22nd ST NE
Address 2:
Address 3:
City: Auburn
State: WA
Zip: 98002
Country: USA
Email: dshau2@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

the environmental catastrophe known as oil shale and tar sands development will never be viable. I opposes to this ill-conceived proposal. | 50824-001

Response for Document 50824

50824-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Edward Talmo.

The comment tracking number that has been assigned to your comment is OSTSD50826.

Comment Date: February 11, 2008 22:30:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD50826

First Name: Edward
Middle Initial: A
Last Name: Talmo
Organization:
Address: PO Box 975
Address 2:
Address 3:
City: Highland Lakes
State: NJ
Zip: 07422
Country: USA
Email: eatalmo@warwick.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is not the answer to our energy problems this in fact creates a larger problem. Our environment can not be raped at time when alternative energy sources must be developed. Please stop this foolish idea and persue alternatives that make more sense. 50826-001 50826-002

Responses for Document 50826

50826-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

50826-002: See response to Comment 50826-001.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50827.

Comment Date: February 11, 2008 22:31:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD50827

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 50827-001

The impact on wildlife and surrounding communities will be negative. Additionally, the resulting fossil fuel recovered will not be worth its true cost in extraction, carbon emissions, environmental impacts and ecological disruption. 50827-002

Responses for Document 50827

50827-001: The BLM acknowledges the commentor's preference for Alternative A.

50827-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

Thank you for your comment, Shawn Lonsfjord.

The comment tracking number that has been assigned to your comment is OSTSD50829.

Comment Date: February 11, 2008 22:33:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD50829

First Name: Shawn
Middle Initial:
Last Name: Lonsfjord
Organization:
Address: 190 Avenue B, 3-A
Address 2:
Address 3:
City: New York
State: NY
Zip: 10009
Country: USA
Email: s_lonsfjord@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

After watching the development of tar sands in Canada, we should know that this type of strip mining & production is ruinous to the environment, destructive to flora & fauna, and commercially desperate. I urge you to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Thank you.	50829-001

Response for Document 50829

50829-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, James Stockley.

The comment tracking number that has been assigned to your comment is OSTSD50832.

Comment Date: February 11, 2008 22:34:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD50832

First Name: James
Middle Initial: R
Last Name: Stockley
Organization:
Address: 458 Staten St
Address 2:
Address 3:
City: Jonesboro
State: GA
Zip: 30238
Country: USA
Email: jamesstockley@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Mr.Bush: You have done enough damage,leave it alone. | 50832-001

Response for Document 50832

50832-001: Thank you for your comment.

Thank you for your comment, Celeste Broughton.

The comment tracking number that has been assigned to your comment is OSTSD50833.

Comment Date: February 11, 2008 22:35:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD50833

First Name: Celeste
Middle Initial: D
Last Name: Broughton
Organization:
Address: 66789 two bunch palms trail apt13
Address 2:
Address 3:
City: Desert Hot springs
State: CA
Zip: 92240
Country: USA
Email: Indian_outlaw@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am very concerned about this ,Because of the wildlife that may drink from these Lakes Or Rivers,and what about the enviroment look what kind of damage to the trees that put oxygen in the air if this goes through.Please leave it be for the sake of all the beauty God has given us.	50833-001

Response for Document 50833

50833-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Philip Simon.

The comment tracking number that has been assigned to your comment is OSTSD50835.

Comment Date: February 11, 2008 22:37:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD50835

First Name: Philip
Middle Initial:
Last Name: Simon
Organization:
Address: Box 9473
Address 2:
Address 3:
City: San rafael
State: CA
Zip: 94912
Country: USA
Email: philsimtpr@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

No development of oil shale or tar sands on BLM lands | 50835-001

Response for Document 50835

50835-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Lee Miller.

The comment tracking number that has been assigned to your comment is OSTSD50837.

Comment Date: February 11, 2008 22:38:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD50837

First Name: Lee
Middle Initial: W
Last Name: Miller
Organization:
Address: 2066 N. Jack Tone Road
Address 2:
Address 3:
City: Stockton
State: CA
Zip: 952159728
Country: USA
Email: leemiller38@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I don't think that the energy developed for oil shales is worth the energy inputs and environmental destruction and water use that this entails. The economic externalities need to be taken into account and when they are this program should not go forward. Population control is a better option for saving energy and creating a more sustainable civilization, though it may be too late for that. Exploiting the last rock for the last ounce of energy will only result in more destruction of the planet, a planet already reeling from the impact of our species.

50837-001

Response for Document 50837

50837-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Richard Goggin.

The comment tracking number that has been assigned to your comment is OSTSD50838.

Comment Date: February 11, 2008 22:38:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD50838

First Name: Richard
Middle Initial: A
Last Name: Goggin
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Wakeup and start directing your efforts at saving the environment not destroying it. | 50838-001

Response for Document 50838

50838-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Anastasia Hopkinson.

The comment tracking number that has been assigned to your comment is OSTSD50840.

Comment Date: February 11, 2008 22:38:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD50840

First Name: Anastasia
Middle Initial:
Last Name: Hopkinson
Organization:
Address: 1036 Harbor
Address 2:
Address 3:
City: Annapolis
State: MD
Zip: 21403
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil recovery from Tar Sands has serious environmental consequences. If this project cannot avoid those consequences, it is not worth the long term costs to society. | 50840-001

Response for Document 50840

50840-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, Helen Goldenberg.

The comment tracking number that has been assigned to your comment is OSTSD50843.

Comment Date: February 11, 2008 22:39:44PM
Oil Shale and Tar Sands
Comment ID: OSTSD50843

First Name: Helen
Middle Initial: A
Last Name: Goldenberg
Organization:
Address: 7739 Southampton Terr
Address 2: Apt G 107
Address 3:
City: Tamarac
State: FL
Zip: 333219128
Country: USA
Email: HelenGolde@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Yes, we need oil and other fuels. However, we should not create vast wastelands looking for fuels. I am interested in responsible, conservative exploration and extraction. Thank you. | 50843-001

Response for Document 50843

50843-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Patricia Salcone.

The comment tracking number that has been assigned to your comment is OSTSD50845.

Comment Date: February 11, 2008 22:42:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD50845

First Name: Patricia
Middle Initial: K
Last Name: Salcone
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. 50845-001

Response for Document 50845

50845-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Michael Lippman.

The comment tracking number that has been assigned to your comment is OSTSD50848.

Comment Date: February 11, 2008 22:42:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD50848

First Name: Michael
Middle Initial: J
Last Name: Lippman
Organization:
Address:
Address 2:
Address 3:
City: Seattle
State: WA
Zip: 98122
Country: USA
Email: milibu@u.washington.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Plese support the "no action" alternative in the Draftp Programmatic Envionmental Statement on Oil Shale in Tar Sands | 50848-001

Response for Document 50848

50848-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Robert Sinclair.

The comment tracking number that has been assigned to your comment is OSTSD50849.

Comment Date: February 11, 2008 22:42:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD50849

First Name: Robert
Middle Initial:
Last Name: Sinclair
Organization:
Address:
Address 2:
Address 3:
City: Sammamish
State: WA
Zip: 90874
Country: USA
Email: resinclair@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Ms. Thompson, BLM Project Mgr:

I am writing to support the "No Action" alternative in the 'Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands' targeting public lands in the Rockies. 50849-001

I am concerned that this proposed development will produce more long-term negative effects on the landscape, the plants and animals that depend upon it, and ultimately on our environment. The BLM needs to be investing heavily in renewable sources of power and energy, not continuing to invest in fossil fuel discovery, extraction and consumption. 50849-002

Because I do not believe this proposal is environmentally responsible, I am requesting that the BLM choose the No Action alternative and/or that you develop a full range of reasonable alternatives based on energy conservation and efficiency. 50849-003

Either way, before deciding upon a course of action, the BLM must completely consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected, and I would like to see those findings made available for public review. 50849-004

Thank you for your time.

Sincerely,

Robert Sinclair

Responses for Document 50849

50849-001: The BLM acknowledges the commentor's preference for Alternative A.

50849-002: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

50849-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50849-004: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the

additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

The results of environmental impact statements generated for compliance with NEPA are available for public review and comment.

Thank you for your comment, Robert Shorin.

The comment tracking number that has been assigned to your comment is OSTSD50850.

Comment Date: February 11, 2008 22:44:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD50850

First Name: Robert
Middle Initial:
Last Name: Shorin
Organization:
Address: 30 Wynn Court
Address 2:
Address 3:
City: Syosset
State: NY
Zip: 117912426
Country: USA
Email: RShorin@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

PLEASE FULFILL YOUR MISSION TO PRESERVE AND PROTECT OUR NATURAL LANDS. DON'T BE SHORT-SIGHTED BY SELLING OUT TO GREEDY OIL COMPANIES WHO ARE ON INTERESTED IN PROFITS.	50850-001

Response for Document 50850

50850-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Raymond Litzsinger.

The comment tracking number that has been assigned to your comment is OSTSD50852.

Comment Date: February 11, 2008 22:44:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD50852

First Name: Raymond
Middle Initial: C
Last Name: Litzsinger
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Conserve energy and improve efficiency. Protect and preserve the natural landscape as it is. | 50852-001

Response for Document 50852

50852-001: Thank you for your comment.

Thank you for your comment, sergr vrabec.

The comment tracking number that has been assigned to your comment is OSTSD50859.

Comment Date: February 11, 2008 22:47:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD50859

First Name: sergr
Middle Initial:
Last Name: vrabec
Organization:
Address: 5902 SE milwaukie ave.
Address 2:
Address 3:
City: portland
State: OR
Zip: 97202
Country: USA
Email: vrabec1@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sirs, Oil shale is proving to be a bad idea in Canada, lets not make the same mistake here. this is not a sustainable solution to Global warming. please no oil shale in the US. | 50859-001

Response for Document 50859

50859-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, richard crawford.

The comment tracking number that has been assigned to your comment is OSTSD50870.

Comment Date: February 11, 2008 22:53:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD50870

First Name: richard
Middle Initial: a
Last Name: crawford
Organization:
Address: po box 51
Address 2:
Address 3:
City: honomu
State: HI
Zip: 96728
Country: USA
Email: Islesea@hialoha.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly oppose all development of oil shale and tar sands on public lands. Please think ahead. Please plan ahead. Please get ahead. | 50870-001

Response for Document 50870

50870-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, William Thomas.

The comment tracking number that has been assigned to your comment is OSTSD50873.

Comment Date: February 11, 2008 22:59:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD50873

First Name: William
Middle Initial: H
Last Name: Thomas
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Starting up a massive development of oil shale and tar sands on public lands is unacceptable. The damage to these lands will be too great. Oil companies will be the main beneficiaries of such development to the detriment of the US citizenry who are the real owners of this land and their mineral rights. THESE ARE OUR LANDS! 50873-001

Sincerely yours, William H. Thomas

Response for Document 50873

50873-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50875.

Comment Date: February 11, 2008 23:02:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD50875

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

preserve nature for the future

50875-001

Response for Document 50875

50875-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Julie Smith.

The comment tracking number that has been assigned to your comment is OSTSD50876.

Comment Date: February 11, 2008 23:04:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD50876

First Name: Julie
Middle Initial: a
Last Name: Smith
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Don't over use our resources | 50876-001

Response for Document 50876

50876-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Robert Stein.

The comment tracking number that has been assigned to your comment is OSTSD50878.

Comment Date: February 11, 2008 23:06:44PM
Oil Shale and Tar Sands
Comment ID: OSTSD50878

First Name: Robert
Middle Initial: W
Last Name: Stein
Organization:
Address: 9708 Fair Rd.
Address 2:
Address 3:
City: Strongsville
State: OH
Zip: 44149
Country: USA
Email: voter@growthchoices.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. | 50878-001

In addition to being economically questionable without government subsidies or tax breaks and destroying local habitat, oil shale and tar sands projects in question would use huge amounts of water in areas where most scientists expect shortages in the coming decades. | 50878-002

Also, BLM rarely gets long-term fair value in resource licensing projects on public lands. They are usually corporate welfare for political friends.

We should put our public lands to better use than supporting an outdated fossil fuel energy infrastructure. | 50878-003

Responses for Document 50878

50878-001: The BLM acknowledges the commentor's preference for Alternative A.

50878-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

50878-003: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Mina Loomis.

The comment tracking number that has been assigned to your comment is OSTSD50879.

Comment Date: February 11, 2008 23:07:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD50879

First Name: Mina
Middle Initial:
Last Name: Loomis
Organization:
Address: 4412 Sinclair Ave
Address 2:
Address 3:
City: Austin
State: TX
Zip: 78756
Country: USA
Email: mkloomis@austin.rr.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please, please don't sacrifice our last wild places and our children's future for short-term oil profits. We always vote, and environmental protection is one of our highest priorities. With reasonable energy conservation efforts and eventual development of renewables, we can have enough energy without all this destruction.	50879-001

Response for Document 50879

50879-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Peter warner.

The comment tracking number that has been assigned to your comment is OSTSD50882.

Comment Date: February 11, 2008 23:10:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD50882

First Name: Peter
Middle Initial: J
Last Name: warner
Organization:
Address: 16451 Franklin
Address 2:
Address 3:
City: Fort Bragg
State: CA
Zip: 95437
Country: USA
Email: corylus@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Destructive, unsustainable, uneconomical, short-term, exploitative, unjust, polluting...among the many adjectives that describe oil shale and tar sand petroleum extraction. One other: justification for militancy against corporations and BLM.	50882-001

Response for Document 50882

50882-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Linda Alband.

The comment tracking number that has been assigned to your comment is OSTSD50884.

Comment Date: February 11, 2008 23:12:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD50884

First Name: Linda
Middle Initial:
Last Name: Alband
Organization:
Address: 4328 NE Maywood Pl
Address 2:
Address 3:
City: Portlane
State: OR
Zip: 97220
Country: USA
Email: cardamom@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This comes at a time when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives,based on energy conservation and efficiency. The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be impacted. Therefore, I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. Sincerely,	50884-001 50884-002 50884-003 50884-001 (cont.)

Responses for Document 50884

50884-001: The BLM acknowledges the commentor's preference for Alternative A.

50884-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50884-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and

3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Angelo Feldkamp.

The comment tracking number that has been assigned to your comment is OSTSD50885.

Comment Date: February 11, 2008 23:13:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD50885

First Name: Angelo
Middle Initial: J
Last Name: Feldkamp
Organization:
Address: 5825 Coors Rd SW
Address 2:
Address 3:
City: Albuquerque
State: NM
Zip: 871216700
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The world needs to move AWAY from selfish dependence on the limited resources of the planet earth. Please do not allow the proposed mining operations for tar sand, etc., to happen! | 50885-001

Response for Document 50885

50885-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Cheryl Toth.

The comment tracking number that has been assigned to your comment is OSTSD50888.

Comment Date: February 11, 2008 23:18:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD50888

First Name: Cheryl
Middle Initial:
Last Name: Toth
Organization:
Address: 1648 Tawnygate Way
Address 2:
Address 3:
City: San Jose
State: CA
Zip: 95124
Country: USA
Email: tothie@theriver.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Do not open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. It ravages the landscape and disrupts wildlife populations. Use my hard earned tax dollars on exploration of alt energies instead. | 50888-001

Response for Document 50888

50888-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Justin Thiel.

The comment tracking number that has been assigned to your comment is OSTSD50890.

Comment Date: February 11, 2008 23:20:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD50890

First Name: Justin
Middle Initial:
Last Name: Thiel
Organization:
Address: 5830 Birch Ct
Address 2:
Address 3:
City: Oakland
State: CA
Zip: 94618
Country: USA
Email: jthiel23@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We need to start investing in new clean sources of energy. Do not develop this on public lands. 50890-001

Response for Document 50890

50890-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Don Salsburg.

The comment tracking number that has been assigned to your comment is OSTSD50892.

Comment Date: February 11, 2008 23:20:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD50892

First Name: Don
Middle Initial: A
Last Name: Salsburg
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Public lands are there for everyones enjoyment, not for big bussiness to make a profit on. Please don't let them ruin it for everybody. Clean renuable energy such as solar and wind power is what we need to persue.	50892-001

Response for Document 50892

50892-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Lorena Bates.

The comment tracking number that has been assigned to your comment is OSTSD50895.

Comment Date: February 11, 2008 23:21:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD50895

First Name: Lorena
Middle Initial: G
Last Name: Bates
Organization:
Address: 226 G NE
Address 2:
Address 3:
City: Miami
State: OK
Zip: 74354
Country: USA
Email: taffy_pixie@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I have not had the opportunity to visit the beautiful lands that are about to be under attack. I would like the option to visit them in the future as they are now. We have the means now to use renewable fuel sources such as ethanol from corn, electric hybrids, natural gas, solar, and I'm sure eventually water powered. I don't know why we are still devastating our planet with large, gaping, ugly holes that scar the landscape. I live in an area that had a booming coal and lead industry. Now all we have to show for it is a desolate, polluted, scarred, worthless area of land that is one of the biggest superfund sites ever known in this country. Taxpayers are footing the bill for the buyout and cleanup of this horrific pollution that was launched by greed and ignorance. We also have a higher than average incidence of cancer and low IQ rates, not to mention high lead levels in young children and heavy metals in the streams around the polluted area. I fear this proposal will bring the same misery and pollution upon what is supposed to be a pristine, beautiful area that all of us want to visit or live in. I hope you will reconsider and weigh the possible ramifications of going ahead with the plans that are laid out. If you want to investigate what I've said about the area I live in, it is all public record. The area is Picher-Cardin, Oklahoma. And, because of the mismanagement of the past, this town will no longer exist in a short while except in the minds of its former residents. I hope you don't consign the beautiful lands of these states to the same fate!

50895-001

Response for Document 50895

50895-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, petr brussmann.

The comment tracking number that has been assigned to your comment is OSTSD50903.

Comment Date: February 11, 2008 23:35:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD50903

First Name: petr
Middle Initial:
Last Name: brussmann
Organization:
Address:
Address 2:
Address 3:
City:
State: CA
Zip: 92704
Country: USA
Email: petrbrussmann@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I do not agree with destuction of public land or any land for profit of few already wealthy people! | 50903-001

Response for Document 50903

50903-001: Thank you for your comment.

Thank you for your comment, David Dunkleberger.

The comment tracking number that has been assigned to your comment is OSTSD50906.

Comment Date: February 11, 2008 23:38:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD50906

First Name: David
Middle Initial: B
Last Name: Dunkleberger
Organization:
Address: 1290 ALMSHOUSE ROAD
Address 2: Apt. # 628
Address 3:
City: Doylestown
State: PA
Zip: 18901
Country: USA
Email: ddunkleberger@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

50906-001

Drilling causes cavities

Response for Document 50906

50906-001: Thank you for your comment.

Thank you for your comment, Pamela Lunn.

The comment tracking number that has been assigned to your comment is OSTSD50908.

Comment Date: February 11, 2008 23:41:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD50908

First Name: Pamela
Middle Initial:
Last Name: Lunn
Organization:
Address: 770 Timber Ridge Rd.
Address 2:
Address 3:
City: Marshfield
State: MO
Zip: 65706
Country: USA
Email: Alyzandrya@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

How many other ways can you find to screw up our planet | 50908-001

Response for Document 50908

50908-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Robert Stennett.

The comment tracking number that has been assigned to your comment is OSTSD50910.

Comment Date: February 11, 2008 23:44:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD50910

First Name: Robert
Middle Initial:
Last Name: Stennett
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I strongly oppose all sales of oil shale and tar sands on public property. 50910-001

Response for Document 50910

50910-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50913.

Comment Date: February 11, 2008 23:47:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD50913

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

The development of oil shale and tar sands is completely unacceptable. It is devastating to the landscape and is absolutely the opposite of what we should be doing - and that is, working towards A CLEAN, SUSTAINABLE, RENEWABLE ENERGY FUTURE and i am not promoting ethanol. in the small farm that is fine but i am not for covering our country with corn plants. please! solar, wind, hydro, wave energy, biofuel from agricultural waste or from garbage (something we seem to have an abundance of).	50913-001

Response for Document 50913

50913-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, David Ferger.

The comment tracking number that has been assigned to your comment is OSTSD50914.

Comment Date: February 11, 2008 23:48:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD50914

First Name: David
Middle Initial:
Last Name: Ferger
Organization:
Address: 25039 Champlaign Drive
Address 2:
Address 3:
City: Southfield
State: MI
Zip: 480341203
Country: USA
Email: dferger@mail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please rebuke those who would compromise our wilderness with a (literally) planet-destroying technology. Such corporate entities are neither our nor the earth's friend. | 50914-001

Response for Document 50914

50914-001: Thank you for your comment.

Thank you for your comment, KC Curry.

The comment tracking number that has been assigned to your comment is OSTSD50916.

Comment Date: February 11, 2008 23:51:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD50916

First Name: KC
Middle Initial:
Last Name: Curry
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please do not allow the shale and tar development on public lands. There is not enough return for the amount of damage it does to the environment for hundreds of miles. | 50916-001

Response for Document 50916

50916-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50921.

Comment Date: February 11, 2008 23:55:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD50921

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I live in a community where the tar sands are likely to be refined. I fear for the future health and safety of the citizens. The area here is already an AOC (Area of Concern). I have been listening to a series of lectures on Energy. Nuclear and Oil. These will not do because of contamination of food supply and supply diminishing respectively. When will this country know that enough of the old technology is enough and we must look forward to varieties of other energies and put the strength of what's left to our research and development into looking ahead? Our federal government mudt be giving incentives to individuals including vehicle and home, water heating alternatives. Conservation is essential and must be stressed. Don't the future generations deserve more than the polluted and wasted planet that tar sands development anticipates? I have heard it compared to making lead out of gold. Here are the lectures in the attachment.http://www.css.edu/x1129.xml

50921-001

Response for Document 50921

50921-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, Naomi Quinones.

The comment tracking number that has been assigned to your comment is OSTSD50924.

Comment Date: February 12, 2008 00:00:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD50924

First Name: Naomi
Middle Initial:
Last Name: Quinones
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: naomiquinones@email.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

Please choose the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Rather than polluting the environment and damaging wildlife, why not develop alternatives based on solar power, energy conservation and efficiency? 50924-001

Again, I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

Thanks, and I look forward to hearing back from you on this matter

Response for Document 50924

50924-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50929.

Comment Date: February 12, 2008 00:08:57AM
Oil Shale and Tar Sands
Comment ID: OSTSD50929

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am writing IN FULL SUPPORT of opening public lands in Utah, Colorado and Wyoming to Oil Shale and Tar Sands development, as described in the Draft Programmatic Environmental Impact Statement. The proposed development comes at a time when crude oil is at record levels, making this sort of development economically feasible. It will reduce this country's dependence on foreign oil, which is a very good thing. In addition, recent scientific research has shown quite clearly that the output of the sun, NOT the "greenhouse gas" carbon dioxide, is what drives global changes in temperature. As a result, there is NO reason to delay developing this region for Oil Shale & Tar Sands development.

50929-001

Response for Document 50929

50929-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Dean Mindock.

The comment tracking number that has been assigned to your comment is OSTSD50930.

Comment Date: February 12, 2008 00:10:24AM
Oil Shale and Tar Sands
Comment ID: OSTSD50930

First Name: Dean
Middle Initial:
Last Name: Mindock
Organization:
Address: 114 Portland Terrace
Address 2:
Address 3:
City: Collinsville
State: IL
Zip: 622343637
Country: USA
Email: oceanpine@charter.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose the development of oil and shale oils extraction using public lands. We need to be moving away from all fossil fuels as quickly as possible. We are in the midst of global warming which will cause extreme weather events, coastal flooding, stress on forests, etc. Alternative energy sources need to be developed on a large scale and we need to move to sustainable farming methods and away from industrial farming which is destroying the fertility of soil. Industrial farming is energy intensive and only because of unwise government subsidies is it able to continue. In the meantime, organic farmers using sustainable nonpolluting methods get hardly any governmental assistance. Subsidies for farming are out of kilter with reality.

50930-001

50930-002

Responses for Document 50930

50930-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

50930-002: Thank you for your comment, but the issue is outside the scope of this PEIS.

Thank you for your comment, MARK Salamon.

The comment tracking number that has been assigned to your comment is OSTSD50931.

Comment Date: February 12, 2008 00:12:57AM
Oil Shale and Tar Sands
Comment ID: OSTSD50931

First Name: MARK
Middle Initial:
Last Name: Salamon
Organization:
Address: 18 Shore Drive
Address 2:
Address 3:
City: HARWICH
State: MA
Zip: 026451603
Country: USA
Email: marksalamon@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Extraction of Oil Shale and Tar Sands in the western U.S. should not be approved by the Bureau of Land Management. This is an environmental disaster that will not help our country achieve energy independence, and will only increase our nation's contribtuion to climate-changing greenhouse gasses from fossil fuels.	50931-001

Response for Document 50931

50931-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, liesbwth nieuwenhuijse.

The comment tracking number that has been assigned to your comment is OSTSD50933.

Comment Date: February 12, 2008 00:14:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD50933

First Name: liesbwth
Middle Initial: l
Last Name: nieuwenhuijse
Organization:
Address: r.vinkeleskade 37lll
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

please donnot chamge anything. 50933-001

Response for Document 50933

50933-001: Thank you for your comment.

Thank you for your comment, Valjean O'Neill.

The comment tracking number that has been assigned to your comment is OSTSD50934.

Comment Date: February 12, 2008 00:17:51AM
Oil Shale and Tar Sands
Comment ID: OSTSD50934

First Name: Valjean
Middle Initial: F
Last Name: O'Neill
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely and choose the No Action alternative. | 50934-001

Responses for Document 50934

50934-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50934-002: The BLM acknowledges the commentor’s preference for Alternative A.

Thank you for your comment, Aleita Hass-Holcombe.

The comment tracking number that has been assigned to your comment is OSTSD50942.

Comment Date: February 12, 2008 00:31:23AM
Oil Shale and Tar Sands
Comment ID: OSTSD50942

First Name: Aleita
Middle Initial:
Last Name: Hass-Holcombe
Organization:
Address: 2022 N.W. Myrtlewood Way
Address 2:
Address 3:
City: Corvallis
State: OR
Zip: 973301086
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The landscape should not be sacrificed for a few more years of our inability to reduce our dependency on oil. | 50942-001

Response for Document 50942

50942-001: Thank you for your comment.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50943.

Comment Date: February 12, 2008 00:32:16AM
Oil Shale and Tar Sands
Comment ID: OSTSD50943

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

WE DO NOT WANT OUR PUBLIC LANDS DEVELOPED IN ANY WAY, AT ANY TIME, PERIOD. BUSH HAD BETTER TAKE CARE OF THIS COUNTRY AND LEAVE NATURE ALONE. HE IS CONSTANTLY PROPOSING HARMFUL THINGS TO BE DONE TO OUR PUBLIC LANDS. THEY ARE NOT HIS TO GIVE AWAY, LEASE OR SELL TO ANYONE INCLUDING DEVELOPERS. IT IS SAD THAT OTHERS IN THE PAST, HAD SET THESE LANDS ASIDE TO BE PROTECTED FOR ALL TIME AND THEN BUSH/CHANEY COMES ALONG AND THINKS THEY CAN OVERLOOK ALL THE PAST AND WHO OWNS THESE LANDS. THESE LANDS ARE TO BE LEFT AS THEY ARE AND FOR ALL TIME. THERE WAS A SENATE BILL IN THE PAST, I'M SURE IT IS STILL IN AFFECT, SINCE PASSED LAST YEAR, WHICH PROHIBITS THIS KIND OF ACTIVITY TO AND FOR OUR PUBLIC LANDS.	50943-001

Response for Document 50943

50943-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Glenn Stewart, Ph.D..

The comment tracking number that has been assigned to your comment is OSTSD50945.

Comment Date: February 12, 2008 00:33:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD50945

First Name: Glenn
Middle Initial: R
Last Name: Stewart, Ph.D.
Organization:
Address: 4524 Briney Point Road
Address 2:
Address 3:
City: La Verne
State: CA
Zip: 91750
Country: USA
Email: grstewart@csupomona.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As a Professor of Zoology and Environmental Science, I urge the BLM to choose the "No Action" alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West, and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 50945-001

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 50945-002 The BLM must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 50945-003 Thank you for your attention to my comments!

Responses for Document 50945

50945-001: The BLM acknowledges the commentor's preference for Alternative A.

50945-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50945-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which

lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Laurie Durand.

The comment tracking number that has been assigned to your comment is OSTSD50948.

Comment Date: February 12, 2008 00:34:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD50948

First Name: Laurie
Middle Initial:
Last Name: Durand
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to urge you to take the "no action" alternative offered in the Draft Programmatic EIS for Oil Shale and Tar Sands. The proposal is far too costly in environmental and energy terms. The money that would be largely wasted in that development would be far better spent developing alternative energy sources that would have a lasting positive effect, as opposed to the lasting devastation that any kind of oil shale and tar sands development would cause to the states of Wyoming, Colorado and Utah. 50948-001

Thank you for your attention, Laurie Durand

Response for Document 50948

50948-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Jean Olmsted.

The comment tracking number that has been assigned to your comment is OSTSD50949.

Comment Date: February 12, 2008 00:38:16AM
Oil Shale and Tar Sands
Comment ID: OSTSD50949

First Name: Jean
Middle Initial:
Last Name: Olmsted
Organization:
Address: 240 W. Charleston Road
Address 2:
Address 3:
City: Palo Alto
State: CA
Zip: 94306
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We should not ruin our environment to obtain oil from oil shale and tar sand. The process of obtaining oil may use more energy than we gain. Jean Olmsted

50949-001

Response for Document 50949

50949-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mark Hayduke Grenard.

The comment tracking number that has been assigned to your comment is OSTSD50953.

Comment Date: February 12, 2008 00:40:28AM
Oil Shale and Tar Sands
Comment ID: OSTSD50953

First Name: Mark Hayduke
Middle Initial:
Last Name: Grenard
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands due to the devestation it causes to these lands. | 50953-001

Response for Document 50953

50953-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jack Fee.

The comment tracking number that has been assigned to your comment is OSTSD50954.

Comment Date: February 12, 2008 00:40:57AM
Oil Shale and Tar Sands
Comment ID: OSTSD50954

First Name: Jack
Middle Initial: W
Last Name: Fee
Organization:
Address: 26 Rocky Road
Address 2:
Address 3:
City: Trout Lake
State: WA
Zip: 98650
Country: USA
Email: earthworm@gorge.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Absolutly NO! | 50954-001

Response for Document 50954

50954-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50955.

Comment Date: February 12, 2008 00:43:43AM
Oil Shale and Tar Sands
Comment ID: OSTSD50955

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. | 50955-001

Response for Document 50955

50955-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Ann McGill.

The comment tracking number that has been assigned to your comment is OSTSD50956.

Comment Date: February 12, 2008 00:44:54AM
Oil Shale and Tar Sands
Comment ID: OSTSD50956

First Name: Ann
Middle Initial: C
Last Name: McGill
Organization:
Address: 1947 Rocklyn Drive
Address 2:
Address 3:
City: Brunswick
State: OH
Zip: 44212
Country: USA
Email: annmcgill@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 50956-001 50956-002 50956-003

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 50956-004

Our children and grandchildren deserve a legacy we can be proud of.

Responses for Document 50956

50956-001: The BLM acknowledges the commentor's preference for Alternative A.

50956-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

50956-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50956-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Dennis Shields.

The comment tracking number that has been assigned to your comment is OSTSD50957.

Comment Date: February 12, 2008 00:45:16AM
Oil Shale and Tar Sands
Comment ID: OSTSD50957

First Name: Dennis
Middle Initial: E
Last Name: Shields
Organization:
Address: 6725 E. Oak St.
Address 2:
Address 3:
City: Scottsdale
State: AZ
Zip: 85257
Country: USA
Email: outdoorfx@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not allow public lands to be opened up for the removal of oil shale or tar sand materials. This is a time when our country should be going in a different direction and to make these lands available is a waste of public resources and will cause irreparable damage to wilderness areas. | 50957-001

Response for Document 50957

50957-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Doug Myerscough.

The comment tracking number that has been assigned to your comment is OSTSD50959.

Comment Date: February 12, 2008 00:50:50AM
Oil Shale and Tar Sands
Comment ID: OSTSD50959

First Name: Doug
Middle Initial:
Last Name: Myerscough
Organization:
Address: 473 Gun Club Rd
Address 2:
Address 3:
City: Denison
State: TX
Zip: 75021
Country: USA
Email: liquidwindows@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This administration will rape the planet for every scrap of oil. I realize this will do no good but I must speak my peace. Bush, his croneys and anyone associated with this abomination should be executed for crimes against humanity. A sentence that should have already been carried out for Bush and Cheney. If you have any power within your organization - do not let this happen or you will be guilty of the same crimes. Insanity is not an American policy. Don't ruin the few unspoiled places we have left.	50959-001

Response for Document 50959

50959-001: Thank you for your comment.

Thank you for your comment, whitney hines.

The comment tracking number that has been assigned to your comment is OSTSD50960.

Comment Date: February 12, 2008 00:50:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD50960

First Name: whitney
Middle Initial: a
Last Name: hines
Organization:
Address: 7715 Overlake Drive West
Address 2:
Address 3:
City: medina
State: WA
Zip: 98039
Country: USA
Email: whitneyhines@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

TEN NEW COAL FIRED POWER PLANTS IS A DISGRACE AFTER ALREADY DESTROYING THE ENVIRONMENT!!!!!!!! A THOUSAND TIMES NO TO DESTROYING THE PLANET.	50960-001

Response for Document 50960

50960-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Nina Royal.

The comment tracking number that has been assigned to your comment is OSTSD50961.

Comment Date: February 12, 2008 00:55:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD50961

First Name: Nina
Middle Initial:
Last Name: Royal
Organization:
Address: [Withheld by requestor]
Address 2: [Withheld by requestor]
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This distruction is outrageous. We owe it to future generations to stop this devastation and preserve our environment.

Instead of all the pork barrel spending, our government must put our tax dollars to work to discover better fuel resources. Putting funds into mas transit would be a hugh help.

50961-001

Response for Document 50961

50961-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Discussion of the use of tax dollars for finding alternative fuel sources or funding mass transit is not within the scope of this PEIS.

Thank you for your comment, Linda Tabor-Beck.

The comment tracking number that has been assigned to your comment is OSTSD50962.

Comment Date: February 12, 2008 00:56:01AM
Oil Shale and Tar Sands
Comment ID: OSTSD50962

First Name: Linda
Middle Initial: B
Last Name: Tabor-Beck
Organization:
Address: 2712 Harrison St.
Address 2:
Address 3:
City: San Francisco
State: CA
Zip: 94110
Country: USA
Email: cane_elder@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This type of mining is way too destructive for consideration. Please do not do it. | 50962-001

Response for Document 50962

50962-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Seline Fröling.

The comment tracking number that has been assigned to your comment is OSTSD50964.

Comment Date: February 12, 2008 00:59:16AM
Oil Shale and Tar Sands
Comment ID: OSTSD50964

First Name: Seline
Middle Initial:
Last Name: Fröling
Organization:
Address: Waterlelie 11
Address 2: 2804PS
Address 3:
City: Gouda
State:
Zip:
Country:
Email: supersienie@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Nature, love it while it lasts. make sure is lasts!

50964-001

Response for Document 50964

50964-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Heather Tobin.

The comment tracking number that has been assigned to your comment is OSTSD50966.

Comment Date: February 12, 2008 01:05:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD50966

First Name: Heather
Middle Initial:
Last Name: Tobin
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. We here in Colorado depend, and have depended on tourism and the Outdoor Sporting Industry (hunting, 4x drivers, mtn biking, skiing, etc) for decades. The extensive mining and drilling are harming these, and the long term effects of the resuling environmental damage will have a negative economic impact on our state as a whole. I understand that there is a lot of money to be made by development, but tourism and the sporting industry are steady and will be a much better long term investment for everyone. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation, efficiency, and long term economic feasability. Thanks

50966-001

50966-002

50966-003

Responses for Document 50966

50966-001: The BLM acknowledges the commentor's preference for Alternative A.

50966-002: The socioeconomic impacts of oil shale and tar sands development are assessed from a number of perspectives, including both the benefits and costs of these developments. In addition to an assessment of the economic impacts of oil shale and tar sands development on ROI direct and indirect employment and income, the PEIS also assesses the impacts of these developments on those sectors of the economy providing goods and services to recreational visitors, also in terms of direct and indirect employment and income. Based on a review of the academic literature, measuring the impacts of oil shale and tar sands development on recreation on public lands only in terms of visitation rates and expenditures, while excluding non-market valuation of recreational resources, could significantly underestimate the value of recreational resources. A qualitative assessment of the impacts on agriculture is also included, in the event that water restrictions to agriculture occur with the commercial development of oil shale and tar sands in the three state ROIs and tar sands in Utah. A qualitative assessment of the impacts on property values is also included, where it is accepted that values may decline in the vicinity of project locations, but increase where employment impacts of oil shale and tar sands development, and overall levels of economic development, contribute to higher values. The social impacts of oil shale and tar sands development on traditional uses of public lands for hunting and angling are also considered, together with the potential impacts of environmental degradation and access restrictions on public lands to low-income and minority populations.

50966-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this

information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Chantel Mitchell.

The comment tracking number that has been assigned to your comment is OSTSD50967.

Comment Date: February 12, 2008 01:05:58AM
Oil Shale and Tar Sands
Comment ID: OSTSD50967

First Name: Chantel
Middle Initial: C
Last Name: Mitchell
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the "No Action" alternative in the Draft Programmic Environmental IMpact Statement for Oil Shale and Tar Sands. I urge the Bureau of Land Management to abandon plans to develop oil shale and tar sands on public lands in the Rockies.	50967-001

Response for Document 50967

50967-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Elisabeth Rappe.

The comment tracking number that has been assigned to your comment is OSTSD50968.

Comment Date: February 12, 2008 01:07:50AM
Oil Shale and Tar Sands
Comment ID: OSTSD50968

First Name: Elisabeth
Middle Initial: R
Last Name: Rappe
Organization:
Address: 10782 Huntwick Street
Address 2:
Address 3:
City: Highlands Ranch
State: CO
Zip: 80130
Country: USA
Email: socruel@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.This proposal is ecologically and economically disastrous. We need to be finding alternative methods of fuel, NOT desperately scrounging around our nation for more oil. Our public lands are already suffering from such pollution and destruction. And our economy will collapse altogether if we do not start putting our money towards alternate fuel sources. Let's not waste more here. If you cannot make this plan economically and environmentally sound, scrap it altogether. 50968-001

Response for Document 50968

50968-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Barbara Warren.

The comment tracking number that has been assigned to your comment is OSTSD50974.

Comment Date: February 12, 2008 01:27:39AM
Oil Shale and Tar Sands
Comment ID: OSTSD50974

First Name: Barbara
Middle Initial: H
Last Name: Warren
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

It is time to radically change our ways of acquiring energy and to preserve what we have left of our beautiful land. The sunshine and wind are plentiful; let's use them for the good purposes of energy production.	50974-001

Response for Document 50974

50974-001: Thank you for your comment. The BLM acknowledges the commentor's preference for reducing the use of fossil fuels.

Thank you for your comment, Carol Taggart.

The comment tracking number that has been assigned to your comment is OSTSD50979.

Comment Date: February 12, 2008 01:43:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD50979

First Name: Carol
Middle Initial: J
Last Name: Taggart
Organization:
Address: 1705 Valparaiso Ave.
Address 2:
Address 3:
City: Menlo Park
State: CA
Zip: 940255560
Country: USA
Email: cbtaggart@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

My husband and I strongly oppose any and all development of oil shale and tar sands on American public lands! Hopefully, the Bush administration will stop their most recent concept of this disastrous development in Colorado, Utah, and Wyoming.	50979-001

Response for Document 50979

50979-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50980.

Comment Date: February 12, 2008 01:44:34AM
Oil Shale and Tar Sands
Comment ID: OSTSD50980

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

The Bureau of Land Management must consider the impacts of the proposed development to all of the plants and animals that will be affected.

I urge the Bureau of Land Management to choose the No Action alternative and to start endorsing alternative means of energy that are less envasive.

50980-001

Thank you.

Response for Document 50980

50980-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Jeremy Lamb.

The comment tracking number that has been assigned to your comment is OSTSD50981.

Comment Date: February 12, 2008 01:51:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD50981

First Name: Jeremy
Middle Initial: T
Last Name: Lamb
Organization:
Address: 4 S Pinehurst Ave
Address 2: Apt 1A
Address 3:
City: New York
State: NY
Zip: 10033
Country: USA
Email: lambjer@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Bureau of Land Management Programmatic EIS Scoping: I am writing to request that you consider all resources and values of our Western public lands when moving forward with oil shale development. In learning from past experience, we know that oil shale development can have devastating impacts to the surrounding land, air, water, wildlife and communities. Though oil shale activity is being considered in Utah, Colorado, and Wyoming, the impacts of this activity are bound to affect many communities across the West that depend on these lands and these natural resources. Many of the lands selected for development are lands that I strongly feel need protection, including the Red Desert in Wyoming, Utah's Book Cliffs, and the White River in Colorado. '- I urge the BLM to analyze carefully how much oil shale development would change the surrounding landscape, including impacts to air and water, the effects on neighboring communities, and the consequences for wildlife, before moving forward with this plan. Thank you for taking these comments into consideration.

50981-001

50981-002

50981-001 (cont.)

Responses for Document 50981

50981-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

50981-002: Thank you for your comment. The analysis in the PEIS takes into consideration the general geologic, wildlife, cultural, and scenic values of areas such as the Book Cliffs and White River areas. Depending on the commentor's definition of the Red Desert, most of the eastern portion of Rock Springs and the western portion of the Rawlins BLM Districts are outside of the area considered in the PEIS. Since the BLM is analyzing an allocation decision in the PEIS, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of the area prior to a decision being made.

Thank you for your comment, Carole Lutness.

The comment tracking number that has been assigned to your comment is OSTSD50982.

Comment Date: February 12, 2008 01:53:36AM
Oil Shale and Tar Sands
Comment ID: OSTSD50982

First Name: Carole
Middle Initial: L
Last Name: Lutness
Organization:
Address: 25439 Via Macarena
Address 2:
Address 3:
City: Valencia
State: CA
Zip: 91355
Country: USA
Email: carolelutness@ca.rr.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

All of our efforts should be going to educating the public about the emerging crisis when our oil supplies will be exhausted. We cannot continue to use oil/gas as if it was inexhaustible. We have 1/2 of the world's oil left. We need to develop a prudent, cooperative approach about how we will use it. I am opposed to any extraction of oil/gas that will further our dependence on oil and keep us in this la-la land of urban sprawl/conspicuous consumption and plunder of our "commons" for the profit of the few.	50982-001

Response for Document 50982

50982-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, L. D. Pratt.

The comment tracking number that has been assigned to your comment is OSTSD50983.

Comment Date: February 12, 2008 01:55:54AM
Oil Shale and Tar Sands
Comment ID: OSTSD50983

First Name: L. D.
Middle Initial:
Last Name: Pratt
Organization:
Address: 2211 Tenth
Address 2:
Address 3:
City: Berkeley
State: CA
Zip: 94710
Country: USA
Email: totemtree@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am strongly opposed to drilling in these wild places. These extraction processes are extremely detrimental to the ecosystem. I am not in favor of destroying the "Commons" for the benefit of corporate energy giants. It is past time that we put our money and ingenuity into alternative forms of energy. 50983-001

Response for Document 50983

50983-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50984.

Comment Date: February 12, 2008 01:57:40AM
Oil Shale and Tar Sands
Comment ID: OSTSD50984

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

IT NEVER CEASES TO AMAZE ME HOW CALLOUS AND GREEDY THIS BUSH ADMINISTRATION HAS BEEN CONCERNING SHOVING OIL AND GAS DEVELOPEMENT DOWN OUR COLLECTIVE THROATS AND TO THE SUPREME DETRIMENT TO THE ECO-SYSTEMS AND ENVIROMENT.OUR PLANET IS IN CRISIS WITH CLIMATE CHANGE ALREADY OCCURRING AND PICKING UP STEAM-AND ALL THESE UNIMAGINATIVE STUCK ON OIL MENTALITIES ARE TOO BUSY COUNTING THEIR OBSCENE PROFITS TO NOTICE SOMETHING IS WRONG WITH THE PLANET.MAY THEIR FILTHY WEALTHY GRANDCHILDREN CURSE THE SOURCE OF THEIR WEALTH FOR THE PRICE PAID IN A RUINED PLANET TO MAKE GRANDDADDIES' DOUGH.	50984-001

Response for Document 50984

50984-001: The BLM acknowledges the commentor's preference to reduce the use of oil and gas resources.

Thank you for your comment, Curtis Swain.

The comment tracking number that has been assigned to your comment is OSTSD50985.

Comment Date: February 12, 2008 01:59:54AM
Oil Shale and Tar Sands
Comment ID: OSTSD50985

First Name: Curtis
Middle Initial: E
Last Name: Swain
Organization:
Address: 215 Prospect Heights
Address 2:
Address 3:
City: Santa Cruz
State: CA
Zip: 95065
Country: USA
Email: ceswain@ucsc.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I urge you to take the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The development of these fuel sources require enormous amounts of water that the increasingly arid West cannot support. Additionaly, we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 50985-001 50985-002 50985-003 50985-004

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 50985-005

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 50985-001 (cont.)

Sincerely, Curtis Swain

Responses for Document 50985

50985-001: The BLM acknowledges the commentor's preference for Alternative A.

50985-002: The amount of water required would depend on many factors, including scale of development, technologies used in the development, national agricultural economy, and the locations and hydrologic conditions of project sites. Finally, whether enough water is available for development depends on the results of intensive negotiations between various parties, including water right owners, state and federal agencies, and municipal water providers as well as the developers.

50985-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2, describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result

from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

50985-004: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

50985-005: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed

operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Candy Bowman-LeBlanc.

The comment tracking number that has been assigned to your comment is OSTSD50992.

Comment Date: February 12, 2008 02:35:12AM
Oil Shale and Tar Sands
Comment ID: OSTSD50992

First Name: Candy
Middle Initial:
Last Name: Bowman-LeBlanc
Organization:
Address: 2674 Woodridge Court
Address 2: # 1
Address 3:
City: Placerville
State: CA
Zip: 956674036
Country: USA
Email: canbowring@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Stop Raping Mother Earth! | 50992-001

Response for Document 50992

50992-001: Thank you for your comment.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD50993.

Comment Date: February 12, 2008 02:36:18AM
Oil Shale and Tar Sands
Comment ID: OSTSD50993

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

No coal plants of any kind. 50993-001

Response for Document 50993

50993-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Yvonne Friedrich.

The comment tracking number that has been assigned to your comment is OSTSD50994.

Comment Date: February 12, 2008 02:36:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD50994

First Name: Yvonne
Middle Initial:
Last Name: Friedrich
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Save the land and the Earth for our children

50994-001

Response for Document 50994

50994-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Susan Goldin.

The comment tracking number that has been assigned to your comment is OSTSD50995.

Comment Date: February 12, 2008 02:43:52AM
Oil Shale and Tar Sands
Comment ID: OSTSD50995

First Name: Susan
Middle Initial:
Last Name: Goldin
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am opposed to opening up millions of acres of public land in Colorado, Utah, and Woming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the lanscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sourses.	50995-001

Response for Document 50995

50995-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Nicholas Rosenstock.

The comment tracking number that has been assigned to your comment is OSTSD50996.

Comment Date: February 12, 2008 02:46:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD50996

First Name: Nicholas
Middle Initial:
Last Name: Rosenstock
Organization:
Address:
Address 2:
Address 3:
City: Oakland
State: CA
Zip: 94602
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am submitting this comment to voice my opposition to using public lands for the the devolpment and extraction of oil shales and tar sands. Developing the technology to extract fossil fuels from oil shales and tar sands represents a step backwards in public policy. Even if we have reached peak oil we must use this, and the resulting increases in fossil fuel prices as an impetus to move away from fossil fuel use. If we do not, the savings we incur by the use of new fossil fuels will be overshadowed by many orders of magnitude by the costs we will incur as a result of increased global warming. This would be generational tyranny and morally reprehensible.

Moreover it is completely unthinkable to use public lands for such a short sided, greedy, selfish move. I am completely against the use of public lands for oil shales and tar sands development and extraction.

50996-001

Response for Document 50996

50996-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, William Schoene.

The comment tracking number that has been assigned to your comment is OSTSD50997.

Comment Date: February 12, 2008 02:48:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD50997

First Name: William
Middle Initial: J
Last Name: Schoene
Organization:
Address: 1519 Oak Street
Address 2:
Address 3:
City: Santa Monica
State: CA
Zip: 90405
Country: USA
Email: william.schoene@teradata.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

While extracting oil from oil shale and tar sands might have made sense as a price hedge against the OPEC cartel in the pre-global-warming era, it no longer makes sense. We need new energy sources that are NOT based on fossil fuels, since their combustion is the primary source of global warming emissions. It is particularly bad policy to despoil public lands to develop backward-looking energy sources, which greatly reduces their potential for recreation, watershed and wildlife habitat.

50997-001

Response for Document 50997

50997-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Barbara McClain.

The comment tracking number that has been assigned to your comment is OSTSD51000.

Comment Date: February 12, 2008 02:59:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD51000

First Name: Barbara
Middle Initial: A
Last Name: McClain
Organization:
Address: 12 Grump blvd
Address 2: PO Box 374
Address 3:
City: Idaho City
State: ID
Zip: 836310374
Country: USA
Email: bobwamcclain@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing regarding the extraction proposed for oil shales and sand. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 51000-001

Response for Document 51000

51000-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51002.

Comment Date: February 12, 2008 03:22:49AM
Oil Shale and Tar Sands
Comment ID: OSTSD51002

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

The Federal Protection Agency for the Environment is falling way short of their job to protect these vunerable places on this earth from Greedy Money Hungry Powers that Be. We have seen so much destruction since the Bush Administration has taken power. There is nothing that they will not do to sell off another portion of real estate that may have value in terms of natural resources. In just 7 years they have stripped the economy of its surplus and now they are stripping the earth of hers. It is time to pull the plug on this free for all and bring justice for our earth! 51002-001

Response for Document 51002

51002-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Marcia Denison.

The comment tracking number that has been assigned to your comment is OSTSD51003.

Comment Date: February 12, 2008 03:31:45AM
Oil Shale and Tar Sands
Comment ID: OSTSD51003

First Name: Marcia
Middle Initial: K
Last Name: Denison
Organization:
Address: PO BOx 1463
Address 2:
Address 3:
City: Longview
State: WA
Zip: 98632
Country: USA
Email: Forest@poetworld.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Do not destroy the landscape with shale and oil sand development. Please get a grip. Stay out of America's wildernesses. | 51003-001

Response for Document 51003

51003-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sherri Morris.

The comment tracking number that has been assigned to your comment is OSTSD51020.

Comment Date: February 12, 2008 05:24:07AM
Oil Shale and Tar Sands
Comment ID: OSTSD51020

First Name: Sherri
Middle Initial: L
Last Name: Morris
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I think we should be looking at alternative fuels. We should not be continuing to seek out and use fossil fuels. Don't you get it "Fossil Fuels" = Global Warming! Alternatives lets use some of that money that Nasa gets to go out into space and figure out how we can resolve our challenges here on Earth!

51020-001

Response for Document 51020

51020-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Johnnie Prosperie.

The comment tracking number that has been assigned to your comment is OSTSD51024.

Comment Date: February 12, 2008 05:31:39AM
Oil Shale and Tar Sands
Comment ID: OSTSD51024

First Name: Johnnie
Middle Initial:
Last Name: Prosperie
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please oppose opening public land to development. | 51024-001

Responses for Document 51024

51024-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Regina Hall.

The comment tracking number that has been assigned to your comment is OSTSD51027.

Comment Date: February 12, 2008 05:58:57AM
Oil Shale and Tar Sands
Comment ID: OSTSD51027

First Name: Regina
Middle Initial: L
Last Name: Hall
Organization:
Address: 3606 Lookout lane
Address 2:
Address 3:
City: Union
State: KY
Zip: 41091
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not open any new land in Colorado, Utah and Wyoming for the extraction and development of oil shale and tar sands, destroys the land and can create quantities of greenhouse gases, needless to say destroys the homes of many types of animals and creatures. 51027-001

Thanks, Regina Hall

Response for Document 51027

51027-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, donna hughes.

The comment tracking number that has been assigned to your comment is OSTSD51034.

Comment Date: February 12, 2008 06:12:12AM
Oil Shale and Tar Sands
Comment ID: OSTSD51034

First Name: donna
Middle Initial: d
Last Name: hughes
Organization:
Address: [Withheld by requestor]
Address 2: [Withheld by requestor]
Address 3: [Withheld by requestor]
City: [Withheld by requestor]
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

it would be wrong to allow the project to go ahead as it will destroy habitat, endenger yet more organisms already under threat, and release more pollution into our atmosphere with dyre consequences. Allowing the project to go ahead shows that certain countries are abandoning their responsibilities to the rest of the world and continuing to pollute regardless of those who/which will suffer. 51034-001

Response for Document 51034

51034-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, marian Sobel.

The comment tracking number that has been assigned to your comment is OSTSD51039.

Comment Date: February 12, 2008 06:21:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD51039

First Name: marian
Middle Initial:
Last Name: Sobel
Organization:
Address: 6201 No. Pomona Rd.
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 85704
Country: USA
Email: maynardsob@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As long as we can keep drilling and extracting usable fossil fuel from any source there will be no motivation to build cars which use less fuel or restrict our driving habits. And the world is fast running out of pristine habitats. | 51039-001

Response for Document 51039

51039-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Gloria Picchetti.

The comment tracking number that has been assigned to your comment is OSTSD51040.

Comment Date: February 12, 2008 06:21:31AM
Oil Shale and Tar Sands
Comment ID: OSTSD51040

First Name: Gloria
Middle Initial:
Last Name: Picchetti
Organization:
Address: 553 W Oakdale
Address 2:
Address 3:
City: Chicago
State: IL
Zip: 60657
Country: USA
Email: picchetti707@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

You can't ruin the Earth this way | 51040-001

Response for Document 51040

51040-001: The BLM acknowledges the commentor's preference against possible future oil shale and tar sands leasing and development.

Thank you for your comment, maria Trampe.

The comment tracking number that has been assigned to your comment is OSTSD51042.

Comment Date: February 12, 2008 06:22:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD51042

First Name: maria
Middle Initial:
Last Name: Trampe
Organization:
Address: 139 robin drive
Address 2:
Address 3:
City: barto
State: PA
Zip: 19504
Country: USA
Email: cookingallday@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Stop taking our precious land away! We have done enough damage to this earth. | 51042-001

Response for Document 51042

51042-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Rosamund Downing.

The comment tracking number that has been assigned to your comment is OSTSD51043.

Comment Date: February 12, 2008 06:27:41AM
Oil Shale and Tar Sands
Comment ID: OSTSD51043

First Name: Rosamund
Middle Initial: E
Last Name: Downing
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 51043-001

The Bureau of Land Management should do away with the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51043-002

Thank you.

Responses for Document 51043

51043-001: The BLM acknowledges the commentor's preference for Alternative A.

51043-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Nina Mortellito.

The comment tracking number that has been assigned to your comment is OSTSD51045.

Comment Date: February 12, 2008 06:32:52AM
Oil Shale and Tar Sands
Comment ID: OSTSD51045

First Name: Nina
Middle Initial:
Last Name: Mortellito
Organization:
Address: 401 East 88th Street
Address 2: Apt 7E
Address 3:
City: New York
State: NY
Zip: 10128
Country: USA
Email: evista@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

For once, stop the greed and think of our environment. | 51045-001

Response for Document 51045

51045-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Linda Boden.

The comment tracking number that has been assigned to your comment is OSTSD51048.

Comment Date: February 12, 2008 06:35:43AM
Oil Shale and Tar Sands
Comment ID: OSTSD51048

First Name: Linda
Middle Initial:
Last Name: Boden
Organization:
Address: 4828 West 27th Avenue
Address 2:
Address 3:
City: Denver
State: CO
Zip: 802121317
Country: USA
Email: lindaboden@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Put a STOP to tar sands and oil shale in public lands at once. Thanks. | 51048-001

Response for Document 51048

51048-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Regina Marino.

The comment tracking number that has been assigned to your comment is OSTSD51049.

Comment Date: February 12, 2008 06:38:28AM
Oil Shale and Tar Sands
Comment ID: OSTSD51049

First Name: Regina
Middle Initial: R
Last Name: Marino
Organization:
Address: 20 Greenes Ridge Rd
Address 2:
Address 3:
City: Hamden
State: CT
Zip: 06514
Country: USA
Email: reggie39@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We have to protect our shore lines from oil and tar on the beaches. It is killing the wild life and making the beaches unsafe for humans toinjoy. | 51049-001

Response for Document 51049

51049-001: Thank you for your comment.

Thank you for your comment, mary calese.

The comment tracking number that has been assigned to your comment is OSTSD51050.

Comment Date: February 12, 2008 06:42:39AM
Oil Shale and Tar Sands
Comment ID: OSTSD51050

First Name: mary
Middle Initial: j
Last Name: calese
Organization:
Address: 497 blue lake drive
Address 2:
Address 3:
City: port st. lucie
State: FL
Zip: 34986
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We need to be putting our efforts into developing clean burning alternative fuels, not into polluting fossil fuels. | 51050-001

Response for Document 51050

51050-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Chris VITOLINS.

The comment tracking number that has been assigned to your comment is OSTSD51051.

Comment Date: February 12, 2008 06:52:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD51051

First Name: Chris
Middle Initial:
Last Name: VITOLINS
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

We must direct our attention for research and development on renewable energy NOW! Stop destroying our environment. Stop giving heed to these rich oil companies who don't care about you or our country. What companies such as Shell want you to think to be immediate solutions are not and only have long term devastating effects.	51051-001

Response for Document 51051

51051-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Susan Peters.

The comment tracking number that has been assigned to your comment is OSTSD51053.

Comment Date: February 12, 2008 06:52:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD51053

First Name: Susan
Middle Initial: M
Last Name: Peters
Organization:
Address: 240 West 98th Street (5C)
Address 2:
Address 3:
City: New York
State: NY
Zip: 10025
Country: USA
Email: peters.s@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The coming of peak oil in the economy will cause much disruption. The solution is not to put more fossil fuel energy into getting the last barrel of oil from tar sands and oil shale. This will only waste fossil fuels and cause more CO2 in the atmosphere for increasing global warming. Please do not go this route which is senseless. Common sense tells us to adjust our lifestyles and economy to less fossil fuels.

51053-001

Response for Document 51053

51053-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Genevieve Goodrich.

The comment tracking number that has been assigned to your comment is OSTSD51055.

Comment Date: February 12, 2008 06:55:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD51055

First Name: Genevieve
Middle Initial: R
Last Name: Goodrich
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: becomedizzy@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Eliminating natural landscapes leads to the extinction of plant and animal species. President Bush, do you really want that on your conscience? Again?

I am a 29 year old from outside of Cleveland, Ohio. I have never been to any of these proposed lands, actually I have never been close to any of these lands. The loss of these lands will in not affect my day to day life. However, it changes our natual system. It alters the state of our planet. For our children and our children's children we have a responsibility to give them the same planet that we have been able to enjoy. We enjoy the land and what it has to offer. Unfortunately, money and profit are not offerings. They are things that are taken, stolen, exploited from the land. Thank you for your time and consideration.

51055-001

Response for Document 51055

51055-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Robert Fowler.

The comment tracking number that has been assigned to your comment is OSTSD51056.

Comment Date: February 12, 2008 06:55:39AM
Oil Shale and Tar Sands
Comment ID: OSTSD51056

First Name: Robert
Middle Initial: M
Last Name: Fowler
Organization:
Address: 704 S. Georgia Avenue
Address 2:
Address 3:
City: Weslaco
State: TX
Zip: 78596
Country: USA
Email: rmfowler@southtexascollege.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please focus on renewable energy sources such as development of solar and wind power, and wave generation power. We MUST move away from fossil-fuels. | 51056-001

Response for Document 51056

51056-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Phyllis Staffel.

The comment tracking number that has been assigned to your comment is OSTSD51062.

Comment Date: February 12, 2008 07:03:58AM
Oil Shale and Tar Sands
Comment ID: OSTSD51062

First Name: Phyllis
Middle Initial:
Last Name: Staffel
Organization:
Address: 6088 N. Christmas Tree Lanw
Address 2:
Address 3:
City: Flagstaff
State: AZ
Zip: 86004
Country: USA
Email: phystaf@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

If we care about our children & the children they may have & the children they may have & so on, we must find a way to develop alternative energy. The earth is finite but no one has a right to decide when to terminate it. Our future generations will not be able to eat, drink or breath the "money" that is left them from your profits.

51062-001

Response for Document 51062

51062-001: Thank you for your comment.

Thank you for your comment, Spencer Selander.

The comment tracking number that has been assigned to your comment is OSTSD51064.

Comment Date: February 12, 2008 07:05:00AM
Oil Shale and Tar Sands
Comment ID: OSTSD51064

First Name: Spencer
Middle Initial:
Last Name: Selander
Organization:
Address: PO Box 363
Address 2: 341 Pioneer Av.
Address 3:
City: Castle Rock
State: WA
Zip: 986110363
Country: USA
Email: spencerselander@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Producing fuel from these sources is an environmental disaster wherever it's carried out, and it would exhaust the scarce water resources of the arid regions proposed for development. Don't subject the West's wild lands to this destruction, and don't pour this filth into our atmosphere - leave oil shale and tar sands in the ground. 51064-001

Response for Document 51064

51064-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Joseph Staples.

The comment tracking number that has been assigned to your comment is OSTSD51070.

Comment Date: February 12, 2008 07:10:03AM
Oil Shale and Tar Sands
Comment ID: OSTSD51070

First Name: Joseph
Middle Initial: M
Last Name: Staples
Organization:
Address: 361 Harvard Road
Address 2:
Address 3:
City: Stow
State: MA
Zip: 01775
Country: USA
Email: staplesj@nortel.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Drilling on these public lands subverts the public interest. Please prevent the drilling. | 51070-001

Response for Document 51070

51070-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Robert Maas.

The comment tracking number that has been assigned to your comment is OSTSD51071.

Comment Date: February 12, 2008 07:10:52AM
Oil Shale and Tar Sands
Comment ID: OSTSD51071

First Name: Robert
Middle Initial:
Last Name: Maas
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please invest in alternative fuels and not a destructive stop gap policy. | 51071-001

Response for Document 51071

51071-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51073.

Comment Date: February 12, 2008 07:12:20AM
Oil Shale and Tar Sands
Comment ID: OSTSD51073

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Public lands, as created by Pres. Theodore Roosevelt, are meant to be PUBLIC and not used for profits by corporations who wish to harvest oil & tar shale. NO use of public lands for oil & tar shale! | 51073-001

Response for Document 51073

51073-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Thomas Snearey.

The comment tracking number that has been assigned to your comment is OSTSD51074.

Comment Date: February 12, 2008 07:12:37AM
Oil Shale and Tar Sands
Comment ID: OSTSD51074

First Name: Thomas
Middle Initial:
Last Name: Snearey
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please, stop the destruction of our environment for unsustainable energy develop. Invest in alternative solutions. I'd even settle for higher taxes if the money were funneed directly to programs for developing alternative energy research and development.

51074-001

Response for Document 51074

51074-001: The BLM acknowledges the commentor's preference for alternative energy sources.

Thank you for your comment, Brian Sutton.

The comment tracking number that has been assigned to your comment is OSTSD51075.

Comment Date: February 12, 2008 07:14:26AM
Oil Shale and Tar Sands
Comment ID: OSTSD51075

First Name: Brian
Middle Initial: K
Last Name: Sutton
Organization:
Address: 34 Kennedy Avenue
Address 2:
Address 3:
City: Bardstown
State: KY
Zip: 400049123
Country: USA
Email: BrianKSutton@MSN.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

No more drilling or more polluting the environment!!! | 51075-001

Response for Document 51075

51075-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Candace Truitt.

The comment tracking number that has been assigned to your comment is OSTSD51076.

Comment Date: February 12, 2008 07:16:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD51076

First Name: Candace
Middle Initial:
Last Name: Truitt
Organization:
Address: 9658 Golden Rod Path
Address 2:
Address 3:
City: Columiba
State: MD
Zip: 21046
Country: USA
Email: candacetruitt2@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This proposal to develope and ruin public lands. Our wilderness is already dissapearing rapidly, and it is a known fact that these practices have effects on humans as well as the enviroment. It's time to stop putting profits in front of safty and health! 51076-001

Response for Document 51076

51076-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, CAROLYN HAWK.

The comment tracking number that has been assigned to your comment is OSTSD51081.

Comment Date: February 12, 2008 07:19:51AM
Oil Shale and Tar Sands
Comment ID: OSTSD51081

First Name: CAROLYN
Middle Initial:
Last Name: HAWK
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Stop tearing up our earth! | 51081-001

Response for Document 51081

51081-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Kari Lopez.

The comment tracking number that has been assigned to your comment is OSTSD51083.

Comment Date: February 12, 2008 07:22:51AM
Oil Shale and Tar Sands
Comment ID: OSTSD51083

First Name: Kari
Middle Initial:
Last Name: Lopez
Organization:
Address: 2122 Bernhurst Drive
Address 2:
Address 3:
City: Knoxville
State: TN
Zip: 37918
Country: USA
Email: karilopez74@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The future of this country and the world are alternative fuels not more fossil fuels. | 51083-001

Response for Document 51083

51083-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Ron Boddicker.

The comment tracking number that has been assigned to your comment is OSTSD51085.

Comment Date: February 12, 2008 07:24:12AM
Oil Shale and Tar Sands
Comment ID: OSTSD51085

First Name: Ron
Middle Initial: F
Last Name: Boddicker
Organization:
Address: 12944 Lake Dora Circle
Address 2:
Address 3:
City: Tavares
State: FL
Zip: 32778
Country: USA
Email: boddicker1@embarqmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please choose the "no action" alternative relative to the development of oil shale and tar sands extraction. This is a highly desttructive and polluting source of energy as clearly demonstrated by the disaster in the Canadian fields. Please show some respect for our Nation and its remaining wild lands. 51085-001

Response for Document 51085

51085-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Michael tackett.

The comment tracking number that has been assigned to your comment is OSTSD51086.

Comment Date: February 12, 2008 07:25:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD51086

First Name: Michael
Middle Initial:
Last Name: tackett
Organization:
Address:
Address 2:
Address 3:
City:
State: IN
Zip:
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I do not wish for my beautiful land to be despoiled to produce very little benefit with a great amount of polution. | 51086-001

Response for Document 51086

51086-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Ann Seip.

The comment tracking number that has been assigned to your comment is OSTSD51088.

Comment Date: February 12, 2008 07:27:20AM
Oil Shale and Tar Sands
Comment ID: OSTSD51088

First Name: Ann
Middle Initial:
Last Name: Seip
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please do all you can to help the environment and do not allow oil sands development in pristine areas of Colorado, Utah and Wyoming. This was done in Canada and it completely devastated the environment like strip mining does. 51088-001

Please don't let this happen!

Thank you.

Ann Seip

Response for Document 51088

51088-001: The BLM acknowledges the commentor's preference to not support oil shale and tar sands development.

Thank you for your comment, Judy Dolan.

The comment tracking number that has been assigned to your comment is OSTSD51090.

Comment Date: February 12, 2008 07:28:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD51090

First Name: Judy
Middle Initial:
Last Name: Dolan
Organization:
Address: 12639 Feldspar Rd.
Address 2:
Address 3:
City: Indianapolis
State: IN
Zip: 46236
Country: USA
Email: jdolan@sommerbarnard.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Perhaps it would be wiser to devise mass transportation and more eco-friendly cars, than to destroy the planet in our unending search for oil. | 51090-001

Response for Document 51090

51090-001: Thank you for your comment.

Thank you for your comment, jonathan strickland.

The comment tracking number that has been assigned to your comment is OSTSD51091.

Comment Date: February 12, 2008 07:29:19AM
Oil Shale and Tar Sands
Comment ID: OSTSD51091

First Name: jonathan
Middle Initial:
Last Name: strickland
Organization:
Address: 42 ivy lane
Address 2:
Address 3:
City: LANSDALE
State: PA
Zip: 19446
Country: USA
Email: jonathan_strickland@merck.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

waste waste waste. we couldn't be more short sited to even propose let alone actuallually do such a wasteful and long term damaging proposition. we have no need for this yet we are going to be left holding the bag when these companies walk away. or has this already been thought of and they have been given immunity from cleaning up their own mess. shame on you. I hope your kids know what you are doing and are as embarrassed as I am of you.

51091-001

Response for Document 51091

51091-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, William Herbert.

The comment tracking number that has been assigned to your comment is OSTSD51093.

Comment Date: February 12, 2008 07:31:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD51093

First Name: William
Middle Initial: G
Last Name: Herbert
Organization:
Address: PO BOX 504
Address 2:
Address 3:
City: REMINGTON
State: IN
Zip: 47977
Country: USA
Email: WGHERBERT@MSN.COM
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

DEVELOPING OIL HSALE AND TAR SAND RESOURES IS LIKE LITERALLY SCRAPING THE BOTTOM OF THE BARREL TO FIND SOME ADDITIONAL FOSSIL FUEL. WE NEED TO SPEND OUR TIME AND ENERGY DEVELOPING ALTERNATE SOURCES OF ENERGY. I LIVE IN A PART OF THE MIDWEST WHERE APPROXIMATELY 1,000,000 ACRES OF MARSH, LAKE AND WETLAND WAS DESTROYED FOR THE SAKE OF INCREASEING THE TAX BASE BY CONVERTING IT TO 'FARMLAND'. WILDLIFE, BOTH FLORA AND FAUNA, DESPERATLY NEED ENVIRONMENTS TO SURVIVE IN, NOT TOXIC, BARREN PITS.	51093-001

Response for Document 51093

51093-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Thomas Laussermair.

The comment tracking number that has been assigned to your comment is OSTSD51095.

Comment Date: February 12, 2008 07:32:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD51095

First Name: Thomas
Middle Initial:
Last Name: Laussermair
Organization:
Address: 2629 Ravella Lane
Address 2:
Address 3:
City: Palm Beach Gardens
State: FL
Zip: 33410
Country: USA
Email: tlausser@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Rather than ravage our own backyard landscapes to feed our fossil fuel addiction we need to aggressively pursue new technologies (such as plug-in hybrid cars) and set incentives to increase fuel efficiencies (such as increased taxes on gasoline). For a comprehensive approach see "PlanB 3.0" by Lester Brown from the Earth Policy Institute.

51095-001

Response for Document 51095

51095-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Keith Boast.

The comment tracking number that has been assigned to your comment is OSTSD51097.

Comment Date: February 12, 2008 07:32:51AM
Oil Shale and Tar Sands
Comment ID: OSTSD51097

First Name: Keith
Middle Initial:
Last Name: Boast
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

"My Mama always said 'stupid is as stupid does.'" ...Forrest Gump | 51097-001

Response for Document 51097

51097-001: Thank you for your comment.

Thank you for your comment, Robert Bisson.

The comment tracking number that has been assigned to your comment is OSTSD51098.

Comment Date: February 12, 2008 07:35:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD51098

First Name: Robert
Middle Initial: F
Last Name: Bisson
Organization:
Address: 735 County Route 25
Address 2:
Address 3:
City: Stuyvesant
State: NY
Zip: 12173
Country: USA
Email: robert.f@berk.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Obtaining fuel from tar oil sands is a waste of time and really impacts the global warming segment of our environment. We need to focus our efforts on non-polluting sources of energy such as solar, wind and hydro. | 51098-001

Response for Document 51098

51098-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, mark mogilner.

The comment tracking number that has been assigned to your comment is OSTSD51099.

Comment Date: February 12, 2008 07:35:28AM
Oil Shale and Tar Sands
Comment ID: OSTSD51099

First Name: mark
Middle Initial: g
Last Name: mogilner
Organization:
Address: 2520 International Circle #309
Address 2:
Address 3:
City: colorado springs
State: CO
Zip: 80910
Country: USA
Email: volcan337@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Given the information and knowledge that we possess about our environment, any further investment that results in destructive acts of degradation or contamination of our remaining protected areas should not be allowed. To permit that level of self interest would be an act of denial and ignorance. On the contrary, we have both positive and beneficial technology currently available to solve our energy needs. We need to move forward to a new and intelligent future by further investment, research and development of clean energy: wind, solar and hydrogen cell. Currently wind turbines and solar energy can provide a very good solution for these states, each of which has many viable areas for installation. The maintenance cost is low and there are no emissions. Please consider these intelligent alternatives which allow a positive end result for life on this planet.

51099-001

Response for Document 51099

51099-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

51099-002: Although renewable energy development is becoming an important part of national energy policy, the scope of the PEIS is to identify public lands that would be available or would not be available for application for the potential leasing of oil shale or tar sands in the future. This scope is consistent with the instruction of Congress in the Energy Policy Act of 2005 for the BLM to develop oil shale and tar sands resources in an environmentally sound manner.

The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An alternative of developing renewable energy was brought up during scoping and eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

Thank you for your comment, Sam Schwartz.

The comment tracking number that has been assigned to your comment is OSTSD51101.

Comment Date: February 12, 2008 07:36:04AM
Oil Shale and Tar Sands
Comment ID: OSTSD51101

First Name: Sam
Middle Initial:
Last Name: Schwartz
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I firmly believe there are better avenues to energy independace than to destroy our beautiful Western lanscape. Thank You | 51101-001

Response for Document 51101

51101-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gabriella Smith.

The comment tracking number that has been assigned to your comment is OSTSD51105.

Comment Date: February 12, 2008 07:41:12AM
Oil Shale and Tar Sands
Comment ID: OSTSD51105

First Name: Gabriella
Middle Initial:
Last Name: Smith
Organization:
Address:
Address 2:
Address 3:
City:
State: KS
Zip: 66044
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Ms. Thompson,

In this era when we are finally becoming aware of the great threat to our earth that fossil fuels of all kinds pose, I am appalled that oil shale and tar sands are being opened on PUBLIC lands. This is outrageous, back-ward thinking and dangerous. I oppose it in the strongest possible terms.	51105-001

Response for Document 51105

51105-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Beret Amundson.

The comment tracking number that has been assigned to your comment is OSTSD51107.

Comment Date: February 12, 2008 07:42:43AM
Oil Shale and Tar Sands
Comment ID: OSTSD51107

First Name: Beret
Middle Initial:
Last Name: Amundson
Organization:
Address: 3801 LISMORE RD
Address 2:
Address 3:
City: Duluth
State: MN
Zip: 55803
Country: USA
Email: bmamunds@d.umn.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Well all know the time for this type of action has passed. Please, do not approve this. This is not what the people of this country want to see happen. | 51107-001

Response for Document 51107

51107-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gray Smith.

The comment tracking number that has been assigned to your comment is OSTSD51108.

Comment Date: February 12, 2008 07:42:50AM
Oil Shale and Tar Sands
Comment ID: OSTSD51108

First Name: Gray
Middle Initial:
Last Name: Smith
Organization:
Address: 718 Pemberton St
Address 2:
Address 3:
City: Philadelphia
State: PA
Zip: 19147
Country: USA
Email: graysmith@gsoexpert.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Why does the Bush administration hate the earth so much? | 51108-001

Response for Document 51108

51108-001: This comment is not within the scope of this PEIS.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51113.

Comment Date: February 12, 2008 07:50:01AM
Oil Shale and Tar Sands
Comment ID: OSTSD51113

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Exactly what will it take before we start conserving, or developing wind, solar, geothermal etc? Think how much further ahead America would be if we invested the amount of the war-for-oil fiasco on solar energy. And, none of OUR KIDS would be killed installing solar collectors. There is a REASON oil is deep deep in the ground & the sun is directly over head. | 51113-001

Response for Document 51113

51113-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51114.

Comment Date: February 12, 2008 07:50:36AM
Oil Shale and Tar Sands
Comment ID: OSTSD51114

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Simply, it's appalling to even consider using any land public or private for such considerations... "renewable recsources" doesn't mean it runs out...	51114-001

Response for Document 51114

51114-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Joel Helfrich.

The comment tracking number that has been assigned to your comment is OSTSD51115.

Comment Date: February 12, 2008 07:53:57AM
Oil Shale and Tar Sands
Comment ID: OSTSD51115

First Name: Joel
Middle Initial: T
Last Name: Helfrich
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Stop what is quite literally the rape of the Earth. Let us put money and time into renewables rather than continue to support companies that only take. | 51115-001

Response for Document 51115

51115-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Virginia Haskell.

The comment tracking number that has been assigned to your comment is OSTSD51118.

Comment Date: February 12, 2008 07:56:37AM
Oil Shale and Tar Sands
Comment ID: OSTSD51118

First Name: Virginia
Middle Initial:
Last Name: Haskell
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please Stop destroying our planet. We should be in search of better fuels, not using the fuels that continue to pollute the air and damage Nature. If we continue these practices there will be nothing left. Trees will only be seen in books.As we destroy the planet we are destroying ourselves. It has to stop.

51118-001

Response for Document 51118

51118-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Stephan Donovan.

The comment tracking number that has been assigned to your comment is OSTSD51122.

Comment Date: February 12, 2008 08:04:24AM
Oil Shale and Tar Sands
Comment ID: OSTSD51122

First Name: Stephan
Middle Initial: M
Last Name: Donovan
Organization:
Address: 4851 North Bernard Street
Address 2:
Address 3:
City: Chicago
State: IL
Zip: 606255107
Country: USA
Email: StephanDonovan@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Protect the environment. No more development. | 51122-001

Response for Document 51122

51122-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Rhonda Reichel.

The comment tracking number that has been assigned to your comment is OSTSD51123.

Comment Date: February 12, 2008 08:07:09AM
Oil Shale and Tar Sands
Comment ID: OSTSD51123

First Name: Rhonda
Middle Initial:
Last Name: Reichel
Organization:
Address: P.O. Box 6109
Address 2: 106 Colton Dr
Address 3:
City: San Antonio
State: TX
Zip: 78209
Country: USA
Email: millenniumforms@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

What a jackass Bush is....plenty of oil sands in Canada...if we must we can buy oil from them rather than ravage our landscape. There's no excuse not to be using clean wind, solar, geothermal energy and be driving electric cars except his oil cronies may not like it.	51123-001

Response for Document 51123

51123-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, roberta sebastian.

The comment tracking number that has been assigned to your comment is OSTSD51124.

Comment Date: February 12, 2008 08:07:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD51124

First Name: roberta
Middle Initial: m
Last Name: sebastian
Organization: na
Address: 999 hamilton drive
Address 2: na
Address 3: na
City: homestead
State: FL
Zip: 33034
Country: USA
Email: rmsbsn@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. | 51124-001

Response for Document 51124

51124-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Nick Berezansky.

The comment tracking number that has been assigned to your comment is OSTSD51125.

Comment Date: February 12, 2008 08:08:55AM
Oil Shale and Tar Sands
Comment ID: OSTSD51125

First Name: Nick
Middle Initial:
Last Name: Berezansky
Organization:
Address: 123 Washington Pl.
Address 2:
Address 3:
City: Ridgewood
State: NJ
Zip: 07450
Country: USA
Email: nick@acereprographic.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am completely against development of oil shale and tar sands on public land. This is blatently an attempt to increase the profits of an oil industry that's already raking in historic profits. No and no. Thanks. | 51125-001

Response for Document 51125

51125-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Dan Mcgraw.

The comment tracking number that has been assigned to your comment is OSTSD51127.

Comment Date: February 12, 2008 08:09:36AM
Oil Shale and Tar Sands
Comment ID: OSTSD51127

First Name: Dan
Middle Initial: J
Last Name: Mcgraw
Organization:
Address: 26658 Dartmouth St
Address 2:
Address 3:
City: Hemet
State: CA
Zip: 92544
Country: USA
Email: dmcgraw48557@roadrunner.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

DRILl FOR OIL. We need oil. there is plenty underground. DRILL FOR OIL!!! | 51127-001

Response for Document 51127

51127-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Eleanor Fox.

The comment tracking number that has been assigned to your comment is OSTSD51134.

Comment Date: February 12, 2008 08:11:18AM
Oil Shale and Tar Sands
Comment ID: OSTSD51134

First Name: Eleanor
Middle Initial:
Last Name: Fox
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. At a time when when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions, amd when public lands and wildlife are suffering from prolonged short-sighted abuse, the BLM should not even consider the proposed debelopment, which would produce unacceptable amounts of greenhouse gases and other pollutants. I strongly urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

51134-001

51134-002

51134-001 (cont.)

Responses for Document 51134

51134-001: The BLM acknowledges the commentor's preference for Alternative A.

51134-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51140.

Comment Date: February 12, 2008 08:16:50AM
Oil Shale and Tar Sands
Comment ID: OSTSD51140

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please do not destroy our landscapes looking for oil. It would be best to find alternative fuel sources. It can be done other countries have done it. We do not need to be so dependant on foreign oil. We already have the technology for greener cars we just need to use it. Thanks, 51140-001

Response for Document 51140

51140-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Lourdes Sian.

The comment tracking number that has been assigned to your comment is OSTSD51143.

Comment Date: February 12, 2008 08:19:15AM
Oil Shale and Tar Sands
Comment ID: OSTSD51143

First Name: Lourdes
Middle Initial: S
Last Name: Sian
Organization: none
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. 51143-001

I am concerned about the continued abuse of public lands in the southwest. Although, I do not live there, I am afraid that this policy will produce greenhouse gases that are contributing to global climate change. 51143-002

This extraction process requires too much energy to produce. It is environmentally unsustainable, while it continues to side-step the issue of finding alternatives that to the nation's dependence on foreign oil. We must invest in solutions that are already known to reduce greenhouse gases such as improving our cities' infrastructure and mass transit, promoting fuel efficient cars, raising the price of gas, and promoting a more sustainable, Earth-friendly lifestyle. 51143-003

This proposal is a poor substitute for satiating our apetite for oil. Thank you. Sincerely,

Lou Sian

Responses for Document 51143

51143-001: The BLM acknowledges the commentor's preference for Alternative A.

51143-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

51143-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating

agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. Alternatives involving use of renewable energy and increased conservation were not analyzed (see Section 2.5.3 of the PEIS) because they would not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

This PEIS uses the available information to analyze impacts from types of projects that might be proposed later for commercial operations. Future leasing decisions will be accompanied by a NEPA document that will analyze impacts using information available at that time.

Thank you for your comment, Dennis German.

The comment tracking number that has been assigned to your comment is OSTSD51144.

Comment Date: February 12, 2008 08:19:24AM
Oil Shale and Tar Sands
Comment ID: OSTSD51144

First Name: Dennis
Middle Initial:
Last Name: German
Organization:
Address: 128 SHELBOURNE DRIVE
Address 2:
Address 3:
City: GOSHEN
State: CT
Zip: 06756
Country: USA
Email: arktoi@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when George Bush has already caused significant destruction of the enviornment and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is shortsighted and stupid and would result in unacceptable quantities of greenhouse gas and other pollutants. Don't do it. | 51144-001 | 51144-002

Responses for Document 51144

51144-001: The BLM acknowledges the commentor's preference for Alternative A.

51144-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51146.

Comment Date: February 12, 2008 08:22:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD51146

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please don't use lands for mining!

51146-001

Response for Document 51146

51146-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Julia Bashaw.

The comment tracking number that has been assigned to your comment is OSTSD51152.

Comment Date: February 12, 2008 08:25:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD51152

First Name: Julia
Middle Initial: E
Last Name: Bashaw
Organization:
Address: 9267Redbird rd
Address 2:
Address 3:
City: Safford
State: AZ
Zip:
Country: USA
Email: jbwecare@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I want to save the environment. Please do not rape the land for oil. 51152-001

Response for Document 51152

51152-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Mary Davis.

The comment tracking number that has been assigned to your comment is OSTSD51156.

Comment Date: February 12, 2008 08:29:20AM
Oil Shale and Tar Sands
Comment ID: OSTSD51156

First Name: Mary
Middle Initial:
Last Name: Davis
Organization:
Address: P.O. Box 1736
Address 2:
Address 3:
City: Tijeras
State: NM
Zip: 87059
Country: USA
Email: davisma@saic.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Please protect our public lands for future generations and stop the wholesale give-aways to corporate interests. Thank you. | 51156-001

Response for Document 51156

51156-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Timothy Weed.

The comment tracking number that has been assigned to your comment is OSTSD51157.

Comment Date: February 12, 2008 08:30:00AM
Oil Shale and Tar Sands
Comment ID: OSTSD51157

First Name: Timothy
Middle Initial: J
Last Name: Weed
Organization:
Address: 1225 Aspen Drive
Address 2:
Address 3:
City: Ridgway
State: CO
Zip: 80146
Country: USA
Email: tim@goputney.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be	51157-001
transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of	51157-002
greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative!!	51157-001 (cont.)

Sincerely, Tim Weed

Responses for Document 51157

51157-001: The BLM acknowledges the commentor's preference for Alternative A.

51157-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51158.

Comment Date: February 12, 2008 08:30:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD51158

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I strongly support making public land available for the exploration and extraction of oil shale and tar sand. | 51158-001

I know that proper reclamation will be practiced. | 51158-002

Sincerely,

Responses for Document 51158

51158-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

51158-002: Thank you for your comment.

Thank you for your comment, Wendy Morical.

The comment tracking number that has been assigned to your comment is OSTSD51159.

Comment Date: February 12, 2008 08:30:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD51159

First Name: Wendy
Middle Initial: N
Last Name: Morical
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Ms. Thompson, Please do not continue to destroy the environment for our children and theirs to come! I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. There are other ways to develop energy rather than destroy the world! Let's spend this money used to develop this on alternative programs such as solar and wind!	51159-001
The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.	51159-002
The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.	51159-003
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. Save the Environment!!!!! PLEASE Wendy Morical	51159-001 (cont.)

Responses for Document 51159

51159-001: The BLM acknowledges the commentor's preference for Alternative A.

51159-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

51159-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and

3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, E Smith.

The comment tracking number that has been assigned to your comment is OSTSD51160.

Comment Date: February 12, 2008 08:31:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD51160

First Name: E
Middle Initial:
Last Name: Smith
Organization:
Address: 61 Fayette
Address 2:
Address 3:
City: Oakdale
State: PA
Zip: 15071
Country: USA
Email: ivagator@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please oppose all development of oil shale and tar sands on public lands. 51160-001

Response for Document 51160

51160-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Tom Peltier.

The comment tracking number that has been assigned to your comment is OSTSD51162.

Comment Date: February 12, 2008 08:32:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD51162

First Name: Tom
Middle Initial: W
Last Name: Peltier
Organization:
Address: 3010 N Oriente Ave
Address 2:
Address 3:
City: Sarasota
State: FL
Zip: 34235
Country: USA
Email: safaritom@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

When is enough enough ? Stop destroying what little of nature that we have. Im am so fed up with the freaking govt destroying everything.	51162-001

Response for Document 51162

51162-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jacqueline Peipert.

The comment tracking number that has been assigned to your comment is OSTSD51168.

Comment Date: February 12, 2008 08:37:40AM
Oil Shale and Tar Sands
Comment ID: OSTSD51168

First Name: Jacqueline
Middle Initial: K
Last Name: Peipert
Organization:
Address: 33425 Irish Lane
Address 2:
Address 3:
City: Brighton
State: IL
Zip: 62012
Country: USA
Email: jacqueline.peipert@shell.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I adamantly oppose the opening up of millions of acres of public lands in CO, UT, and WY for extraction of oil shale and tar sands. The devastation to these lands would be disasterous. They would never be the same again. | 51168-001

Response for Document 51168

51168-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, DL Royer.

The comment tracking number that has been assigned to your comment is OSTSD51172.

Comment Date: February 12, 2008 08:39:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD51172

First Name: DL
Middle Initial:
Last Name: Royer
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I want you to reconsider opening up oil shale and tar sands in Colorado, Utah and Wyoming to dirty and damaging mining processes.

I feel very strongly that the time is overdue to find new, cleaner, fuels and/or extraction processes!!! 51172-001

I am older, but the earth will sustain the next generation only if we leave it alone and do not damage it further. We have no choice, according to the majority of scientific literature!

Response for Document 51172

51172-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Cynthia Ingebrigtson.

The comment tracking number that has been assigned to your comment is OSTSD51175.

Comment Date: February 12, 2008 08:41:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD51175

First Name: Cynthia
Middle Initial:
Last Name: Ingebrigtson
Organization:
Address: 6230 SW 8th ST
Address 2:
Address 3:
City: North Lauderdale
State: FL
Zip: 33068
Country: USA
Email: cindyingebri@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

save our land please | 51175-001

Response for Document 51175

51175-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Elizabeth Collins.

The comment tracking number that has been assigned to your comment is OSTSD51176.

Comment Date: February 12, 2008 08:42:15AM
Oil Shale and Tar Sands
Comment ID: OSTSD51176

First Name: Elizabeth
Middle Initial: M
Last Name: Collins
Organization:
Address: PO Box 303
Address 2:
Address 3:
City: Bonaire
State: GA
Zip: 31005
Country: USA
Email: Qmyrtle@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Don't sell our national heritage for short term gain. No shale oil extraction on public lands! | 51176-001

Response for Document 51176

51176-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Winston Goodrich Jr.

The comment tracking number that has been assigned to your comment is OSTSD51180.

Comment Date: February 12, 2008 08:45:14AM
Oil Shale and Tar Sands
Comment ID: OSTSD51180

First Name: Winston
Middle Initial:
Last Name: Goodrich Jr
Organization:
Address: 4010 Shoreview Ln
Address 2:
Address 3:
City: Missouri City
State: TX
Zip: 77459
Country: USA
Email: goodrichjr@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The benefits of these programs are minimal compared to the damage done to the environment, which is unacceptable. Until technology becomes available to minimize the impact to the environment, extraction of energy in this fashion should be avoided. 51180-001

Response for Document 51180

51180-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, David Burns.

The comment tracking number that has been assigned to your comment is OSTSD51181.

Comment Date: February 12, 2008 08:45:25AM
Oil Shale and Tar Sands
Comment ID: OSTSD51181

First Name: David
Middle Initial: E
Last Name: Burns
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This is a really bad idea from both a conservation view and an net energy gain view. This land can never be "recovered" and the production of this oil will not solve our energy deficit. Please, preserve the land and look for renewable energy alternatives.	51181-001

Response for Document 51181

51181-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, gary luhnow.

The comment tracking number that has been assigned to your comment is OSTSD51183.

Comment Date: February 12, 2008 08:46:24AM
Oil Shale and Tar Sands
Comment ID: OSTSD51183

First Name: gary
Middle Initial:
Last Name: luhnow
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

please see that described areas are not spoiled by oil shale exlploration or development. | 51183-001

Response for Document 51183

51183-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Shirley Stotko.

The comment tracking number that has been assigned to your comment is OSTSD51184.

Comment Date: February 12, 2008 08:48:31AM
Oil Shale and Tar Sands
Comment ID: OSTSD51184

First Name: Shirley
Middle Initial:
Last Name: Stotko
Organization:
Address: 90 Bluebird Lane
Address 2:
Address 3:
City: Port Deposit
State: MD
Zip: 21904
Country: USA
Email: sstotko@udel.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly oppose all development of oil shale and tar sands on public lands. It is bad for the environment and also creates an eyesore. | 51184-001

Response for Document 51184

51184-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Benzi Kluger.

The comment tracking number that has been assigned to your comment is OSTSD51186.

Comment Date: February 12, 2008 08:49:08AM
Oil Shale and Tar Sands
Comment ID: OSTSD51186

First Name: Benzi
Middle Initial: M
Last Name: Kluger
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.

51186-001

51186-002

51186-003

Responses for Document 51186

51186-001: The BLM acknowledges the commentor's preference for Alternative A.

51186-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51186-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Susan Seitz.

The comment tracking number that has been assigned to your comment is OSTSD51187.

Comment Date: February 12, 2008 08:49:14AM
Oil Shale and Tar Sands
Comment ID: OSTSD51187

First Name: Susan
Middle Initial:
Last Name: Seitz
Organization:
Address: 427 A South College Ave
Address 2:
Address 3:
City: Tyler
State: TX
Zip: 75702
Country: USA
Email: srsusancathedral@suddenlinkmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

ENVIRONMENT in all its dimensions is my primary concern and I believe its care is a God-given responsibilty of each person on this EARTH. | 51187-001

Response for Document 51187

51187-001: Thank you for your comment.

Thank you for your comment, Lisey Good.

The comment tracking number that has been assigned to your comment is OSTSD51188.

Comment Date: February 12, 2008 08:52:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD51188

First Name: Lisey
Middle Initial:
Last Name: Good
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Destroying land forever is not worth the gain. We need to protect our resources for future generations....not exploit them. | 51188-001

Response for Document 51188

51188-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Mitzie Weicks.

The comment tracking number that has been assigned to your comment is OSTSD51191.

Comment Date: February 12, 2008 08:54:55AM
Oil Shale and Tar Sands
Comment ID: OSTSD51191

First Name: Mitzie
Middle Initial: J
Last Name: Weicks
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please, lets focus on what can be done for alternative fuels and cleaner options. With it being common knowledge that CO2 producing fuels are the main cause of global warming our government should be putting more resources into finding a way to be a role modle for the world instead of being greedy and destroying the only place we (humans beings) have to live. 51191-001

Sincerely,

Mitzie Weicks

Response for Document 51191

51191-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Brad Walker.

The comment tracking number that has been assigned to your comment is OSTSD51192.

Comment Date: February 12, 2008 08:57:26AM
Oil Shale and Tar Sands
Comment ID: OSTSD51192

First Name: Brad
Middle Initial:
Last Name: Walker
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. Oil shale and tar sands result in net energy losses and can only be justified with huge taxpayer subsidies. Their development also uses vast volumes of valuable water and creates large amounts of pollution. The pursuit of these resources will only benefit a small number of large corporations, not the American people.	51192-001 51192-002 51192-003
The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.	51192-004
The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.	51192-005
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	51192-001 (cont.)

Sincerely,

Brad Walker

Responses for Document 51192

51192-001: The BLM acknowledges the commentor's preference for Alternative A.

51192-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51192-003: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

51192-004: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

51192-005: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed

in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51194.

Comment Date: February 12, 2008 08:58:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD51194

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. We need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically.

I ask you to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

51194-001

Sincerely,

Response for Document 51194

51194-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51196.

Comment Date: February 12, 2008 09:01:58AM
Oil Shale and Tar Sands
Comment ID: OSTSD51196

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

It has become the mission of this administration to confiscate public lands for the president's own greedy goals. These lands are "PUBLIC". This indicates that George Bush does not own these lands, they belong to the American people. We want our children, grandchildren, great-grandchildren and all future generations to have these lands to enjoy without the stamp of George Bush's destruction. | 51196-001

Response for Document 51196

51196-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, rob jereski.

The comment tracking number that has been assigned to your comment is OSTSD51199.

Comment Date: February 12, 2008 09:04:19AM
Oil Shale and Tar Sands
Comment ID: OSTSD51199

First Name: rob
Middle Initial:
Last Name: jereski
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I'm disgusted with the destruction which the tar sands excavation is unleashing not only on the local and regional environment but also on the future of our planet from the impacts of this high energy consuming and co2 releasing fuels.	51199-001

Response for Document 51199

51199-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, Vickie Wagner.

The comment tracking number that has been assigned to your comment is OSTSD51202.

Comment Date: February 12, 2008 09:05:15AM
Oil Shale and Tar Sands
Comment ID: OSTSD51202

First Name: Vickie
Middle Initial: M
Last Name: Wagner
Organization:
Address: 6707 West Martin Road
Address 2:
Address 3:
City: Three Oaks
State: MI
Zip: 49128
Country: USA
Email: o2travel2@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources.	51202-001
The Bureau of Land Management must adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.	51202-002
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	51202-001 (cont.)

Sincerely, Vickie Wagner

Responses for Document 51202

51202-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

51202-002: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, NM Chobin.

The comment tracking number that has been assigned to your comment is OSTSD51203.

Comment Date: February 12, 2008 09:05:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD51203

First Name: NM
Middle Initial:
Last Name: Chobin
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

When is enough, enough!? We have the ability and the know how to stop all this and be more environmentally friendly and ecologically sound. There is NO amount of money in the world that can replace "the world" or earth itself. Wake up people! | 51203-001

Response for Document 51203

51203-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Robert Wagner.

The comment tracking number that has been assigned to your comment is OSTSD51206.

Comment Date: February 12, 2008 09:06:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD51206

First Name: Robert
Middle Initial: B
Last Name: Wagner
Organization:
Address: 6707 West Martin Road
Address 2:
Address 3:
City: Three Oaks
State: MI
Zip: 49128
Country: USA
Email: vwagner@triton.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 51206-001

I ask the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

Sincerely, Robert B. Wagner

Response for Document 51206

51206-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, barbara englehart.

The comment tracking number that has been assigned to your comment is OSTSD51208.

Comment Date: February 12, 2008 09:08:48AM
Oil Shale and Tar Sands
Comment ID: OSTSD51208

First Name: barbara
Middle Initial: l
Last Name: englehart
Organization:
Address: 12513 granite ridge drive
Address 2:
Address 3:
City: north potomac
State: MD
Zip: 20878
Country: USA
Email: benglehart2@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

please stop destroying the earth. 51208-001

Response for Document 51208

51208-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Rebecca Floyd.

The comment tracking number that has been assigned to your comment is OSTSD51218.

Comment Date: February 12, 2008 09:14:08AM
Oil Shale and Tar Sands
Comment ID: OSTSD51218

First Name: Rebecca
Middle Initial: m
Last Name: Floyd
Organization:
Address: 209 S Nashville Ave
Address 2:
Address 3:
City: Sylacauga
State: AL
Zip: 35150
Country: USA
Email: rebeccamaurinefreeman@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I was appalled byt the state of affairs in various regoins of our country in regaurd to pollution affecting our wildlife habitats. This has to stop! Our children's future education on true nature in its purest form is at stake! Please act now! | 51218-001

Response for Document 51218

51218-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Laura Oesterhaus.

The comment tracking number that has been assigned to your comment is OSTSD51221.

Comment Date: February 12, 2008 09:17:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD51221

First Name: Laura
Middle Initial:
Last Name: Oesterhaus
Organization:
Address: 2128 Wandersee Rd
Address 2:
Address 3:
City: Dwight
State: KS
Zip: 66849
Country: USA
Email: llo@ksu.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Have you seen what damage Oil shale and Tar sands development have done to the land and environment in Canada?? Is that the type of damage you want done to our land? I sure don't want that type of damage here. Why not invest in renewable energy instead?	51221-001

Response for Document 51221

51221-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, chris vilandry.

The comment tracking number that has been assigned to your comment is OSTSD51222.

Comment Date: February 12, 2008 09:19:26AM
Oil Shale and Tar Sands
Comment ID: OSTSD51222

First Name: chris
Middle Initial:
Last Name: vilandry
Organization:
Address: sepasco center st
Address 2:
Address 3:
City: rhinebeck
State: NY
Zip: 12572
Country: USA
Email: tophers49@hvc.rr.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Seems to me that the time for an overall energy transition is now.In the field of energy if you are not going forward,you are going backwards. The world needs another answer to energy crunch and it is not more fossil fuel.	51222-001

Response for Document 51222

51222-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, TEDDY SEDLMAYR.

The comment tracking number that has been assigned to your comment is OSTSD51223.

Comment Date: February 12, 2008 09:19:43AM
Oil Shale and Tar Sands
Comment ID: OSTSD51223

First Name: TEDDY
Middle Initial:
Last Name: SEDLMAYR
Organization:
Address: 1607 REDBAY CIR
Address 2:
Address 3:
City: VERO
State: FL
Zip: 32963
Country: USA
Email: CRUZANAU@AOL.COM
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

ONLY ALLOW USE OF PUBLIC LAND FOR THE BENEFIT OF THE PUBLIC AND AND PROF OF THE USE OF PUBLIC LAND MUST BE SHARED EQUALLY WITH THE PUBLIC AND USE FOR THE PUBLIC GOOD THE LAND MUST BE RESTORED TO THE SAME OER BETTER CONDITION AT THE END OF THE PROJECT	51223-001

Response for Document 51223

51223-001: The BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use to preserve and protect the public lands and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified. Conflicts between potential commercial development of oil shale and grazing would be considered in future NEPA analysis associated with commercial leasing on public lands.

Thank you for your comment, Heike Hansen-Schiemann.

The comment tracking number that has been assigned to your comment is OSTSD51224.

Comment Date: February 12, 2008 09:21:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD51224

First Name: Heike
Middle Initial:
Last Name: Hansen-Schiemann
Organization:
Address: Merkurweg 12 b
Address 2:
Address 3:
City: Mülheim
State:
Zip:
Country:
Email: puenzelchen@web.de
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

stop it

51224-001

Response for Document 51224

51224-001: The BLM acknowledges the commentor's preference against the action proposed in the PEIS.

Thank you for your comment, Curtis Goss.

The comment tracking number that has been assigned to your comment is OSTSD51225.

Comment Date: February 12, 2008 09:22:55AM
Oil Shale and Tar Sands
Comment ID: OSTSD51225

First Name: Curtis
Middle Initial: D
Last Name: Goss
Organization:
Address: 816 E. Lindon
Address 2:
Address 3:
City: Bolivar
State: MO
Zip: 65613
Country: USA
Email: cgoss@sbuniv.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Working toward energy independence is an essential and worthwhile cause. This includes responsible development of our natural resources; however, criteria must be followed which minimizes ecological pollution and destruction. Consideration must be given to current populations of people, as well as to wildlife and plant life. It is very important to take into consideration other land uses of the areas being considered, especially in light of long-term impacts on fresh water supplies, air quality and land usage. All mining or extraction projects should only be viewed as providing us temporary sources of energy, with the development of renewable sources of energy (such as wind and solar) being made the top priority as our best long-term hope in the search for real energy independence. 51225-001

Thank you for considering my comments.

Response for Document 51225

51225-001: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing.

Subsequent NEPA analysis will be required prior to any leasing or plan of development decision and will analyze the direct, indirect, and cumulative effects of that action. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to avoid or mitigate short-term and long-term adverse impacts.

Thank you for your comment, Russell Yttri.

The comment tracking number that has been assigned to your comment is OSTSD51227.

Comment Date: February 12, 2008 09:25:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD51227

First Name: Russell
Middle Initial:
Last Name: Yttri
Organization:
Address:
Address 2:
Address 3:
City: Hudson
State: WI
Zip: 54016
Country: USA
Email: ybaynedog33@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is increasingly difficult finding a half day hike that has not had some sort of extractive activities on public lands. Please leave a little for future generations. | 51227-001

Response for Document 51227

51227-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Jane Bennett.

The comment tracking number that has been assigned to your comment is OSTSD51228.

Comment Date: February 12, 2008 09:27:29AM
Oil Shale and Tar Sands
Comment ID: OSTSD51228

First Name: Jane
Middle Initial: C
Last Name: Bennett
Organization:
Address: 4146 Pine Point Rd.
Address 2:
Address 3:
City: Sartell
State: MN
Zip: 563779751
Country: USA
Email: janecbennett@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am opposed to the extraction of oil shale and tar sands on public lands in these states. This is a time to invest in renewable, cleaner and less carbon emitting forms of energy, not the opposite. | 51228-001

Response for Document 51228

51228-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sabreena Barton.

The comment tracking number that has been assigned to your comment is OSTSD51235.

Comment Date: February 12, 2008 09:29:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD51235

First Name: Sabreena
Middle Initial:
Last Name: Barton
Organization:
Address: 2219 No. Edgemere Street
Address 2:
Address 3:
City: Phoenix
State: AZ
Zip: 850061707
Country: USA
Email: sbarton2@xmission.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I find it incredible that you are STILL trying to get fossil fuels out of the ground when you should be concentrating on alternatives. Join the 21st Century please.. | 51235-001

Response for Document 51235

51235-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, sarah atwood.

The comment tracking number that has been assigned to your comment is OSTSD51236.

Comment Date: February 12, 2008 09:30:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD51236

First Name: sarah
Middle Initial:
Last Name: atwood
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

please protect our earth!!!!! 51236-001

Response for Document 51236

51236-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Nina Cornett.

The comment tracking number that has been assigned to your comment is OSTSD51239.

Comment Date: February 12, 2008 09:31:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD51239

First Name: Nina
Middle Initial:
Last Name: Cornett
Organization:
Address: POB 685
Address 2:
Address 3:
City: Cooper Landing
State: AK
Zip: 99572
Country: USA
Email: ngcornett@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am always disappointed at how short-sighted our government is about how to handle our energy problems. The proposal for development of oil shale is just one more example. I spent a career working in the DOD, and our attitude toward our energy problems reminds me all too strongly of the accusation often aimed at DOD: that we prepare for the next war by refighting the last one.

That's exactly our problem here. We need to turn our attention to renewable energy, instead of determining to go down with oil, coal, and gas, our current energy 'ship'. I know I will hear a chorus of, "We will run out of energy before we can develop those sources, so we have to do this." We heard the same thing from the government 25 years ago when it became obvious that an energy crisis was looming. We are hearing it now, and we will be hearing it 25 years from now, and every day the crisis will get worse. If we'd started on renewable energy 25years ago, we wouldn't be in this mess now, but we fought it tooth and nail, just as this current plan does. Pogo was right when he said we have met the enemy and he is us. Except that I'd like to paraphrase it to say he is those who represent us in Washington. 51239-001

The bitterest thing about our blind pursuit of coal, gas, and oil is that we are letting the rest of the world get ahead of us in renewable energy, which not only will enable them to provide goods a lot more cheaply than we can, stealing our markets, but will also mean that they, not us, are the people holding the invaluable patents for renewable energy production. We used not to be this stupid. What has happened to us? 51239-002

As I understand it, it takes an enormous amount of energy to get oil out of shale because it has to be heated to 400 degrees to release the oil. That means a huge amount of power, and power in this country comes generally from coal plants. Coal plants are huge polluters and contributors to global warming. 51239-003

Furthermore, since I suspect the heating mechanism will be steam, that means a huge drawdown of water, which the west is already short of. If we go ahead with this proposal, we 51239-004

will be doing a lot more harm than the good we will get from it. 51239-004 (cont.)

What we need to do is to institute energy conservation on a huge scale until we can get renewable energy on-line. So either choose the "no action" alternative or add some additional alternatives that may work. 51239-001 (cont.)

Sincerely, Nina Cornett

Responses for Document 51239

51239-001: The BLM acknowledges the commentor's preference for energy conservation and renewable energy.

51239-002: Although renewable energy development is becoming an important part of national energy policy, the scope of the PEIS is to identify public lands that would be available or would not be available for application for the potential leasing of oil shale or tar sands in the future. This scope is consistent with the instruction of Congress in the Energy Policy Act of 2005 for the BLM to develop oil shale and tar sands resources in an environmentally sound manner.

The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An alternative of developing renewable energy was brought up during scoping and eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

This PEIS uses the available information to analyze impacts from types of projects that might be proposed later for commercial operations. Future leasing decisions will be accompanied by a NEPA document that will analyze impacts using information then available.

51239-003: Thank you for your comment.

51239-004: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Phillip Flusche.

The comment tracking number that has been assigned to your comment is OSTSD51241.

Comment Date: February 12, 2008 09:32:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD51241

First Name: Phillip
Middle Initial: A
Last Name: Flusche
Organization:
Address: 18673 SE Old Trail Dr West
Address 2:
Address 3:
City: Jupiter
State: FL
Zip: 334781800
Country: USA
Email: paaflyer@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am opposed to using tar sand areas of public laNDS. The minimal ammount of oil is not worth the destruction of the lands involved. Some places should be left alone for future generations. | 51241-001

Response for Document 51241

51241-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, Gary Barnett.

The comment tracking number that has been assigned to your comment is OSTSD51242.

Comment Date: February 12, 2008 09:33:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD51242

First Name: Gary
Middle Initial:
Last Name: Barnett
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands.

The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 51242-001

Response for Document 51242

51242-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Peter Curia.

The comment tracking number that has been assigned to your comment is OSTSD51249.

Comment Date: February 12, 2008 09:38:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD51249

First Name: Peter
Middle Initial:
Last Name: Curia
Organization:
Address: 2048 N. 68Th Place
Address 2:
Address 3:
City: Scottsdale
State: AZ
Zip: 852572637
Country: USA
Email: pgeometro@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. This controversial proposal would fuel an outdated, fossil-fuel-intensive energy infrastructure and comes at a time when we need to be rapidly transitioning away from fossil fuels-based energy production. The environmental catastrophe known as oil shale and tar sands development will never be viable. Thank you. 51249-001

Response for Document 51249

51249-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Kriste Duff.

The comment tracking number that has been assigned to your comment is OSTSD51251.

Comment Date: February 12, 2008 09:40:07AM
Oil Shale and Tar Sands
Comment ID: OSTSD51251

First Name: Kriste
Middle Initial: a
Last Name: Duff
Organization:
Address: 3532 Beau Chene Drive
Address 2:
Address 3:
City: Kissimmee
State: FL
Zip: 34746
Country: USA
Email: jkb092190@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

What are you doing to this planet ??? Can you not see you are destroying it ??? 51251-001

Response for Document 51251

51251-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Denise Gregory.

The comment tracking number that has been assigned to your comment is OSTSD51252.

Comment Date: February 12, 2008 09:40:47AM
Oil Shale and Tar Sands
Comment ID: OSTSD51252

First Name: Denise
Middle Initial: C
Last Name: Gregory
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear BLM,

Thank you very much for accepting and considering public comments!

Please note that I am in opposition of all development of oil shale and tar sands on public land. 51252-001

Thank you and best regards!

Response for Document 51252

51252-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51253.

Comment Date: February 12, 2008 09:40:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD51253

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

why are you continuing to rape the Earth of it's natural resources, that are non-renewable when other options are so obvious and not al all harmful?? Have you ever heard or SOLAR Energy. What about recycling and utilizing methane? This country is so far behind when the rest of the world is making so many advancements! Wake UP People, this is your planet too!! 51253-001

Response for Document 51253

51253-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Andy Tomsky.

The comment tracking number that has been assigned to your comment is OSTSD51254.

Comment Date: February 12, 2008 09:41:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD51254

First Name: Andy
Middle Initial:
Last Name: Tomsky
Organization:
Address: po box 82673
Address 2:
Address 3:
City: san diego
State: CA
Zip: 92138
Country: USA
Email: atomsky@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is totally unnecessary. This techonology has not even been proven to work. 51254-001

Response for Document 51254

51254-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51255.

Comment Date: February 12, 2008 09:41:54AM
Oil Shale and Tar Sands
Comment ID: OSTSD51255

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 51255-001

Response for Document 51255

51255-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Barbara Fleming.

The comment tracking number that has been assigned to your comment is OSTSD51258.

Comment Date: February 12, 2008 09:44:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD51258

First Name: Barbara
Middle Initial:
Last Name: Fleming
Organization:
Address: 726 Eastdale Drive
Address 2:
Address 3:
City: Fort Collins
State: CO
Zip: 80524
Country: USA
Email: bff@frii.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We need open, undisturbed public lands more than we need what can be extracted from them. The government should be working on renewable energy sources rather than relying on the established ones, which increase global warming. | 51258-001

Response for Document 51258

51258-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Steve Seuser.

The comment tracking number that has been assigned to your comment is OSTSD51269.

Comment Date: February 12, 2008 09:50:23AM
Oil Shale and Tar Sands
Comment ID: OSTSD51269

First Name: Steve
Middle Initial:
Last Name: Seuser
Organization:
Address: 1504 Monroe Street NW
Address 2:
Address 3:
City: Washington
State: DC
Zip: 20010
Country: USA
Email: steve.seuser@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands considers the option of opening up public lands and damaging public resources. Please support the "No Action" alternative to this proposal.

Our country needs to move forward with new technology that will reduce our reliance on fossil fuels. Please do not allow commercial leasing of oil shale and tar sands on public lands.

51269-001

Response for Document 51269

51269-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, mark dent.

The comment tracking number that has been assigned to your comment is OSTSD51272.

Comment Date: February 12, 2008 09:51:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD51272

First Name: mark
Middle Initial: h
Last Name: dent
Organization:
Address: po box 1714
Address 2:
Address 3:
City: kingsbeach
State: CA
Zip: 96143
Country: USA
Email: markimagines@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

come on people...this really is a backwards step. could you sleep soundly at night knowing this type of destruction was allowed when there is no real need. open your eyes to the sun and it's everlasting power. we must use our innovation to capture the renewable energy and leave these arcane methods in the past where they belong. don't our children desreve a cleaner future? | 51272-001

Response for Document 51272

51272-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Sr.Mary Fineran.

The comment tracking number that has been assigned to your comment is OSTSD51278.

Comment Date: February 12, 2008 09:59:04AM
Oil Shale and Tar Sands
Comment ID: OSTSD51278

First Name: Sr.Mary
Middle Initial:
Last Name: Fineran
Organization:
Address: 17 Franklin Pl.
Address 2:
Address 3:
City: North Arlington
State: NJ
Zip: 07031
Country: USA
Email: yarmaf@lycos.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Now is the time when we should be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This action would result in unacceptable quantities of greenhouse gas and other pollutants. Please choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

51278-001

51278-002

51278-001 (cont.)

Responses for Document 51278

51278-001: The BLM acknowledges the commentor's preference for Alternative A.

51278-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment, Kenneth Lauter.

The comment tracking number that has been assigned to your comment is OSTSD51282.

Comment Date: February 12, 2008 10:00:49AM
Oil Shale and Tar Sands
Comment ID: OSTSD51282

First Name: Kenneth
Middle Initial: A
Last Name: Lauter
Organization:
Address: 4310 Friar Tuck Dr
Address 2:
Address 3:
City: Nacogdoches
State: TX
Zip: 759652370
Country: USA
Email: KLauter43@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. | 51282-001

Response for Document 51282

51282-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Laura Ackerman.

The comment tracking number that has been assigned to your comment is OSTSD51284.

Comment Date: February 12, 2008 10:03:28AM
Oil Shale and Tar Sands
Comment ID: OSTSD51284

First Name: Laura
Middle Initial:
Last Name: Ackerman
Organization:
Address: 3118 S. Windsor Rd.
Address 2:
Address 3:
City: Spokane
State: WA
Zip: 992245043
Country: USA
Email: simahafarm@ieway.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Ms. Thompson,

I am writing to support the "No Action" alternative in the DPEIS for Oil Shale and Tar Sands. Not only have our public lands been ravaged enough, but we absolutely have to move away from fossil fuels.

As a citizen, I take very seriously that the public lands belong to me, and all Americans. They are for our benefit, not for the financial profit of a few in this country.

51284-001

Response for Document 51284

51284-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Wilbur Lindstrom.

The comment tracking number that has been assigned to your comment is OSTSD51286.

Comment Date: February 12, 2008 10:04:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD51286

First Name: Wilbur
Middle Initial:
Last Name: Lindstrom
Organization:
Address: 13270 Se 91 Circle
Address 2:
Address 3:
City: Summerfield
State: FL
Zip: 34491
Country: USA
Email: willo_boat@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Progress should proceed quickly to provide access to the shale oil areas. This valuable resource must be developed as quickly as possible. I am a Colorado native and support this development. | 51286-001

Response for Document 51286

51286-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Oakley Howell.

The comment tracking number that has been assigned to your comment is OSTSD51287.

Comment Date: February 12, 2008 10:05:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD51287

First Name: Oakley
Middle Initial:
Last Name: Howell
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Saint Paul says that we need to crucify our flesh with Christ. We need to stop this insane quest for ever increasing wealth. It shows no respect for future generations, in fact it is murdering them. Let us all stop being murderers, the only moral way to live is simply. No one can live large and still love God.	51287-001

Response for Document 51287

51287-001: Thank you for your comment.

Thank you for your comment, Maia Ingram.

The comment tracking number that has been assigned to your comment is OSTSD51290.

Comment Date: February 12, 2008 10:08:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD51290

First Name: Maia
Middle Initial:
Last Name: Ingram
Organization:
Address: 5232 E. 3rd
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 85711
Country: USA
Email: ingramagnew@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. As a lifetime resident of the Southwest United States I have both an emotional and practical response to this issue. We desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51290-001 51290-002 51290-003

Thank you.

Responses for Document 51290

51290-001: The BLM acknowledges the commentor's preference for Alternative A.

51290-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51290-003: The CEQ regulations (40 CFR 1502.1) require that BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. This alternative was brought up during scoping and was eliminated from detailed analysis (see Section 2.5.3 of the

PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available or would not be available for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation, or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not include a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When, applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and possible mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, craig hart.

The comment tracking number that has been assigned to your comment is OSTSD51299.

Comment Date: February 12, 2008 10:14:01AM
Oil Shale and Tar Sands
Comment ID: OSTSD51299

First Name: craig
Middle Initial: d
Last Name: hart
Organization:
Address: 9874 157th street
Address 2:
Address 3:
City: surrey
State:
Zip:
Country:
Email: craighartca@yahoo.ca
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Recently the tar sands have made themselves the darling of the fossil fuel industry, presenting as they do as large a pool of oil as Saudi Arabia. There are problems with them though. Firstly in order to extract oil from sand takes large amounts of water and steam. To get the steam the oil companies must divers water from the Athabasca River, which is in limited supply. To heat the water they must use existing natural gas or in the future the natural gas of any future gas pipeline that is built between the mouth of the Mckenzie river and the tar sands, which unfortunately is still in the planning stages, and is a very wastefull use of fossil fuel, making tar sand extraction one of the most expensive ways to get oil, and making the oil more expensive than Saudi oil. Not only that 51299-001

but vast areas of boreal forest under which the tar sands are located will have to be stripped away and the soil completely overturned in order to get the tar out, which will leave polluted lakes of oil residue, and spindly unhealthy forests in their wake. To make matters worse, oil as well as coal produce greenhouse gasses when burned, and the both the extraction of tar sand oil, and the subdsequent burning in automobiles, will mean buisiness as ussual, and the further promulgation and expansion of the fossil fuel nightmare of greenhouse gas increases. When the world is looking for greener forms of energy , this expensive and unsustainable form of energy extraction and utilization will be a white elephant. Even if tar sands production is ramped up to 4 million barrels a day as is predicte by 2030, it will not make oil cheaper, as the demand for oil will have gone up, and the discovery of any new large pools of fossil fues will not have followed suit. Ergo oil will be as or more expensive than it is now, probably 200 or 250 dollars a barrel. By that time other forms of cheaper energy ergo a nuclear ressurgance, cellulosic ethonol, wind, solar, and geo thermal, which are not all on the verge of competative economic equality with coal and oil, will look, and in fact be as competative, and more environmentally friendly that oil. In short, tar sands developement, is a 51299-002

dinosaur that should be left out of the energy picture as mush as possible, in favour of alternate energy! 51299-003

Responses for Document 51299

51299-001: Thank you for your comment.

51299-002: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

51299-003: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, Marilyn Pierson.

The comment tracking number that has been assigned to your comment is OSTSD51302.

Comment Date: February 12, 2008 10:15:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD51302

First Name: Marilyn
Middle Initial:
Last Name: Pierson
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am letting you know that I OPPOSE ALL development of oil shale and tar sands on public lands. These lands belong to the public and not to all the private interests. We do not want our landscapes spoiled by the greed of a few. Invest in clean and green technology and leave this polluting kind in the ground.

The Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 51302-001

Response for Document 51302

51302-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, jane hughes.

The comment tracking number that has been assigned to your comment is OSTSD51303.

Comment Date: February 12, 2008 10:15:26AM
Oil Shale and Tar Sands
Comment ID: OSTSD51303

First Name: jane
Middle Initial: l
Last Name: hughes
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to request that you consider all resources and values of our Western public lands when moving forward with oil shale development. In learning from past experience, we know that oil shale development can have devastating impacts to the surrounding land, air, water, wildlife and communities. Though oil shale activity is being considered in Utah, Colorado, and Wyoming, the impacts of this activity are bound to affect many communities across the West that depend on these lands and these natural resources. Many of the lands selected for development are lands that I strongly feel need protection, including the Red Desert in Wyoming, Utah's Book Cliffs, and the White River in Colorado. Although I am not currently living in Colorado, much of my life has been spent there, and I will be returning. I am deeply concerned that the fragility of the Rocky Mountains will be irrevocably affected by these actions. I urge the BLM to analyze carefully how much oil shale development would change the surrounding landscape, including impacts to air and water, the effects on neighboring communities, and the consequences for wildlife, before moving forward with this plan. Thank you for taking these comments into consideration.

51303-001

51303-002

51303-001 (cont.)

Responses for Document 51303

51303-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

51303-002: In consultation with our Cooperating Agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. The limited action of amending the RMPs will not cause risks to the environment or society. Futhermore, this PEIS uses the available information to analyze impacts from types of projects that might be proposed later for commercial operations. Future leasing decisions will be accompanied by a NEPA document that will analyze impacts using available information. No land disturbance in the places listed in the comment will occur as a result of this PEIS.

Thank you for your comment, Ruth Remple.

The comment tracking number that has been assigned to your comment is OSTSD51305.

Comment Date: February 12, 2008 10:16:40AM
Oil Shale and Tar Sands
Comment ID: OSTSD51305

First Name: Ruth
Middle Initial: A
Last Name: Remple
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to ask you to support the "no Action" alternative in the draft Programmatic Environmental Impact Statement for oil shale and Tar Sands. The 2 million acres of PUBLIC lands in Wyoming, Colorado and Utah belong to the public. Your proposal would cost taxpayers billions, consuming millions of tons of coal and water each year. Please do not fuel and outdated, fossil fuel intensive energy infrastructure. I urge the BLM to choose the No Action alternative. Please do not choose what is profitable for a few and consider the impacts this will have on our land and water quality for the public and all of the creatures who live there. 51305-001

Response for Document 51305

51305-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51307.

Comment Date: February 12, 2008 10:19:40AM
Oil Shale and Tar Sands
Comment ID: OSTSD51307

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Lets focus on reducing our use of resources, not finding more to use!!!!!! There are just too many people using too many resources. We are running out and will if the consumption keeps up. | 51307-001

Response for Document 51307

51307-001: The BLM acknowledges the commentor's preference for reducing the use of fossil fuels.

Thank you for your comment, shirley whalen.

The comment tracking number that has been assigned to your comment is OSTSD51310.

Comment Date: February 12, 2008 10:24:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD51310

First Name: shirley
Middle Initial: m
Last Name: whalen
Organization:
Address: pobox 536 mohawk vista rd. 4
Address 2:
Address 3:
City: blairsden
State: CA
Zip: 96103
Country: USA
Email: roshwha@psln.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We had a beautiful country given to us 400 years ago. It was pristine and contained everything we needed to live on. Now today, we have a country that is being carved up to serve the interests of the oil barons whose profits benefit foreign countries. Look at the offshore banks, China and the trade, the long, long trains carrying chinese cheap goods while they buy our bonds and financial instruments. Look at the other countries total holdings of American monies. We fight foreign wars giving our young people to fight their wars, meanwhile our country is being overrun by illegals who then take their wages and ship them back to the country they came from. Now this proposal to drill and deface our beautiful land for oil shale will render the landscape ugly and scarred forever. Think about what is proposed and put a stop toit now while there is time. 51310-001

Response for Document 51310

51310-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Melissa Epple.

The comment tracking number that has been assigned to your comment is OSTSD51312.

Comment Date: February 12, 2008 10:24:15AM
Oil Shale and Tar Sands
Comment ID: OSTSD51312

First Name: Melissa
Middle Initial:
Last Name: Epple
Organization:
Address: 20 Village Lane
Address 2:
Address 3:
City: Santa Fe
State: NM
Zip: 875059368
Country: USA
Email: santafemom@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is not the approach to address this country's energy needs! Wrecking the landscape, polluting ground water, creating erosion, greatly increasing the greenhouse gases, and contributing to the fall of human health, hmm, sounds like the work of the GREEDY CORPORATE DEVILS! Come on back to your heart and let's devote our actions toward truly conscious sustainable energy practices such as re-newables, NOT GEO-EXTRACTION! ENOUGH IS ENOUGH! LESS IS MORE IF THIS COUNTRY AND GLOBAL CIVILIZATION IS TO THRIVE!! 51312-001

Response for Document 51312

51312-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Ajax Eastman.

The comment tracking number that has been assigned to your comment is OSTSD51313.

Comment Date: February 12, 2008 10:25:05AM
Oil Shale and Tar Sands
Comment ID: OSTSD51313

First Name: Ajax
Middle Initial: w
Last Name: Eastman
Organization:
Address: 112 E.Lake Ave.
Address 2:
Address 3:
City: Baltimore
State: MD
Zip: 21212
Country: USA
Email: ajaxeast@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear sir; I am opposed to opening lands in Utah, Colorado, or Wyoming for the mining of oil shale or coal tar. The massive destruction of land would be terrible. | 51313-001

Sincerely, Ajax Eastman

Response for Document 51313

51313-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, April Boerstler.

The comment tracking number that has been assigned to your comment is OSTSD51315.

Comment Date: February 12, 2008 10:25:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD51315

First Name: April
Middle Initial: L
Last Name: Boerstler
Organization:
Address: 1531 N. Wheeling Ave
Address 2:
Address 3:
City: Tulsa
State: OK
Zip: 74110
Country: USA
Email: bovrstl@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please, Please, No More Drilling. We really need to re-think the stratagy of drilling, and just who will benefit from this. For the past two years, Mr. bush has wanted to allow trees to be cut down in a preserved forest, has wanted to be allowed to drill in natural forests & preserves. All Destruction, and who will benefit from this? Our air is so polluted, and the oil tycoons are able to get past the EPA, look at the polar bears, wolves, bears and wetlands. Enough, Please preserve whats left of our world, with no more drilling, it pollutes our water, air, & preservation. 51315-001

Response for Document 51315

51315-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mary Weathers.

The comment tracking number that has been assigned to your comment is OSTSD51317.

Comment Date: February 12, 2008 10:26:04AM
Oil Shale and Tar Sands
Comment ID: OSTSD51317

First Name: Mary
Middle Initial: B
Last Name: Weathers
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This proposal is an environmental disaster. It would despoil the land for existing plants and animals and produce greenhouse gases at a time we need to be looking at energy alternatives. Thank you. 51317-001

Response for Document 51317

51317-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Nancy Miller.

The comment tracking number that has been assigned to your comment is OSTSD51319.

Comment Date: February 12, 2008 10:27:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD51319

First Name: Nancy
Middle Initial:
Last Name: Miller
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Do the right thing. 51319-001

Response for Document 51319

51319-001: Thank you for your comment.

Thank you for your comment, Judith Rucker.

The comment tracking number that has been assigned to your comment is OSTSD51321.

Comment Date: February 12, 2008 10:27:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD51321

First Name: Judith
Middle Initial: A
Last Name: Rucker
Organization:
Address: 41 Mara Rd
Address 2:
Address 3:
City: Lake Hiawatha
State: NJ
Zip: 07034
Country: USA
Email: sadieruk@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Our public lands are already being stressed to accomodate our insatialbe need for fossil fuels. It's time to seriously enter into a new phase of energy development, one that doesn't violate the public lands. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. We need to think of future generations instead of squadering the treasure of our public lands for the greed of a few which will damage the environment and add to the pollution of our planet. It should not be the future. 51321-001 51321-002

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51321-001 (cont.)

Sincerely, Judith Rucker

Responses for Document 51321

51321-001: The BLM acknowledges the commentor's preference for Alternative A.

51321-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Fred Hall.

The comment tracking number that has been assigned to your comment is OSTSD51323.

Comment Date: February 12, 2008 10:29:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD51323

First Name: Fred
Middle Initial:
Last Name: Hall
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The BLM should be responsible for managing public lands in a way that protects the environment and the habitat of plants and animals that evolved there. I oppose the development of lands in the West for oil from shale and tar sands. We need to be developing alternative fuels, conserving energy and preserving the quality of our air, water and soils. I know that we are a nation addicted to oil, but we need to begin to address the addiction and not continue to fuel it. Please work to tip the balance in favor of the planet and not against it. \Thank you. 51323-001

Response for Document 51323

51323-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jesse Troxler.

The comment tracking number that has been assigned to your comment is OSTSD51324.

Comment Date: February 12, 2008 10:30:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD51324

First Name: Jesse
Middle Initial:
Last Name: Troxler
Organization:
Address: 5514 Sheldon Dr.
Address 2:
Address 3:
City: Alexandria
State: VA
Zip: 22312
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Having lived in Wyoming and worked in the conservation field, I have seen the effects both positive and negative of mining and drilling on the wild and human communities of that state. I believe that this development will negatively affect the wildlife, plants, water resources and landscape of the mountain west as well as produce atmospheric pollution with effects felt world wide. This proposal is a short-sighted solution to our energy needs. While it may temporarily stimulate the economy with jobs and cheaper oil, the long term effects are hardly worth the short term benefits. For too long, industrial and economic interests have taken precedence over the well being of ecosystems. This system is unsustainable. The west is currently in a serious cycle of drought that is predidcted to worsen in the coming years. This is not a wise use of millions of acre feet of water required by the increasing western population. I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51324-001 (cont.)

51324-001

51324-002

Sincerely, Jesse Troxler

Responses for Document 51324

51324-001: The BLM acknowledges the commentor's preference for Alternative A.

51324-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

Thank you for your comment, Gary Jeffers.

The comment tracking number that has been assigned to your comment is OSTSD51326.

Comment Date: February 12, 2008 10:31:40AM
Oil Shale and Tar Sands
Comment ID: OSTSD51326

First Name: Gary
Middle Initial: L
Last Name: Jeffers
Organization:
Address: 6134 Yankee Rd.
Address 2:
Address 3:
City: Middletown
State: OH
Zip: 450449125
Country: USA
Email: gryjffrs@fuse.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We as a nation, need to be looking for new sources of energy not new places to look for old sources. Stop business as usual and just say no to this proposed environmental disaster. | 51326-001

Response for Document 51326

51326-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Livia McRee.

The comment tracking number that has been assigned to your comment is OSTSD51331.

Comment Date: February 12, 2008 10:34:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD51331

First Name: Livia
Middle Initial:
Last Name: McRee
Organization:
Address: 1409 Greenwood Terrace
Address 2:
Address 3:
City: Berkeley
State: CA
Zip: 94708
Country: USA
Email: livia.mcree@mac.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I strongly support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. We should be focusing our efforts to transition away from fossil fuels and reduce our greenhouse gas emissions; public opinion is ever more in favor of this as the undeniable effects of global warming reach everyone. 51331-001

Please drop the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51331-002

No Action! Please do everything in your power to protect our last shreds of nature.

Regards,

Livia McRee

Responses for Document 51331

51331-001: The BLM acknowledges the commentor's preference for Alternative A.

51331-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Debra Callahan.

The comment tracking number that has been assigned to your comment is OSTSD51334.

Comment Date: February 12, 2008 10:36:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD51334

First Name: Debra
Middle Initial:
Last Name: Callahan
Organization:
Address: 33608 Valley View Dr.
Address 2:
Address 3:
City: Evergreen
State: CO
Zip: 80439
Country: USA
Email: upperbeardeb@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I want you to adopt the No Action Alternative for the Oil Shale and Tar Sands EIS. The oil produced from such a project is not worth the envinmental impact the operation would inflict on our landscape. We need to concentrate all of our efforts on developing alternative resources to meet our energy needs and to protect our environment. 51334-001

Response for Document 51334

51334-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Jack Strasburg.

The comment tracking number that has been assigned to your comment is OSTSD51336.

Comment Date: February 12, 2008 10:37:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD51336

First Name: Jack
Middle Initial: E
Last Name: Strasburg
Organization:
Address: 31 W Los Reales Rd # 221
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 85706
Country: USA
Email: greenjackd10@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Let's do something original like thinking this through thoroughly and transparently before doing something stupid. Destroying large tracts of our national environment is not an appropriate response to the fact that those making our major energy decisions for the past several decades have done such an outrageously incompetent job of it. There are many people available who could do a much, much better job and they need to be listened to and tapped. | 51336-001

Response for Document 51336

51336-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Lydia Breunig.

The comment tracking number that has been assigned to your comment is OSTSD51341.

Comment Date: February 12, 2008 10:41:37AM
Oil Shale and Tar Sands
Comment ID: OSTSD51341

First Name: Lydia
Middle Initial: A
Last Name: Breunig
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. 51341-001

Do not open our public lands to this devastating activity which would deface the landscape,create pollution, and destroy habitat for wildlife! We need our public lands as a safe haven for wildlife, particularly in the face of global warming, which is shifting habitats and ecosystems. 51341-002

Do not enable the development of this dirty fossil fuel that will pollute our air! We need better solutions to the energy crisis and we need to reduce our green house gas emissions. 51341-003

Do not contribute to our economic decline by propping up a decrepit energy system that is in need of desperate overhaul with innovative technological advances in renewable energy sources -- not more dirty fossil fuel sources!

You must include in your analysis of all the alternatives a look at the cumulative effects of this project to green house gas emissions and global warming. When you do, you will see there is no option besides "NO Action" because we must desperately reduce our fossil fuel consumption, not increase it. 51341-004

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51341-003 (cont.) 51341-005

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51341-001 (cont.)

Sincerely, Lydia Breunig

Responses for Document 51341

51341-001: The BLM acknowledges the commentor's preference for Alternative A.

51341-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

51341-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51341-004: The PEIS cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

This PEIS does include in the cumulative impacts analysis a discussion of the possibility of land disturbance and other impacts from planned power lines, both those required for oil shale/tar sands facilities and those planned for other purposes (e.g., the transmission and pipeline rights-of-way are included in the total acreage estimate of 14,000 acres for an oil shale facility [Table 6.1.5-9 of the PEIS], and the potential impacts from other energy corridors are also acknowledged in Section 6.1.5.3.1). The impacts of greenhouse gas emissions from oil shale, tar sands, and ancillary facilities are not assessed at this time, because the lack of scientific tools designed to predict climate change on regional or local scales limits the ability to quantify potential future impacts (see Sections 4.6.1 and 5.6.1).

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, it is justifiable that the evaluation of specific occurrences of resources and supporting facilities, analyses of the environmental consequences of oil shale or tar sands development, and the assessment of the cumulative effects of oil shale and tar sands development together with the other factors mentioned in the comment be included in subsequent project- or site-specific NEPA documents rather than in the PEIS.

The BLM acknowledges the commentor's preference for Alternative A.

51341-005: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional

information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Marilyn Wargo.

The comment tracking number that has been assigned to your comment is OSTSD51342.

Comment Date: February 12, 2008 10:42:24AM
Oil Shale and Tar Sands
Comment ID: OSTSD51342

First Name: Marilyn
Middle Initial: K
Last Name: Wargo
Organization:
Address: 213 West Gloria Drive
Address 2:
Address 3:
City: Eureka
State: IL
Zip: 615301519
Country: USA
Email: lightprint1949@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

My problem with the rush to take this action is that those who want to profit are attempting to by pass proper steps to get what they want. Greed does not meet need. The West has a great deal of activity right now and until there are appreciable results we need to slow down some of the wasteful proposals and maybe we need not do them at the costs and destruction they create. If our country begins to show changes in energy use and sources we will be better off not destroying and polluting our lands.MKW

51342-001

Response for Document 51342

51342-001: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures a commercial oil shale program that meets the intent of Congress while taking advantage of the best available information and practices to minimize impacts and offer opportunities for the states, local communities, and the public to participate in the process.

Thank you for your comment, Mark Ezzo.

The comment tracking number that has been assigned to your comment is OSTSD51343.

Comment Date: February 12, 2008 10:43:23AM
Oil Shale and Tar Sands
Comment ID: OSTSD51343

First Name: Mark
Middle Initial:
Last Name: Ezzo
Organization:
Address: 2904 Hill Road
Address 2:
Address 3:
City: Sellersville
State: PA
Zip: 18960
Country: USA
Email: markezzo@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly urge that we adopt the "No Action" solution. This is unquestionably a step backwards in regards to fuel and science. Let us put our money and efforts as a nation in more efficient sources and non-polluting energy. Any other action is replete with negative externalities that far outweigh the benefit of this antiquated procedure. 51343-001

Response for Document 51343

51343-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Karen Gray.

The comment tracking number that has been assigned to your comment is OSTSD51347.

Comment Date: February 12, 2008 10:46:54AM
Oil Shale and Tar Sands
Comment ID: OSTSD51347

First Name: Karen
Middle Initial:
Last Name: Gray
Organization:
Address: 5749 Arlington Drive
Address 2:
Address 3:
City: Plainfield
State: IN
Zip: 461689029
Country: USA
Email: kcgii2@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. | 51347-001

Response for Document 51347

51347-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Wanda Rurak.

The comment tracking number that has been assigned to your comment is OSTSD51350.

Comment Date: February 12, 2008 10:50:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD51350

First Name: Wanda
Middle Initial: F
Last Name: Rurak
Organization:
Address: 164 Hillview Street
Address 2:
Address 3:
City: Whitney
State: TX
Zip: 76692
Country: USA
Email: wandar@easygardener.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I have seen how it ravages the land in Canada. Why would we want to do that to our country. We need to be putting that money to work finding other alternatives. | 51350-001

Response for Document 51350

51350-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Shirley Wodtke.

The comment tracking number that has been assigned to your comment is OSTSD51351.

Comment Date: February 12, 2008 10:50:34AM
Oil Shale and Tar Sands
Comment ID: OSTSD51351

First Name: Shirley
Middle Initial: E
Last Name: Wodtke
Organization:
Address: 1051 Tuscany Place
Address 2:
Address 3:
City: Cupertino
State: CA
Zip: 95014
Country: USA
Email: shirley_wod@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.	51351-001 51351-002
The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.	51351-003
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	51351-001 (cont.)

Sincerely,

Responses for Document 51351

51351-001: The BLM acknowledges the commentor's preference for Alternative A.

51351-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

51351-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and

3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Gail Nash.

The comment tracking number that has been assigned to your comment is OSTSD51354.

Comment Date: February 12, 2008 10:52:59AM
Oil Shale and Tar Sands
Comment ID: OSTSD51354

First Name: Gail
Middle Initial:
Last Name: Nash
Organization:
Address: 9615 Reese Cove
Address 2:
Address 3:
City: Dripping Springs
State: TX
Zip: 78620
Country: USA
Email: gcnash@cruzinternet.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We need to perserve our land and stop destroying the environment for our future generations and our wildlife. You are destroying their natural habitats. | 51354-001

Response for Document 51354

51354-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Jamie Ross.

The comment tracking number that has been assigned to your comment is OSTSD51358.

Comment Date: February 12, 2008 10:55:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD51358

First Name: Jamie
Middle Initial: D
Last Name: Ross
Organization:
Address:
Address 2:
Address 3:
City: Johannesburg
State:
Zip:
Country:
Email: jamieross@iburst.co.za
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Tell me what I can do to stop this destruction and I will consider it. It is time for standing up and being counted. Talk will not work as is shown with the fiasco in Australian waters with those butchers killing Whales under teh pretext of science. | 51358-001

Response for Document 51358

51358-001: Thank you for your comment.

Thank you for your comment, Peggy B. La Point.

The comment tracking number that has been assigned to your comment is OSTSD51362.

Comment Date: February 12, 2008 11:03:40AM
Oil Shale and Tar Sands
Comment ID: OSTSD51362

First Name: Peggy B.
Middle Initial:
Last Name: La Point
Organization:
Address: 1900 Highland Park Circle
Address 2:
Address 3:
City: Denton
State: TX
Zip: 76205
Country: USA
Email: tnplapoint@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Ms Thompson:

As a native of Wyoming, I urge you to select the "No Action" alternative in the Draft Programmatic EIS for Oil Shale and Tar Sands. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 51362-001

BLM has failed to develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. Nor have you sufficiently considered the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 51362-002 51362-003

I urge BLM to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51362-001 (contl.)

Responses for Document 51362

51362-001: The BLM acknowledges the commentor's preference for Alternative A.

51362-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

51362-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and

3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Martha Hess.

The comment tracking number that has been assigned to your comment is OSTSD51364.

Comment Date: February 12, 2008 11:05:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD51364

First Name: Martha
Middle Initial:
Last Name: Hess
Organization:
Address: 72 Bower Tree
Address 2:
Address 3:
City: Irvine
State: CA
Zip: 92603
Country: USA
Email: hessmartha@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Eliminate this gross practice. 51364-001

Response for Document 51364

51364-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Susan Dzienius.

The comment tracking number that has been assigned to your comment is OSTSD51367.

Comment Date: February 12, 2008 11:10:14AM
Oil Shale and Tar Sands
Comment ID: OSTSD51367

First Name: Susan
Middle Initial:
Last Name: Dzienius
Organization:
Address: 10015 Paseo Montril
Address 2:
Address 3:
City: San Diego
State: CA
Zip: 92129
Country: USA
Email: sdzienius@ucsd.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. 51367-001

Response for Document 51367

51367-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, John Arendshorst.

The comment tracking number that has been assigned to your comment is OSTSD51371.

Comment Date: February 12, 2008 11:13:30AM
Oil Shale and Tar Sands
Comment ID: OSTSD51371

First Name: John
Middle Initial: D
Last Name: Arendshorst
Organization:
Address: 1262 W. Argyle St. #2
Address 2:
Address 3:
City: Chicago
State: IL
Zip: 60640
Country: USA
Email: russelldog1@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 51371-001

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 51371-002 In addition, the new in situ oil shale processing techniques would present an excessive risk of significant groundwater pollution. 51371-003

The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51371-004

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 51371-005

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51371-001 (cont.)

Sincerely, John Arendshorst

Responses for Document 51371

51371-001: The BLM acknowledges the commentor's preference for Alternative A.

51371-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51371-003: Groundwater contamination from in situ retorting is a key concern identified in the draft PEIS. Section 4.5.1.2 includes a discussion of changes in permeability and leaching potential, and Section 4.5.1.3 contains a discussion of the organic contaminants that are possible from in situ processes based on field and lab studies. It is expected that groundwater monitoring at the RD&D sites will provide information at a pilot scale.

51371-004: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and

facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

51371-005: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding

the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51373.

Comment Date: February 12, 2008 11:17:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD51373

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

PLEASE WITHHOLD MY NAME AND ADDRESS FROM THE PUBLIC RECORD.

TO Whom It Concerns:

As a physician with science and engineering training, while I acknowledge the useful role extracting oil shale and tar sands might play in linked energy policies that potentially lessen our dependence on foreign energy resources, the environmental downside and limitations require nonpartisan and systematic review, with an incremental "go-slow" approach.

I strongly recommend that the federal government, particularly the executive branch, restrain from "handing out" American taxpayers' lands until the new government is in place, and the Congress in partnership with the new President begins the patient progress of evaluating and recommending plans for a new energy policy. 51373-001

Furthermore, the quite profitable oil companies should be encouraged (mandated?)to invest a significant portion of their earnings into developing any oil-based alternatives without reliance upon federal tax breaks or monies (other than performance-based matching funds with liability for suboptimal work or avoidable environmental damage). After all, is it not their American patriotic duty to do so? 51373-002

Responses for Document 51373

51373-001: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures a commercial oil shale program that both meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offer opportunities for states, local communities, and the public to participate in the process.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. The BLM will involve the state, local communities, and the public throughout the subsequent NEPA processes.

51373-002: Thank you for your comment, but the issue is outside the scope of this PEIS.

Thank you for your comment, Sande Rego-Ross.

The comment tracking number that has been assigned to your comment is OSTSD51375.

Comment Date: February 12, 2008 11:17:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD51375

First Name: Sande
Middle Initial: R
Last Name: Rego-Ross
Organization:
Address: 9208 North Condor Place
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 85742
Country: USA
Email: saun41@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The public wants the public lands to stay public and usable. I have see what oil shale and tar sands stripping does to the land. We don't want that now or ever. Please stop this process. | 51375-001

Response for Document 51375

51375-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Karen Cappa.

The comment tracking number that has been assigned to your comment is OSTSD51377.

Comment Date: February 12, 2008 11:20:49AM
Oil Shale and Tar Sands
Comment ID: OSTSD51377

First Name: Karen
Middle Initial:
Last Name: Cappa
Organization:
Address: 581 Santa Alicia Dr.
Address 2:
Address 3:
City: Rohernt park
State: CA
Zip: 94928
Country: USA
Email: kjcappico@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please keep out private lands in tact . This oil shale and tar sands extraction process is detrimental to the Earth and will destroy our land forever.We do not believe this is good for anyone, especially the Planet and our health.	51377-001

Response for Document 51377

51377-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Timothy Wilson.

The comment tracking number that has been assigned to your comment is OSTSD51378.

Comment Date: February 12, 2008 11:20:54AM
Oil Shale and Tar Sands
Comment ID: OSTSD51378

First Name: Timothy
Middle Initial: F
Last Name: Wilson
Organization:
Address: 1260 Thornton Court
Address 2: Apt. D
Address 3:
City: Columbus
State: IN
Zip: 47201
Country: USA
Email: tfw1955@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale & Tar Sands. I strongly oppose this type of energy development, especially on public lands. These practices are highly destructive to the land, disruptive and endangering to wildlife, from migratory birds to various fish species, extremely energy intensive and as dirty and polluting an operation as can be imagined. When we MUST be reducing GHG emissions, these projects would greatly increase CO2 emissions. This would represent a major step backwards in every conceivable area of concern! 51378-001 51378-002 51378-003

Responses for Document 51378

51378-001: The BLM acknowledges the commentor's preference for Alternative A.

51378-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

51378-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment, Patricia Evans.

The comment tracking number that has been assigned to your comment is OSTSD51380.

Comment Date: February 12, 2008 11:24:01AM
Oil Shale and Tar Sands
Comment ID: OSTSD51380

First Name: Patricia
Middle Initial: L
Last Name: Evans
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Sooner or later we all must start thinking of the way to preserve our earth for the future generations. Gutting the land that has supplied ecosystems to preseve our water, habitat, and cover for the land to prevent errosian is not the way to do it. We must, in this country, start finding ways to cut back on our abuse of all the gifts we have shared in this country. It does not matter at this time what India and China are doing, we must lead the way to pro tecting this earth. We must show the way to protect this earth! We need to stop pointing fingers and start being responible. 51380-001

Sincerely, Patricia L. Evans

Response for Document 51380

51380-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Mandy Merritt.

The comment tracking number that has been assigned to your comment is OSTSD51382.

Comment Date: February 12, 2008 11:24:55AM
Oil Shale and Tar Sands
Comment ID: OSTSD51382

First Name: Mandy
Middle Initial: S
Last Name: Merritt
Organization:
Address: 805 First Street
Address 2:
Address 3:
City: Merritt Island
State: FL
Zip: 32953
Country: USA
Email: mandyfao@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not use public land for the extraction and development of oil shale and tar sands. This ravages our natural preserves and releases more greenhouse gases into the atmosphere. We should be developing renewable energy instead. | 51382-001

Response for Document 51382

51382-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51386.

Comment Date: February 12, 2008 11:30:52AM
Oil Shale and Tar Sands
Comment ID: OSTSD51386

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I strongly urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. | 51386-001

The proposed energy source is extremely inefficient (in terms of the amount of energy to create this energy) and devastating to not only the land, but the world climate (in the form of greenhouse gasses). There are already alternatives that could be used (notably solar or wind) in these areas that have very few of the short or long-term negative consequences of oil shale and tar sands. | 51386-002

Responses for Document 51386

51386-001: The BLM acknowledges the commentor's preference for Alternative A.

51386-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51388.

Comment Date: February 12, 2008 11:31:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD51388

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

NO MORE SCREWING UP OF OUR PLANET, LEAVE WELL ENOUGH ALONE. GREED TAKES OVER THE BRAIN OF HUMANS AND THE OUTCOME IS DESTRUCTION OF THIS WORLD/PLANET. NO NOW. | 51388-001

Response for Document 51388

51388-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Celena Chalkley.

The comment tracking number that has been assigned to your comment is OSTSD51392.

Comment Date: February 12, 2008 11:36:30AM
Oil Shale and Tar Sands
Comment ID: OSTSD51392

First Name: Celena
Middle Initial: N
Last Name: Chalkley
Organization:
Address: 2 Crompton Place
Address 2:
Address 3:
City: Palm Coast
State: FL
Zip: 32137
Country: USA
Email: chalkley@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.

51392-001

51392-002

51392-003

Responses for Document 51392

51392-001: The BLM acknowledges the commentor's preference for Alternative A.

51392-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51392-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Michael Haseltine.

The comment tracking number that has been assigned to your comment is OSTSD51396.

Comment Date: February 12, 2008 11:41:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD51396

First Name: Michael
Middle Initial:
Last Name: Haseltine
Organization:
Address: 1231 Four Mile Rd.
Address 2:
Address 3:
City: Viola
State: ID
Zip: 838729773
Country: USA
Email: haseltin@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. 51396-001

Our lands are being destroyed for the sake of development, which to me means big business profit at the expense of the environment.

A quick look at what has happened in Alberta, Canada, with their tar sands development shows the consequences of what you are proposing. It's more than severely destructive to the environment, not to mention creating a culture where recklessness with the lives of others and quality of life is endemic. We don't need this in the US! 51396-002

Another aspect is that it's so inefficient. Alternative energy is so much more economical if all production costs are included, as well as develops new technologies better suited to a modern world instead of renewing the ancient, destructive processes of times past.

BLM must choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51396-001 (cont.)

Respectfully,

Michael Haseline

Responses for Document 51396

51396-001: The BLM acknowledges the commentor's preference for Alternative A.

51396-002: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, Colin Griffin.

The comment tracking number that has been assigned to your comment is OSTSD51398.

Comment Date: February 12, 2008 11:44:30AM
Oil Shale and Tar Sands
Comment ID: OSTSD51398

First Name: Colin
Middle Initial: l
Last Name: Griffin
Organization:
Address: 23201 Rosewood
Address 2:
Address 3:
City: Oak Park
State: MI
Zip: 48237
Country: USA
Email: seaalgae13@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We must keep our public lands clean and healthy for all to enjoy not to be exploited by profiteers and the wealthy few. | 51398-001

Response for Document 51398

51398-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Phyllis Krystal.

The comment tracking number that has been assigned to your comment is OSTSD51401.

Comment Date: February 12, 2008 11:47:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD51401

First Name: Phyllis
Middle Initial: J
Last Name: Krystal
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

We have to stop this! | 51401-001

Response for Document 51401

51401-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Timothy Kelley.

The comment tracking number that has been assigned to your comment is OSTSD51404.

Comment Date: February 12, 2008 11:49:59AM
Oil Shale and Tar Sands
Comment ID: OSTSD51404

First Name: Timothy
Middle Initial: D
Last Name: Kelley
Organization:
Address: 1825 Riverside Drive
Address 2:
Address 3:
City: New York
State: NY
Zip: 10034
Country: USA
Email: kingofny@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is time to begin a discontinuation of the wreckless scarification of the earth, when so many alternative energy sources are right on the horizon (ie wind, solar, hydrogen, etc) This is a useless stuffing of pockets of the last greedy cretins. The day is coming when greed may very well be punishable by death. Look smart, do the right thing.

51404-001

Response for Document 51404

51404-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Robert MacAdam.

The comment tracking number that has been assigned to your comment is OSTSD51405.

Comment Date: February 12, 2008 11:50:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD51405

First Name: Robert
Middle Initial: B
Last Name: MacAdam
Organization:
Address: 1165 Podunk Road
Address 2:
Address 3:
City: White River Junction
State: VT
Zip: 050012224
Country: USA
Email: rbmaca@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The production of energy from oil shale and tar sands does not make sense, economically or environmentally. The thoughtless greed that it exemplifies is short-sighted and irresponsible. I urge that it not be allowed on public lands. | 51405-001

Response for Document 51405

51405-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, suzi hokonson.

The comment tracking number that has been assigned to your comment is OSTSD51409.

Comment Date: February 12, 2008 11:53:14AM
Oil Shale and Tar Sands
Comment ID: OSTSD51409

First Name: suzi
Middle Initial: w
Last Name: hokonson
Organization:
Address:
Address 2:
Address 3:
City: spokane
State: WA
Zip: 99208
Country: USA
Email: suzihokonson@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do all you can, suzi | 51409-001

Response for Document 51409

51409-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Carolyn Straub.

The comment tracking number that has been assigned to your comment is OSTSD51410.

Comment Date: February 12, 2008 11:53:24AM
Oil Shale and Tar Sands
Comment ID: OSTSD51410

First Name: Carolyn
Middle Initial:
Last Name: Straub
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Sherry Thompson BLM Project Manager

Dear Project Manager:

What happens to the majestic National Parks in Utah - Moab, Arches, Brice Canyon - when these and others are flanked by wells and stripped industrial lands? There was a time when the country had a better soul. 51410-001

We are not supportive of the extensive proposed land takes for energy development - oil shale and tar sands development - in Utah, Montana, and Wyoming.

We understood that the previous land takes were enough; but more millions proposed now is wrong. A mild word. Instead of the American West we were and still are proud of, we will have fields and fields of industrial abuse for a public appetite that is inordainate at this point and wants material resources. They and we Americans have enough. 51410-002

Curb this development project now, thank you, and to be repetitive - smell the roses.

Regards,

Carolyn Straub Steve McHenry , CA

Responses for Document 51410

51410-001: Thank you for your comment.

51410-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51415.

Comment Date: February 12, 2008 11:57:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD51415

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

There is no need for polluting our air any further. | 51415-001

Response for Document 51415

51415-001: Thank you for your comment.

Thank you for your comment, Thomas Knott Sr..

The comment tracking number that has been assigned to your comment is OSTSD51416.

Comment Date: February 12, 2008 11:57:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD51416

First Name: Thomas
Middle Initial:
Last Name: Knott Sr.
Organization:
Address: 1009 State Route 307
Address 2:
Address 3:
City: Spring Brook twp
State: PA
Zip: 184446457
Country: USA
Email: tmksr@att.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is time to STOP the continually destructive actions of this administration! We must change the way we are conducting ourselves towards the enviroment. If we continue upon this path the planet will become extinct as well as all lifeforms!! 51416-001

Response for Document 51416

51416-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51418.

Comment Date: February 12, 2008 11:58:51AM
Oil Shale and Tar Sands
Comment ID: OSTSD51418

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

Choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

The BLM must choose conservation for the public over profits for special interests.

51418-001

Response for Document 51418

51418-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Sue Crawford.

The comment tracking number that has been assigned to your comment is OSTSD51419.

Comment Date: February 12, 2008 11:59:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD51419

First Name: Sue
Middle Initial: M
Last Name: Crawford
Organization:
Address: 49 Divisadero Street
Address 2:
Address 3:
City: San Francisco
State: CA
Zip: 94117
Country: USA
Email: susancrawford@mac.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We must seek alternative fuels and break our dependence on fossil fuels which are degrading the environment in many ways (climate change being only one of them). Please do not excavate tar sands and oil shale but use the cost of this to develop wind, solar and water power and educate the public to use less fuel by offering serious incentives for reducing air and car travel and making public transport cleaner, more accessible and free. 51419-001

Response for Document 51419

51419-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, jez williams.

The comment tracking number that has been assigned to your comment is OSTSD51420.

Comment Date: February 12, 2008 11:59:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD51420

First Name: jez
Middle Initial:
Last Name: williams
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

please wake up and smell the sunshine - you don't need fossil fuels - take less profit and think about your children | 51420-001

Response for Document 51420

51420-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Sandra Clark.

The comment tracking number that has been assigned to your comment is OSTSD51423.

Comment Date: February 12, 2008 12:00:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD51423

First Name: Sandra
Middle Initial: L
Last Name: Clark
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I urge the Bureau of Land Management to scrap the proposed development of oil shale and tar sands in the Rocky Mountains completely, choose the "No Action" alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. | 51423-001

Response for Document 51423

51423-001: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Robert mERTZ.

The comment tracking number that has been assigned to your comment is OSTSD51424.

Comment Date: February 12, 2008 12:01:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD51424

First Name: Robert
Middle Initial: A
Last Name: mERTZ
Organization:
Address: 1205 Mulberry Ridge Road
Address 2:
Address 3:
City: Spencer
State: WV
Zip: 252768561
Country: USA
Email: ramertz@mountain.net
Privacy Preference: Don't withhold name or address from public record
Attachment: No action.doc

Comment Submitted:

See Attachment.

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 51424-001 51424-002

As a Biology, Wildlife Management and Environmental Earth Science teacher working in the public school systems of several states, for over thirty years, I have been teaching students as well as our two sons, the importance of a sustainable life style. I want them to learn to live within the ecological budget of Earth. The quality of life for the present and future generations depends on keeping the life sustaining diversity of our complex life systems healthy. Although there are some impressive self-maintaining dynamics at work to stabilize these systems, there are limits to their ability to correct for continued stress. The geological record is full of evidence showing sudden drastic upheavals and ecological disasters. We have no valid reason to believe that we humans with our huge powers to alter the climate and ecosystems will not trigger another watershed shift in the world's balance that will result in condition that renders the Earth unsuitable for human life, or that degrades the quality of our existence to a much lower level. It is our duty as the most powerful species to exist on this planet to use our might to protect the integrity of our life support systems for the benefit of all living things, to do anything is the extreme in narrow minded, short sighted self indulgent stupidity.

Some things should be protected from our destructive development schemes forever. The words "development" and balance" have to often come to be code words for continued disruption of our life support systems here on Earth. How can one "balance" the rape of the planet? Those in favor of every destructive development project talk about balancing the "needs" of humans with the needs of the environment. Their schemes are not unlike a starving man cutting off his leg to serve as a meal.

Our sons are the most important and joyful part of my life. Although both my wife and I have spent the greater part of our adult lives interacting with young people as teachers, nothing comes close to the emotional intensity of raising your own children. They are grown and mostly independent of us now, but our commitment to them continues. Today the growth of the human population and the selfish consumerism that is spreading over the Earth is endangering the future of all humans. Will we be able to both save ourselves from self-destruction and maintain our freedom and individuality? I have been teaching students the value of developing a sustainable culture and personal life style for 31 years as a Biology and Environmental Earth Science teacher. I hope that the knowledge I

have gained from my masters degree in Biology as well as my extensive reading have been delivered with the passion that I feel for the welfare of our planet. Teaching is a powerful way to have a positive influence on the future, but many issues are too important and too immediate to wait for the future. I am writing today about one of these issues.

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51424-003

Sincerely,

Robert A. Mertz
1205 Mulberry Ridge Road
Spencer WV 25276-8561
ramertz@mountain.net

Responses for Document 51424

51424-001: The BLM acknowledges the commentor's preference for Alternative A.

51424-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51424-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Nicole Hilkovitch.

The comment tracking number that has been assigned to your comment is OSTSD51426.

Comment Date: February 12, 2008 12:03:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD51426

First Name: Nicole
Middle Initial:
Last Name: Hilkovitch
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. The proposed development is not feasible environmentally or economically. So please choose the No Action alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands, or at least develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.

51426-001

51426-002

Responses for Document 51426

51426-001: The BLM acknowledges the commentor's preference for Alternative A.

51426-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Jolene Ford.

The comment tracking number that has been assigned to your comment is OSTSD51428.

Comment Date: February 12, 2008 12:04:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD51428

First Name: Jolene
Middle Initial:
Last Name: Ford
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Instead of tearing up the beautiful land that God gave us, it is now time to use the alternative fuels that man has worked on for a long time. We have the means and the technology for bio fuels, let's pioneer our efforts into that and make history!	51428-001

Response for Document 51428

51428-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Toni Siegrist.

The comment tracking number that has been assigned to your comment is OSTSD51429.

Comment Date: February 12, 2008 12:06:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD51429

First Name: Toni
Middle Initial: M
Last Name: Siegrist
Organization:
Address: 17 Quincy Street
Address 2:
Address 3:
City: Cambridge
State: MA
Zip: 02138
Country: USA
Email: antoinette_siegrist@harvard.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I understand that there is preparation to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 51429-001

I want you to know that I oppose all development of oil shale and tar sands on public lands. Please keep the lands in their natural state to make everything pure and safe for all wildlife, forests, trees, plants, and people. Thank you very much. 51429-002

Responses for Document 51429

51429-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51429-002: The BLM acknowledges the commentor’s preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Michelle Gerrie.

The comment tracking number that has been assigned to your comment is OSTSD51431.

Comment Date: February 12, 2008 12:07:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD51431

First Name: Michelle
Middle Initial:
Last Name: Gerrie
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This proposal is not feasible environmentally or economically, and would result in UNACCEPTABLE quantities of GREENHOUSE GASSES and other pollutants. The Bureau of Land Management should scrap the proposed development completely and choose the No Action alternative. 51431-001 51431-002

The Bureau of Land Management MUST also ACCURATELY PORTRAY the cumulative impacts of the proposed development to all of the PLANTS and ANIMALS (including mankind) that WILL be affected 51431-003

As shown in Alberta, Canada, this kind of processing is devastating. Oil shale rock must be heated up to about 900 degrees F to release the oil, and AT LEAST 40% OF THE ENERGY VALUE OF THE SHALE IS CONSUMED IN PRODUCTION! Producing 1 million barrels of shale oil a day, as some have proposed, would require 10 new (and likely coal-fired) power plants and five new coal mines just to serve them, costing taxpayers billions, consuming millions of tons of coal and acre-feet of water each year, and PRODUCING an astronomical amount of GREENHOUSE POLLUTION. Development of oil shale and tar sands in the Rocky Mountains would also hurt dozens of species that depend on our public lands and waters for survival including migratory birds, endangered plants, and federally protected fish species like the humpback chub, Colorado pikeminnow, razorback sucker, and others. If "business as usual" greenhouse gas emissions continue, over ONE THIRD of the world's plants and animals WILL be COMMITTED TO EXTINCTION by the middle of this century or before. 51431-004

Responses for Document 51431

51431-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51431-002: The BLM acknowledges the commentor's preference for Alternative A.

51431-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which

lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

51431-004: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

Thank you for your comment, phil hughes.

The comment tracking number that has been assigned to your comment is OSTSD51437.

Comment Date: February 12, 2008 12:17:59PM
Oil Shale and Tar Sands
Comment ID: OSTSD51437

First Name: phil
Middle Initial:
Last Name: hughes
Organization: none
Address: 152 cable ave
Address 2:
Address 3:
City: salisbury
State: MA
Zip: 01952
Country: USA
Email: phughes978@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

no drilling any where leave the land untouched | 51437-001

Response for Document 51437

51437-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Rita Guidi.

The comment tracking number that has been assigned to your comment is OSTSD51438.

Comment Date: February 12, 2008 12:18:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD51438

First Name: Rita
Middle Initial: L
Last Name: Guidi
Organization:
Address: P.O. Box 593
Address 2:
Address 3:
City: Ajo
State: AZ
Zip: 85321
Country: USA
Email: ritag505@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources.	51438-001
I would like to let the Bureau of Land Management know that I oppose all development of oil shale and tar sands on public lands.	51438-002

Responses for Document 51438

51438-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51438-002: The BLM acknowledges the commentor’s preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, bette grotegut.

The comment tracking number that has been assigned to your comment is OSTSD51441.

Comment Date: February 12, 2008 12:24:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD51441

First Name: bette
Middle Initial: c
Last Name: grotegut
Organization:
Address: 5824 sw arnold road
Address 2:
Address 3:
City: plattsburg
State: MO
Zip: 644779326
Country: USA
Email: gandggroup@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly oppose the exploration for oil on oil shale and tar sands on public lands. Please honor the government's commitment to preserve and protect public lands. | 51441-001

Thank you,

Bette Grotegut

Response for Document 51441

51441-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Elizabeth Bancroft.

The comment tracking number that has been assigned to your comment is OSTSD51446.

Comment Date: February 12, 2008 12:33:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD51446

First Name: Elizabeth
Middle Initial: D
Last Name: Bancroft
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

It is time to stop ravaging our few remaining wild areas to burn more oil and coal. Ruining the Earth to ruin the Earth more is not in anyone's best interest and must cease now. | 51446-001

Response for Document 51446

51446-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Penny Govedich.

The comment tracking number that has been assigned to your comment is OSTSD51450.

Comment Date: February 12, 2008 12:41:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD51450

First Name: Penny
Middle Initial: J
Last Name: Govedich
Organization:
Address: POB 903
Address 2: 1200 E Prescott Rnch Rd
Address 3:
City: Paulden
State: AZ
Zip: 86334
Country: USA
Email: penny.govedich@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I feel I am living in Alice's looking glass. We are suppose to be reducing greenhouse gasses, not looking for ways to increase them!

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and huge population growth across the West. The BLM should scap the proposed development completely before we loose all of our public lands to private business. 51450-001

Please choose the No Action alternative!

Sincerely, Penny Govedich

Response for Document 51450

51450-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Richard Greenwood.

The comment tracking number that has been assigned to your comment is OSTSD51452.

Comment Date: February 12, 2008 12:42:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD51452

First Name: Richard
Middle Initial: J
Last Name: Greenwood
Organization:
Address: P.O. Box 540
Address 2:
Address 3:
City: Idyllwild
State: CA
Zip: 925490540
Country: USA
Email: rg@greencafe.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am totally against opening up public lands to companies wishing to destroy the planet by mining and refining oil shale and tar sands. Fossil fuels in this form have a slim energy budget and profit factor, but when the devastation of global warming is considered, all the factors slide over into disaster. The companies will make a profit today, and we will pay many times over tomorrow. Please do not allow this folly... 51452-001

Sincerely, Richard J. Greenwood

Response for Document 51452

51452-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51453.

Comment Date: February 12, 2008 12:43:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD51453

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

We must STOP using OIL. We have alternatives. The OIL Kings must bite the bullet and invest in something else!! Disgusting! | 51453-001

Response for Document 51453

51453-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Ayman Fadel.

The comment tracking number that has been assigned to your comment is OSTSD51455.

Comment Date: February 12, 2008 12:46:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD51455

First Name: Ayman
Middle Initial: H
Last Name: Fadel
Organization:
Address: 3503 Lost Tree Ln
Address 2:
Address 3:
City: Augusta
State: GA
Zip: 30907
Country: USA
Email: aymanfadel@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Let us cease investment in environmentally destructive technologies. Let us move quickly to clean energy sources, and let us focus in the short term on conservation. | 51455-001

Response for Document 51455

51455-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51456.

Comment Date: February 12, 2008 12:47:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD51456

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Funds should now go into developing alternative energies and not into aggravating the situation that is critical already.Create jobs and protect the environment should be the ways to go!! | 51456-001

Response for Document 51456

51456-001: Thank you for your comment.

Thank you for your comment, Ben Finkelstein.

The comment tracking number that has been assigned to your comment is OSTSD51457.

Comment Date: February 12, 2008 12:48:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD51457

First Name: Ben
Middle Initial:
Last Name: Finkelstein
Organization:
Address: 27501 Albion Ridge Road
Address 2:
Address 3:
City: Albion
State: CA
Zip: 954100820
Country: USA
Email: bnflrw@mcn.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Protect our public land from profiteering oil development. Our Democracy holds this land in trust for the use of the public, that we and our posterity can know the beautiful bounty of the American Wilderness. Oil development of Public Land is unacceptable. The oil conglomerates have enough. Leave this land for the People.

51457-001

Response for Document 51457

51457-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Bethlyn MAYERS.

The comment tracking number that has been assigned to your comment is OSTSD51461.

Comment Date: February 12, 2008 12:54:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD51461

First Name: Bethlyn
Middle Initial: O
Last Name: MAYERS
Organization:
Address: 1001 ASTER
Address 2:
Address 3:
City: BATON ROUGE
State: LA
Zip: 70803
Country: USA
Email: bmayers77@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Would you people please STOP destroying the Planet already! The Bush Administration and everyone in it has done and continue to do more damage to our Planet than any administration or government in the history of humankind. How absolutely deplorable! High crimes and misdemeanors abound! STOP DESTROYING "OUR" AS IN "WE THE PEOPLE"S PLANET! IT DOES NOT BELONG TO THE UPPER 3% OF THE UNITED STATES TO DESTROY, RAPE AND PILLAGE! SHAME ON YOU FOR MANY ETERNITIES!

51461-001

Response for Document 51461

51461-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Melanie Baker McCain.

The comment tracking number that has been assigned to your comment is OSTSD51462.

Comment Date: February 12, 2008 12:54:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD51462

First Name: Melanie
Middle Initial: M
Last Name: Baker McCain
Organization:
Address: 9808 Q Street #24
Address 2:
Address 3:
City: Omaha
State: NE
Zip: 68127
Country: USA
Email: onelifefan@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Regarding the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands, I am hereby writing in support of the "No Action" alternative. 51462-001

We need to protect wildlife habitats and limit greenhouse emissions, and I do not believe that the proposed development will help either of those endeavors.

I implore the Bureau of Land Management to consider the aggregate effects of this proposed development on the environment, plants, animals, and the land itself. 51462-002

Responses for Document 51462

51462-001: The BLM acknowledges the commentor's preference for Alternative A.

51462-002: The cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS, (i.e., amending land use plans to allow certain lands to be considered for future leasing). A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

The impacts of greenhouse gas emissions from oil shale, tar sands, and ancillary facilities are not assessed at this time because of the lack of scientific tools, designed to predict climate change on regional or local scales, limits the ability to quantify potential future impacts (see Sections 4.6.1 and 5.6.1).

Any impacts on wildlife habitats and from greenhouse emissions would be considered as a part of future environmental analysis conducted for leasing or for project-specific plans.

Thank you for your comment, geraldine baron.

The comment tracking number that has been assigned to your comment is OSTSD51465.

Comment Date: February 12, 2008 13:00:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD51465

First Name: geraldine
Middle Initial:
Last Name: baron
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This plan is dangerous and not considerate of the immediate and near future effects on the enviroment. The IRREVERSABLE damage that would be done is obviously a bad idea and would result in investing in predictable failure and catastrophe. It's time to invest in other energies and to educate the public to consume less. | 51465-001

Response for Document 51465

51465-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, BARBARA FERGUSON.

The comment tracking number that has been assigned to your comment is OSTSD51466.

Comment Date: February 12, 2008 13:02:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD51466

First Name: BARBARA
Middle Initial:
Last Name: FERGUSON
Organization:
Address: 822 REYBOLD DRIVE
Address 2: MONTEREY FARMS
Address 3:
City: NEW CASTLE
State: DE
Zip: 19720
Country: USA
Email: barbfergie@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

WE ONLY HAVE ONE EARTH ..... LET'S LEAVE SOMETHING FOR FUTURE GENERATIONS | 51466-001

Response for Document 51466

51466-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Shawn Evans.

The comment tracking number that has been assigned to your comment is OSTSD51471.

Comment Date: February 12, 2008 13:08:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD51471

First Name: Shawn
Middle Initial: e
Last Name: Evans
Organization:
Address:
Address 2:
Address 3:
City:
State: TX
Zip: 78382
Country: USA
Email: madwolf802@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Enough is enough. It is time to stop using the energy "crisis" as an excuse to let the Bush administration to rape our planet and profit from it. | 51471-001

Response for Document 51471

51471-001: Thank you for your comment.

Thank you for your comment, James Celico.

The comment tracking number that has been assigned to your comment is OSTSD51474.

Comment Date: February 12, 2008 13:10:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD51474

First Name: James
Middle Initial: P
Last Name: Celico
Organization:
Address: 37 Butternut Drive
Address 2:
Address 3:
City: North Kingstown
State: RI
Zip: 02852
Country: USA
Email: jcelico@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

lets protect our environment, the air ,water, land upin which all life depends | 51474-001

Response for Document 51474

51474-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Lorraine Galbo.

The comment tracking number that has been assigned to your comment is OSTSD51479.

Comment Date: February 12, 2008 13:14:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD51479

First Name: Lorraine
Middle Initial:
Last Name: Galbo
Organization:
Address: 5900 Arlington Ave
Address 2:
Address 3:
City: Bronx
State: NY
Zip: 10471
Country: USA
Email: galbo55@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I urge that you do not open public land in Colorado, Utah and Wyoming for extraction and development of oil shale and tar sands.

We need to invest in renewable, nonpolluting energy sources.

This is a no-brainer.

51479-001

Response for Document 51479

51479-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, roberta claypool.

The comment tracking number that has been assigned to your comment is OSTSD51481.

Comment Date: February 12, 2008 13:17:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD51481

First Name: roberta
Middle Initial: a
Last Name: claypool
Organization:
Address: 2822 coconut ave
Address 2:
Address 3:
City: miami
State: FL
Zip: 33133
Country: USA
Email: raclaypool@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Think of the environment, the wildlife, of global warming. Think of others not just your greed | 51481-001

Response for Document 51481

51481-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Carroll Munz.

The comment tracking number that has been assigned to your comment is OSTSD51485.

Comment Date: February 12, 2008 13:20:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD51485

First Name: Carroll
Middle Initial:
Last Name: Munz
Organization:
Address: 4820 Caida del Sol Dr
Address 2:
Address 3:
City: Paradise Valley
State: AZ
Zip: 85253
Country: USA
Email: cmunz@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

My Dear Sirs: It appears your decisions would be a short term solution to some of our energy problem but with long term damage to our environment. You have the responsibility to consider the effects of your decisions on the entire nation and our environment and not just the demands of a few special intersts groups and politicians.

51485-001

Response for Document 51485

51485-001: Thank you for your comment.

Thank you for your comment, David Perlman.

The comment tracking number that has been assigned to your comment is OSTSD51486.

Comment Date: February 12, 2008 13:20:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD51486

First Name: David
Middle Initial:
Last Name: Perlman
Organization:
Address: 908 La Mirada St.
Address 2:
Address 3:
City: Laguna Beach
State: CA
Zip: 92651
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Committing this country to oil shale and tar sand petroleum production is a poor idea. Not only will it ravage natural areas particularly in the Green River formation but will add to green house gases. Producing petroleum in this manner is energy intensive, giving poor energy return for the energy invested and as a result also has a high associated production cost, estimated to be about $60 per barrel.

This practice will not be sustainable. Conservation and the development of renewable energy is far more favorable and is necessary for the sake of future generations.

51486-001

Response for Document 51486

51486-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Celeste Shitama.

The comment tracking number that has been assigned to your comment is OSTSD51487.

Comment Date: February 12, 2008 13:23:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD51487

First Name: Celeste
Middle Initial:
Last Name: Shitama
Organization:
Address: 425 NE 9th St
Address 2:
Address 3:
City: Gainesville
State: FL
Zip: 32601
Country: USA
Email: celesteas@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not allow the mining of oil shale and tar sands on public lands. The economic costs combined with the ecological damage no longer can support the extraction of a resource that has serious consequences for global warming. Now is the time to put our time and effort into the development and improvement of sustainable energy sources. NOW! 51487-001

Response for Document 51487

51487-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Patricia Casey.

The comment tracking number that has been assigned to your comment is OSTSD51489.

Comment Date: February 12, 2008 13:25:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD51489

First Name: Patricia
Middle Initial:
Last Name: Casey
Organization:
Address: 17816 NW 282nd Lane
Address 2:
Address 3:
City: Alachua
State: FL
Zip: 32615
Country: USA
Email: patcasey@ufl.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Continuing on the path of fossil fuel exploration is only delaying the inevitable. People need to accept the fact that the supply will run out. What is the point of destroying the environment any further? The money should be put towards developing renewable alternatives. | 51489-001

Response for Document 51489

51489-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51492.

Comment Date: February 12, 2008 13:26:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD51492

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

We strongly urge you to oppose all development of oil shale and tar sands on public lands. | 51492-001

The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, sustainable, renewable energy sources. | 51492-002

Responses for Document 51492

51492-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

51492-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment, chriset palenshus.

The comment tracking number that has been assigned to your comment is OSTSD51493.

Comment Date: February 12, 2008 13:28:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD51493

First Name: chriset
Middle Initial: a
Last Name: palenshus
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

we need to preserve the earth | 51493-001

Response for Document 51493

51493-001: Thank you for your comment. The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Johnnie White.

The comment tracking number that has been assigned to your comment is OSTSD51494.

Comment Date: February 12, 2008 13:30:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD51494

First Name: Johnnie
Middle Initial: V
Last Name: White
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please stop hurting our beautiful open lands do not destroy anything else. This is home to many animals and a thing of beauty to many, not everyone see dollar signs in this .....

51494-001

Response for Document 51494

51494-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Rhona Medina.

The comment tracking number that has been assigned to your comment is OSTSD51495.

Comment Date: February 12, 2008 13:31:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD51495

First Name: Rhona
Middle Initial: C
Last Name: Medina
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. We need to transition away from fossil fuels and reduce our greenhouse gas emissions, focusing our research and development on alternative fuel sources, not resorting to the pollutive, dwindling old sources. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.

51495-001

51495-002

51495-003

Responses for Document 51495

51495-001: The BLM acknowledges the commentor's preference for Alternative A.

51495-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

51495-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and

3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Alice Polesky.

The comment tracking number that has been assigned to your comment is OSTSD51500.

Comment Date: February 12, 2008 13:35:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD51500

First Name: Alice
Middle Initial:
Last Name: Polesky
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please support the "No Action" option for the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands -- don't devastate our beautiful wild lands in Wyoming, Utah, and Colorado and destroy flora and fauna there. If you love America the Beautiful, don't turn it into America the Eyesore.	51500-001

Response for Document 51500

51500-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Richard Wentzel.

The comment tracking number that has been assigned to your comment is OSTSD51501.

Comment Date: February 12, 2008 13:35:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD51501

First Name: Richard
Middle Initial:
Last Name: Wentzel
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Extracting oil from shale and tar sands if far, far more destructive then the public is aware of. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51501-001 51501-002 51501-003

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the vegetation and wildlife that will be affected. 51501-004

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51501-001 (cont.)

Sincerely,

Richard Wentzel

Responses for Document 51501

51501-001: The BLM acknowledges the commentor's preference for Alternative A.

51501-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51501-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

51501-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Jo Conaty.

The comment tracking number that has been assigned to your comment is OSTSD51502.

Comment Date: February 12, 2008 13:37:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD51502

First Name: Jo
Middle Initial: A
Last Name: Conaty
Organization:
Address: 22 Botsford Ave.
Address 2:
Address 3:
City: Milford
State: CT
Zip: 06460
Country: USA
Email: antiqshd@optonline.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Enough is enough of King Bush & his administration ravaging the lands of these great United States! | 51502-001

Response for Document 51502

51502-001: Thank you for your comment.

Thank you for your comment, james grizzell.

The comment tracking number that has been assigned to your comment is OSTSD51504.

Comment Date: February 12, 2008 13:38:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD51504

First Name: james
Middle Initial:
Last Name: grizzell
Organization:
Address: po box 2642
Address 2:
Address 3:
City: venice
State: CA
Zip: 90294
Country: USA
Email: jgrizzell@opcc.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

stop the oil shale and tar sands developement | 51504-001

Response for Document 51504

51504-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51506.

Comment Date: February 12, 2008 13:43:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD51506

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I oppose ALL development of oil shale and tar sands on public lands. New, non-polluting and renewable energy sources MUST be developed in order to save our already ravaged environment. | 51506-001

Response for Document 51506

51506-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51507.

Comment Date: February 12, 2008 13:45:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD51507

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please do not allow these pristine areas to be opened for destruction. The idea is for us to get away this use of fossil fuels, NOT to use more.

This is not necessary, will have a tremendous negative effect on the area and all its inhabitants. It cause only harm. 51507-001

Think of future generations of ALL species; that includes us!

Thank you!

Response for Document 51507

51507-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Holly Babutzke.

The comment tracking number that has been assigned to your comment is OSTSD51508.

Comment Date: February 12, 2008 13:46:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD51508

First Name: Holly
Middle Initial: J
Last Name: Babutzke
Organization:
Address: 13998 Woolworth Cir.
Address 2:
Address 3:
City: Omaha
State: NE
Zip: 68144
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil? Isn't that yesturdays form of fuel? I think it would be wise to develop new technology that is not harmful to the environment instead of destroying it by excavating oil. I think its sickening and wrong | 51508-001

Response for Document 51508

51508-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51510.

Comment Date: February 12, 2008 13:49:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD51510

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

During my 38-year teaching career at The College of Wooster, Wooster, OH, I taught a variety of courses about energy use and development. From those experiences, I cannot support the development of oil shale and tar sands resources. The energy cost to produce oil from oil shale and tar sands is just too high. Also, and very importantly, the cost to the environment is considerable. Conservation and moving to renewable energy sources is the much to be preferred route.

51510-001

Response for Document 51510

51510-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51513.

Comment Date: February 12, 2008 13:51:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD51513

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please support the No Action alternative in the Draft Programmatic Environmental Impact Satement for Oil Shale and Tar sands. The impact on beautiful land would be unacceptable. The BLM should not support this activity. Please consider alternatives which do not harm our environment. I urge the BLM to support the No Action alternative. 51513-001 51513-002

Responses for Document 51513

51513-001: The BLM acknowledges the commentor's preference for Alternative A.

51513-002: The BLM acknowledges the commentor's preference to not allow access to oil shale and tar sands resources on public lands. The BLM is committed to managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Lois Robin.

The comment tracking number that has been assigned to your comment is OSTSD51514.

Comment Date: February 12, 2008 13:51:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD51514

First Name: Lois
Middle Initial:
Last Name: Robin
Organization:
Address: 4701 Nova Dr.
Address 2:
Address 3:
City: Santa Cruz
State: CA
Zip: 95062
Country: USA
Email: lolotusi@cruzio.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

No oil shale and tar sands exploration or excavation on public lands. | 51514-001

Response for Document 51514

51514-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Kristine Richter.

The comment tracking number that has been assigned to your comment is OSTSD51516.

Comment Date: February 12, 2008 13:54:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD51516

First Name: Kristine
Middle Initial: A
Last Name: Richter
Organization:
Address: 5700 E 24th Street
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 85711
Country: USA
Email: hopefulnomad@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Our public lands were never intended for this. It is not in the public's best interests to basically destroy these open areas. We need to put money into alternative energy which is much less destructive and much more forward thinking. Fossil fuel use is one of the biggest problems we face. Why contribute to it in such an ineffective manner and in the process ruin lands that are set aside for the American public. Sincerely, Kristine Richter. 51516-001

Response for Document 51516

51516-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Bud McAllister.

The comment tracking number that has been assigned to your comment is OSTSD51517.

Comment Date: February 12, 2008 13:55:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD51517

First Name: Bud
Middle Initial:
Last Name: McAllister
Organization:
Address: 155 Blood St
Address 2:
Address 3:
City: Lyme
State: CT
Zip: 06371
Country: USA
Email: budmcallister@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Fossil Fuel is Dinosaur Technology! 51517-001

Response for Document 51517

51517-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Michael Bird.

The comment tracking number that has been assigned to your comment is OSTSD51527.

Comment Date: February 12, 2008 14:07:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD51527

First Name: Michael
Middle Initial: D
Last Name: Bird
Organization:
Address: 5446 Crowflock Ct.
Address 2:
Address 3:
City: Columbia
State: MD
Zip: 210452208
Country: USA
Email: Midbird@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am opposed to the development of oil shale and tar sands for oil. Such decvelopmenrt is an ecoligical disaster, excessivly poluting, and a very inefficient use of resources in the energy area. | 51527-001

Response for Document 51527

51527-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Randall Keith.

The comment tracking number that has been assigned to your comment is OSTSD51528.

Comment Date: February 12, 2008 14:09:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD51528

First Name: Randall
Middle Initial: J
Last Name: Keith
Organization:
Address: 422 Font Blvd.
Address 2:
Address 3:
City: San Francisco
State: CA
Zip: 94132
Country: USA
Email: ibass4u@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

There are certain moments when the universe calls oiut for change. To recognizing these moments is half the battle. Our world is at this junture now. Will our leaders recognize this moment or will they drop the ball?	51528-001

Response for Document 51528

51528-001: Thank you for your comment.

Thank you for your comment, Rebecca Lippa.

The comment tracking number that has been assigned to your comment is OSTSD51530.

Comment Date: February 12, 2008 14:11:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD51530

First Name: Rebecca
Middle Initial: E
Last Name: Lippa
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dir Sir/Madam,

I am writing to you to encourage you to select either the "No Action" or "Alternative Action" option to the request for Shale Oil and Tar Sand farming on public lands. Our country has the technology and capability to develop and use renewable energy sources, as well as more responsible energy resources that reduce the negative impact on the environment caused by the use and production of fossil fuels. We should be putting man hours and money into energy source inproving initiatives, rather than into the Oil Shale and Tar Sand farming that will destroy portions of our public lands, compromising the habitats of many species of plants and animals. We can not assume that losing this land and its dependents will be free of short or long term negative consequences that will outweigh the acquisition of more of the outdated fossil fuels. 51530-001

Response for Document 51530

51530-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, David Davidson.

The comment tracking number that has been assigned to your comment is OSTSD51532.

Comment Date: February 12, 2008 14:11:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD51532

First Name: David
Middle Initial:
Last Name: Davidson
Organization: none
Address: 117 Elm Spring
Address 2:
Address 3:
City: San Antonio
State: TX
Zip: 78231
Country: USA
Email: ddavidson2314@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Habitat is being destroyed at an appalling rate due to human overpopulation and insane consumption of energy. I oppose the use of public lands to extract anything until USA has a population and energy policy that will lead to a sustainable future.	51532-001

Response for Document 51532

51532-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Liz Bowen.

The comment tracking number that has been assigned to your comment is OSTSD51533.

Comment Date: February 12, 2008 14:12:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD51533

First Name: Liz
Middle Initial:
Last Name: Bowen
Organization:
Address: 10800 S. Hwy 3
Address 2: PO Box 1527
Address 3:
City: Callahan, California
State: CA
Zip: 96014
Country: USA
Email: lizbowen@sisqtel.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The oil shale and tar sands areas in Colorado and Utah SHOULD be opened for oil development. Please move ahead with the project that President Bush has designated. | 51533-001

Response for Document 51533

51533-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Sarah Adamson.

The comment tracking number that has been assigned to your comment is OSTSD51534.

Comment Date: February 12, 2008 14:18:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD51534

First Name: Sarah
Middle Initial:
Last Name: Adamson
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The short term solution to our energy greed is not the destruction of our national treasures.. our environment and natural wilderness areas! Please prevent this desecration to our land but instead urge the government to put more effort into non polluting and non destructive solutions to our power needs before we end up living in a world that will shame our generation! 51534-001

Response for Document 51534

51534-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Dan Carsen.

The comment tracking number that has been assigned to your comment is OSTSD51535.

Comment Date: February 12, 2008 14:18:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD51535

First Name: Dan
Middle Initial: E
Last Name: Carsen
Organization:
Address: 3550 Grandview Parkway
Address 2:
Address 3:
City: BIRMINGHAM
State: AL
Zip: 35243
Country: USA
Email: dancarsen@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I can't believe we are foolish and shortsighted enough even to consider ravaging our lands in the name of getting MORE OF THE SUBSTANCES THAT ARE CONTRIBUTING TO GLOBAL WARMING. It's mind-boggling. Come on, people: let's put short term power, politics, and profit aside and do what's not only RIGHT, but SMART.

51535-001

Response for Document 51535

51535-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Charles Fox.

The comment tracking number that has been assigned to your comment is OSTSD51536.

Comment Date: February 12, 2008 14:18:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD51536

First Name: Charles
Middle Initial:
Last Name: Fox
Organization:
Address: 1320 San Jose Avenue
Address 2:
Address 3:
City: Santa Fe
State: NM
Zip: 87505
Country: USA
Email: cfox@aviandesign.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am extremely concerned with the prospects of massive environmental degradation associated with oil tar sands extraction activity, wherever it occurs.

In this regard, I strongly support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

51536-001

Response for Document 51536

51536-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51537.

Comment Date: February 12, 2008 14:19:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD51537

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please protect our land. | 51537-001

Response for Document 51537

51537-001: Thank you for your comment.

Thank you for your comment, Kirk Lumpkin.

The comment tracking number that has been assigned to your comment is OSTSD51538.

Comment Date: February 12, 2008 14:19:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD51538

First Name: Kirk
Middle Initial: D
Last Name: Lumpkin
Organization:
Address: 5505 Macdonald Ave.
Address 2:
Address 3:
City: El Cerrito
State: CA
Zip: 94530
Country: USA
Email: kirk@twinberry.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil shale and tar sands exploration and exploitation are exactly the wrong way for the country to be going at this time. These activities are extremely destructive in the immediate area where they are carried out and spread pollution far beyond that area. As a nation we should be focussing on renewable energy sources and this diverts needed attention and funding from that need. | 51538-001

Response for Document 51538

51538-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Flo Ginsburg.

The comment tracking number that has been assigned to your comment is OSTSD51539.

Comment Date: February 12, 2008 14:20:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD51539

First Name: Flo
Middle Initial:
Last Name: Ginsburg
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am so opposed to oil shale, tar sands development on public lands. We are doing to ourselves at an accelerated pace, what nature did to the dinosauers over many a millinea. Our instant need for satisfaction of greed will kill us off, and possibly painfully. Don't let our public lands be used to accelerate this fatal process. 51539-001

Response for Document 51539

51539-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, helen hastingss.

The comment tracking number that has been assigned to your comment is OSTSD51548.

Comment Date: February 12, 2008 14:31:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD51548

First Name: helen
Middle Initial:
Last Name: hastingss
Organization:
Address: 5703 southern pky
Address 2:
Address 3:
City: louisville
State: KY
Zip: 40214
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose oil shale and tar sands development on public lands. thank you | 51548-001

Response for Document 51548

51548-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jacqueline Robinson.

The comment tracking number that has been assigned to your comment is OSTSD51551.

Comment Date: February 12, 2008 14:34:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD51551

First Name: Jacqueline
Middle Initial:
Last Name: Robinson
Organization:
Address: 4843 Stately Oaks Ct.
Address 2:
Address 3:
City: Powder Springs
State: GA
Zip: 30127
Country: USA
Email: jacquelinermike@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Plese stop this destruction of our environment. The negative impact outweights the positive for this sinceless act of destruction. Please do the right thing and stop this before it is too late. Thanks

51551-001

Response for Document 51551

51551-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, David Karowe.

The comment tracking number that has been assigned to your comment is OSTSD51552.

Comment Date: February 12, 2008 14:34:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD51552

First Name: David
Middle Initial:
Last Name: Karowe
Organization:
Address: 4044 Sunvalley Drive
Address 2:
Address 3:
City: Kalamazoo
State: MI
Zip: 49008
Country: USA
Email: karowe@wmich.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We need to stop using fossil fuels, not destroy public treasures to harvest a little more. | 51552-001

Response for Document 51552

51552-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Claude McDonald.

The comment tracking number that has been assigned to your comment is OSTSD51553.

Comment Date: February 12, 2008 14:35:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD51553

First Name: Claude
Middle Initial:
Last Name: McDonald
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is a hugh destruction of prestine land for a project of questionable economic return. | 51553-001

Response for Document 51553

51553-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Josie Coogan.

The comment tracking number that has been assigned to your comment is OSTSD51555.

Comment Date: February 12, 2008 14:39:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD51555

First Name: Josie
Middle Initial: O
Last Name: Coogan
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I think that it is of the utmost importance to preserve our natural resources as much as possible,and this is my comment- Thank you! | 51555-001

Response for Document 51555

51555-001: Thank you for your comment.

Thank you for your comment, howard adler.

The comment tracking number that has been assigned to your comment is OSTSD51557.

Comment Date: February 12, 2008 14:41:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD51557

First Name: howard
Middle Initial: L
Last Name: adler
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

we must leave things alone or die.

i know no matter what we do, our earth mother will still thrive, but it's time for me and you, to ask each other, how long, how well should humanity survive...

leave the groung alone. using what's burried there if grave robbin.

if we need fuel there are plenty that need no intrusive mining and polluting refining.

if you few dominant one need profit then join the move to green collar jobs and sustainable industry.

51557-001

Response for Document 51557

51557-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jean Woodman.

The comment tracking number that has been assigned to your comment is OSTSD51558.

Comment Date: February 12, 2008 14:47:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD51558

First Name: Jean
Middle Initial: L
Last Name: Woodman
Organization:
Address: 1501 shland Ave
Address 2:
Address 3:
City: Evanston
State: IL
Zip: 60201
Country: USA
Email: MountnBird@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil Shale and Tar Sand treatments are extremely polluting in terms of greenhouse gases which is not what we should be doing at this time. We should be working overtime to develope alternatives to our oil needs not just other sources of oil. | 51558-001

Response for Document 51558

51558-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Laurence Burris.

The comment tracking number that has been assigned to your comment is OSTSD51559.

Comment Date: February 12, 2008 14:49:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD51559

First Name: Laurence
Middle Initial: P
Last Name: Burris
Organization:
Address: 23405 50th Ave W
Address 2:
Address 3:
City: Mountlake Terrace
State: WA
Zip: 980435305
Country: USA
Email: LBurris597@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is just sheer madness and greed for us to be dependent on fossil fuels. | 51559-001

Response for Document 51559

51559-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, leona klerer.

The comment tracking number that has been assigned to your comment is OSTSD51560.

Comment Date: February 12, 2008 14:51:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD51560

First Name: leona
Middle Initial:
Last Name: klerer
Organization:
Address: 71 strawberry hill ave
Address 2:
Address 3:
City: stamford
State: CT
Zip: 06902
Country: USA
Email: leona@klerer.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The idea of mining the shale and tar sands is horrible. It will ruin the landscape, pollute the air and obtain the oil at a huge expense. Please give up this program. Leona | 51560-001

Response for Document 51560

51560-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51562.

Comment Date: February 12, 2008 14:51:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD51562

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

shove your greed where the sun don't shine and leave our land alone | 51562-001

Response for Document 51562

51562-001: Thank you for your comment.

Thank you for your comment, Nelle McKay.

The comment tracking number that has been assigned to your comment is OSTSD51564.

Comment Date: February 12, 2008 14:56:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD51564

First Name: Nelle
Middle Initial:
Last Name: McKay
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. | 51564-001

Response for Document 51564

51564-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, randy sailer.

The comment tracking number that has been assigned to your comment is OSTSD51565.

Comment Date: February 12, 2008 14:56:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD51565

First Name: randy
Middle Initial: g
Last Name: sailer
Organization:
Address: 1018 cherry lane
Address 2:
Address 3:
City: beulah
State: ND
Zip: 58523
Country: USA
Email: rcsailer@beu.midco.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am very much against developeing our public lands for oil shale/tar sands production.These extractions produce tremendous pollution and destroy the surrounding land and habitat for wildlife.One only has to look at canada to see what greed and indifference can do. | 51565-001

Response for Document 51565

51565-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, judy desreuisseau.

The comment tracking number that has been assigned to your comment is OSTSD51566.

Comment Date: February 12, 2008 15:03:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD51566

First Name: judy
Middle Initial:
Last Name: desreuisseau
Organization:
Address: 2 myrtle street
Address 2:
Address 3:
City: Gill
State: MA
Zip: 013549615
Country: USA
Email: tazbambi@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

stop depleating mother earth..

51566-001

Response for Document 51566

51566-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Nancy Lill.

The comment tracking number that has been assigned to your comment is OSTSD51567.

Comment Date: February 12, 2008 15:04:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD51567

First Name: Nancy
Middle Initial: E
Last Name: Lill
Organization:
Address: 7910 S Krell Ridge Ln
Address 2:
Address 3:
City: Spokane
State: WA
Zip: 99223
Country: USA
Email: meglill@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on our public lands. One need only look at the before and after pictures of such development in northern Alberta to see that the meager amounts of energy extracted will never compensate for the absolute devastation of the land. | 51567-001

Response for Document 51567

51567-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Richenda Davison.

The comment tracking number that has been assigned to your comment is OSTSD51568.

Comment Date: February 12, 2008 15:04:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD51568

First Name: Richenda
Middle Initial: C
Last Name: Davison
Organization:
Address: 2300 W. 14th St.
Address 2:
Address 3:
City: Wilmington
State: DE
Zip: 19806
Country: USA
Email: chenda59@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I vigorously oppose all development of oil shale and tar sands on public lands. Keep public land pristine. That's why it was set aside! | 51568-001

Response for Document 51568

51568-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Michael Wagner.

The comment tracking number that has been assigned to your comment is OSTSD51569.

Comment Date: February 12, 2008 15:06:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD51569

First Name: Michael
Middle Initial: J
Last Name: Wagner
Organization:
Address: 811 W Kennicott
Address 2:
Address 3:
City: Carbondale
State: IL
Zip: 62901
Country: USA
Email: reefgroup@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Sherry Thompson, BLM Project Manager:

I am opposed to the development of public lands for oil extraction from shale and tar sands.

I urge the Bureau of Land Management to choose the No Action alternative to the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. 51569-001

Sincerely,

Response for Document 51569

51569-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Kathryn Rose.

The comment tracking number that has been assigned to your comment is OSTSD51571.

Comment Date: February 12, 2008 15:08:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD51571

First Name: Kathryn
Middle Initial:
Last Name: Rose
Organization:
Address: 2749 Lafayette St.
Address 2:
Address 3:
City: Denver
State: CO
Zip: 80205
Country: USA
Email: mizkate52@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Fossil fuel extraction and consumption is so last century. Where are the wind farms? Where are the solar collectors? Where are the tide and ocean wave and geothermal generators? Save the Earth! Save the humans!! | 51571-001

Response for Document 51571

51571-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Michael Tabib.

The comment tracking number that has been assigned to your comment is OSTSD51574.

Comment Date: February 12, 2008 15:12:59PM
Oil Shale and Tar Sands
Comment ID: OSTSD51574

First Name: Michael
Middle Initial: M
Last Name: Tabib
Organization:
Address: 5120 Gravenstein Hwy. North
Address 2:
Address 3:
City: Sebastopol
State: CA
Zip: 95472
Country: USA
Email: mmtabib@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please encourage alternative energies readily available to us with a myriad of new technologies (i.e. solar, wind, ocean tides) instead of oil technology which has proved to be devastating in the long AND the short term to our environment. | 51574-001

Thank you.

Response for Document 51574

51574-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Christie Greene.

The comment tracking number that has been assigned to your comment is OSTSD51575.

Comment Date: February 12, 2008 15:15:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD51575

First Name: Christie
Middle Initial:
Last Name: Greene
Organization:
Address: 4176 Ridge Village Drive
Address 2:
Address 3:
City: Evergreen
State: CO
Zip: 80439
Country: USA
Email: christiegreene@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose any oil sands or tar development in the US based on the extreme nature of the impact on the land. Taking a natural area rife with wildlife and turning it into a moonscape is just not an acceptable practice. While we need to wean ourselves off foreign oil, allowing complete environmental devastation is simply wrong. | 51575-001

Response for Document 51575

51575-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Pat McCabe.

The comment tracking number that has been assigned to your comment is OSTSD51576.

Comment Date: February 12, 2008 15:16:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD51576

First Name: Pat
Middle Initial:
Last Name: McCabe
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Don't you get it?

In order to prevent more climate change we MUST reduce our burning of fossil fuel.

Why don't you encourage use of public lands to harvest wind and solar energy instead? 51576-001

Whose pocket are you in? Surely it can't be the American Peoples'!

Response for Document 51576

51576-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Brenda Priddy.

The comment tracking number that has been assigned to your comment is OSTSD51577.

Comment Date: February 12, 2008 15:19:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD51577

First Name: Brenda
Middle Initial:
Last Name: Priddy
Organization:
Address: 1900 Hollyhock Cir
Address 2:
Address 3:
City: Farmington
State: NM
Zip: 87401
Country: USA
Email: bspriddy@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. | 51577-001

Response for Document 51577

51577-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, George Merilatt.

The comment tracking number that has been assigned to your comment is OSTSD51578.

Comment Date: February 12, 2008 15:20:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD51578

First Name: George
Middle Initial:
Last Name: Merilatt
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Briefly, I have two main reasons for supporting the "No Action" alternative. 1) This use of public lands will cause excessive and substantial destruction of these lands... the habitat and wildlife they support.

2) Greenhouse Gases and Global Warming.

These particular energy resources tremendously exacerbate the causes of global warming. It's unconscionable to expand the use of such energy sources at a time when we must transition to types of energy generation that are safe and sustainable.

51578-001

Thank you for the opportunity to respond. Sincerely, George Merilatt

Response for Document 51578

51578-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Jessica Soza.

The comment tracking number that has been assigned to your comment is OSTSD51579.

Comment Date: February 12, 2008 15:25:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD51579

First Name: Jessica
Middle Initial:
Last Name: Soza
Organization:
Address: 9051 mill station Rd.
Address 2:
Address 3:
City: Sebastopol
State: CA
Zip: 95472
Country: USA
Email: jksoza@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am urging the BLM to select the No Action alternative in the DPEIS for oil shale and tar sands in the Rockies. Opening public land for this purpose is neither economically nor environmentally feasible to say the least. It is harmful for much longer`than the products themselves will be used or the money made from the extraction spent. You have a responsibility to the health of the land. Please do not hand it over to those that will abuse the priveledge.--JS

51579-001

Response for Document 51579

51579-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Joseph Kincheloe.

The comment tracking number that has been assigned to your comment is OSTSD51580.

Comment Date: February 12, 2008 15:27:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD51580

First Name: Joseph
Middle Initial: P
Last Name: Kincheloe
Organization:
Address: 23348 Balmoral Lane
Address 2:
Address 3:
City: West Hills
State: CA
Zip: 91307
Country: USA
Email: jpkinch@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly oppose any further drilling or surface mining for oil or natural gas on public lands, or environmentally sensitive areas. WE have had ominous warnings from the scientific community that continued use of fossil fuels will ultimately make our beautiful blue planet uninhabitable to air-breathing mammals, so we either heed their warnings, or play the fool. It's way past time for us all to employ all our energy and technological prowess toward the development of alternative energy fuels and processes. Stop destroying our air, our water, and our environment in the persuit of oil profits. 51580-001

Response for Document 51580

51580-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Linda Austin.

The comment tracking number that has been assigned to your comment is OSTSD51581.

Comment Date: February 12, 2008 15:29:46PM
Oil Shale and Tar Sands
Comment ID: OSTSD51581

First Name: Linda
Middle Initial: L
Last Name: Austin
Organization:
Address: 2109 Jessie Place
Address 2:
Address 3:
City: Fort Worth
State: TX
Zip: 761342728
Country: USA
Email: lindalarueaustin@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

What part of the word "Ruined" is it you do not understand? 51581-001

Response for Document 51581

51581-001: Thank you for your comment.

Thank you for your comment, Vic Maietta.

The comment tracking number that has been assigned to your comment is OSTSD51582.

Comment Date: February 12, 2008 15:32:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD51582

First Name: Vic
Middle Initial:
Last Name: Maietta
Organization:
Address:
Address 2:
Address 3:
City: Green Island
State: NY
Zip: 12183
Country: USA
Email: alchemist1-618@nycap.rr.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is disgusting and I don't see how it's legal. The production of these fossil fuels will destroy the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. America needs to set an example and stop destroying ourselves. We're like a bipolar mental patient saying one thing while slicing our wrists. The land needs to be protected and preserved! | 51582-001

Response for Document 51582

51582-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51586.

Comment Date: February 12, 2008 15:40:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD51586

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

It is a crime and an outrage that such outrageous, ill-planned exploitation is even being considered by this government. Oil shale and tar sands are so inefficient and dirty, especially when considering the increased greenhouse gases and associated contamination that they will produce, that any attempt to utilize these sources for energy given current technology is not only idiotic, it is insane. Clean, renewable energies such as geothermal, wind, and solar power should be investigated instead of of these dirty, inefficient fossil fuels. 51586-001

Response for Document 51586

51586-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51589.

Comment Date: February 12, 2008 15:45:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD51589

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51589-001

Response for Document 51589

51589-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Irene Best.

The comment tracking number that has been assigned to your comment is OSTSD51598.

Comment Date: February 12, 2008 15:55:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD51598

First Name: Irene
Middle Initial: M
Last Name: Best
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Oil has had it's day. Get with it Dinosaurs - alternate fuels and energy is the way to go. | 51598-001

Response for Document 51598

51598-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51600.

Comment Date: February 12, 2008 16:00:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD51600

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please allow no oil shale or tar sands petroleum development on our Western lands. I am particularly concerned, very deeply, about the global warming effects. 51600-001

Thank you very much.

Response for Document 51600

51600-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gordon Grant.

The comment tracking number that has been assigned to your comment is OSTSD51601.

Comment Date: February 12, 2008 16:03:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD51601

First Name: Gordon
Middle Initial: P
Last Name: Grant
Organization:
Address: 2650 N Lakeview Ave
Address 2: Apt 1708
Address 3:
City: Chicago
State: IL
Zip: 606141872
Country: USA
Email: ggrant1012@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Is the only word known in Washington is DRILL. Why not use words such as conserve or alternate energy. | 51601-001

Response for Document 51601

51601-001: Thank you for your comment.

Thank you for your comment, Constance Spenger.

The comment tracking number that has been assigned to your comment is OSTSD51602.

Comment Date: February 12, 2008 16:06:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD51602

First Name: Constance
Middle Initial: E
Last Name: Spenger
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Our public lands are already bearing the brunt of the current energy boom and significant population growth across the West, even though we need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management must also consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 51602-001 51602-002 51602-003

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51602-001 (cont.)

Sincerely,

Responses for Document 51602

51602-001: The BLM acknowledges the commentor's preference for Alternative A.

51602-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51602-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which

lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Hayley Bagwell.

The comment tracking number that has been assigned to your comment is OSTSD51609.

Comment Date: February 12, 2008 16:20:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD51609

First Name: Hayley
Middle Initial: E
Last Name: Bagwell
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

How DARE the Bush administration take actions to uncover more fossil fuels, when it has been widely known and accepted that NOW is the time, PAST the time even, that we should be organizing ourselves to find alternative, green and renewable energies, and begin the transition, so that in as short a time as resonably possible, we can be a non-polluting and green energy using people. THIS MEANS NO MORE FOSSIL FUELS. ALSO, NO NUCLEAR ENERGY!!! We have enough pollution and waste from these avenues already. THINK for the future, not the present!!!!! 51609-001

Response for Document 51609

51609-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Karen Clarke.

The comment tracking number that has been assigned to your comment is OSTSD51612.

Comment Date: February 12, 2008 16:23:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD51612

First Name: Karen
Middle Initial: M
Last Name: Clarke
Organization:
Address: 4554 S. Rhett Ave.
Address 2:
Address 3:
City: North Charleston
State: SC
Zip: 29405
Country: USA
Email: kplants@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Let us preserve this precious land for future generations and not succomb to the greed fed into corporations for short term profit and gain | 51612-001

Response for Document 51612

51612-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Dorothy Ours.

The comment tracking number that has been assigned to your comment is OSTSD51616.

Comment Date: February 12, 2008 16:25:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD51616

First Name: Dorothy
Middle Initial:
Last Name: Ours
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The widely destructive process for extracting energy from oil shale and tar sands has no place in our public lands. Please do all in your power to prevent such thorough degradation and, instead, promote greener energy development and distribution. | 51616-001

Response for Document 51616

51616-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Patrick Corbett.

The comment tracking number that has been assigned to your comment is OSTSD51619.

Comment Date: February 12, 2008 16:34:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD51619

First Name: Patrick
Middle Initial: J
Last Name: Corbett
Organization:
Address: 408 North A St.
Address 2:
Address 3:
City: Lompoc
State: CA
Zip: 93436
Country: USA
Email: coachcorb40@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is a simply idea that the exploitation of the earths resources cannot continue indefinetly. The first step is to reduce our impact and this must become universal and enforced I some way. By opening up other aeres for exploitation we give people the false sense that there are plenty of natural resources for the future. Within a finite ecosystem this is not possible. Please stay away from what is left of the natural world and encourage people to use less before you again destroy another part of the natural world.

51619-001

Response for Document 51619

51619-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Carole Selz.

The comment tracking number that has been assigned to your comment is OSTSD51622.

Comment Date: February 12, 2008 16:40:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD51622

First Name: Carole
Middle Initial:
Last Name: Selz
Organization:
Address: 861 Regal Rd
Address 2:
Address 3:
City: Berkeley
State: CA
Zip: 94708
Country: USA
Email: carole34@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Stop destroying more of the environment than you already have. We don't need to get more oil in any way....it's obsolete. | 51622-001

Response for Document 51622

51622-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, sarah forrester.

The comment tracking number that has been assigned to your comment is OSTSD51625.

Comment Date: February 12, 2008 16:44:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD51625

First Name: sarah
Middle Initial:
Last Name: forrester
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support action and legislation to stop the devistation being caused by Oil Shale adn Tar Sands development. Public lands are for all of our use, not for one entitiy to abuse and the rest of us to lose.	51625-001

Response for Document 51625

51625-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Madeline Banschbach.

The comment tracking number that has been assigned to your comment is OSTSD51626.

Comment Date: February 12, 2008 16:45:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD51626

First Name: Madeline
Middle Initial: c
Last Name: Banschbach
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

If the administration put effort and funding into renewable sources and subsidies for them instead of trying to drill in new places, especially conservation areas, maybe we would be making progress towards the energy crisis. The administration needs to stop looking for cop outs and start dealing with the solutions we have available. | 51626-001

Response for Document 51626

51626-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Annemarie Krammes.

The comment tracking number that has been assigned to your comment is OSTSD51631.

Comment Date: February 12, 2008 16:58:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD51631

First Name: Annemarie
Middle Initial:
Last Name: Krammes
Organization:
Address: 19 Cresswell Ave.
Address 2:
Address 3:
City: Pottsville
State: PA
Zip: 17901
Country: USA
Email: annemariek@losch.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The time has come that we must find energy sources that do the least harm to the environment and do not add to the carbon dioxide driving global warming, Oil shale and tar sands do not measure up in either consideration. Use your funds to support conservation of the energy we now have, and developement of renewable energy that will not contribute to global warming. 51631-001

Response for Document 51631

51631-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Robert Hill.

The comment tracking number that has been assigned to your comment is OSTSD51633.

Comment Date: February 12, 2008 17:02:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD51633

First Name: Robert
Middle Initial: D
Last Name: Hill
Organization:
Address: 340SW22ndCT
Address 2:
Address 3:
City: FtLauderdale
State: FL
Zip: 333124361
Country: USA
Email: bobhill22@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Enough is enough. This is not the direction to go economically or environmentally. This will not resolve or allieviate our energy problems in the short or long haul. It will not be beneficial, it will be detrimental. There is no restoring the destruction to the environment, and it will take away from the focus and development of more energy efficient development already inprocess. 51633-001

Response for Document 51633

51633-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Shelley Ottenbrite.

The comment tracking number that has been assigned to your comment is OSTSD51634.

Comment Date: February 12, 2008 17:03:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD51634

First Name: Shelley
Middle Initial:
Last Name: Ottenbrite
Organization:
Address: 1809 W Grace St
Address 2:
Address 3:
City: Richmond
State: VA
Zip: 23220
Country: USA
Email: tiddas@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Of course I oppose all development of public lands for the use of oil companies. Under the Bush administration, these conglomerates have plundered our national treasures, returning only favors to their political friends. The American people have been trodden upon and abused enough and so have our natural resources. Please don't give license to these institutions of destruction to continue in their pillaging. We no longer need an attitude of destroy first then say you're sorry where irreplaceable environments are concerned. 51634-001

Response for Document 51634

51634-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Andrew McMahon.

The comment tracking number that has been assigned to your comment is OSTSD51637.

Comment Date: February 12, 2008 17:07:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD51637

First Name: Andrew
Middle Initial: T
Last Name: McMahon
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I'm writing to tell you why I, and many others, think that developing vast amounts of land for oil and gas drilling in Colorado, Utah, and Wyoming is absolutely unacceptable. Putting aside contentious issues such as global warming and greenhouse gas emissions, it is time we start saving land for the simple sake of the planet herself. Humans have drastically altered much of the planet, we're even now altering Antartica, which was formerly thought to be a bastion against human influence, through climate change, so is it asking for so much to just leave a small portion of the formerly pristine western landscape just that, pristine? 51637-001

Response for Document 51637

51637-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Lynne Lightowler-Buck.

The comment tracking number that has been assigned to your comment is OSTSD51641.

Comment Date: February 12, 2008 17:14:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD51641

First Name: Lynne
Middle Initial:
Last Name: Lightowler-Buck
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This seems as archaic as an old book of Ayn Rands, Atlas Shrugged. You need to rethink this position. | 51641-001

Response for Document 51641

51641-001: Thank you for your comment.

Thank you for your comment, Lynda Quadland.

The comment tracking number that has been assigned to your comment is OSTSD51642.

Comment Date: February 12, 2008 17:18:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD51642

First Name: Lynda
Middle Initial: K
Last Name: Quadland
Organization:
Address: 226 IRVINGTON
Address 2:
Address 3:
City: San Antonio
State: TX
Zip: 78209
Country: USA
Email: lquadland10@care2.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Not on my watch. | 51642-001

Response for Document 51642

51642-001: Thank you for your comment.

Thank you for your comment, HERMAN GREENWOOD.

The comment tracking number that has been assigned to your comment is OSTSD51644.

Comment Date: February 12, 2008 17:28:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD51644

First Name: HERMAN
Middle Initial: E
Last Name: GREENWOOD
Organization:
Address: 1102 N LYNHURST DR
Address 2:
Address 3:
City: SPEEDWAY
State: IN
Zip: 46224
Country: USA
Email: greenwoodlaw@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not open lands for mining of shale for oil. This goes the wrong direction at the wrong time in our need to reduce pollution. | 51644-001

Response for Document 51644

51644-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Paul Kripli.

The comment tracking number that has been assigned to your comment is OSTSD51645.

Comment Date: February 12, 2008 17:29:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD51645

First Name: Paul
Middle Initial:
Last Name: Kripli
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: p.kripli@att.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Stop this destructive practice of oil mining! | 51645-001

Response for Document 51645

51645-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51646.

Comment Date: February 12, 2008 17:37:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD51646

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

In the strongest of terms I oppose development of oil shale and tar sands on our citizens' lands. Mining of these fossil fuels will kill off wildlife habitats and render the land uninhabitable. We should be channeling our efforts in developing clean, renewable energy sources instead of relying on the production of fossil fuels to meet our energy needs as a country. 51646-001

Response for Document 51646

51646-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Walter Wolverton.

The comment tracking number that has been assigned to your comment is OSTSD51648.

Comment Date: February 12, 2008 17:42:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD51648

First Name: Walter
Middle Initial:
Last Name: Wolverton
Organization:
Address: 220 Wildwood Court
Address 2:
Address 3:
City: Lafayette
State: IN
Zip: 47905
Country: USA
Email: wcwolverton@netscape.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not open the Oil Shale and Tar Sands as proposed currently. | 51648-001

Response for Document 51648

51648-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Verne Huser.

The comment tracking number that has been assigned to your comment is OSTSD51649.

Comment Date: February 12, 2008 17:45:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD51649

First Name: Verne
Middle Initial: C
Last Name: Huser
Organization:
Address: 7106 Coors Trail NW
Address 2:
Address 3:
City: Albuquerque
State: NM
Zip: 871202779
Country: USA
Email: riverne@newmexico.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Is extracting shale oil and fossil fuel from tar sands worth the energy it takes? Is it worth the environmental costs? I know the area well, having run rivers, driven shuttles, traveled through it for many years. It may seem little more than barren sheep country to many, but it has an ecological vitality that extractive activities can only mar. Leave it alone.

51649-001

Response for Document 51649

51649-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Benjamin Zank.

The comment tracking number that has been assigned to your comment is OSTSD51652.

Comment Date: February 12, 2008 17:55:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD51652

First Name: Benjamin
Middle Initial:
Last Name: Zank
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

the damage from oil shale will never be undone, so we need to stop the damage we are doing to the environment. | 51652-001

Response for Document 51652

51652-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51653.

Comment Date: February 12, 2008 17:56:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD51653

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Extracting oil is invasive and unnecessary. Alternative energy such as wind and solar, are effective and better for the environment, and everyone's health both now and in the future. | 51653-001

Response for Document 51653

51653-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Randy Haworth.

The comment tracking number that has been assigned to your comment is OSTSD51654.

Comment Date: February 12, 2008 18:05:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD51654

First Name: Randy
Middle Initial:
Last Name: Haworth
Organization:
Address: 2722 Blue Mist Dr
Address 2:
Address 3:
City: Sugar Land
State: TX
Zip: 77478
Country: USA
Email: greenmarbl@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Does your department even contemplate returning the land you allow to be devastated for energy exploitation to some semblance of its original state...or do you intend to look the other way as a lackey of the "slash and burn" industries of Corporate America as they "bush-whack" and rape America the Beautiful for their own private, aggrandizement? 51654-001

Response for Document 51654

51654-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Cathy Conroy.

The comment tracking number that has been assigned to your comment is OSTSD51661.

Comment Date: February 12, 2008 18:37:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD51661

First Name: Cathy
Middle Initial:
Last Name: Conroy
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. This should not even be in question!!! | 51661-001

Response for Document 51661

51661-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Jim Hurson.

The comment tracking number that has been assigned to your comment is OSTSD51662.

Comment Date: February 12, 2008 18:38:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD51662

First Name: Jim
Middle Initial:
Last Name: Hurson
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This proposal for oil extraction is as idiotic as granting amnesty to illegal migrants. It's far past time to start thinking about the long-term well-being of the country. Oil is a short-term solution; we must start investing in infrastructure that is sustainable and not fossil-fuel sourced.	51662-001

Response for Document 51662

51662-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Laura Tabili.

The comment tracking number that has been assigned to your comment is OSTSD51663.

Comment Date: February 12, 2008 18:39:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD51663

First Name: Laura
Middle Initial:
Last Name: Tabili
Organization:
Address: 116 N Mountain Av
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 85719
Country: USA
Email: tabili@u.arizona.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Stop shale oil drilling on public lands. | 51663-001

Response for Document 51663

51663-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, g. v. christensen.

The comment tracking number that has been assigned to your comment is OSTSD51664.

Comment Date: February 12, 2008 18:39:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD51664

First Name: g. v.
Middle Initial:
Last Name: christensen
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I urge you not allow oil shale and tar sand strip mining on public lands that you manage for "We the People", not now, not ever! The Bushites, lackeys for the oil industry, are more than willing to decimate the surface of the whole earth for the "almighty" but greatly weakened dollar. So, I urge you to not give in to Kempthorne and the Bushite gang---just say NO! | 51664-001

Response for Document 51664

51664-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Christopher Kalinowski.

The comment tracking number that has been assigned to your comment is OSTSD51665.

Comment Date: February 12, 2008 18:40:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD51665

First Name: Christopher
Middle Initial: J
Last Name: Kalinowski
Organization:
Address: 46 Cayuga Blvd.
Address 2:
Address 3:
City: Depew
State: NY
Zip: 14043
Country: USA
Email: kalman60@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Why is the government so quick to decide on ravaging our pristine landscape in an unending search for oil? There is a better avenue to go down without destroying our planet. | 51665-001

Response for Document 51665

51665-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Milton Bennett.

The comment tracking number that has been assigned to your comment is OSTSD51668.

Comment Date: February 12, 2008 18:45:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD51668

First Name: Milton
Middle Initial: E
Last Name: Bennett
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: grimey12@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Hi, I am a geography and geology student at ASU here in Boone, NC. I am writing to state my opinion about Oil Shale and Tar Sands proposal. I am strongly against the proposal of invasively extracting these resources from our public lands. Ive read what will be affected by this action. 51668-001

Migratory birds, protected fish, among other life native to this continent, will be deeply affected by habitat destruction and pollution. This low-grade fuel will be costly and inefficient to produce energy for our consuming lifetyles. We do not need to promote this. It will take more coal and water and construction nearby to extract this energy. We need to fully comprehend what our actions are continuing to do to the environment, OUR environment as well as other animals. We 51668-002

should be ending our addiction to oil and investing this money into renewable energy sources. Doesnt that make a tremendous amount of sense? To produce our own energy within the country for ourselves from resources that are basically inexhaustable and replentished daily? We need to invest in these types of energy and set an example for the rest of the world. The US is the best equipped to begin this energy revolution. I hope you can understand how that makes more sense to me and many other informed students. Regards, Milton Bennett 51668-001 (cont.)

Responses for Document 51668

51668-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

51668-002: The PEIS provides a general discussion of the impacts associated with water and power requirements associated with potential future oil shale and tar sands development. At present, water and power requirements are very speculative due to the variation in technology currently available, and because the source of the water and power (and, therefore, the impacts) is unknown. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power and water requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

51668-003: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Lorna Salzman Salzman.

The comment tracking number that has been assigned to your comment is OSTSD51669.

Comment Date: February 12, 2008 18:46:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD51669

First Name: Lorna Salzman
Middle Initial:
Last Name: Salzman
Organization:
Address:
Address 2:
Address 3:
City:
State: NY
Zip:
Country: USA
Email: lsalzman@rcn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

How can the exploitation and development of ANY additional fossil fuel be even considered? All credible scientists tell us we must stabilize CO2 emissions immediately and start reducing them, not increasing them. Yet corporations and government ignore them. Curbing global warming must be our main objective, not enhancing it. Expert studies demonstrate that serious efficiency measures in industry, construction, residences and transportation will eliminate the need for energy growth. These measures need to be mandated in any EIS as alternatives to new exploration or development of any and all fossil fuel energy sources. Industry must prove that oil shale development is the only alternative available, that there is no other way to fulfill present and future energy demand, and that such development will not add to the global burden of greenhouse gases. Until and unless this is done, all permits should be denied.

51669-001

51669-002

Responses for Document 51669

51669-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

51669-002: Although energy conservation and fuel efficiency may become an important part of national energy policy, the scope of the PEIS is to identify public lands that would be available or would not be available for application for the potential leasing of oil shale or tar sands in the future. This scope is consistent with the instruction of Congress in the Energy Policy Act of 2005 for the BLM to develop oil shale and tar sands resources in an environmentally sound manner.

The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An alternative of conservation was not analyzed (see Section 2.5.3 of the PEIS) because it would not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

Thank you for your comment, Marguerite Dessornes.

The comment tracking number that has been assigned to your comment is OSTSD51670.

Comment Date: February 12, 2008 18:46:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD51670

First Name: Marguerite
Middle Initial:
Last Name: Dessornes
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I want the Bureau of Land Management to know that I oppose all development of oil shale and tar sands on public lands. This proposal is a pathetic attempt for a "quick fix" in the energy crisis but would ultimately ravage millions of acres of precious land, poison wildlife, produce unacceptable quantities of greenhouse gases and other pollutants. This is the time when we need to transition to non-polluting, renewable energy sources - not go backwards and get energy in this dirty way! I am appalled that this plan is even being considered! I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

51670-001

Response for Document 51670

51670-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, carol strom.

The comment tracking number that has been assigned to your comment is OSTSD51671.

Comment Date: February 12, 2008 18:48:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD51671

First Name: carol
Middle Initial: j
Last Name: strom
Organization:
Address: 1019 kearns ave
Address 2:
Address 3:
City: winston-salem
State: NC
Zip: 271065823
Country: USA
Email: cjstrom@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It would seem that we have damaged the planet enough. Now is the time to reverse the destruction. We are a great nation that needs to do something great and grand now for this planet. The damage and problems from oil shale and tar sand are simply too much. The time for change is now. 51671-001

Response for Document 51671

51671-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Dan McCormack.

The comment tracking number that has been assigned to your comment is OSTSD51672.

Comment Date: February 12, 2008 18:49:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD51672

First Name: Dan
Middle Initial: S
Last Name: McCormack
Organization:
Address: 5265 Toscana Way 229
Address 2:
Address 3:
City: San Diego
State: CA
Zip: 92122
Country: USA
Email: nasiviru@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

At a time when we need to be putting our time and energy into sustainable and alternate fuel sources it is not an option for me to allow mining or production of oil on our public lands. This type of activity leads to high levels of climate changing gases being emitted into the atmosphere as well as significant levels of groundwater contamination. Please do not allow coal mining for oil production nor coal fired operations to be built on my public land. Sincerely, Daniel S McCormack

51672-001

Response for Document 51672

51672-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Rael Nidess, M.D. .

The comment tracking number that has been assigned to your comment is OSTSD51673.

Comment Date: February 12, 2008 18:56:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD51673

First Name: Rael
Middle Initial:
Last Name: Nidess, M.D.
Organization:
Address: [Withheld by requestor]
Address 2: [Withheld by requestor]
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

There are myriads of good reasons not to use tar sands as a source of oil and they will be well discussed by experts in due course.

I am writing to say that I have reviewed the information regarding tar sand oil extraction and I am utterly & completely opposed to it.

51673-001

Response for Document 51673

51673-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, Abby Marical.

The comment tracking number that has been assigned to your comment is OSTSD51679.

Comment Date: February 12, 2008 19:17:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD51679

First Name: Abby
Middle Initial:
Last Name: Marical
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I beleive that Bush is a idiot and that green house gases must be stopped! If they do not cease, the world will be destroyed much quicker then it should and the floridians will be in the deep weeds, literally and figuretively. 51679-001

Sincerly, Abby

Response for Document 51679

51679-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Marsha Foutz.

The comment tracking number that has been assigned to your comment is OSTSD51680.

Comment Date: February 12, 2008 19:20:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD51680

First Name: Marsha
Middle Initial:
Last Name: Foutz
Organization:
Address: 313 Main Box 443
Address 2:
Address 3:
City: Clarkdale
State: AZ
Zip: 86324
Country: USA
Email: mfoutz@commspeed.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Production of oil from shale is the scariest environmental potential distaster I know of. The water supply of our vacation home is threatened in Colorado. What a waste to destroy this pristine land in order to harvest carbon-producing oil. In this time of environmental disasters, we need to pursue alternative energies and to secure a sustainable future. 51680-001

Response for Document 51680

51680-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, susanna sorin.

The comment tracking number that has been assigned to your comment is OSTSD51683.

Comment Date: February 12, 2008 19:24:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD51683

First Name: susanna
Middle Initial: w
Last Name: sorin
Organization:
Address: 17916 Gridley Rd
Address 2:
Address 3:
City: Artesia
State: CA
Zip: 907013945
Country: USA
Email: caliwoman63@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This sort of thing is a desperate attempt to prolong the life of the oil companies. At the expense of the earth. Give it up already. | 51683-001

Response for Document 51683

51683-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, mary luminoso.

The comment tracking number that has been assigned to your comment is OSTSD51685.

Comment Date: February 12, 2008 19:29:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD51685

First Name: mary
Middle Initial: b
Last Name: luminoso
Organization:
Address: pob 3268
Address 2:
Address 3:
City: saratoga
State: CA
Zip: 95070
Country: USA
Email: sekmet9995008@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please choose the No Action alternative in the consideration of the development of oil shale and tar sands on public lands. This development would increase pollutants and greenhouse gases, and adversely effect life for humans, animals and plants. I urge you to strngly oppose all such development. Thank you. 51685-001

Response for Document 51685

51685-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Emily Cleath.

The comment tracking number that has been assigned to your comment is OSTSD51691.

Comment Date: February 12, 2008 19:39:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD51691

First Name: Emily
Middle Initial: J
Last Name: Cleath
Organization:
Address: 280 fisk st
Address 2:
Address 3:
City: Pittsburgh
State: PA
Zip: 15201
Country: USA
Email: emilystricker@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

When is this administration going to stop trading our children's birthright for corporate profits? The time for fossil fuels has ended. It is time to embrace the long tradition of American ingenuity and leadership and seek safe alternatives. | 51691-001

Response for Document 51691

51691-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Judith Bosma.

The comment tracking number that has been assigned to your comment is OSTSD51698.

Comment Date: February 12, 2008 19:58:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD51698

First Name: Judith
Middle Initial: L
Last Name: Bosma
Organization:
Address: 14233 Honor Hwy.
Address 2:
Address 3:
City: Beulah
State: MI
Zip: 49617
Country: USA
Email: jlbosma@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I'm writing to voice my strong opposition to mining tar sands and shale oil for energy. The environmental devastation that would result isn't necessary or justified. There are other, simpler avenues to investigate for alternative fuels, but I know and we all know that the large energy interests in industry and politics will not allow them to go forward. How would they keep the power they now hold over the American public if we were asked to conserve, if energy use were reduced through new technologies, or if they couldn't make a complex "mining", refining process within their control. (Are you also operating within their control?) Please listen to the American public. We're ready for real change that preserves the lovely planet we have, instead of destroying more of it.

51698-001

Response for Document 51698

51698-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Kathy dicker.

The comment tracking number that has been assigned to your comment is OSTSD51701.

Comment Date: February 12, 2008 20:05:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD51701

First Name: Kathy
Middle Initial: a
Last Name: dicker
Organization:
Address: 1172 Fay Street
Address 2:
Address 3:
City: Redwood City
State: CA
Zip: 94061
Country: USA
Email: kathydeee@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Lou,

The Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 51701-001

Please let the Bureau of Land Management know that you oppose all development of oil shale and tar sands on public lands.

Thank you,

Kathy

Response for Document 51701

51701-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sasha Silvestrini.

The comment tracking number that has been assigned to your comment is OSTSD51702.

Comment Date: February 12, 2008 20:06:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD51702

First Name: Sasha
Middle Initial:
Last Name: Silvestrini
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I strongly oppose all development of oil shale and tar sands on public lands. | 51702-001

Response for Document 51702

51702-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, fred pomerantz.

The comment tracking number that has been assigned to your comment is OSTSD51706.

Comment Date: February 12, 2008 20:13:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD51706

First Name: fred
Middle Initial:
Last Name: pomerantz
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The enormous amount of energy needed to produce usable fuel and the land eaten up by this mining process makes for an extremely inappropriate use of land that belongs to all Americans.Public land belongs to the Public and should not be traded away to a handful of potential leaseholders. Thank you. 51706-001

Response for Document 51706

51706-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Bill Forbes.

The comment tracking number that has been assigned to your comment is OSTSD51715.

Comment Date: February 12, 2008 20:48:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD51715

First Name: Bill
Middle Initial:
Last Name: Forbes
Organization:
Address: 134 N. Church St.
Address 2:
Address 3:
City: Nacogdoches
State: TX
Zip: 75961
Country: USA
Email: bforbes@care2.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The BLM should choose the No Action alternative or develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51715-001 51715-002

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 51715-003

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51715-001 (cont.)

Sincerely,

Bill Forbes

Responses for Document 51715

51715-001: The BLM acknowledges the commentor's preference for Alternative A.

51715-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

51715-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and

3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Duane Kubischta.

The comment tracking number that has been assigned to your comment is OSTSD51716.

Comment Date: February 12, 2008 20:50:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD51716

First Name: Duane
Middle Initial:
Last Name: Kubischta
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I thoroughly and morally disagree with Oil Shale and Tar Sands developments. Please do everything in your power to end this development so that we may protect our country and our planet from their undo harm.

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.

I request that the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

51716-001

51716-002

51716-003

51716-001 (cont.)

Sincerely,

Duane Kubischta

Responses for Document 51716

51716-001: The BLM acknowledges the commentor's preference for Alternative A.

51716-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51716-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Stefanie Gandolfi.

The comment tracking number that has been assigned to your comment is OSTSD51719.

Comment Date: February 12, 2008 20:54:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD51719

First Name: Stefanie
Middle Initial: Y
Last Name: Gandolfi
Organization:
Address: 81 Donna Way
Address 2:
Address 3:
City: Oakland
State: CA
Zip: 946055037
Country: USA
Email: stef.gandolfi@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please protect our public lands! | 51719-001

Response for Document 51719

51719-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Abigail Norman.

The comment tracking number that has been assigned to your comment is OSTSD51720.

Comment Date: February 12, 2008 20:55:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD51720

First Name: Abigail
Middle Initial:
Last Name: Norman
Organization:
Address: 4 Hubbard St.
Address 2:
Address 3:
City: Boston
State: MA
Zip: 02130
Country: USA
Email: abigailnorman@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

To whom it may concern:

I am writing to oppose all development of oil shale and tar sands on public lands in the Rocky Mountain area. I urge you to adopt the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

I oppose the certain destruction of natural habitat that would result. Even more, I thoroughly oppose further exploitation of fossil fuel at a time when carbon emissions pose one of the gravest threat to life on earth as we know it.

51720-001

Sincerely,

A concerned citizen

Response for Document 51720

51720-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Mary Alexander.

The comment tracking number that has been assigned to your comment is OSTSD51722.

Comment Date: February 12, 2008 20:58:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD51722

First Name: Mary
Middle Initial:
Last Name: Alexander
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 51722-001

I am coming to the conclusion, unfortunately, that America has decided to commit suicide. Please do not do this.

Thank you for considering my comments.

Response for Document 51722

51722-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, J. Gregory Twain.

The comment tracking number that has been assigned to your comment is OSTSD51731.

Comment Date: February 12, 2008 21:29:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD51731

First Name: J. Gregory
Middle Initial:
Last Name: Twain
Organization:
Address: 1422 SE 34th Avenue
Address 2:
Address 3:
City: Portland
State: OR
Zip: 972144226
Country: USA
Email: gtwain@netscape.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Don't develop oil shale and tar sand. Spend the money on developing non-petroleum alternative energy sources. | 51731-001

Response for Document 51731

51731-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Natalie Tedford.

The comment tracking number that has been assigned to your comment is OSTSD51737.

Comment Date: February 12, 2008 21:41:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD51737

First Name: Natalie
Middle Initial: M
Last Name: Tedford
Organization:
Address: 3619 W. Creedance
Address 2:
Address 3:
City: Glendale
State: AZ
Zip: 85310
Country: USA
Email: sushifreak@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am submitting this letter to support the "No Action" Alternative in the Draft Programmic Environmental Impact Statement for Oil Shale and Tar Sands. We as stewards of this planet desperately need to transition away from fossil fuels, greenhouse gas emmisions and most of all we must ensure the safety and protection of our bretheren- WILDLIFE! Once you open these vastly unspoiled regions, THEY WILL BE LOST! Please, Bureau of Land Management, scrap the plan completely or chose the "No Action" alternative or at the very least, develope and evaluate the reasonable alternatives based on wildlife and wildlands protection, energy conservation and efficiency. I strongly urge the Bureau of Reclamation to not be so shortsighted and to please support the "No Action" alternative. 51737-001 51737-002

Thank you for allowing me the opportunity to voice my support for this.

Sincerely,

Natalie M. Tedford Glendale, Arizona

Responses for Document 51737

51737-001: The BLM acknowledges the commentor's preference for Alternative A.

51737-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, gerry coffey.

The comment tracking number that has been assigned to your comment is OSTSD51740.

Comment Date: February 12, 2008 21:45:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD51740

First Name: gerry
Middle Initial:
Last Name: coffey
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager: Dear Sherry Thompson, BLM Project Manager: I've hike in this area and feel sadness when I visualize the long term consequences of the proposed development on these lands. We can and must do better than this as an intelligent species, for all other species are dependent on our decisions. I look at some of our recent poor decisions an wonder if maybe we have peaked as a species in our evolutionary cycle. This is an old out dated solution to our energy problems. Please show courage and foresight and take the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. Sincerely, Gerry Coffey

51740-001

51740-002

51740-001 (cont.)

Responses for Document 51740

51740-001: The BLM acknowledges the commentor's preference for Alternative A.

51740-002: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Walter Koch.

The comment tracking number that has been assigned to your comment is OSTSD51743.

Comment Date: February 12, 2008 21:52:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD51743

First Name: Walter
Middle Initial: D
Last Name: Koch
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear BLM, In a time when it's become emminently apparent that the people of this country AND THE WORLD must begin now to find,through research & development, alternatives to fossil fuels it is truly hard to understand why you insist on staying on the same old course.I urge you to support the No Action alternative in the Draft Programmatic Evvironmental Impact Statement for Oil Shale and Tar Sands. 51743-001

Please join with so many others and do what YOU can to pass on a living,healthy planet to your grandchildren and mine.

Respectfully Walter D. Koch

Response for Document 51743

51743-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Lynne Marko.

The comment tracking number that has been assigned to your comment is OSTSD51747.

Comment Date: February 12, 2008 22:08:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD51747

First Name: Lynne
Middle Initial: S
Last Name: Marko
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I lived in Green River, UT and Grand Juction, CO combined 6 years and I feel this form of extracting oil from rock will be highly costly in start-up costs and to the public lands. More research is needed for a less costly approach to the environment with a "think tank" of smart minded individuals who could come up with more renewable energy resources. Enough oil extraction.	51747-001

Response for Document 51747

51747-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51748.

Comment Date: February 12, 2008 22:23:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD51748

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Do we really need to destroy some of the most beautiful land in the United States? Yes we still need oil but there must be some other ways of retrieving the oil> | 51748-001

Response for Document 51748

51748-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Brian Smith.

The comment tracking number that has been assigned to your comment is OSTSD51749.

Comment Date: February 12, 2008 22:25:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD51749

First Name: Brian
Middle Initial:
Last Name: Smith
Organization:
Address: 729 W 26th Street
Address 2:
Address 3:
City: San Pedro
State: CA
Zip: 90731
Country: USA
Email: brian@outlandimages.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.	51749-001
The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.	51749-002
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	51749-003

Responses for Document 51749

51749-001: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

51749-002: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation

measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

51749-003: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51750.

Comment Date: February 12, 2008 22:28:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD51750

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Processing oil shale and tar sands have proven on a regular basis to render an environmentally negative effect.

We have enough pollution going against us now, without adding public lands to private, industrial venues.

Our tax dollars, not industrial money, support these lands, and it would appear that BLM has, again, become the means for industry to reap a windfall.

51750-001

Response for Document 51750

51750-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Tim Martin.

The comment tracking number that has been assigned to your comment is OSTSD51751.

Comment Date: February 12, 2008 22:36:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD51751

First Name: Tim
Middle Initial:
Last Name: Martin
Organization:
Address: 485 Mountain Home Road
Address 2:
Address 3:
City: Woodside
State: CA
Zip: 94062
Country: USA
Email: timmartinsr@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It's not worth it; develope alternate energy instead. | 51751-001

Response for Document 51751

51751-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Walter Kloefkorn.

The comment tracking number that has been assigned to your comment is OSTSD51752.

Comment Date: February 12, 2008 22:45:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD51752

First Name: Walter
Middle Initial:
Last Name: Kloefkorn
Organization:
Address:
Address 2:
Address 3:
City: Springdale
State: WA
Zip: 99173
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We need a change in direction on energy, not a few more barrels of oil. What will be destroyed is worth far more than the months of energy that will be produced. This is about profits for the existing industries who don't want to adapt, not about a sensible energy policy. Stop this madness. 51752-001

Response for Document 51752

51752-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, scott yoak.

The comment tracking number that has been assigned to your comment is OSTSD51754.

Comment Date: February 12, 2008 23:08:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD51754

First Name: scott
Middle Initial:
Last Name: yoak
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The ravaging of mother earth for fossil fuels is unacceptable. Its called evolution people. There are plenty of energy sources now available that do not destroy our home planet.	51754-001

Response for Document 51754

51754-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, William Gray.

The comment tracking number that has been assigned to your comment is OSTSD51755.

Comment Date: February 12, 2008 23:16:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD51755

First Name: William
Middle Initial: E
Last Name: Gray
Organization:
Address: 8537 Doubleheader Ranch Rd#6
Address 2:
Address 3:
City: Morrison
State: CO
Zip: 804652555
Country: USA
Email: willeyg333@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am concerned with the inability of Oil Shale and Tar Sands Developers to act within strict Environmental Impact Guidelines. In the 1970's I worked as a Biological Researcher on the Parachute Oil Shale Project to prove that the spent oil shale would not support any revegitation attempts. Of course technologies have changed in 30 years, but can these areas be developed ecologically?	51755-001

Response for Document 51755

51755-001: Project-specific requirements to ensure the successful reclamation of disturbed land would be established by the BLM prior to leasing. The difficulties associated with the restoration of native plant communities, especially in arid regions, are acknowledged and discussed in Sections 4.8.1.2 and 5.8.1.2. The PEIS states that although revegetation of disturbed soils may successfully establish a productive vegetation cover, with biomass and species richness similar to those of local native communities, the resulting plant community may be quite different from native communities in species composition and the representation of particular vegetation types, such as shrubs. The PEIS also states that the establishment of mature native plant communities may require decades.

Thank you for your comment, Sharon Rich.

The comment tracking number that has been assigned to your comment is OSTSD51757.

Comment Date: February 12, 2008 23:21:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD51757

First Name: Sharon
Middle Initial:
Last Name: Rich
Organization:
Address: 2834 Regent Crescent
Address 2:
Address 3:
City: South Daytona
State: FL
Zip: 321198556
Country: USA
Email: sharonbrich@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please prevent all development of oil shale and tar sands on public lands.

Opening up millions of acres out west to produce these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 51757-001

Response for Document 51757

51757-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Robert Glass.

The comment tracking number that has been assigned to your comment is OSTSD51765.

Comment Date: February 13, 2008 00:19:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD51765

First Name: Robert
Middle Initial: L
Last Name: Glass
Organization:
Address: 736 Hayes
Address 2:
Address 3:
City: Oak Park
State: IL
Zip: 603021706
Country: USA
Email: boblglass@mac.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Do not destroy the land to pollute the air and water to produce oil from oil shale. Learn to walk. | 51765-001

Response for Document 51765

51765-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Ken Burke.

The comment tracking number that has been assigned to your comment is OSTSD51773.

Comment Date: February 13, 2008 00:50:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD51773

First Name: Ken
Middle Initial:
Last Name: Burke
Organization:
Address: 5000 MacArthur Blvd
Address 2:
Address 3:
City: Oakland
State: CA
Zip: 94613
Country: USA
Email: ninak@mills.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.

51773-001

51773-002

51773-003

Responses for Document 51773

51773-001: The BLM acknowledges the commentor's preference for Alternative A.

51773-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51773-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Ashley Braun.

The comment tracking number that has been assigned to your comment is OSTSD51776.

Comment Date: February 13, 2008 01:35:22AM
Oil Shale and Tar Sands
Comment ID: OSTSD51776

First Name: Ashley
Middle Initial:
Last Name: Braun
Organization:
Address: 3851 Mesquite Dr.
Address 2:
Address 3:
City: Dayton
State: OH
Zip: 45440
Country: USA
Email: abraun3@alumni.nd.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51776-001 51776-002 51776-003

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. The processes for developing and refining oil shale and tar sands have extremely intense and detrimental effects on the local ecological and hydrological systems. 51776-004

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. Thank you for considering my input. 51776-001 (cont.)

Sincerely, Ashley Braun

Responses for Document 51776

51776-001: The BLM acknowledges the commentor's preference for Alternative A.

51776-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51776-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

51776-004: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

Thank you for your comment, vernon cameron.

The comment tracking number that has been assigned to your comment is OSTSD51780.

Comment Date: February 13, 2008 02:49:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD51780

First Name: vernon
Middle Initial: r
Last Name: cameron
Organization:
Address: 2751 prescott east hwy
Address 2:
Address 3:
City: Prescott Valley
State: AZ
Zip: 86314
Country: USA
Email: vcullum@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Maybe we should start gill netting all the fish on our public lands water ways and squeezing THEM for oil. We would end up with a much cleaner and relatively more efficiently produced product without the massive road building, drilling, scraping, digging, polluting, reclaiming, lying, pandering, masterbating the public opinion, abusing the will of the intent of public lands use laws. Better yet, forget all the above. Just start cutting down, scraping and grinding up any thing with a carbon base. This way we can really accelerate global warming and can put an end to modern civilization in a succinct and relatively short manner and forego prolonged suffering and the ensuing enviromental apocalypse will be done with sooner than later. Most sincerely

51780-001

Response for Document 51780

51780-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Richard Huff.

The comment tracking number that has been assigned to your comment is OSTSD51784.

Comment Date: February 13, 2008 04:24:08AM
Oil Shale and Tar Sands
Comment ID: OSTSD51784

First Name: Richard
Middle Initial:
Last Name: Huff
Organization:
Address: 4918 Nevada Ave
Address 2:
Address 3:
City: Fort Wayne
State: IN
Zip: 468157335
Country: USA
Email: Richardnhuff@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

No development of oil shale and tar sands. We should be moving to solar, wind, and other greener processes. Thank you. | 51784-001

Response for Document 51784

51784-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Selina Schecroun.

The comment tracking number that has been assigned to your comment is OSTSD51785.

Comment Date: February 13, 2008 04:36:05AM
Oil Shale and Tar Sands
Comment ID: OSTSD51785

First Name: Selina
Middle Initial:
Last Name: Schecroun
Organization:
Address: 5316 Remington Drive
Address 2:
Address 3:
City: Alexandria
State: VA
Zip: 223093344
Country: USA
Email: selinaschecroun@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please preserve our natural treasures. Research for renewable energies should be the priority, not continuation of land desecration to continue using oil which is not a renewable ressource. The land we used is borrowed from our children. What will they inherit if we continue to devastate the planet?

51785-001

Response for Document 51785

51785-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, bill gilchrist.

The comment tracking number that has been assigned to your comment is OSTSD51787.

Comment Date: February 13, 2008 06:16:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD51787

First Name: bill
Middle Initial:
Last Name: gilchrist
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please stop planning drilling and excavation for oil and start planning for wind and solar energy production - and work on conservation.	51787-001

Response for Document 51787

51787-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Paula Stone.

The comment tracking number that has been assigned to your comment is OSTSD51792.

Comment Date: February 13, 2008 07:40:55AM
Oil Shale and Tar Sands
Comment ID: OSTSD51792

First Name: Paula
Middle Initial:
Last Name: Stone
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Fossil fuels are out of date; they are too polluting and too destructive. This country needs to move forward with renewable energy, not invest in the destruction of our land the pollution of our air and water. We need to show leadership in this area or we will fall behind the rest of the world. | 51792-001

Response for Document 51792

51792-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Shiela Smith.

The comment tracking number that has been assigned to your comment is OSTSD51797.

Comment Date: February 13, 2008 08:07:47AM
Oil Shale and Tar Sands
Comment ID: OSTSD51797

First Name: Shiela
Middle Initial: M
Last Name: Smith
Organization:
Address: 608 Main Street
Address 2:
Address 3:
City: Delta
State: PA
Zip: 17314
Country: USA
Email: ssmith608@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Do not desecrate the public lands. | 51797-001

Response for Document 51797

51797-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Bonnie Poulos.

The comment tracking number that has been assigned to your comment is OSTSD51799.

Comment Date: February 13, 2008 08:20:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD51799

First Name: Bonnie
Middle Initial: T
Last Name: Poulos
Organization:
Address: 1208 E. Smoot Dr.
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 857191351
Country: USA
Email: btpoulos@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is about time that we stop catering to the big oil corporations and think seriously about renewable forms of energy for Americans. Opening millions of acres of public lands in Colorado, Wyoming and Utah for extraction and development of oil shale and tar sands will ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants. Now is the time when we desperately need to transition to non-polluting, renewable energy sources. We should not sacrifice our public lands for short-sighted and unsustainable extraction of yet more fossil fuels. I oppose all development of oil shale and tar sands on public lands. If these corporations see a future in this kind of exploitation of the environment, then let them do it on land that they own and are responsible for, not on land that belongs to the American public. 51799-001

Response for Document 51799

51799-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Barbara Woods.

The comment tracking number that has been assigned to your comment is OSTSD51801.

Comment Date: February 13, 2008 08:30:34AM
Oil Shale and Tar Sands
Comment ID: OSTSD51801

First Name: Barbara
Middle Initial:
Last Name: Woods
Organization:
Address: 200 Riverside Drive
Address 2:
Address 3:
City: New York
State: NY
Zip: 10025
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not allow any furthur development on the Oil Shale and Tar Sands project. The area is becoming an environmental disaster. | 51801-001

Response for Document 51801

51801-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Anne Valdez.

The comment tracking number that has been assigned to your comment is OSTSD51802.

Comment Date: February 13, 2008 08:31:22AM
Oil Shale and Tar Sands
Comment ID: OSTSD51802

First Name: Anne
Middle Initial:
Last Name: Valdez
Organization:
Address: 129 Southwood Oaks Dr
Address 2:
Address 3:
City: Floresville
State: TX
Zip: 78114
Country: USA
Email: poetrader@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We don't need more oil development, we need the energy companies, with government encouragement, to invest in green, renewable energy. It's a joke that oil found here stays here - it goes onto the world market. We need to invest in newer technologies, force car companies to make cars more fuel efficient more rapidly and stop kowtowing to special interests with short-term profit goals at the cost of long-term solutions to greenhouse gases and economic problems. We could be the technology capital of the world with green technology. We risk ceding that to other countries while we piddle away with old oil. | 51802-001

Response for Document 51802

51802-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Virginia Black.

The comment tracking number that has been assigned to your comment is OSTSD51804.

Comment Date: February 13, 2008 08:47:22AM
Oil Shale and Tar Sands
Comment ID: OSTSD51804

First Name: Virginia
Middle Initial: R
Last Name: Black
Organization:
Address: 12 West Kennedy St
Address 2:
Address 3:
City: Statesboro
State: GA
Zip: 30458
Country: USA
Email: vrblack@georgiasouthern.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please just stop allowing activity that makes climate change more likely. If we make the planet uninhabitable, having more energy isn't going to help us a bit. All you're doing is giving a few people permission to make a lot of money engaging in a practice that will make things worse for the rest of us.

51804-001

Response for Document 51804

51804-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51806.

Comment Date: February 13, 2008 08:53:26AM
Oil Shale and Tar Sands
Comment ID: OSTSD51806

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Isn't there any way to curb rampant development? 51806-001

Response for Document 51806

51806-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Rav Freidel.

The comment tracking number that has been assigned to your comment is OSTSD51807.

Comment Date: February 13, 2008 08:54:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD51807

First Name: Rav
Middle Initial:
Last Name: Freidel
Organization:
Address: P.O. Box 733
Address 2: 677 Old Montauk Highway
Address 3:
City: Montauk
State: NY
Zip: 11954
Country: USA
Email: rav@agencyrav.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Despite every other excuse they made up, the Bush administration declared war against Iraq for one reason: oil. Now you want to declare war against the environment of Colorado and Utah for one thing: oil.

Not only will your actions guarantee the destruction of our public lands, you'll further contribute to global warming. This is not only bad public policy. It's stupid. It's past time for our country to focus on alternative energy. It's past time to double milage standards for all vehicles. It's past time to build bullet trains and increase mass transit. All of which will save so much oil, the Arabs will choke on what they've got left and the war on terror will be over with us being the victors. 51807-001

I urge you to say no to your mindless policy.

Response for Document 51807

51807-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Scot Phillips.

The comment tracking number that has been assigned to your comment is OSTSD51808.

Comment Date: February 13, 2008 08:59:00AM
Oil Shale and Tar Sands
Comment ID: OSTSD51808

First Name: Scot
Middle Initial: C
Last Name: Phillips
Organization:
Address: 500 E 61 Terr
Address 2:
Address 3:
City: Kansas City
State: MO
Zip: 64110
Country: USA
Email: bittersweettooth@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. 51808-001

Response for Document 51808

51808-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Michelle lord.

The comment tracking number that has been assigned to your comment is OSTSD51809.

Comment Date: February 13, 2008 09:08:34AM
Oil Shale and Tar Sands
Comment ID: OSTSD51809

First Name: Michelle
Middle Initial: r
Last Name: lord
Organization:
Address: 4839 w. engle rd
Address 2: unit 1a
Address 3:
City: Alsip
State: IL
Zip: 608033034
Country: USA
Email: angelette72@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Carlos Mencia would have a field day with all you dee dee dee's!! I can't believe I have to sign a petition to tell you guys not to do this. I too disgusted to comment w/o completely losing it. | 51809-001

Response for Document 51809

51809-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Richard Ouren.

The comment tracking number that has been assigned to your comment is OSTSD51810.

Comment Date: February 13, 2008 09:14:43AM
Oil Shale and Tar Sands
Comment ID: OSTSD51810

First Name: Richard
Middle Initial:
Last Name: Ouren
Organization:
Address: 17892 Co Rd G
Address 2:
Address 3:
City: Muscoda
State: WI
Zip: 53573
Country: USA
Email: dickouren@countryspeed.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We don't need more polluting energy sources. Lets go instead for solar, wind, geo thermal, or tidal etc. Global warming is real and must be reckoned with. | 51810-001

Response for Document 51810

51810-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Naomi Zurcher.

The comment tracking number that has been assigned to your comment is OSTSD51815.

Comment Date: February 13, 2008 09:59:47AM
Oil Shale and Tar Sands
Comment ID: OSTSD51815

First Name: Naomi
Middle Initial:
Last Name: Zurcher
Organization:
Address: 161 Columbia Hts
Address 2:
Address 3:
City: Brooklyn
State: NY
Zip: 11201
Country: USA
Email: treerap@sprintmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As a forestry professional ans an avid outdoorsperson, I am extremely disturbed by BLM's plans for oil shale and tar sands extractio and development on public lands throughout Wyoming, Colorado and Utah. We all know the debacle that ensues from such mining yet the BLM repeatedly choses to ignore the byproducts of these processes. 51815-001

I urge the BLM to adopt the "NO ACTION" alternative in the draft Programmatic EIS.

Response for Document 51815

51815-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Simon Teolis.

The comment tracking number that has been assigned to your comment is OSTSD51817.

Comment Date: February 13, 2008 10:03:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD51817

First Name: Simon
Middle Initial: J
Last Name: Teolis
Organization:
Address: 5 South Stargazer
Address 2:
Address 3:
City: Santa Fe
State: NM
Zip: 87506
Country: USA
Email: Celticmanst@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

If it is necessary to destroy every last pristine ecosystem to extract every drop of oil, coal or natural gas and turn the living earth into a moon scape you can keep your energy! | 51817-001

Response for Document 51817

51817-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Rita McCabe.

The comment tracking number that has been assigned to your comment is OSTSD51821.

Comment Date: February 13, 2008 10:12:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD51821

First Name: Rita
Middle Initial:
Last Name: McCabe
Organization:
Address: 1140 Blanchan
Address 2:
Address 3:
City: LaGrange Park
State: IL
Zip: 60526
Country: USA
Email: r.cabe@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil cannot be obtained by extracting it through tar sands and shale without first destroying the landscape. In a time when water supplies are dwindling, it would be more than foolish to undertake an exploitation of resources in a manner that demands a tremendous use of water. We need a more enlightened approach to satisfying our need for energy - one that is not self-defeating. | 51821-001

Response for Document 51821

51821-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Lisa DeJesse.

The comment tracking number that has been assigned to your comment is OSTSD51825.

Comment Date: February 13, 2008 10:19:57AM
Oil Shale and Tar Sands
Comment ID: OSTSD51825

First Name: Lisa
Middle Initial: A
Last Name: DeJesse
Organization:
Address: 50 Boston Turnpike
Address 2:
Address 3:
City: Pomfret Center
State: CT
Zip: 06259
Country: USA
Email: lisa.dejesse@uconn.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not destroy the beauty of the earth. 51825-001

Response for Document 51825

51825-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Nancy Macy.

The comment tracking number that has been assigned to your comment is OSTSD51826.

Comment Date: February 13, 2008 10:21:34AM
Oil Shale and Tar Sands
Comment ID: OSTSD51826

First Name: Nancy
Middle Initial: B
Last Name: Macy
Organization:
Address: 15485 Bear Creek Rd.
Address 2:
Address 3: 15485 Bear Creek Rd.
City: Boulder Creek
State: CA
Zip: 95006
Country: USA
Email: nbbm@cruzio.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Using oil shale and tar sands to produce oil is extraordinarily destructive --in fact COMPLETELY destructive. It is inconscionable that it would be considered, and I must protest against it. Please do not allow this to proceed.	51826-001

Response for Document 51826

51826-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mary Ann Evans.

The comment tracking number that has been assigned to your comment is OSTSD51830.

Comment Date: February 13, 2008 10:31:07AM
Oil Shale and Tar Sands
Comment ID: OSTSD51830

First Name: Mary Ann
Middle Initial:
Last Name: Evans
Organization:
Address: 3373 Ritner HIghway
Address 2:
Address 3:
City: Newville
State: PA
Zip: 17241
Country: USA
Email: cymru@epix.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. Please use some common sense and do not allow this to happen. 51830-001

Response for Document 51830

51830-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Anthony Parisi.

The comment tracking number that has been assigned to your comment is OSTSD51834.

Comment Date: February 13, 2008 10:38:18AM
Oil Shale and Tar Sands
Comment ID: OSTSD51834

First Name: Anthony
Middle Initial:
Last Name: Parisi
Organization:
Address: 8 Pschorn Lane
Address 2:
Address 3:
City: Hillsborough
State: NJ
Zip: 08844
Country: USA
Email: suepari@eclipse.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We must not permit the extraction and development of oil shale and tar sands. These products are too dangerous to be used. The health and welfare of our planet and all its life is at too much risk. | 51834-001

Response for Document 51834

51834-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51836.

Comment Date: February 13, 2008 10:46:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD51836

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51836-001 51836-002 51836-003

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51836-001 (cont.)

Responses for Document 51836

51836-001: The BLM acknowledges the commentor's preference for Alternative A.

51836-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51836-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51839.

Comment Date: February 13, 2008 10:54:07AM
Oil Shale and Tar Sands
Comment ID: OSTSD51839

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

What are companies like you going to do when you use and pollute up all we have left? I'm disgusted. | 51839-001

Response for Document 51839

51839-001: Thank you for your comment.

Thank you for your comment, Nancy LaPlaca.

The comment tracking number that has been assigned to your comment is OSTSD51840.

Comment Date: February 13, 2008 11:02:12AM
Oil Shale and Tar Sands
Comment ID: OSTSD51840

First Name: Nancy
Middle Initial:
Last Name: LaPlaca
Organization:
Address: 4801 W. Yale Ave.
Address 2:
Address 3:
City: Denver
State: CO
Zip: 802195651
Country: USA
Email: nancylaplaca@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please make sure you take a look at Energy Returned on Energy Invested (ERoEI) for the lifecycle of the project. 51840-001

I believe it will show that this project is not worth the time, energy, cost and pollution -- as well as water use. 51840-002

LET'S GET SMART. NO MORE BOONDOGGLES. WE DON'T HAVE TIME TO WASTE ON NON-SOLUTIONS, OR PROJECTS LIKE THIS THAT WILL MAKE GLOBAL WARMING WORSE.

See the article below:

Experts debate oil shale's future Brent Gardner-Smith, Aspen Daily News GRAND JUNCTION -- Battling viewpoints on oil shale were presented on Friday at a water seminar sponsored by the Colorado River District.

The theme of the conference was "Water: Fueling the Future?" and much of that question pertains to how much water it might take to extract oil from the vast oil shale deposits in Western Colorado, eastern Utah and southeastern Wyoming.

"Half of the world's oil shale is within 100 miles of this room," Randy Udall of the Community Office for Resource Efficiency told the audience at the Two Rivers Convention Center in Grand Junction.

And he thinks the oil shale should stay in the ground.

"We have one energy boom in our region and that's plenty," he said.

He said that oil shale has low energy content and it is not worth the environmental degradation,

water use, and intense electricity use that would go along with intense oil shale production.

Udall believes that pursuing energy efficiency measures makes far more sense than developing elaborate and technically complex schemes to heat the oil shale in the ground as part of the process of turning it into fuel.

"I do think there are better ways to address our energy needs than oil shale," he said. "The way we are using petroleum right now in the United States today is a tragedy and it's kind of a bad joke and we will not use it this stupidly and this wastefully in the future. So oil shale will have to compete with all kinds of ways to save this precious fluid we call oil or 'black magic.'"

But Tony Dammer, the director of the Office of Naval Petroleum and Oil Shale Reserves with U.S. Department of Energy, said the federal government is bullish on oil shale development and that the potential exists for 2 trillion barrels of oil to be extracted from the oil shale in the Green River Basin region.

"It is a huge, secure source," he said. (17 September 2007)

Water needs for potential oil shale industry could complicate things Dennis Webb, Glenwood Springs Post Independent (Colorado) America's thirst for oil is threatening to add to the thirst for water in the West.

Meeting the nation's energy needs also is threatening water quality in the region, speakers said Friday at a seminar in Grand Junction on energy development's impacts on water. The seminar was organized by the Colorado River District, based in Glenwood Springs.

It focused on possible oil shale development, which is considered to be an elephant in the room when it comes to planning for Colorado's future needs.

High oil prices and a diminishing global supply have renewed interest in the oil shale industry, which went bust in the early 1980s. If the industry took off, full production could reach 2.5 million barrels per day. Each barrel could require 1 to 3 barrels of water to produce.

If full production occurred, that would require additional withdrawals of water from the Colorado and other rivers in western Colorado, said Cathy Wilson, who has studied the oil shale industry's water needs for Los Alamos National Laboratory.

Her study found that the White River in northwest Colorado might be able to support production of 500,000 barrels of oil per day, but only with creation of 16,000 acre feet of new water storage to provide backup during dry years. (15 September 2007)

Responses for Document 51840

51840-001: The computation of EROI is not within the scope of this PEIS. The PEIS addresses a land allocation decision; the proposed action does not commit any mineral resources or grant any lease rights.

51840-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51841.

Comment Date: February 13, 2008 11:02:48AM
Oil Shale and Tar Sands
Comment ID: OSTSD51841

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I believe we should do this and more! We are way to dependent on foreign sources. I am sure the majority of those who are against this are also against the war too. Probably for the same reason..cause you like to give other nations all of your money!

51841-001

Response for Document 51841

51841-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Charles Conner.

The comment tracking number that has been assigned to your comment is OSTSD51842.

Comment Date: February 13, 2008 11:06:57AM
Oil Shale and Tar Sands
Comment ID: OSTSD51842

First Name: Charles
Middle Initial:
Last Name: Conner
Organization:
Address: 501 S. Sonoyta Way
Address 2:
Address 3:
City: Why
State: AZ
Zip: 85321
Country: USA
Email: whysaurus@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please say NO to oil shale and tar sands development - a ruinous and grossly inefficient method to obtain energy that we waste every day | 51842-001

Response for Document 51842

51842-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Guy Davis.

The comment tracking number that has been assigned to your comment is OSTSD51843.

Comment Date: February 13, 2008 11:07:31AM
Oil Shale and Tar Sands
Comment ID: OSTSD51843

First Name: Guy
Middle Initial:
Last Name: Davis
Organization:
Address: 15225 Leeward Drive B6
Address 2:
Address 3:
City: Corpus Christi
State: TX
Zip: 78418
Country: USA
Email: guy@guydavisproperties.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I know our present administration is in total denial that we have a problem with Global Warming, but if this short note helps them to reconsider and do something positive about it, maybe the planet might look kindly towards Mr. Bush in the far distant future. Better late than ever. | 51843-001

Response for Document 51843

51843-001: Thank you for your comment.

Thank you for your comment, Barbara Ocskai.

The comment tracking number that has been assigned to your comment is OSTSD51845.

Comment Date: February 13, 2008 11:09:36AM
Oil Shale and Tar Sands
Comment ID: OSTSD51845

First Name: Barbara
Middle Initial:
Last Name: Ocskai
Organization:
Address: 13525 Lost Lake Road
Address 2:
Address 3:
City: Snohomish
State: WA
Zip: 98296
Country: USA
Email: barbara@soulproprietor.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Let's not go backwards. We MUST be forward thinking. Do the right thing! | 51845-001

Response for Document 51845

51845-001: Thank you for your comment.

Thank you for your comment, Arvin Eyre.

The comment tracking number that has been assigned to your comment is OSTSD51846.

Comment Date: February 13, 2008 11:12:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD51846

First Name: Arvin
Middle Initial: l
Last Name: Eyre
Organization:
Address: 1 CENTRAL E.
Address 2:
Address 3:
City: Cascade
State: MT
Zip: 594218118
Country: USA
Email: pettem@sofast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Until the price of gas and oil becomes what the real price should be, this oil in the ground should stay there. Also I do not believe the tech. for this development is clean enough to proceed. | 51846-001

Response for Document 51846

51846-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Patricia Monahan.

The comment tracking number that has been assigned to your comment is OSTSD51847.

Comment Date: February 13, 2008 11:18:01AM
Oil Shale and Tar Sands
Comment ID: OSTSD51847

First Name: Patricia
Middle Initial:
Last Name: Monahan
Organization:
Address: 1455 Sandburg Terrace
Address 2: apt 2901&2B
Address 3:
City: Chicago
State: IL
Zip: 60610
Country: USA
Email: prmflicka@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

stop ruining our landscape - you are supposed to preserve our public lands - not sell them off to the highest bidder! | 51847-001

Response for Document 51847

51847-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Amy Adshead.

The comment tracking number that has been assigned to your comment is OSTSD51850.

Comment Date: February 13, 2008 11:27:24AM
Oil Shale and Tar Sands
Comment ID: OSTSD51850

First Name: Amy
Middle Initial: T
Last Name: Adshead
Organization:
Address: 334 Oso Ridge Route
Address 2:
Address 3:
City: Grants
State: NM
Zip: 87020
Country: USA
Email: gregamy@wildblue.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager I write to urge the BLM to choose the "No ACtion" alternative in the Draft EIS for Oil Shale and Tar Sands.We need to move away from fossil fuels, not further ravage our already burdened public lands. Please choose the "No Action" alternative. Thank-you for the opportunity to comment. Sincerely, Amy T. Adshead 334 Oso Ridge Rt Grants New Mexico 87020

51850-001

Response for Document 51850

51850-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Peggy Coon.

The comment tracking number that has been assigned to your comment is OSTSD51854.

Comment Date: February 13, 2008 11:34:24AM
Oil Shale and Tar Sands
Comment ID: OSTSD51854

First Name: Peggy
Middle Initial: E
Last Name: Coon
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Opening public lands to oil shale extraction is a terrible idea. We are already seeing terrible environmental impact from oil shale extraction in Canada. We should not make the same mistakes here. Energy independence should be explored through conservation, new technology development and actively encouraging American citizens to lesson their energy usage through a myriad of conservation measures. This is MY land you are ready to despoil and the land of every other American please don't give it away to George Bush's energy industry cronies.	51854-001

Response for Document 51854

51854-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Juli Slivka.

The comment tracking number that has been assigned to your comment is OSTSD51856.

Comment Date: February 13, 2008 11:43:08AM
Oil Shale and Tar Sands
Comment ID: OSTSD51856

First Name: Juli
Middle Initial:
Last Name: Slivka
Organization:
Address: 945 S. Elizabeth St.
Address 2:
Address 3:
City: Denver
State: CO
Zip: 80209
Country: USA
Email: juli.slivka@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Thank you for the opportunity to comment on BLM's Draft PEIS for commercial oil shale leasing.

I am concerned that BLM is willing to sacrifice substantial portions of our public lands for something that has not yet been proven viable. Even industry leaders think we are a dozen years away from successful commercial-scale oil shale development. The Draft PEIS should provide analysis of the cumulative impacts of the proposed actions, but this is impossible since research and development of new technologies will not be completed for years. The public cannot sufficiently assess the potential impacts to our land, air, and water and make substantive comments without all of the necessary information. 51856-001

I am most concerned about the important and relevant information that will be hidden from the public because it is "proprietary." It is unacceptable for corporations to use our public lands for activities without revealing the details of those activities to the people who live here and giving us a chance to comment. 51856-002

A native Coloradan, I have watched many of our spectacular landscapes disappear over the years, often due to decisions made by government officials and corporate executives who don't live here. I hope we critically and adequately assess projects that will damage our few remaining wild lands.

I ask BLM to not lease our public lands for commercial oil shale development until the technologies are fully developed and can be properly assessed. I also ask BLM to make public the chemical processes that corporations will be using on our public lands, and give residents an opportunity to comment, before leasing land for commercial oil shale development. 51856-003

Responses for Document 51856

51856-001: A cumulative effects analysis for amending the RMPs has been presented to the extent possible. However, because of the limited character of the decision to be made on the basis of this PEIS (allocation of lands where applications for leasing can be considered), and because there will be additional environmental analysis prior to leasing, it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. As a result of several comments regarding the cumulative impacts analysis in the Draft PEIS, this point has now been clarified in Sections 1.2.1., 6.1.5, and 6.2.6 of the document. At the leasing decision and at the decision to approve a plan of development, more specific cumulative effects analyses would be appropriate, and such analysis would be able to be completed, as specific technical and environmental information for those analyses should be available.

51856-002: Although the regulatory requirements for the approval of oil shale plans of development are not yet finalized, it can be assumed that comparable requirements for the exploration, development, and production of mineral resources on the public lands would be drafted. For example, Onshore Order No. 1 contains the requirements and information necessary for the approval of all proposed oil and gas exploratory, development, or service wells. Since this is an allocation decision, subsequent NEPA analysis will be required prior to offering for lease parcels of land for commercial oil shale exploration and development or prior to the approval of plans of development. This NEPA analysis will evaluate environmental impacts of the operation(s) and develop specific measures to mitigate or eliminate those impacts. Under this land use planning and NEPA process, there are provisions for public participation.

If there is incomplete or no information regarding any particular decision, the BLM will comply with CEQ regulations (40 CFR 1502.22) and make it clear that such information is lacking. If the incomplete information relevant to reasonably foreseeable significant adverse impacts is essential to a reasoned choice among alternatives and the overall costs of obtaining it are not exorbitant, the BLM will obtain the information. If overall costs of obtaining the information are exorbitant or the means to obtain it are not known, the BLM will provide the appropriate statements on the relevance of the information and a summary of any existing information.

51856-003: Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sands resources, among other unconventional fuels, and in an environmentally sound manner. As required by that Act, the BLM initiated this PEIS, intending to provide the environmental analysis for issuance of commercial leases that would convey development rights to lease holders. As discussed in the Draft PEIS, because of various uncertainties regarding the locations of developments and the technologies to be employed, and the lack of knowledge of specific impacts on various resources, the BLM decided

not to analyze the environmental impacts of issuing particular leases at this time and instead decided to analyze amendments of land use plans. Amending those plans is necessary, but not sufficient, to proceed to commercial development of federal oil shale resources.

The BLM believes that analyzing an allocation decision provides the opportunity to build on scientific, governmental, or industry research in order to analyze, in a general way, the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale exploration and development, further analysis will be carried out and documented in accordance with NEPA, to support any decisions in this regard. That NEPA analysis will evaluate the environmental impacts of the oil shale exploration and development and develop specific measures to mitigate or eliminate the identified impacts. The BLM believes that such a phased approach will ensure that commercial oil shale development programs meet the intent of Congress and take advantage of the best available practices to minimize impacts and to offer opportunities for state, local communities, and the public to participate in the process.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA processes.

Thank you for your comment, merle neidell.

The comment tracking number that has been assigned to your comment is OSTSD51858.

Comment Date: February 13, 2008 11:46:52AM
Oil Shale and Tar Sands
Comment ID: OSTSD51858

First Name: merle
Middle Initial:
Last Name: neidell
Organization:
Address: 40 bacon rd
Address 2:
Address 3:
City: st james
State: NY
Zip: 11780
Country: USA
Email: neidell@optonline.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

the anti environmental stance of the current administration has far reaching consequences in an unquenchable quest for fossil fuels. consequently, I am writing to request a "no action" alternative to the draft programmatic environmental impact statement dealing with oil shale and tar sands development on public lands in the west. tragically, a procedure that would open up millions of pristine wilderness acreage to development would have devasting consequences. 51858-001

Response for Document 51858

51858-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Julie Leavenworth.

The comment tracking number that has been assigned to your comment is OSTSD51859.

Comment Date: February 13, 2008 11:47:04AM
Oil Shale and Tar Sands
Comment ID: OSTSD51859

First Name: Julie
Middle Initial: S
Last Name: Leavenworth
Organization:
Address: PO Box 592
Address 2:
Address 3:
City: Indianola
State: WA
Zip: 98342
Country: USA
Email: jleavenworth@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please save our public lands. We need to mine for alternative energy and leave the Carbo emitting fossil fuels where they lay...Its time for CHANGE | 51859-001

Response for Document 51859

51859-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Barbara Menkes.

The comment tracking number that has been assigned to your comment is OSTSD51861.

Comment Date: February 13, 2008 12:09:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD51861

First Name: Barbara
Middle Initial:
Last Name: Menkes
Organization:
Address: 173 Sullivan St
Address 2:
Address 3:
City: New York
State: NY
Zip: 10012
Country: USA
Email: bmenkes777@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Re: Bush administration's preparation to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands.

The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 51861-001

We need to be moving away from fossil fuels and reducing our greenhouse gas emissions -NOW.

What are we waiting for?

Response for Document 51861

51861-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Dale La Cognata.

The comment tracking number that has been assigned to your comment is OSTSD51864.

Comment Date: February 13, 2008 12:33:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD51864

First Name: Dale
Middle Initial:
Last Name: La Cognata
Organization:
Address: 6244 Dover Ct.
Address 2:
Address 3:
City: Fishers
State: IN
Zip: 46038
Country: USA
Email: dalelacognata@insightbb.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose the development of land for oil sale projects! The destruction is OBSCENE!!! 51864-001

Response for Document 51864

51864-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jay Sikorski.

The comment tracking number that has been assigned to your comment is OSTSD51865.

Comment Date: February 13, 2008 12:37:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD51865

First Name: Jay
Middle Initial:
Last Name: Sikorski
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Opening up mass amounts of delicate wilderness for fossil fuel extraction is not the method of choice for energy in the 21st century. We must put our minds into serving our public's energy demands with new sources that will not end up altering the natural systems of the planet that supports us. This method of energy extraction also requires massive amounts of energy, which would likely be provided by building several new coal-fire power plants that would be fed by new coal mines. This results in too much burning of fossil fuels when what we need to begin to do is turn away from this technology. Therefore, this method will increase the accelerated global warming that we are already experiencing, sacrifice delicate wilderness that supports many species that depend on public lands for survival, including several endangered and threatened species, and will cost tax-payers billions of dollars when the money could be appropriated so much more efficiently. I DO NOT support the Bureau of Land Management's proposal. 51865-001

Response for Document 51865

51865-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Doug and Lee Buckmaster.

The comment tracking number that has been assigned to your comment is OSTSD51868.

Comment Date: February 13, 2008 12:47:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD51868

First Name: Doug and Lee
Middle Initial:
Last Name: Buckmaster
Organization:
Address: 1965 Emmons Road
Address 2:
Address 3: 1965 Emmons Road
City: Cambria
State: CA
Zip: 93428
Country: USA
Email: dbuck1@charter.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We are totally opposed to the destructive development of oil shale and tar sands deposits. We must stop this insane drive to squeeze every drop of oil out of the environment with no consideration whatsoever of the negative aspects of these efforts. 51868-001

Response for Document 51868

51868-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Donna Cussac.

The comment tracking number that has been assigned to your comment is OSTSD51869.

Comment Date: February 13, 2008 12:50:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD51869

First Name: Donna
Middle Initial: L
Last Name: Cussac
Organization:
Address: 211 Hannah Rd NW
Address 2:
Address 3:
City: Cleveland
State: TN
Zip: 37311
Country: USA
Email: epona111@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please please, do not ravage any more of our land and air. With all of the money that you will be pouring into this project, that money would be better spent on creating electrical or battery operated vehicles, possibly hydrogen ones. And the ability for our people to afford them can be worked on as well. We have to get away from oil and petroleum consumption whether it is in a foreign land or in our own. Please do something that is right this time. 51869-001

Response for Document 51869

51869-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Kleomichele Leeds.

The comment tracking number that has been assigned to your comment is OSTSD51874.

Comment Date: February 13, 2008 13:26:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD51874

First Name: Kleomichele
Middle Initial:
Last Name: Leeds
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This administration wishes to destroy our land in every and any way possible for the sake of an outmoded energy source. This kind of exploitation should be illegal. Certainly it is immoral. Let us turn to our natural, sustainable and renewable resources - sun, wind, etc. to preserve and conserve our precious land.	51874-001

Response for Document 51874

51874-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51878.

Comment Date: February 13, 2008 14:25:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD51878

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

one again our land is torn apart for little gain! This is a very poor approach to getting resources while the land suffers! I hope this will not happen! | 51878-001

Response for Document 51878

51878-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, D. Gal.

The comment tracking number that has been assigned to your comment is OSTSD51880.

Comment Date: February 13, 2008 14:30:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD51880

First Name: D.
Middle Initial: C
Last Name: Gal
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Sirs:

There is no possible reasonable excuse for opening up these roads. Yet another case of rich politicians and lobbyists getting together to bilk the public.

Please cease and desist for the sake of the nation and our national patrimony in animals, flora, and waters. Sincerely, DCG

51880-001

Response for Document 51880

51880-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Adrienne Ross.

The comment tracking number that has been assigned to your comment is OSTSD51884.

Comment Date: February 13, 2008 15:04:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD51884

First Name: Adrienne
Middle Initial:
Last Name: Ross
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This is to request that you please do not allow exploration and extraction and development of shale oil and tar sands on public lands. These are meant to be protected for our present and future enjoyment. Thank you. | 51884-001

Response for Document 51884

51884-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Leslie Kuhn.

The comment tracking number that has been assigned to your comment is OSTSD51886.

Comment Date: February 13, 2008 15:08:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD51886

First Name: Leslie
Middle Initial: A
Last Name: Kuhn
Organization:
Address: 6162 Oakpark Trail
Address 2:
Address 3:
City: Haslett
State: MI
Zip: 48840
Country: USA
Email: KuhnL@msu.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I strongly oppose the opening of public lands for extraction of oil shale and tar sands. These operations would ravage the landscape and generate large quantities of oil-based pollutants. Due to the close connection between burning fossil fuels, generation of greenhouse gases, and global warming, this is clearly the time for us to shift policy away from oil and towards clean, renewable power sources. 51886-001

Response for Document 51886

51886-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jessica Jasper.

The comment tracking number that has been assigned to your comment is OSTSD51892.

Comment Date: February 13, 2008 15:37:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD51892

First Name: Jessica
Middle Initial: L
Last Name: Jasper
Organization:
Address:
Address 2:
Address 3:
City: Seattle, WA
State: WA
Zip: 98121
Country: USA
Email: mystic224@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

PLEASE DO NOT INVEST ANY MORE PRECIOUS TIME AND MONEY ON ANY FORM OF OIL PRODUCTS. TEH FUTURE IS IN RENEWABLE SOURCES OF ENERGY. WE NEED TO MOVE FORWARD! | 51892-001

Response for Document 51892

51892-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Melanie Picciotti.

The comment tracking number that has been assigned to your comment is OSTSD51893.

Comment Date: February 13, 2008 15:38:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD51893

First Name: Melanie
Middle Initial:
Last Name: Picciotti
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.

51893-001

51893-002

51893-003

Response for Document 51893

51893-001: The BLM acknowledges the commentor's preference for Alternative A.

51893-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51893-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Giro Cestaro.

The comment tracking number that has been assigned to your comment is OSTSD51895.

Comment Date: February 13, 2008 15:46:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD51895

First Name: Giro
Middle Initial:
Last Name: Cestaro
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager: Please act to block the BLM proposal to open nearly 2 million acres of public land in Wy.,Co. and Utah to commercial leasing of oil shale and tar sands. The negative environmental impact of such action would be sheer folly at a time when we still have an opportunity to control and reverse the production of greenhouse gases. We are counting on you to oppose this destructive proposal by choosing the "no action" alternative to this draft proposal. That is,in fact,the only action open to sane, responsible citizenship. Thank you, G.Cestaro

51895-001

Response for Document 51895

51895-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Sharon Morgan.

The comment tracking number that has been assigned to your comment is OSTSD51896.

Comment Date: February 13, 2008 15:52:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD51896

First Name: Sharon
Middle Initial: A
Last Name: Morgan
Organization:
Address: 4731 Ironwood Ln.
Address 2:
Address 3:
City: Silver City
State: NM
Zip: 88061
Country: USA
Email: paganlady718@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Public lands should not be up for grabs by the oil industry. Policy must include the PUBLIC's comments, ideas, concern for environmental integrity, for local flora & fauna, and especially any endangered species and ecology.	51896-001

Response for Document 51896

51896-001: Thank you for your comment. This PEIS provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale leasing. Furthermore, it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions. It puts operators on notice that development of oil shale can occur only if it is done in an environmentally acceptable manner, and it also reiterates the requirements that any development will have to comply with existing laws and regulations regarding protection of the natural, social, and cultural environment. At the project-specific level, future environmental analysis for leasing and development actions will include detailed evaluation of potential impacts on wildlife, plants, and threatened and endangered species.

Thank you for your comment, LaRoy and Mary Seaver.

The comment tracking number that has been assigned to your comment is OSTSD51898.

Comment Date: February 13, 2008 16:15:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD51898

First Name: LaRoy and Mary
Middle Initial: E
Last Name: Seaver
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

As citizens of our country who have used public lands--forests, parks, etc.--often we write to express our opposition to leasing public lands for oil and gas exploration Such exploration destroys the natural setting and gives corporations subsidies they should not have.

These leases do not move us in the direction of energy policy that produces energy from renewable sources. That is the direction our energy policy should be moving in, not in the search for non-renew- able energy that destroys the benefits public lands offer our citizens.

51898-001

Response for Document 51898

51898-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

Thank you for your comment, Linda DiSantis.

The comment tracking number that has been assigned to your comment is OSTSD51900.

Comment Date: February 13, 2008 16:26:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD51900

First Name: Linda
Middle Initial: K
Last Name: DiSantis
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Destroying areas like this is irreversible and we must begin to think about how we reduce our dependence on petroleum rather than where we find every last drop. We cannot continue to destroy this planet. We have an obligation to maintain the planet's ability to sustain life and quality of life, and these types of projects are untenable and should not be considered appropriate ever.	51900-001

Response for Document 51900

51900-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Brigid Geroux.

The comment tracking number that has been assigned to your comment is OSTSD51902.

Comment Date: February 13, 2008 17:15:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD51902

First Name: Brigid
Middle Initial: P
Last Name: Geroux
Organization:
Address: 5203 Deerfield Road
Address 2:
Address 3:
City: Eau Claire
State: WI
Zip: 54701
Country: USA
Email: gerouxsalm@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The earth is fragile and we are its caretakers. You have been chosen as leaders to protect America's treasures. I urge you to prevent drilling on public lands. They belong not to the government, not to big business, but to all Americans and generations to come. 51902-001

Response for Document 51902

51902-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Carole Tebay.

The comment tracking number that has been assigned to your comment is OSTSD51904.

Comment Date: February 13, 2008 17:26:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD51904

First Name: Carole
Middle Initial:
Last Name: Tebay
Organization:
Address:
Address 2:
Address 3:
City: Milton
State: FL
Zip: 32583
Country: USA
Email: tebay@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am against oil shale and tar sand mining on public lands in the western US because it is destructive to animal habitats, creates more pollution to process, and the American people are wasteful with the resources we have and do not seem to be changing their ways. | 51904-001

Response for Document 51904

51904-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, John Blair.

The comment tracking number that has been assigned to your comment is OSTSD51907.

Comment Date: February 13, 2008 17:41:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD51907

First Name: John
Middle Initial:
Last Name: Blair
Organization: Valley Watch, Inc.
Address: 800 Adams Ave.
Address 2:
Address 3:
City: Evansville
State: IN
Zip: 47713
Country: USA
Email: ecoserve1@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

After seeing videos and photos of oil shale and tar sand developments in Alberta, Canada, I cannot support these methods of extraction in the US.

Thus,I urge you to disqualify any public lands from either oil shale or tar sadn development.

51907-001

Response for Document 51907

51907-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, William Kohler.

The comment tracking number that has been assigned to your comment is OSTSD51909.

Comment Date: February 13, 2008 17:48:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD51909

First Name: William
Middle Initial: L
Last Name: Kohler
Organization:
Address: 1238 Coburg Rd
Address 2:
Address 3:
City: Eugene
State: OR
Zip: 97401
Country: USA
Email: Potawatomi13@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

No more destruction of the landscape in the name of mining or oil exploration/recovery. | 51909-001

Response for Document 51909

51909-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Krista Mahoney.

The comment tracking number that has been assigned to your comment is OSTSD51911.

Comment Date: February 13, 2008 17:56:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD51911

First Name: Krista
Middle Initial: A
Last Name: Mahoney
Organization:
Address: 4426 59 st
Address 2:
Address 3:
City: Sacramento
State: CA
Zip: 95820
Country: USA
Email: soulm8s@surewest.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. | 51911-001

Response for Document 51911

51911-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Jamie Riel.

The comment tracking number that has been assigned to your comment is OSTSD51912.

Comment Date: February 13, 2008 18:01:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD51912

First Name: Jamie
Middle Initial:
Last Name: Riel
Organization:
Address: P.O. Box 258
Address 2:
Address 3:
City: Fryeburg
State: ME
Zip: 04037
Country: USA
Email: treesoftaproot2@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West. Also, we desperately need to be transitioning away from fossil fuels and reduce greenhouse gas emissions. 51912-001

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The BLM should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51912-002 51912-003

I Strongly urge the BLM to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51912-001 (cont.)

Sincerely,

Responses for Document 51912

51912-001: The BLM acknowledges the commentor's preference for Alternative A.

51912-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51912-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, jorian trowbridge.

The comment tracking number that has been assigned to your comment is OSTSD51913.

Comment Date: February 13, 2008 18:06:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD51913

First Name: jorian
Middle Initial:
Last Name: trowbridge
Organization:
Address: 60 new street
Address 2:
Address 3:
City: kingston
State: NY
Zip: 12401
Country: USA
Email: lemmieadam@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

please leave our wilderness alone tar sands and shale are the worst possible thing to do with this land maybe you should consider putting wind turbines up instead you would get alot more longevity out of our land than what is being proposed. please dont leave our children this horrible legacy earth raping they will never see its bounty all they will have is a great big waste land. PLEASE reconsider this would be a huge unforgivable mistake. sincerely jorian trowbridge

51913-001

Response for Document 51913

51913-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sylvia Jones.

The comment tracking number that has been assigned to your comment is OSTSD51916.

Comment Date: February 13, 2008 18:33:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD51916

First Name: Sylvia
Middle Initial:
Last Name: Jones
Organization:
Address: 10906 Exposition Blvd.
Address 2:
Address 3:
City: Los Angeles,
State: CA
Zip: 900643125
Country: USA
Email: syljones@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I would have thought we were too far advanced as a society to ever go back to using the methods for clearing lumber and mining the way it was done in the past. Class, sophistication, spirituality; all these things should intervene , or is it still the same Wild West? | 51916-001

Response for Document 51916

51916-001: Thank you for your comment.

Thank you for your comment, Elyse Stabiner.

The comment tracking number that has been assigned to your comment is OSTSD51919.

Comment Date: February 13, 2008 18:54:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD51919

First Name: Elyse
Middle Initial: M
Last Name: Stabiner
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I do not believe that oil sands and tar should be allowed on public lands. We should be working towards a newer method of doing things, don't you think so?

At a minimum, oil sands and tar should not be permitted on public lands -- or private, for that matter. Thank you for your time and consideration.

51919-001

Response for Document 51919

51919-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Maya Be.

The comment tracking number that has been assigned to your comment is OSTSD51931.

Comment Date: February 13, 2008 21:04:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD51931

First Name: Maya
Middle Initial:
Last Name: Be
Organization:
Address: 525 SW 155th St
Address 2:
Address 3:
City: Burien
State: WA
Zip: 98166
Country: USA
Email: mayabels@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Don't sell off our resources. No oil shale and tar sands on public lands. Go solar now. | 51931-001

Response for Document 51931

51931-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51933.

Comment Date: February 13, 2008 21:13:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD51933

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager: I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in COMPLETELY unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely. The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. Sincerely,

51933-001

51933-002

51933-003

51933-001 (cont.)

Biology and Environmental Studies Student University of

Responses for Document 51933

51933-001: The BLM acknowledges the commentor's preference for Alternative A.

51933-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51933-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which

lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Charles Stout.

The comment tracking number that has been assigned to your comment is OSTSD51934.

Comment Date: February 13, 2008 21:25:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD51934

First Name: Charles
Middle Initial: D
Last Name: Stout
Organization:
Address: P.O. Box 2146
Address 2:
Address 3:
City: Alpine
State: CA
Zip: 91903
Country: USA
Email: dave@scripps.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As a taxpayer and U.S. citizen I am adamantly opposed to all oil and tar sands development in the continental U.S. It's not just that it destroys habitats, watersheds and water quality, it keeps our country on fossil fuel dependency, which is bad for the economy, because it inhibits alternative energy development and worsens the effects of global warming. I sincerely expect that by Jan. 20, 2009 your destructive proposal will be dead. 51934-001

Response for Document 51934

51934-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, anne veraldi.

The comment tracking number that has been assigned to your comment is OSTSD51935.

Comment Date: February 13, 2008 21:36:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD51935

First Name: anne
Middle Initial:
Last Name: veraldi
Organization:
Address:
Address 2:
Address 3:
City:
State: CA
Zip:
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose the development of oil shale and tar sands on public land. | 51935-001

Response for Document 51935

51935-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51936.

Comment Date: February 13, 2008 21:53:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD51936

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please save our natural wonders. We need to think of the future impacts we are creating and we need act now!! We need to think eco friendly and fast otherwise. | 51936-001

Response for Document 51936

51936-001: Thank you for your comment.

Thank you for your comment, Penelope Delevoryas.

The comment tracking number that has been assigned to your comment is OSTSD51937.

Comment Date: February 13, 2008 21:57:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD51937

First Name: Penelope
Middle Initial:
Last Name: Delevoryas
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please support a "No Action" alternative in the Programmatic EIS regarding extraction and development of oil shale and tar sands in Colorado, Utah and Wyoming. This would be a wasteful method of extraction that would cause huge damage to the environment, animals and plants and contribute huge amounts of greenhouse gases. We should be looking for ways to reduce use of fossil fuels, not create more pollution! Thank you. | 51937-001

Response for Document 51937

51937-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Brandon Ruhe.

The comment tracking number that has been assigned to your comment is OSTSD51940.

Comment Date: February 13, 2008 22:02:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD51940

First Name: Brandon
Middle Initial: M
Last Name: Ruhe
Organization:
Address: 3701-1 Orchid Place
Address 2:
Address 3:
City: Emmaus
State: PA
Zip: 18049
Country: USA
Email: bmruhe@ptd.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

To Whom It May Concern:

Public land is a common resource belonging to the people of this nation. Your obvious catering to the oil industry has been gaining a wider base of attention in this country and is truly unAmerican. You are helping to destroy our nation and make our resources available to private companies in a way that is deplorable in both its moral and ethical corruptness. Economists are not scientists and should not have equal say. When do scientists try to dictate and hijack the economy? Stay out of disciplines that you don't understand. Please do the right thing and protect America's resources and public property. To do otherwise is shameful. 51940-001

Response for Document 51940

51940-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Prof.John Delevoryas.

The comment tracking number that has been assigned to your comment is OSTSD51943.

Comment Date: February 13, 2008 22:13:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD51943

First Name: Prof.John
Middle Initial: B
Last Name: Delevoryas
Organization:
Address: 1668 Jacob Avenue
Address 2:
Address 3:
City: San Jose
State: CA
Zip: 951243813
Country: USA
Email: bolsero@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am totally opposed to ANY drilling on these pristine acres for the simple reason that it will RAVAGE the land FOREVER.Have these people no regard for the natural treasures we have in this country.STOP ANY DRILLING,PERIOD!!!!!!!	51943-001

Response for Document 51943

51943-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Carol Long.

The comment tracking number that has been assigned to your comment is OSTSD51944.

Comment Date: February 13, 2008 22:14:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD51944

First Name: Carol
Middle Initial: J
Last Name: Long
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The EIR does not take into account the cumulative effect on the biota, or on the greenhouse gases of the planet, by the development of oil shale and tar sands on our public lands in the Rocky Mountain states. The "no action" alternative is the only environmentally acceptable one. 51944-001 51944-002

Responses for Document 51944

51944-001: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions. The impacts of greenhouse gas emissions will also be assessed.

51944-002: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Bruce Barnbaum.

The comment tracking number that has been assigned to your comment is OSTSD51945.

Comment Date: February 13, 2008 22:57:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD51945

First Name: Bruce
Middle Initial:
Last Name: Barnbaum
Organization:
Address: 31417 Mountain Loop Highway
Address 2:
Address 3:
City: Granite Falls
State: WA
Zip: 98252
Country: USA
Email: barnbaum@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

In his 2006 State of the Union speech, President Bush stated that the US is addicted to oil. His solution: get more oil. That's like saying the solution to a drug addiction is to get more drugs. The Bush prescription is utterly senseless. It would become utterly destructive is more land is opend up to oil drilling, and even worse if it is opened to tar sands development, which is even more environmentally destructive. Do not open up the most magnificent portions of the US—Utah, Wyoming, Colorado, or any other location—to tar sands development. Opening up land for such destruction would be nothing less than criminal

51945-001

Response for Document 51945

51945-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51947.

Comment Date: February 13, 2008 23:58:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD51947

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

The American People are so tired of the Bush Adm. doing what you want to do against our consititution and our laws. No more drilling/ruining land/forest for your search for oil just for a buck ruining our planet. The American People do not want our planet ruined for you to make a buck, we want you to find alternative fuels and are sick of you doing/passing laws for your profits. We have had it with this Administrations greed for a buck. The American People have had IT. | 51947-001

Response for Document 51947

51947-001: Thank you for your comment. The BLM acknowledges the commentor's preference for alternative fuel sources.

Thank you for your comment, Todd Quade.

The comment tracking number that has been assigned to your comment is OSTSD51951.

Comment Date: February 14, 2008 03:32:37AM
Oil Shale and Tar Sands
Comment ID: OSTSD51951

First Name: Todd
Middle Initial:
Last Name: Quade
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please preserve what little pristine public lands we have remaining.

No oil shale or tar sand exploration on public land.

Thank you

51951-001

Response for Document 51951

51951-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Lance Polya.

The comment tracking number that has been assigned to your comment is OSTSD51952.

Comment Date: February 14, 2008 06:27:04AM
Oil Shale and Tar Sands
Comment ID: OSTSD51952

First Name: Lance
Middle Initial:
Last Name: Polya
Organization:
Address: 46 Fields Lane
Address 2:
Address 3:
City: Jericho
State: VT
Zip: 054659627
Country: USA
Email: lancepolya@alum.dartmouth.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

The Bureau of Land Management should choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51952-001

Sincerely,

Response for Document 51952

51952-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Thomas Dukes.

The comment tracking number that has been assigned to your comment is OSTSD51953.

Comment Date: February 14, 2008 06:28:16AM
Oil Shale and Tar Sands
Comment ID: OSTSD51953

First Name: Thomas
Middle Initial: H
Last Name: Dukes
Organization:
Address:
Address 2:
Address 3:
City: San Antonio
State: TX
Zip: 78209
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. We have been through this foolishness once before, 3 decades ago. Oil Shale proved environmentally destructive and economically unfeasible for use back then, and it remains so now. | 51953-001

Response for Document 51953

51953-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Mark Hodie.

The comment tracking number that has been assigned to your comment is OSTSD51955.

Comment Date: February 14, 2008 07:31:52AM
Oil Shale and Tar Sands
Comment ID: OSTSD51955

First Name: Mark
Middle Initial:
Last Name: Hodie
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

Oil is the past. Oil is the present. Oil is NOT the future! So much of our beautiful public lands have already been ruined by drilling and overdevelopment! Enough is enough!

It is way past time to be pushing for and developing ALTERNATIVE and CLEAN energy sources! Drilling for oil shale and tar sands is just keeping us in the past. This is the 21st century and we need to look to the future and helping to save our country and planet.

And besides ruining our public lands, forests, and open spaces, further drilling will affect and disrupt the wildlife who inhabit them. Where are the animals supposed to go when they are pushed from the drilling areas? Pretty soon, there will be nowhere left for them to go. 51955-001

Please think of the environment, wildlife, and lands that will be adversely affected and damaged by new drilling for oil shale and tar sands.

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51955-002

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51955-001 (cont.)

Sincerely, Mark Hodie

Responses for Document 51955

51955-001: The BLM acknowledges the commentor's preference for Alternative A.

51955-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Jules Mari.

The comment tracking number that has been assigned to your comment is OSTSD51956.

Comment Date: February 14, 2008 08:25:07AM
Oil Shale and Tar Sands
Comment ID: OSTSD51956

First Name: Jules
Middle Initial:
Last Name: Mari
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I STRONGLY oppose Oil Shale and Tar Sands Development On Our Public Lands. It is truly deplorable that this current administration continues to rape the land of this country without any regard for what their actions are doing to nature and what will be left for future generations. In the meantime, not nearly enough action is being taken to slow the U.S. participation in greenhouse gases.

51956-001

51956-002

Responses for Document 51956

51956-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

51956-002: Thank you for your comment.

Thank you for your comment, Debbie Epps-Mullins.

The comment tracking number that has been assigned to your comment is OSTSD51959.

Comment Date: February 14, 2008 08:53:48AM
Oil Shale and Tar Sands
Comment ID: OSTSD51959

First Name: Debbie
Middle Initial:
Last Name: Epps-Mullins
Organization:
Address: 2088 NORTH HIGHWAY 81
Address 2:
Address 3:
City: Westville
State: FL
Zip: 32464
Country: USA
Email: moonshadow@wfeca.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please don't do this.We need to do something other than use these fossil fuels. Plenty of sunshine,wind and/or water to use as a means of clean/er energy to use! | 51959-001

Response for Document 51959

51959-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, David Mazure.

The comment tracking number that has been assigned to your comment is OSTSD51960.

Comment Date: February 14, 2008 08:54:16AM
Oil Shale and Tar Sands
Comment ID: OSTSD51960

First Name: David
Middle Initial: B
Last Name: Mazure
Organization:
Address: 370 Buckner Branch
Address 2:
Address 3:
City: Mars Hill
State: NC
Zip: 28754
Country: USA
Email: eeporders@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please protect public lands -- no more destruction! | 51960-001

Response for Document 51960

51960-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, James Michel.

The comment tracking number that has been assigned to your comment is OSTSD51965.

Comment Date: February 14, 2008 09:42:09AM
Oil Shale and Tar Sands
Comment ID: OSTSD51965

First Name: James
Middle Initial:
Last Name: Michel
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please stop acting in ways that destroy our earth We need you to protect us (as in people animals living things) I realize dollars and jobs matter but not if we are all poisoned please help us and stand up for us....	51965-001

Response for Document 51965

51965-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Sheila Rekdal.

The comment tracking number that has been assigned to your comment is OSTSD51966.

Comment Date: February 14, 2008 09:43:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD51966

First Name: Sheila
Middle Initial:
Last Name: Rekdal
Organization:
Address: 518 S Overton Ave
Address 2:
Address 3:
City: Independence
State: MO
Zip: 64053
Country: USA
Email: she_rek@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

TURN THE CORNER! bRAKES! SLOW DOWN! GO SOLAR!!!!!!! | 51966-001

Response for Document 51966

51966-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Jonathan Wallace.

The comment tracking number that has been assigned to your comment is OSTSD51968.

Comment Date: February 14, 2008 09:52:55AM
Oil Shale and Tar Sands
Comment ID: OSTSD51968

First Name: Jonathan
Middle Initial:
Last Name: Wallace
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 51968-001

From what I have read about oil shale and tar sands oil extraction in Canada is that current "steam based" extraction methods are ecologically unsound, and use large amounts of fresh water. I don't believe that is appropriate for the drought stricken Southwest. 51968-002

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 51968-003 51968-004

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 51968-005

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 51968-001 (cont.)

Thank you for your time.

Sincerely,

Jonathan Wallace

Responses for Document 51968

51968-001: The BLM acknowledges the commentor's preference for Alternative A.

51968-002: The PEIS provides a general discussion of the impacts associated with water and power requirements associated with potential future oil shale and tar sands development. At present, water and power requirements are very speculative due to the variation in technology currently available, and because the source of the water and power (and, therefore, the impacts) is unknown. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power and water requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

51968-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA

analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

51968-004: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

51968-005: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed

operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51969.

Comment Date: February 14, 2008 09:58:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD51969

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Stop Raping Our Earth!!! | 51969-001

Response for Document 51969

51969-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Jeffrey Bove.

The comment tracking number that has been assigned to your comment is OSTSD51970.

Comment Date: February 14, 2008 10:05:13AM
Oil Shale and Tar Sands
Comment ID: OSTSD51970

First Name: Jeffrey
Middle Initial: A
Last Name: Bove
Organization:
Address: 14 Elmbrook Dr
Address 2:
Address 3:
City: Pittsford
State: NY
Zip: 145342047
Country: USA
Email: jbove@rochester.rr.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Ms Thompson, I write to you today with the hope that you will decide not to go through with the oil shale and tar sands project in Colorado,Utah and Wyoming. This will only serve to destroy those states. This process for the most part uses more energy than it produces. Bush and his administration have been hell bent on destroying this country since he took office and it needs to stop. Please spend your time more wisely by focusing on renewable energy. 51970-001

Response for Document 51970

51970-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Monica Santa-Maria.

The comment tracking number that has been assigned to your comment is OSTSD51972.

Comment Date: February 14, 2008 10:14:26AM
Oil Shale and Tar Sands
Comment ID: OSTSD51972

First Name: Monica
Middle Initial:
Last Name: Santa-Maria
Organization:
Address: 3216 Shire Lane Apt C
Address 2:
Address 3:
City: Raleigh
State: NC
Zip: 27606
Country: USA
Email: monisama@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Don't do it. Don't destroy our natural environment. Please. | 51972-001

Response for Document 51972

51972-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Quilla Miralia.

The comment tracking number that has been assigned to your comment is OSTSD51975.

Comment Date: February 14, 2008 10:43:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD51975

First Name: Quilla
Middle Initial: E
Last Name: Miralia
Organization:
Address:
Address 2:
Address 3:
City:
State: FL
Zip: 32257
Country: USA
Email: qearth@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil Shale and Tar Sands development is a waste of energy. It releases a lot of greenhouse gases. I don't think this is an appropriate direction for our government to be going. We should be supporting renewable energy instead.	51975-001

Response for Document 51975

51975-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Max and Mary Herink.

The comment tracking number that has been assigned to your comment is OSTSD51976.

Comment Date: February 14, 2008 10:55:25AM
Oil Shale and Tar Sands
Comment ID: OSTSD51976

First Name: Max and Mary
Middle Initial:
Last Name: Herink
Organization:
Address: 14541 Peppertree Cir.
Address 2:
Address 3:
City: Tustin
State: CA
Zip: 92780
Country: USA
Email: mnmherink@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please protect our public land from misuse! That is supposed to be your JOB! | 51976-001

Response for Document 51976

51976-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Lisa Heinkel.

The comment tracking number that has been assigned to your comment is OSTSD51979.

Comment Date: February 14, 2008 11:04:37AM
Oil Shale and Tar Sands
Comment ID: OSTSD51979

First Name: Lisa
Middle Initial:
Last Name: Heinkel
Organization:
Address: 3190 McClellan St.
Address 2:
Address 3:
City: Port Townsend
State: WA
Zip: 98368
Country: USA
Email: tigereyes@mailhaven.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please leave something not messed up for our kids. | 51979-001

Response for Document 51979

51979-001: Thank you for your comment.

Thank you for your comment, Joanne Hammes.

The comment tracking number that has been assigned to your comment is OSTSD51980.

Comment Date: February 14, 2008 11:06:19AM
Oil Shale and Tar Sands
Comment ID: OSTSD51980

First Name: Joanne
Middle Initial: P
Last Name: Hammes
Organization:
Address: 131st Place NE
Address 2:
Address 3:
City: Kirkland
State: WA
Zip: 990342952
Country: USA
Email: jphammes32@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Once again, Bush has taken action to destroy our world. Please take action to prevent this travesty!!! | 51980-001

Response for Document 51980

51980-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Tess Beck.

The comment tracking number that has been assigned to your comment is OSTSD51983.

Comment Date: February 14, 2008 12:17:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD51983

First Name: Tess
Middle Initial: M
Last Name: Beck
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please keep our public lands pristine and do not drill or log or in any way disturb the wild life and natural beauty that is our duty to cherish and protect. If every person in this country replaced their dish washing detergent with a non oil based product, we would save 4500 barrels of oil per year. Simple measures such as this should be encouraged instead of harming our beaufiul natural world. 51983-001

Response for Document 51983

51983-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD51984.

Comment Date: February 14, 2008 12:19:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD51984

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

The environmental destruction caused by oil sands is not worth it - under any consideration, at any time, no matter what money might be made from the project. We have done far too much already to this part of the country; we need to stop such destructive practices completely.

Therefore, I support the "No Action" alternative in the Draft EIS for Oil Shale and Tar Sands.

51984-001

Response for Document 51984

51984-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Barrie Stebbings.

The comment tracking number that has been assigned to your comment is OSTSD51988.

Comment Date: February 14, 2008 12:42:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD51988

First Name: Barrie
Middle Initial:
Last Name: Stebbings
Organization:
Address: 390A Cedar
Address 2:
Address 3:
City: Bolinas
State: CA
Zip: 94924
Country: USA
Email: barriemom@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Public lands should not be a privatized resource for profit. Our energy needs can be met through innovation and conservation. We have the knowledge. We don't have the time to waste on destructive practices. Our natural environment is too fragile to continue this assault on nature. We are failing our future generations by allowing the destruction of our natural resources. Money lining the pockets of corporations will not buy us a better world. 51988-001

Response for Document 51988

51988-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, ellen liston.

The comment tracking number that has been assigned to your comment is OSTSD51993.

Comment Date: February 14, 2008 13:11:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD51993

First Name: ellen
Middle Initial: e
Last Name: liston
Organization:
Address: 78 Carroll Ave.
Address 2:
Address 3:
City: Newport
State: RI
Zip: 02840
Country: USA
Email: ellenliston@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please reconsider this proposal. Our energy and research must be directed to non-fossil fuels in the future for our posterity to inherit any viable life. | 51993-001

Response for Document 51993

51993-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, anish Harrison.

The comment tracking number that has been assigned to your comment is OSTSD51999.

Comment Date: February 14, 2008 14:12:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD51999

First Name: anish
Middle Initial:
Last Name: Harrison
Organization:
Address: 90 Beaulieu Close
Address 2: Toothill
Address 3: Swindon
City:
State:
Zip:
Country:
Email: anishhiya@yahoo.co.uk
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is unacceptble to try and extract oil shale and tar sand from the public lands of Utah, Wyoming and Colerado. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 51999-001

Response for Document 51999

51999-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Kristin Mueller.

The comment tracking number that has been assigned to your comment is OSTSD52002.

Comment Date: February 14, 2008 15:03:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD52002

First Name: Kristin
Middle Initial:
Last Name: Mueller
Organization:
Address: 74 Stonybrook Lane
Address 2:
Address 3:
City: Contoocook
State: NH
Zip: 03229
Country: USA
Email: kristin.l.mueller@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Opening up public lands for the extraction and development of oil shale and tar sands is a bad idea. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. I strongly oppose this plan. Please find an alternative. 52002-001

Response for Document 52002

52002-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mary Mutch.

The comment tracking number that has been assigned to your comment is OSTSD52007.

Comment Date: February 14, 2008 15:35:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52007

First Name: Mary
Middle Initial: L
Last Name: Mutch
Organization:
Address: 1027 Cameron Ave.
Address 2:
Address 3:
City: La Crosse
State: WI
Zip: 54601
Country: USA
Email: mmutch@fspa.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.

52007-001

52007-002

Responses for Document 52007

52007-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52007-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and

need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Dan Flapper.

The comment tracking number that has been assigned to your comment is OSTSD52008.

Comment Date: February 14, 2008 15:45:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD52008

First Name: Dan
Middle Initial: T
Last Name: Flapper
Organization:
Address:
Address 2:
Address 3:
City: Chino
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The public lands of this country belong to the people and are controlled by the government as part of a trust. That trust is being broken everywhere and it has to stop. The land is not for sale. | 52008-001

Response for Document 52008

52008-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Janette Jakobs.

The comment tracking number that has been assigned to your comment is OSTSD52010.

Comment Date: February 14, 2008 16:38:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD52010

First Name: Janette
Middle Initial: M
Last Name: Jakobs
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Projuect Manager

I support the "No Action" alternatives in the Draft Programmatic Environmental Impact statement for Oil Shale and Tar sands. This comes at a time when public lands are already endangered by population growth and the current energy boom across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. 52010-001 52010-002

The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 52010-003

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 52010-001 (cont.)

Responses for Document 52010

52010-001: The BLM acknowledges the commentor's preference for Alternative A.

52010-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52010-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Susan Westervelt.

The comment tracking number that has been assigned to your comment is OSTSD52011.

Comment Date: February 14, 2008 16:40:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD52011

First Name: Susan
Middle Initial: M
Last Name: Westervelt
Organization: none
Address: PO Box 223
Address 2:
Address 3:
City: Deary
State: ID
Zip: 83823
Country: USA
Email: smsw948@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Do not let the Bush administration open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources.

I oppose all development of oil shale and tar sands on public lands. We simply must turn to alternative forms of energy and get serious about conservation. The Bureau of Land Management is charged with taking care of the public's land, not padding the pockets of corporate oil giants.

52011-001

Response for Document 52011

52011-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Frank Severson.

The comment tracking number that has been assigned to your comment is OSTSD52013.

Comment Date: February 14, 2008 17:34:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD52013

First Name: Frank
Middle Initial:
Last Name: Severson
Organization:
Address: 7014 Stope Court
Address 2:
Address 3:
City: Placerville
State: CA
Zip: 95667
Country: USA
Email: frankseverson@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please deny the Bush administration's request to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. | 52013-001

Response for Document 52013

52013-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52017.

Comment Date: February 14, 2008 18:37:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52017

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Ruining these parts of these western states would be a tragedy---something previos administrations managed to avoid. Please avoid the wasteful rapacious and irreversible pressures placed upon you and actions you are considering. Instead, help shift us to renewable resources for our needs. You are destroying the earth, and you will make life much worse for all of us if you open these areas up for developement. How can you be so greedy, so single-mindedly blind to what you are doing. With a little work, you wouldn't even have to consider this. You are destroying our grandchildrens, and your own's inheritance. 52017-001

Response for Document 52017

52017-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, David Dvorak Jr..

The comment tracking number that has been assigned to your comment is OSTSD52018.

Comment Date: February 14, 2008 18:50:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD52018

First Name: David
Middle Initial: F
Last Name: Dvorak Jr.
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: bigskydvor@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Going after tar sands is a costly waste of the environment and a waste of money. Renewable energy is the only answer. | 52018-001

Response for Document 52018

52018-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52020.

Comment Date: February 14, 2008 20:46:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52020

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I don't believe the extraction of oil shale and tar sands is jsutifiable, both in light of the ecological devastation caused and the high energy cots involved in this mode of extraction. | 52020-001

Response for Document 52020

52020-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, annie steele.

The comment tracking number that has been assigned to your comment is OSTSD52022.

Comment Date: February 14, 2008 21:29:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD52022

First Name: annie
Middle Initial: L
Last Name: steele
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The idea of drilling fresh new holes in the earth, when here in my county there over 150 drilling sites that are sealed. Why drill new holes. Get the oil that is reddily available. Yes there is oil in them. With the treat of Global Warming being told to us by Nation Geographic and Former President Al Gore as to what is happening to our planet and you make this kind of decision, just blane dumb or is ther kick back some where in this. With the rise of just 2 degrees life as we know it is in serious jepardy. Every grean plant must be preserved amd the planet considered first and formost. INcrease the Cafee standards to 50 milles put money in solar and wind humans life is at stake. Please consider these action first

52022-001

52022-002

52022-001 (cont.)

Responses for Document 52022

52022-001: Thank you for your comments but the issues you have raised regarding shut in wells and CAFE standards are beyond the scope of the PEIS.

52022-002: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, William Weston.

The comment tracking number that has been assigned to your comment is OSTSD52024.

Comment Date: February 14, 2008 22:39:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD52024

First Name: William
Middle Initial:
Last Name: Weston
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Our public lands should not be used for drilling or mining. Even tho our need for oil is great other methods of obtaining oil must be utilized before before public lands are open to exploration. | 52024-001

Response for Document 52024

52024-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gilia Angell.

The comment tracking number that has been assigned to your comment is OSTSD52025.

Comment Date: February 14, 2008 23:18:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52025

First Name: Gilia
Middle Initial:
Last Name: Angell
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please do not forfeit public lands into oil shale development. Choose the No Action alternative and pursue alternative fuel options rather than destroying public lands in the Rockies. As a voting citizen of the USA, I care deeply about the careful use of public lands for resource allocation and urge the most stringent environmental evaluations of any such development pursuits. 52025-001

Thank you.

Response for Document 52025

52025-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Charlene Woodcock.

The comment tracking number that has been assigned to your comment is OSTSD52026.

Comment Date: February 15, 2008 00:46:23AM
Oil Shale and Tar Sands
Comment ID: OSTSD52026

First Name: Charlene
Middle Initial: M
Last Name: Woodcock
Organization:
Address: 2355 Virginia Street
Address 2:
Address 3:
City: Berkeley
State: CA
Zip: 947091315
Country: USA
Email: charlene@woodynet.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is deeply irresponsible to encourage extraction of fossil fuels from oil shale and tar sands when we know fossil fuels are driving global climate change. It is an outrage to propose to use public funds to undertake this activity which would be so damaging to the public good. | 52026-001

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. | 52026-002

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. | 52026-001 (cont.)

Responses for Document 52026

52026-001: The BLM acknowledges the commentor's preference for Alternative A.

52026-002: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Jean Jenks.

The comment tracking number that has been assigned to your comment is OSTSD52033.

Comment Date: February 15, 2008 09:14:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD52033

First Name: Jean
Middle Initial: K
Last Name: Jenks
Organization:
Address: 250 Hillside Avenue
Address 2:
Address 3:
City: Sedona
State: AZ
Zip: 86336
Country: USA
Email: jeankjenks@npgcable.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not allow oil share and tar sands mining in ANY of our precious national forests. This is an absurd idea that will harm the environment tremendously and cause a massive amount of sight-blight. 52033-001 52033-002

Thank you very much.

Responses for Document 52033

52033-001: The decisions arising from the PEIS are only applicable to lands under BLM's jurisdiction. Land under the jurisdiction of the U.S. Forest Service are excluded from the scope of the proposed land allocations.

52033-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Nancy Huff.

The comment tracking number that has been assigned to your comment is OSTSD52035.

Comment Date: February 15, 2008 10:14:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD52035

First Name: Nancy
Middle Initial: R
Last Name: Huff
Organization:
Address: 4918 Nevada Avenue
Address 2:
Address 3:
City: Fort Wayne
State: IN
Zip: 468157335
Country: USA
Email: Nancyrhuff@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

By the time we're through, all the beautiful hills, mountains, valleys etc, will be gone...just flat land. This is what makes the U S so beautiful. Why arn't we finding something besides oil for energy? | 52035-001

Response for Document 52035

52035-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Richard Huff.

The comment tracking number that has been assigned to your comment is OSTSD52036.

Comment Date: February 15, 2008 10:17:03AM
Oil Shale and Tar Sands
Comment ID: OSTSD52036

First Name: Richard
Middle Initial: N
Last Name: Huff
Organization:
Address: 4918 Nevada Avenue
Address 2:
Address 3:
City: Fort Wayne
State: IN
Zip: 468157335
Country: USA
Email: Richardnhuff@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Lets lead the world into other ways to run cars, and heat homes...Solar energy, etc | 52036-001

Response for Document 52036

52036-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52037.

Comment Date: February 15, 2008 10:22:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD52037

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment: COGCC Rule 802 Nov2006.pdf

Comment Submitted:

Does the Colorado Oil and Gas Conservation Commissions Noise Control Regulation Rule 802 (passed in Nov2006) apply to this. This rule seems to supercede the CO State Statute. Yes, it does have similar noise limits to the CO State Statute mentioned in Part C, but if you read the whole thing, it talks about levels 350 ft from the noise source, and noise levels for installation of a facility.

Does COGCC Rule 802 apply to this?

If not, please let me know why. It is called out in county codes in Colorado.

If it is, can you provide a clear interpretation of Rule 802? I find this regulation to contradict itself, though I appreciate the intent to protect rural homeowners. Note that we have run into cases where BLM land was considered a "residential zone" by the COGCC.

52037-001

See Attachment.

AESTHETIC AND NOISE CONTROL REGULATIONS

801. INTRODUCTION

The rules and regulations in this section are promulgated to control aesthetics and noise impacts during the drilling, completion and operation of oil and gas wells and production facilities. Any Colorado county, home rule or statutory city, town, territorial charter city or city and county may, by application to the Commission, seek a determination that the rules and regulations in this section, or any individual rule or regulation, shall not apply to oil and gas activities occurring within the boundaries, or any part thereof, of any Colorado county, home rule or statutory city, town, territorial charter city or city and county, such determination to be based upon a showing by any Colorado county, home rule or statutory city, town, territorial charter city or city and county that, because of conditions existing therein, the enforcement of these rules and regulations is not necessary within the boundaries of any Colorado county, home rule or statutory city, town, territorial charter city or city and county for the protection of public health, safety and welfare.

802. NOISE ABATEMENT

a. The goal of this rule is to identify noise sources related to oil and gas operations that impact surrounding landowners and to implement cost-effective and technically-feasible mitigation measures to bring oil and gas facilities into compliance with the allowable noise levels identified in subsection c. Operators should be aware that noise control is most effectively addressed at the siting and design phase, especially with respect to centralized compression and other downstream "gas facilities" (see definition in the 100 Series of these rules).

b. Oil and gas operations at any well site, production facility or gas facility, shall comply with the following maximum permissible noise levels. Operations involving pipeline or gas facility installation or maintenance, the use of a drilling rig, completion rig, workover rig, or stimulation is subject to the maximum permissible noise levels for industrial zones. The type of land use of the surrounding area shall be determined by the Commission in consultation with the local governmental designee taking into consideration any applicable zoning or other local land use designation.

c. In the hours between 7:00 a.m. and the next 7:00 p.m. the noise levels permitted below may be increased ten (10) db(A) for a period not to exceed fifteen (15) minutes in any one (1) hour period. The allowable noise level for periodic, impulsive or shrill noises is reduced by five (5) db(A) from the levels shown.

ZONE	7:00 am to next 7:00 pm	7:00 pm to next 7:00 am
Residential/Agricultural/Rural	55 db(A)	50 db(A)
Commercial	60 db(A)	55 db(A)
Light industrial	70 db(A)	65 db(A)
Industrial	80 db(A)	75 db(A)

In remote locations, where there is no reasonably proximate occupied structure or designated outside activity area, the light industrial standard may be applicable.

Pursuant to Commission inspection or upon receiving a complaint from a nearby property owner or local governmental designee regarding noise related to oil and gas operations, the Commission shall conduct an onsite investigation and take sound measurements as prescribed herein.

The following provide guidance for the measurement of sound levels and assignment of points of compliance for oil and gas operations:

(1) Sound levels shall be measured at a distance of three hundred and fifty (350) feet from the noise source. At the request of the complainant, the sound level shall also be measured at a point beyond three hundred fifty (350) feet that the complainant believes is more representative of the noise impact. If an oil and gas well site, production facility or gas facility is installed closer than three hundred fifty (350) feet from an existing occupied structure, sound levels shall be measured at a point twenty-five (25) feet from the structure towards the noise source. Noise levels from oil and gas facilities located on surface property owned, leased or otherwise controlled by the operator shall be measured at three hundred and fifty (350) feet or at the property line, whichever is greater.

In situations where measurement of noise levels at three hundred and fifty (350) feet is impractical or unrepresentative due to topography, the measurement may be taken at a lesser distance and extrapolated to a 350-foot equivalent using the following formula:

$$db(A)DISTANCE\ 2 = db(A)DISTANCE\ 1 - 20 \times \log10(distance\ 2/distance\ 1)$$

(2) Sound level meters shall be equipped with wind screens, and readings taken when the wind velocity at the time and place of measurement is not more than five (5) miles per hour.

(3) Sound level measurements shall be taken four (4) feet above ground level.

(4) Sound levels shall be determined by averaging minute-by-minute measurements made over a minimum fifteen (15) minute sample duration if practicable. The sample shall be taken under conditions that are representative of the noise experienced by the complainant (e.g., at night, morning, evening, or during special weather conditions).

(5) In all sound level measurements, the existing ambient noise level from all other sources in the encompassing environment at the time and place of such sound level measurement shall be considered to determine the contribution to the sound level by the oil and gas operation(s).

d. In situations where the complaint or Commission onsite inspection indicates that low frequency noise is a component of the problem, the Commission shall obtain a sound level measurement twenty-five (25) feet from the exterior wall of the residence or occupied structure nearest to the noise source, using a noise meter calibrated to the db(C) scale. If this reading exceeds 65 db(C), the Commission shall require the operator to obtain a low frequency noise impact analysis by a qualified sound expert, including identification of any reasonable control measures available to mitigate such low frequency noise impact. Such study shall be provided to the Commission for consideration and possible action.

e. Exhaust from all engines, motors, coolers and other mechanized equipment shall be vented in a direction away from all occupied buildings.

f. All facilities within four hundred (400) feet of occupied buildings with engines or motors which are not electrically operated shall be equipped with quiet design mufflers or equivalent. All mufflers shall be properly installed and maintained in proper working order.

803. LIGHTING

To the extent practicable, site lighting shall be directed downward and internally so as to avoid glare on public roads and occupied buildings within seven hundred (700) feet.

804. VISUAL IMPACT MITIGATION

Production facilities constructed or substantially repainted after May 30, 1992 which are observable from any public highway shall be painted with uniform, non-contrasting, non-reflective color tones, (similar to the Munsell Soil Color Coding System) and with colors matched to but slightly darker than the surrounding landscape.

Response for Document 52037

52037-001: Noise levels are the same in the two regulations. The differences are in where the levels are determined. Without knowing the specific site, it cannot be determined which regulation is more stringent. Depending on the project location, there could also be county noise regulations that would apply to the project. There will be additional levels of NEPA analysis for specific sites during the leasing process and during the preparation of the plan of development. When appropriate, a detailed analysis would be done to determine potential significant impacts and appropriate mitigation. Also note that the COGCC regulations apply to oil and gas operations. It would be the purview of the state to determine whether this regulation would apply to oil shale operations.

No text change was made.

Thank you for your comment, Melinda Hanson.

The comment tracking number that has been assigned to your comment is OSTSD52038.

Comment Date: February 15, 2008 10:27:12AM
Oil Shale and Tar Sands
Comment ID: OSTSD52038

First Name: Melinda
Middle Initial:
Last Name: Hanson
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: lokoum@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I do not support the proposed oil and shale project on public lands in the Rockies. I think our efforts should instead be directed toward non-fossil fuel alternatives. Therefore, I think you should adopt the No Action alternative or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. Also, please do research about the effects on plants and animals. Thank you. 52038-001 52038-002 52038-003

Responses for Document 52038

52038-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52038-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

52038-003: The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and they provide an effective analytical foundation for subsequent project-specific NEPA documents. There is sufficient information pertaining to impacts on biota and their habitats on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing. This information and analyses presented in the PEIS are based on an extensive review of the existing scientific literature. Conducting research on the effects of oil shale and tar sands development on biota is not a component of NEPA document preparation.

Thank you for your comment, K. Shea.

The comment tracking number that has been assigned to your comment is OSTSD52040.

Comment Date: February 15, 2008 10:40:03AM
Oil Shale and Tar Sands
Comment ID: OSTSD52040

First Name: K.
Middle Initial: e
Last Name: Shea
Organization:
Address: 1234
Address 2:
Address 3:
City: Madison
State: WI
Zip: 53704
Country: USA
Email: katshea2@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

WE need to focus more energy and fundsm on clean fuels, Solar wind biodeisel. | 52040-001

Response for Document 52040

52040-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52042.

Comment Date: February 15, 2008 11:04:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD52042

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

The ONLY entities that will benefit from Oil Shale and Tar Sands development are those who derive income from from preventing the development of alternative energy sources! | 52042-001

Response for Document 52042

52042-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52044.

Comment Date: February 15, 2008 12:27:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD52044

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale Will Help America Become Energy Independent

February 15, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

American energy must be utilized to a greater extent in order for America to overcome its current energy problems. Instead of consistently ignoring the vast energy potential of the United States, America should instead start to use the rich energy supply it has in order to satisfy its energy needs.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52044-001

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52044

52044-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Charles Ayers.

The comment tracking number that has been assigned to your comment is OSTSD52046.

Comment Date: February 15, 2008 13:43:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD52046

First Name: Charles
Middle Initial:
Last Name: Ayers
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: charlie.ayers@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As a lover of our Western landscape, I find this proposal completely unfeasible. Oil shale and tar sand devolpmentis both environmentally and economically unsound, particularly at a time when little is being done to further resource conservation. | 52046-001

Response for Document 52046

52046-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Janet Moore.

The comment tracking number that has been assigned to your comment is OSTSD52048.

Comment Date: February 15, 2008 14:54:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD52048

First Name: Janet
Middle Initial: E
Last Name: Moore
Organization:
Address: 518 Heizer Ave.
Address 2:
Address 3:
City: Encampment
State: WY
Zip: 82325
Country: USA
Email: jemoore@cc.usu.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The BLM needs to begin working for the public, current and future, not industry, as I have seen too many times. Our federal dollars and energy should be focused on renewable energy development and research. Global warming is real, but even if you still have doubt, you cannot dispute air quality or water quality which has drastically declined the past few decades. Visibility itself has been reduced at least 10% world wide due to fossil fuel use. Why does the federal government continue endorsing dirty energy when clean technologies are available? 52048-001

Response for Document 52048

52048-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Robert Petersen.

The comment tracking number that has been assigned to your comment is OSTSD52050.

Comment Date: February 15, 2008 15:29:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52050

First Name: Robert
Middle Initial: A
Last Name: Petersen
Organization:
Address: 975 Memorial Drive
Address 2:
Address 3:
City: Cambridge
State: MA
Zip: 02138
Country: USA
Email: robert.petersen@childrens.harvard.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not make the American West look like the oil sands mining area of Alberta. Please do not alow the contamination of land and water the such mining entails. | 52050-001

Response for Document 52050

52050-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Henry Savioli.

The comment tracking number that has been assigned to your comment is OSTSD52053.

Comment Date: February 15, 2008 16:49:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD52053

First Name: Henry
Middle Initial:
Last Name: Savioli
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Are you peeople at the BLM out of your minds? No to oil shale extraction! My (and your) decendants are going to inherit this mess you people are planning. | 52053-001

Response for Document 52053

52053-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52054.

Comment Date: February 15, 2008 16:51:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52054

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

"There is little that separates humans from other sentient beings – we all feel pain, we all feel joy, we all deeply crave to be alive and live freely, and we all share this planet together."

-Gandhi

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 52054-001

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.

Sincerely,

Response for Document 52054

52054-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Dan Becker.

The comment tracking number that has been assigned to your comment is OSTSD52056.

Comment Date: February 15, 2008 17:21:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD52056

First Name: Dan
Middle Initial: J
Last Name: Becker
Organization:
Address: 1209 Odin Dr
Address 2:
Address 3:
City: Silt
State: CO
Zip: 81652
Country: USA
Email: dbecker@willowwisp.net
Privacy Preference: Don't withhold name or address from public record
Attachment: One scenario.doc

Comment Submitted:

See Attachment.

One scenario
So you say you want an energy revolution…and oil shale is going to be the forward guard? Well you know we all want to change the world. But before we get too far ahead of ourselves let's fast forward 20 years into this brave new world of oil shale and take a look at what it might look like.

Do you like Grand Junction, Rock Springs? Or maybe Gillette, Casper, or Rawlins are more to your liking. Good, 'cause will need to expand Rifle into Grand Junction. Rural communities are soo yesterday…strip malls, strip clubs, hamburger stands, subdivisions, liquor stores, gas stations, 7-11s, Townhome Village, Go-Fer foods, subdivisions, Wallmarts, tire shops, car washes, subdivisions (lets call this one Cottonwood Grove), Subways, Wendy's, Starbucks, T-J Maxx, subdivisions (maybe Bluff View Estates?) Super 8, Grass Mesa High School, Holiday Inn, Mid-Valley Pawn, a couple of paint stores, Condoland, McDonalds, subdivisions, bars, bowling alleys, liquor stores, Jiffy Lube, gas stations, nightclubs, subdivision, fitness centers, Payless Shoes, Home Depot, subdivision, Webster Hill Middle school, crack dealers, Applebees, RV and boat sales, meth, all those industrial shops and yards, homeless people, Pay Check loans, Office Depot, adult book store, high rise apartments, multi-story office building, Shale elementary school, Happy Acres trailer park, high crime, multi-family subdivisions…all that good urban development connecting Silt to Rifle, and Rifle to Rulison and Parachute, it was all in the works anyway. Besides we've got all those abandoned gas field roads and pads that never got reclaimed (somehow we ran out of money, water and suitable topsoil and the reclamation didn't quite get done) a little pavement and we're most of the way there.

52056-001

Of course, these won't be well planned communities, time is of the essence, after all. Our poor planning departments (no pun intended) will be lucky to get sewer, water and electricity extended, let alone plan for mass transit, parks, traffic flow and neighborhood shopping. Do you like traffic, overcrowded mega schools, waiting in line, views of …your neighbors (sorry those pesky temperature inversions can really trap the smog, anyway mountains were made to be moved not looked at)? Good, than its settled, plunk down rapid urban growth over Meeker, Rangley, Maybell, Craig, Hamilton, Rio Blanco, out into Utah and Wyoming, connect them all with four lane highways (think highway 82, with I-25 traffic) and at least some of the infrastructure is complete. Remember there will be a certain amount of carnage on these highways to the brave new world. Deer, elk, bunnies, coons, coworkers. I wouldn't worry too much about the wildlife, they're on their way out regardless. But I'm getting ahead of myself.

Urban life got you down? Relax, you can still head for the hills. Remember what the camping situation is like during hunting seasons; those traffic snarls on I-70 getting to and from ski areas? Transfer those to the drive up the White River to Lake Avery on a lazy summer's day. Pushing onto Trappers? Sorry, campsites are spoken for by the guys who got off work from the nightshift, ahead of you. Man the dust is a killer along that road too, what with the counties and the Forest Service being under-funded and under-staffed, they just don't have money for the incidentals. Having problems finding parking at the trailheads? Oh well, give it a few minutes, I'm sure that guy from Texas, Missouri, Florida, California, Louisiana, Michigan, New Jersey will be out of the way in no time. Worried about your favorite fishing hole?...pphfftt come on, these people know all about high desert ecology and western wildlife, I'm sure they will all keep well within bag

limits, stay on the designated trails and roads, not start any unnecessary wildfires, keep the litter confined to the trailhead dumpsters, turn down their generator driven boom boxes and generally be happy campers and exemplary stewards of all the favorite spots…or was that all the best places? Besides they'll all head home for the holidays and you can sneak into the backcountry then. Oh yeah, I forgot, my bad. Gas is still at $13/gallon, guess they won't be going back to visit the kin folk after all. Oh well, who can afford to go anywhere, anyway? Let's just go down to the multi-plex and see what armageddon movie might be smashing the box office. Besides tomorrow begins another seven day work shift, we've got to tie one off before the wife spends it all on the frozen pizza allotment.

Work. Well most of us work for Shell and its subsidiaries. Joe he works out on the field where they're scrapping off the sagebrush, pinion and juniper, deer and elk (and the bunnies, lizards, snakes, mice…the little guys) and punching in those hundreds of wells, (or is it thousands now?). You know, these are the wells they're pumping full of refrigerant (some undisclosed chemical, its proprietary) to form that frost curtain a thousand foot deep. That keeps all the oil from leaking out and all the water in the aquifers from leaking in. And Fred, he works over there building the nuclear power plant that will supply all the electricity needed to power the heating elements that will melt the oil out of the shale, that will grind the corn, that will knead the bread, that will power the cars, that will add to global warming, that will flood the rest of the Florida coastline, that will spur the record drought, that will build the class 5 hurricanes, and turn the spring line up of Midwest tornados, that will fuel continued international conflict…I digress. My apologies. They decided to go nuclear, for the electrical supply. Something about ten to twenty coal fired plants having too large a carbon footprint and exacerbating all of the above conditions even more. I don't know. Leave the heavy lifting to the guys running the show, is my philosophy. Say, can you turn up the air conditioning while you're up and I could use a little more ice here. What's that? No ice! Oh yeah, water is kinda rationed. Oil shale takes just a little bit of water. But no worries, Sally, she works on that water pipeline they're bring in from BC, she says it will all be good once that's complete. 'Course some Canadians don't much like it. But the Marines can handle pipeline security, that's not what we do anyway. Me, I work at one of the oil refineries in the area. It's the big one right outside of Maybell. Most of my buddies work at one refinery or another. Oil shale is pretty low quality crude, takes a lot of refinement. My neighbor across the party wall he's a welder, welds the web of pipelines pushing oil here and there. Those things never end. Well I guess they do terminate at the rail lines which bring all that black gold to a hungry nation. My son, he's in the Air Force, fighting that hundred year war in the mideast. Funny how all this shale oil hasn't made us more energy independent. The production efficiency didn't hit what they were hoping for and now they tell us it wouldn't have amounted to more than 5% of our energy needs anyway. I guess its all worth it, certain sacrifices have to be made. But man, the size of this sacrifice zone! All of northwest Colorado, northeast Utah and vast parts of southwest Wyoming! It takes $200 dollars worth of gas in the ol' hemi just to drive away from it all!

Of course the rest of the world is invested in renewable energy. Even if it appears solar, wind, geothermal, tidal, ethanol form waste products and algae, fuel cells, and tremendous increases in efficiency are working for them, it doesn't mean we want

52056-001 (cont.)

such a society. What kind of candy-ass country figures out how to turn waste into fuel, and abandons carbon intensive climate changing polluting fossil fuels in favor of clean sustainable energy? Who needs clean air, predictable weather patterns, jobs with integrity, and endless supplies of energy harnessed through innovation and that can do spirit? What a bunch of losers! We've got enough fossil fuels for centuries. Shoot our oil shale reserves alone are bigger than all of Saudi Arabia's nice light crude oil reserves. If you give us a few more years we'll have the west looking just like Saudi Arabia too, what with all the industrialization and climate change there's hardly a sprig of vegetation left and sand dunes as far as the ATV can ride. So the rest of the world isn't too happy about our continued high carbon emissions, we still have the largest military in the world, right? Never mind that we don't have the fuel too run it over a prolonged conflict, we still have nukes. The neo-cons were right anyway…it's the end times, just like the bible says.

Oops, gotta go queue up for my monthly ration of fuel…seems like there's never enough to go around these days.

52056-001 (cont.)

Response for Document 52056

52056-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Dan Becker.

The comment tracking number that has been assigned to your comment is OSTSD52057.

Comment Date: February 15, 2008 17:25:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD52057

First Name: Dan
Middle Initial: J
Last Name: Becker
Organization:
Address: 1209 Odin Dr
Address 2:
Address 3:
City: Silt
State: CO
Zip: 81652
Country: USA
Email: dbecker@willowwisp.net
Privacy Preference: Don't withhold name or address from public record
Attachment: first elk.doc

Comment Submitted:

See Attachment.

First elk, last hunt?

The routine was the same. Shake my son, Zach, awake and go get started on cooking a cheese omelet and hot cocoa. We inhale it in silence, already overheating in our winter snow gear. Lunch is in the packs, packs in the truck, and we are on the road chasing the headlights for sixty miles. Zach is thirteen and this is his first year of hunting. He has been a reluctant hunter, unsure whether a day spent busting through snow measures up to hours spent on the pogo stick, hacky sacking or video gaming. I know today could very well be the make or break point in his brief hunting career. We need to see something today and at least have the possibility of firing a shot. Since he has a youth tag our hunting has been greatly extended into seasons and areas beyond his original license. This has been interesting for me, exploring different country and trying to find elk after winter has arrived in earnest, but somewhat exasperating for Zach and my wife who are both wondering whether hunting will ever end this year.

Today we will be going back into the Piceance Creek basin, of Colorado, to a place where yesterday I finally found elk tracking up the snow in an old burn area. We are not the only ones hunting in the Piceance Creek basin. Oil and gas companies have flocked to the area in recent years hunting natural gas and new means of extracting oil from the vast oil shale deposits that blanket the region. Though the Piceance Creek basin is home to the largest herd of migrating mule deer in North America, it is also, as we discover, an important winter range for elk migrating from the higher Flattops area and the Roan Plateau.

The Roan Plateau, which lies on the southern edge of the Piceance Creek basin, had been our destination on earlier trips this season. The Roan is rich in scenic, wildlife, recreation and hunting opportunities as well as being perched above those rich deposits of natural gas and oil shale. As these pursuits do not always coexist peacefully there has been much discussion on the fate of the Roan. A wide variety of conservation and recreation interests have joined locals in calling for the preservation of the Roan.

To date this small corner of habitat on the Roan, remains essentially untouched, though exploration and oil and gas leasing is occurring full bore all around it. Our previous trips have taken us far back into country locked in winter but made accessible by miles of plowed roads busy with heavy equipment servicing numerous well pads, pumping stations, field offices, landing pads and man camps. Former fourwheel drive roads have now been improved to handle heavy truck traffic and branch out along nearly every draw and ridgeline. While the public land on the Roan remains in dispute, much of the private holdings on the Roan are in full development. Some of these private holdings are former public lands, now owned by oil and gas companies, thanks to lease-to-own agreements setup in the early 1980's. To the companies' credit, some of this land still remains open to the public, through agreements reached with the Colorado Division of Wildlife.

Today we will hunt north of the Roan on BLM land adjacent to a State Wildlife Area. As we approach my parking spot of the day before, I spy a couple of elk on the opposite slope. A quick peek through the binoculars confirms they are cows, the proper gender for Zach's tag. We park the truck out of their line of sight, grab packs and rifle and head out. A direct approach up the draw will give us away so we cross the bottom land and start up the snow covered hillside. It's a steep climb, kicking foot holds in the

snow and winding our way to the top. Finally we top out and begin to cautiously examine the opposite slope. Nothing.

We continue up the ridgeline looking over each draw and ridge as it is revealed. Almost all of it has been burned, either by prescription or not, and the elk seem to like it, as there are tracks everywhere. On the ridge ahead of us a gas drilling rig clamors with activity and raised voices drift down to us. The tracks indicate our elk have moved over hill and dale to the west. A movement, and there they are, several ridges over, a couple of cows and three bulls, still moving west. I groan inwardly at the thought of busting through snow, up and down successive draws, until we catch up with our long legged prey. But as the day is young, and nothing else is presenting itself, it is only our mettle that remains to be tested.

After another ridge Zach surrenders to the aerobic warmth and sheds his jacket. We relish the long sliding downhill steps through knee deep snow but trudge up opposite slopes. As we crest the ridge where the elk last stood, I catch a glimpse of tan on the opposite ridge. At last they have bedded. We back off and slip downwind and out of sight into better cover. We creep through the pinon and juniper carefully using it to conceal our approach. An elk looms on the opposite side and my hopes soar. A little further and antlers appear on his head. Damn! We move even more cautiously now, cognizant of his every move and head turn. Two more elk down below us! Both bulls, one a nice six point. We change our trajectory searching out a path that will keep us concealed from all eyes and still move us forward towards the cows bedded up on the ridge, sheltered behind some burnt snags.

Two deer jump out ahead of us and run up the draw. I know it's all over and desperately try to get us into position. The cows stand and after a few moments wander over the ridge and out of sight. The lower bulls appear an easy shot below us, and soon return to feeding. The bull opposite us strolls across and upslope. We do our crawl and slide forward. The cows are still there, bedded as before, their sisters having left!

We still do not have a shot with the snags in the way. I turn to look at Zach. His teeth are chattering. We take cover behind a tree and dig out jackets. I bear hug him and try to rub some heat back into him. The bull plops down in plain view, near the cows. I relax as well, our presence still unknown. Jackets or not, we will need to get into a position for a shot soon, before we begin to chill down in earnest. I aim for a small dead juniper hoping from there we will have a clear shot. We creep forward when unwatched and I slip the rifle over a dead branch. It's not a great shot, at a hundred and fifty yards she's bedded in deep snow making the vital zone less distinct, though it appears free of interfering branches. Zach slides his eighty pound frame behind the rifle and after struggling with head position and scope optics, he sizes up the shot. He looks again. I tell him he will need to aim just over the top of the snow and behind the shoulder. I want him to feel comfortable with the shot if not confident, and ask him if he thinks he can make the shot, letting him know he can pass it up if he wants. This will be his first shot at an animal, should he choose to take it, and I am a bit nervous at what the outcome might hold. He looks again. "I think I can make it", he says. I reach forward and break two large branches out from in front of the muzzle, staring at the elk all the while. All heads turn our way, but no one moves. His ski gloves will be a tight squeeze into the trigger guard. We reset the safety, get his trigger finger in and pressed forward against the guard. The safety comes back off. I stare at the cow. At the shot, all three elk jump to

their feet and stand in confusion. I tell Zach to cycle a round and try another shot. As he moves to do so the cow wobbles and collapses. I'm ecstatic, hugging, pounding and congratulating him!

At the kill, we start a fire, warm up and eat lunch. When the elk is quartered we head out with full packs, pulling two quarters as we go. We do three or four hundred yards and then return for the other two. We repeat the routine until a mile and a half later we make the road with lungs and legs on the verge of collapse. Tired but satisfied we turn the truck into a gathering snowstorm and head for home. Zach admits later that it was the hardest thing he's ever done. I take that as a good thing.

Though the Piceance Creek basin and Roan Plateau are under siege from energy development, they remain important and viable habitat for wildlife. It remains to be seen what the impacts to wildlife will be at the current level of development. Hunting in this area reminds me, in the most in your face way, that we face enormous challenges as a nation in meeting our energy requirements while preserving our natural heritage. Having grown up in western Colorado I have come to deeply appreciate all the natural wonders it has to offer. We are now hearing talk that the oil and gas rich regions of northwestern Colorado, southwestern Wyoming and northeastern Utah should be considered a sacrifice zone for the good of the nation's energy independence. This is utterly unacceptable, and reminds me that it is imperative for those of us concerned with protecting habitat, to also be on the forefront of energy independence through sustainable and renewable sources. Full blown oil shale development will bring impacts far beyond current levels, with the possibilities of coal-fired or nuclear power plants, refineries, pipelines, more roads and infrastructure and large scale residential and commercial developments. 52057-001

Over the past several years our family has invested in both solar thermal and solar electric and we now capture and produce virtually all the energy our home requires. Alternative energy is becoming increasingly affordable and viable. Don't let the naysayers convince you otherwise. We do not have to sacrifice our natural heritage to fossil fuel energy sources, we only need embrace the alternatives. After all, my son just may want to hunt again next year.

Response for Document 52057

52057-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, phil whitford.

The comment tracking number that has been assigned to your comment is OSTSD52062.

Comment Date: February 15, 2008 18:18:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52062

First Name: phil
Middle Initial: j
Last Name: whitford
Organization:
Address: po
Address 2: box 1360
Address 3:
City: welches
State: OR
Zip: 97067
Country: USA
Email: fornaturesake@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please help stopt this administration in one last attempt to leave the planet worse off than it has ever been. This is our land, we love it, please help us to protect it. | 52062-001

Response for Document 52062

52062-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, jimi logsdon.

The comment tracking number that has been assigned to your comment is OSTSD52064.

Comment Date: February 15, 2008 18:55:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52064

First Name: jimi
Middle Initial:
Last Name: logsdon
Organization:
Address: 1884 humboldt rd
Address 2:
Address 3:
City: chico
State: CA
Zip: 95928
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

please stop the insanity! 52064-001

Response for Document 52064

52064-001: Thank you for your comment.

Thank you for your comment, Margaret Brandt.

The comment tracking number that has been assigned to your comment is OSTSD52065.

Comment Date: February 15, 2008 19:31:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52065

First Name: Margaret
Middle Initial: G
Last Name: Brandt
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to support the "No Action" alternative in the Draft Programmatic EIS for Oil Shale and Tar Sands. THis is terribly laborious and expensive for the amount of product obtained, which, when burned just worsens our greenhouse gas situation. Please put up wind farms instead. | 52065-001

Response for Document 52065

52065-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Lydia Garvey.

The comment tracking number that has been assigned to your comment is OSTSD52071.

Comment Date: February 16, 2008 01:53:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD52071

First Name: Lydia
Middle Initial:
Last Name: Garvey
Organization:
Address: 429 S 24th
Address 2:
Address 3:
City: Clinton
State: OK
Zip: 73601
Country: USA
Email: wolfhowlmama@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Nix rape of Public lands(CO,UT,WY) for oil shale/tar sands extraction/development!It is unacceptable! the resulting greenhouse gases/pollutants, at a time when we desperately need to transition to non-polluting, renewable energy sources. You work for citizens, not industry! Protect Our Public lands, waters & wildlife! Your attention to this most urgent matter would be much appreciated by all present & future generatons of all species. thank you	52071-001

Response for Document 52071

52071-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jean Eno.

The comment tracking number that has been assigned to your comment is OSTSD52073.

Comment Date: February 16, 2008 08:08:40AM
Oil Shale and Tar Sands
Comment ID: OSTSD52073

First Name: Jean
Middle Initial:
Last Name: Eno
Organization:
Address: 28 Bay Shore Drive
Address 2:
Address 3:
City: Greenland
State: NH
Zip: 03840
Country: USA
Email: jmeno@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I couldn't despise this administration more for what it is doing to OUR land and the biological diversity it supports. Oil sands, complete with their toxic tailings ponds, require MORE energy to mine than they put out. When will you people STOP catering to the oil industry and START listening to the people who are asking for more investment in renewable energy (and they ARE the majority!)?!?! 52073-001

Response for Document 52073

52073-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Luanne LaPierre.

The comment tracking number that has been assigned to your comment is OSTSD52075.

Comment Date: February 16, 2008 09:39:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD52075

First Name: Luanne
Middle Initial: M
Last Name: LaPierre
Organization:
Address:
Address 2:
Address 3:
City: Ware
State: MA
Zip: 01082
Country: USA
Email: hawkwoman0411@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Our public lands are for all to enjoy, not tear up for resources that are finite, and leave nothing for future generations to enjoy because of our outrageous need for consumption. We need to get our resources from less destructive sources like solar, wind and alternative fuels. Our human survival depends on our ability to stop our current consumption, and find more environmentally safe methods. Stop destroying our children's future! | 52075-001

Response for Document 52075

52075-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52077.

Comment Date: February 16, 2008 10:22:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD52077

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I urge the BLM to support the "NO ACTION" alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	52077-001
The proposal is not feasible economically or environmentally. The result will be increases in greenhouse gases and other pollutants.	52077-002

Responses for Document 52077

52077-001: The BLM acknowledges the commentor's preference for Alternative A.

52077-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment, Kathleen Donovan.

The comment tracking number that has been assigned to your comment is OSTSD52079.

Comment Date: February 16, 2008 10:46:13AM
Oil Shale and Tar Sands
Comment ID: OSTSD52079

First Name: Kathleen
Middle Initial:
Last Name: Donovan
Organization:
Address: 15815 S. LAKEWOOD PKWY. WEST
Address 2:
Address 3:
City: Phoenix
State: AZ
Zip: 85048
Country: USA
Email: instantk8@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

A lot of us prefer higher gas prices if it means keeping flora, fauna, and animals around for us and future generations to learn about and appreciate; don't do this horrible mining thing, please. | 52079-001

Response for Document 52079

52079-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Ragen Tilzey, CPA.

The comment tracking number that has been assigned to your comment is OSTSD52081.

Comment Date: February 16, 2008 10:58:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD52081

First Name: Ragen
Middle Initial:
Last Name: Tilzey, CPA
Organization:
Address: P.O. Box 75
Address 2:
Address 3:
City: Samoa
State: CA
Zip: 95564
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Ms. Thompson, BLM Project Manager:

I am writing to express my support for the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 52081-001

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should abandon the proposed development completely and choose the No Action alternative. 52081-002

I urge you to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 52081-001 (cont.)

Sincerely,

Ragen Tilzey, CPA

Responses for Document 52081

52081-001: The BLM acknowledges the commentor's preference for Alternative A.

52081-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment, Mitch Malott.

The comment tracking number that has been assigned to your comment is OSTSD52084.

Comment Date: February 16, 2008 11:12:43AM
Oil Shale and Tar Sands
Comment ID: OSTSD52084

First Name: Mitch
Middle Initial:
Last Name: Malott
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

President Bush has done nothing but put the American economy in the hole. Funding an endless war over seas for what ever political reasons he thinks are worthy. If i was an american citizen i would have much rathered Al Gore take the position, then this would not be even an option. Take the money that would be put into destroying our environment (what we have left of it) and put it into research and development. Instead of creating more damage to our planet by extracting resources we need to survive, lets just extract subsitutes from human capital! There are brilliant people all over the world that are working on creating earth friendly sources of energy. Fund them instead of putting us deeper in a hole.	52084-001

Response for Document 52084

52084-001: Thank you for your comment, but the issue presented is outside the scope of the PEIS.

Thank you for your comment, Janice Reid.

The comment tracking number that has been assigned to your comment is OSTSD52085.

Comment Date: February 16, 2008 11:28:13AM
Oil Shale and Tar Sands
Comment ID: OSTSD52085

First Name: Janice
Middle Initial:
Last Name: Reid
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

We should be looking for ways to provide energy without destroying the landscape or pollute our air and water. Tar sands are an expensive fossil fuel with many costs to the environment. The benifit is a short term gain of some oil and it is not worth it. | 52085-001

Response for Document 52085

52085-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52086.

Comment Date: February 16, 2008 11:35:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD52086

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I oppose of all development of oil shale and tar sands on public lands. You should be ashamed of yourselves for wanting to do such a thing to this wonderful earth of ours. She has given us a place to live and call our own and you repay her by destroying her land, her water and her air. Please do not do this, keep her clean and safe. | 52086-001

Response for Document 52086

52086-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Debby Kruzic.

The comment tracking number that has been assigned to your comment is OSTSD52091.

Comment Date: February 16, 2008 14:26:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD52091

First Name: Debby
Middle Initial:
Last Name: Kruzic
Organization:
Address: 5720 Osuna Road NE
Address 2:
Address 3:
City: Albuquerque
State: NM
Zip: 87109
Country: USA
Email: dkruzic@dhinfo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not allow The Bush administration to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 52091-001

Thank you.

Response for Document 52091

52091-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Kimberly Wyke.

The comment tracking number that has been assigned to your comment is OSTSD52092.

Comment Date: February 16, 2008 14:59:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52092

First Name: Kimberly
Middle Initial:
Last Name: Wyke
Organization:
Address: 29 Codman Island
Address 2:
Address 3:
City: Camden
State: ME
Zip: 04843
Country: USA
Email: kimberlywyke@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Protect Our Environment for Us! | 52092-001

Response for Document 52092

52092-001: Thank you for your comment.

Thank you for your comment, Trish Doherty.

The comment tracking number that has been assigned to your comment is OSTSD52096.

Comment Date: February 16, 2008 19:47:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD52096

First Name: Trish
Middle Initial:
Last Name: Doherty
Organization:
Address: 285 Washington Avenue
Address 2:
Address 3:
City: Brooklyn
State: NY
Zip: 11205
Country: USA
Email: trishskytree@cybermesa.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am horrified that our leaders are preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources.

THIS IS TOTALLY UNACCEPTABLE. IT IS TIME TO CHANGE OUR WAYS AND PUT OUR EFFORTS INTO DEVELOPING RENEWABLE ENERGIES. IT IS A GREAT TRAGEDY IN THE MAKING THAT OUR LEADERS CONTINUE TO USE THESE OLD AND HIGHLY DESTRUCTIVE METHODS TO EXTRACT OIL SHALE. 52096-001

PLEASE LEADERS WAKE UP AND STOP THIS NOW AND FOCUS ON THE NEW AND SUSTAINABLE WAYS TO CREATE NEW ENERGY.

Response for Document 52096

52096-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Beverly Cherner.

The comment tracking number that has been assigned to your comment is OSTSD52103.

Comment Date: February 17, 2008 04:11:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD52103

First Name: Beverly
Middle Initial:
Last Name: Cherner
Organization:
Address:
Address 2:
Address 3:
City: Sausalito
State: CA
Zip:
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose the sale of tar sands and oil shale on our public lands. Please protect these lands. Thank you. | 52103-001

Response for Document 52103

52103-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Joyce Janicki.

The comment tracking number that has been assigned to your comment is OSTSD52105.

Comment Date: February 17, 2008 08:04:14AM
Oil Shale and Tar Sands
Comment ID: OSTSD52105

First Name: Joyce
Middle Initial: E
Last Name: Janicki
Organization:
Address: 22493 Milner
Address 2:
Address 3:
City: St. Clair Shores
State: MI
Zip: 48081
Country: USA
Email: joycejanicki@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.	52105-001
This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants.	52105-002
The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency.	52105-003
I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies.	52105-001 (cont.)

Thank you for your time.

Responses for Document 52105

52105-001: The BLM acknowledges the commentor's preference for Alternative A.

52105-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52105-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, David Thompson.

The comment tracking number that has been assigned to your comment is OSTSD52109.

Comment Date: February 17, 2008 09:02:09AM
Oil Shale and Tar Sands
Comment ID: OSTSD52109

First Name: David
Middle Initial:
Last Name: Thompson
Organization:
Address: Rt 1, Box 176
Address 2:
Address 3:
City: Anadarko
State: OK
Zip: 73005
Country: USA
Email: mytoki2@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

My family and I frequently vacation on BLM lands especially in Utah and Colorado. BLM lands need to be protected from resource development for the recreational benefits of all Americans; not the profits of the few resource extraction corporations. | 52109-001

Response for Document 52109

52109-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, marilyn evenson.

The comment tracking number that has been assigned to your comment is OSTSD52110.

Comment Date: February 17, 2008 10:08:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD52110

First Name: marilyn
Middle Initial: f
Last Name: evenson
Organization: none
Address: 16016 29th ave ct-e
Address 2:
Address 3:
City: tacoma
State: WA
Zip: 98445
Country: USA
Email: lowrider3111@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Ms Thompson, I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale & Tar Sands in Colorado, Utah, & Wyoming. This development could be an environmental catastrophe to the earth, plants, & animals. The cumulative impacts could be disastrous. The contoversial proposal adds to an outdated, fossil-fuel-intensive energy infrastructure that comes at a time when we need to be transitioning away from fossil-fuel energy. Once again, I urge the BLM " No Action". Let's preserve our planet for future generations to enjoy. Thank you. 52110-001 52110-002 52110-001 (cont.)

Response for Document 52110

52110-001: The BLM acknowledges the commentor's preference for Alternative A.

52110-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

Thank you for your comment, Joseph Bateman.

The comment tracking number that has been assigned to your comment is OSTSD52111.

Comment Date: February 17, 2008 10:14:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD52111

First Name: Joseph
Middle Initial: W
Last Name: Bateman
Organization:
Address: 322 Stanton
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84111
Country: USA
Email: seagel_inc@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil Shale and Tar Shands are not the right direct for this country. Rather then relying on coal, we should be directing our attention towards sustainable resoruces. I implore the BLM to halt the exploration of oil and tar sands. | 52111-001

Response for Document 52111

52111-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Beth Rockwell.

The comment tracking number that has been assigned to your comment is OSTSD52112.

Comment Date: February 17, 2008 10:34:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD52112

First Name: Beth
Middle Initial:
Last Name: Rockwell
Organization:
Address: 132 W. 23rd St.
Address 2: Apt. 313
Address 3:
City: Erie
State: PA
Zip: 16502
Country: USA
Email: trish134@surferie.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We must grieve over the rape of our beautiful wild lands, and work harder to protect those we yet have. | 52112-001

Response for Document 52112

52112-001: Thank you for your comment.

Thank you for your comment, Frederick Wills.

The comment tracking number that has been assigned to your comment is OSTSD52113.

Comment Date: February 17, 2008 10:58:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD52113

First Name: Frederick
Middle Initial:
Last Name: Wills
Organization:
Address: 11322 Two Wells
Address 2:
Address 3:
City: San Antonio
State: TX
Zip: 78245
Country: USA
Email: fredwills@att.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose the development of oil shale and tar sands on public lands (Support NO ACTION alternative). These activities would devastate 2 million acres of my land with strip mines, while pouring tons of greenhouse gases into the atmosphere. Extracting oil from these deposits is extremely inefficient (40% of the energy value is lost in heating the material to release the petroleum). Plant, fish, and wildlife resources would be sacrificed. I propose instead that the federal government (including BLM) put its efforts toward energy conservation and developing alternative energy sources. 52113-001

Response for Document 52113

52113-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Scott Myer.

The comment tracking number that has been assigned to your comment is OSTSD52114.

Comment Date: February 17, 2008 12:08:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52114

First Name: Scott
Middle Initial: W
Last Name: Myer
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is completely unaccpetable. | 52114-001

Response for Document 52114

52114-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gerard Cobut.

The comment tracking number that has been assigned to your comment is OSTSD52119.

Comment Date: February 17, 2008 15:04:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD52119

First Name: Gerard
Middle Initial: M
Last Name: Cobut
Organization:
Address: Rue Vautier 29
Address 2:
Address 3:
City: Brussels (Belgium)
State:
Zip:
Country:
Email: gerard@cobut.be
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am strongly opposed to opening up almost 2 million acres of public lands in Wyoming, Colorado, and Utah to commercial leasing of oil shale and tar sands. This proposal would spoil public lands favourable to many wild species. 52119-001

Response for Document 52119

52119-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52121.

Comment Date: February 17, 2008 16:25:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD52121

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

This can only harm more than it can help, invest in creating a market for sustainable energy instead. | 52121-001

Response for Document 52121

52121-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Margaret Maurin.

The comment tracking number that has been assigned to your comment is OSTSD52123.

Comment Date: February 17, 2008 17:09:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD52123

First Name: Margaret
Middle Initial: S
Last Name: Maurin
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to support in the strongest terms the "NO ACTION" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This proposal would cause widespread and unacceptable devastation. This proposal would cause widespread and unacceptable devastation(just look at the widespread destruction that has been visited on the province of Alberta), and it is not feasible either economically or environmentally. Remember this land is not for us to exploit; it belongs to our children and grandchildren and future generations. This is their heritage - are you going to continue despoiling it and making them pay the environmental and emotional costs? 52123-001

Response for Document 52123

52123-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, George Rawley.

The comment tracking number that has been assigned to your comment is OSTSD52125.

Comment Date: February 17, 2008 18:58:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD52125

First Name: George
Middle Initial:
Last Name: Rawley
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, I am writing to urge the BLM to choose the "No Action" alternative in the Draft Programatic Environmental Impact Statement for Oils and Tar Sands. The proposal makes no economic sense. Besides, it causes an environmental disaster. Yours Truly, George Rawley

52125-001

Response for Document 52125

52125-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Shirley Wallack.

The comment tracking number that has been assigned to your comment is OSTSD52127.

Comment Date: February 17, 2008 20:05:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD52127

First Name: Shirley
Middle Initial:
Last Name: Wallack
Organization:
Address: 450C Las Casitas
Address 2:
Address 3:
City: Santa Rosa
State: CA
Zip: 95403
Country: USA
Email: shpeeke@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I would like to provide my opinion in support of the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. We greatly need to transition away from fossil fuels. It is time to reduce our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative. I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 52127-001 52127-002 52127-001 (cont.)

Sincerely,

Responses for Document 52127

52127-001: The BLM acknowledges the commentor's preference for Alternative A.

52127-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment, Rachel Deierling.

The comment tracking number that has been assigned to your comment is OSTSD52128.

Comment Date: February 17, 2008 20:42:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD52128

First Name: Rachel
Middle Initial: F
Last Name: Deierling
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 52128-001

Response for Document 52128

52128-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, PHYLLIS & Chuck hugins.

The comment tracking number that has been assigned to your comment is OSTSD52129.

Comment Date: February 17, 2008 20:48:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD52129

First Name: PHYLLIS & Chuck
Middle Initial:
Last Name: hugins
Organization:
Address: POBX1210/711 BELFORD ST
Address 2:
Address 3:
City: Frisco
State: CO
Zip: 80443
Country: USA
Email: phugins@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Let's not suffer as Canada has with the OIL shell crime!! | 52129-001

Response for Document 52129

52129-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, MICHAEL KARMAZIN.

The comment tracking number that has been assigned to your comment is OSTSD52132.

Comment Date: February 17, 2008 22:33:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52132

First Name: MICHAEL
Middle Initial: L
Last Name: KARMAZIN
Organization:
Address: 54 Lincoln street
Address 2:
Address 3:
City: WINTHROP
State: MA
Zip: 02152
Country: USA
Email: michaelkarmazin@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

OIL SHALE AND TAR SANDS WILL NEVER BE VIABLE CONSIDERING THE DEVISTATING ENVIRONMENTAL CONSEQUENCE.IT IS THEREFORE MY BELIEF AND DESIRE TO SUPPORT "NO ACTION" ALTERNATIVE AND ABANDON PLANS TO DEVELOP SUCH TAR SANDS AND OIL SHALE ON PUBLIC LANDS IN THE ROCKIES. MAHALO, MICHAEL KARMAZIN	52132-001

Response for Document 52132

52132-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Malcolm Simpson.

The comment tracking number that has been assigned to your comment is OSTSD52136.

Comment Date: February 18, 2008 08:53:58AM
Oil Shale and Tar Sands
Comment ID: OSTSD52136

First Name: Malcolm
Middle Initial: G
Last Name: Simpson
Organization:
Address: 1924 Franklin Ave.
Address 2:
Address 3:
City: Las Vegas
State: NV
Zip: 891041918
Country: USA
Email: roadrunnersam@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support the no action alternative on the grounds that the adverse effects to the environment are too great. | 52136-001

Response for Document 52136

52136-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Kurt Evans.

The comment tracking number that has been assigned to your comment is OSTSD52137.

Comment Date: February 18, 2008 09:24:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD52137

First Name: Kurt
Middle Initial: M
Last Name: Evans
Organization:
Address: 2702 E Kenwood St
Address 2:
Address 3:
City: Mesa
State: AZ
Zip: 85213
Country: USA
Email: kurt_evans@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all development of oil shale and tar sands on public lands. Getting oil by this means causes far too much permanent damage and distruction to the land. We need to come up with solutions that prevent continual destruction of the environment. The oil shale and tar sands development is especially detrimental. We would all like our grandchildren to live in a world that has not been ravaged by the previous generation. 52137-001

Response for Document 52137

52137-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Kerri Campbell.

The comment tracking number that has been assigned to your comment is OSTSD52138.

Comment Date: February 18, 2008 10:38:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD52138

First Name: Kerri
Middle Initial:
Last Name: Campbell
Organization:
Address: 528 Calle De Los Hijos Nw
Address 2:
Address 3:
City: Albuquerque
State: NM
Zip: 87114
Country: USA
Email: kerricampbell@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Do not look and mine for Oil shale and Tar sands on public lands! We as the public do not want this. Ever. | 52138-001

Response for Document 52138

52138-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Cheryl Thacker.

The comment tracking number that has been assigned to your comment is OSTSD52140.

Comment Date: February 18, 2008 11:11:16AM
Oil Shale and Tar Sands
Comment ID: OSTSD52140

First Name: Cheryl
Middle Initial:
Last Name: Thacker
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: cathacker@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

No mining on public lands, period, until ALL options for renewable energy have been pursued! | 52140-001

Response for Document 52140

52140-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, leslie bald.

The comment tracking number that has been assigned to your comment is OSTSD52141.

Comment Date: February 18, 2008 11:26:52AM
Oil Shale and Tar Sands
Comment ID: OSTSD52141

First Name: leslie
Middle Initial:
Last Name: bald
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: lucy@porchlight.ca
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Haven't we destroyed enough of our world in the greedy acquistion of money, and more money? What kind of world are we going to leave for our children? Think about it...and quit this destruction. | 52141-001

Response for Document 52141

52141-001: Thank you for your comment.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52145.

Comment Date: February 18, 2008 14:00:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD52145

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Now is not the time to be creating more green house gases. This country most start investing more in alternative energy sources and the government must make better efforts to curb global warming. This proposed project would needless cause a huge amount of damage to the environment. It is thoughtless out dated practices, and poorly plained projects like this one that make me fear for the future of our land, water, and air quality. However there is still time for the The Bureau of Land Management to do the right thing by not letting this project go forward. I encourage them along with President Bush to rethink the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands proposal. Let's take steps to protect our planet instead of destroying it. 52145-001

Thank you for your time.

Response for Document 52145

52145-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Than Boves.

The comment tracking number that has been assigned to your comment is OSTSD52149.

Comment Date: February 18, 2008 16:38:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD52149

First Name: Than
Middle Initial: J
Last Name: Boves
Organization:
Address: 301 Woodlawn Pike Apt. J6
Address 2:
Address 3:
City: Knoxville
State: TN
Zip: 37920
Country: USA
Email: tboves@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I vehemently oppose the development of all oil shale and tar sands on public lands. At this time, we need to give up on the idea of fossil fuels providing energy in the future and we need to begin truly working at developing RENEWABLE energy sources. Lets face the facts- fossil fuels are the past, we need to move on!

52149-001

Response for Document 52149

52149-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Marjorie Hass.

The comment tracking number that has been assigned to your comment is OSTSD52150.

Comment Date: February 18, 2008 17:09:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52150

First Name: Marjorie
Middle Initial: A
Last Name: Hass
Organization:
Address: 820 Lehigh Avenue
Address 2:
Address 3:
City: Hartshorne
State: OK
Zip: 74547
Country: USA
Email: mhass85@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose all developement of oil shale and tar shale on public lands. | 52150-001

Response for Document 52150

52150-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Elizabeth Boylston.

The comment tracking number that has been assigned to your comment is OSTSD52152.

Comment Date: February 18, 2008 18:38:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52152

First Name: Elizabeth
Middle Initial:
Last Name: Boylston
Organization:
Address: P.O.Box 6086
Address 2:
Address 3:
City: Snowmass Vlg.
State: CO
Zip: 81615
Country: USA
Email: 78eliz@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We must be very dedicated to save as much of our environment as possible. We cannot do too much to preserve our natural heritage. Our technologies today and the vast extent of our harvesting can create mass destruction before we even realize what is happening. | 52152-001

Response for Document 52152

52152-001: Thank you for your comment.

Thank you for your comment, CLYDE GEORGE.

The comment tracking number that has been assigned to your comment is OSTSD52154.

Comment Date: February 18, 2008 19:31:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD52154

First Name: CLYDE
Middle Initial:
Last Name: GEORGE
Organization:
Address: 14588 N. 140TH LANE
Address 2:
Address 3:
City: SURPRISE
State: AZ
Zip: 85379
Country: USA
Email: CLYDEH3@AOL.COM
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

PLEASE LEAVE THE LAND ALONE. REIN IN YOUR INFINITE GREED! | 52154-001

Response for Document 52154

52154-001: Thank you for your comment.

Thank you for your comment, Barbara Kelly.

The comment tracking number that has been assigned to your comment is OSTSD52156.

Comment Date: February 18, 2008 20:06:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52156

First Name: Barbara
Middle Initial:
Last Name: Kelly
Organization:
Address: 5 Camelford Ct.
Address 2:
Address 3:
City: Moraga
State: CA
Zip: 94556
Country: USA
Email: Beekay104@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

More destruction of our earth is unacceptable! | 52156-001

Response for Document 52156

52156-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Ward Dudley.

The comment tracking number that has been assigned to your comment is OSTSD52157.

Comment Date: February 18, 2008 20:36:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52157

First Name: Ward
Middle Initial: H
Last Name: Dudley
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Stop this unspeakable act. | 52157-001

Response for Document 52157

52157-001: Thank you for your comment.

Thank you for your comment, JAMES CONROY.

The comment tracking number that has been assigned to your comment is OSTSD52163.

Comment Date: February 19, 2008 00:30:03AM
Oil Shale and Tar Sands
Comment ID: OSTSD52163

First Name: JAMES
Middle Initial:
Last Name: CONROY
Organization:
Address: 214 NINTH STREET
Address 2:
Address 3:
City: HICKSVILLE
State: NY
Zip: 11801
Country: USA
Email: JIM214COMRAD@GMAIL.COM
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. The proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The BLM should scrap the proposed development completely, choose the No Action alternative, or at the very lease development and evaluate a full range of reasonable alternative, including alternatives based on energy conservation and efficiency. 52163-001 52163-002 52163-003

Oil shale is a loosing proposition. As someone in their 50's I am old enough to remember the last go round of the oil shale boondoggle. In the 1970s the government sank hundreds of millions of our tax dollars into oil shale blackhole. The money disappeared without trace, leaving nothing behind except ruined landscapes, pollution and ripped-off taxpayers.

One of the worst features of oil shale is that it is dog from an energy standpoint. Traditional above-ground retorts for cooking oil shale must heat the rock to up to about 900° F to release the oil. Studies show that at least 40% of the energy value of the shale is consumed in production, since the shale has to be mined, transported, retorted, and then the by-products disposed of. Not a very high yield for the amount of energy put into the process. 52163-004

Then there are the environmental effects of this highly polluting technology. The oil shale region of western Colorado, eastern Utah, and southwestern Wyoming is dry country. Water supplies are scarce and relied upon heavily. Oil shale extraction and processing will require significant amounts of water, as will the associated growth in local communities. For these reasons, water issues have long been viewed as a major constraint on large-scale development of oil shale resources. Surface mining and retorting of oil shale would use up to five barrels of water for each barrel of oil produced. In most of the arid West, were available water supplies are already oversubscribed, this water could only come by diverting it from agriculture, wildlife habitat and recreation.

Responses for Document 52163

52163-001: The BLM acknowledges the commentor's preference for Alternative A.

52163-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52163-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

52163-004: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

Thank you for your comment, Ben Rall.

The comment tracking number that has been assigned to your comment is OSTSD52164.

Comment Date: February 19, 2008 08:14:52AM
Oil Shale and Tar Sands
Comment ID: OSTSD52164

First Name: Ben
Middle Initial:
Last Name: Rall
Organization:
Address:
Address 2:
Address 3:
City:
State: OR
Zip: 97217
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I would like you to know that my family and I oppose all development of oil shale and tar sands on public lands. Please reconsider your options. Thank you. | 52164-001

Response for Document 52164

52164-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Eric Wahl.

The comment tracking number that has been assigned to your comment is OSTSD52167.

Comment Date: February 19, 2008 09:23:14AM
Oil Shale and Tar Sands
Comment ID: OSTSD52167

First Name: Eric
Middle Initial:
Last Name: Wahl
Organization: Colorado Solar Inc.
Address: 38150 River Frontage Rd. #1D
Address 2:
Address 3:
City: New Castle
State: CO
Zip: 81647
Country: USA
Email: ericw@cosolar.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Eric Wahl ericw@cosolar.com 02/17/2008 11:45 AM To scott_archer@blm.gov cc dshrull@postindependent.com Subject Oil Shale Draft EIS Mr Archer,

It appears you are responsible for the "Air Quality and Climate Impact Analysis" in the ostseis. I know you're busy, but I have a question. Where is it? I have read chapter 4 and couldn't find any sort of quantitative analysis at all.

In fact this section is so short I can easily paste the entire air quality section below this email.

To say "It is not possible to predict site-specific air quality impacts until actual oil shale projects are proposed and designed." is a lie, Mr Archer. In fact it would be difficult to invent a more polluting process, and I believe you know that. 52167-001

Also, the Energy Return on Investment, or EROI, is widely acknowledged to be an important variable in evaluating new energy sources. Can you direct me to the section of the report that addresses that?

My comment will also be submitted here: http://ostseis.anl.gov/involve/comments/index.cfm

Eric R. Wahl, pres. Colorado Solar Inc. 38150 River Frontage Rd. #1D New Castle CO 81647

from the report at http://ostseis.anl.gov/documents/dpeis/vol2/OSTS_DPEIS_Vol2_Ch4.pdf

4.6 AIR QUALITY AND CLIMATE 4.6.1 Common Impacts The potential for air quality impacts from commercial oil shale development, including ancillary facilities such as access roads, upgraded facilities, gas pipelines, and compressors, is directly related to the amount of land disturbance, drilling and mining operations, processing methods, and the quantity of oil and gas equivalent produced. Indirect effects, such as impacts resulting from the need for additional

electrical generation and increased secondary population growth, are also considered. Impacts on air quality from oil shale development would occur in several ways, as described below: • Temporary, localized impacts (primarily PM and SO2, with some CO and NOx emissions) would result from the clearing of the project area; grading, excavation, and construction of facilities and associated infrastructure; and mining (extraction) or drilling of the oil shale resource. • Long-term, regional impacts (primarily CO and NOx, with lesser amounts of PM, SO2, and VOCs) would result from oil shale processing, upgrading, and transport (pipelines). Depending on site-specific locations, meteorology, and topography, NOx and SO2 emissions could cause regional visibility impacts (through the formation of secondary aerosols) and contribute to regional nitrogen and sulfur deposition. In turn, atmospheric deposition could cause changes in sensitive (especially alpine) lake chemistry. In addition, depending on the amounts and locations of NOx and VOC emissions, photochemical production of O3 (a very reactive oxidant) is possible, with potential impacts on human health and vegetation. Similar impacts could also occur from the additional coal-fired power plants that would be needed to supply electricity for in situ oil shale extraction. Localized impacts due to emissions of hazardous air pollutants (HAPs) (particularly benzene, toluene, ethylbenzene, xylene, and formaldehyde) and diesel PM could also present health risks to workers and nearby residences. It is not possible to predict site-specific air quality impacts until actual oil shale projects are proposed and designed. Once such a proposal is presented, impacts on these resources would be further considered in project-specific NEPA evaluations and through consultations with the BLM prior to actual development. Although oil shale is found in the states of Colorado, Utah, and Wyoming, there are two high-yield areas of the Piceance Basin in western Colorado with the greatest potential for development. Table 4.6.1-1 identifies those counties where direct and indirect air pollutant emissions could result from oil shale leasing. Impacts on air quality would be limited by applicable local, state, Tribal, and federal regulations, standards, and implementation plans established under the CAA and administered by the applicable air quality regulatory agency, with EPA oversight. These agencies include, but are not limited to, the Colorado Department of Public Health and Environment?Air Pollution Control Division (CDPHE-APCD), the Utah Department of Environmental Quality?Division of Air Quality (UTDEQ-DAQ), and the Wyoming Department of Environmental Quality?Division of Air Quality (WYDEQ-DAQ). Air quality regulations require that proposed new or modified existing air pollutant emission sources undergo a permitting review before their construction can begin. Therefore, these state agencies have the primary authority and responsibility to review permit applications and to require emission permits, fees, and control devices prior to construction and/or operation. The U.S. Congress (through CAA Section 116) authorized local, state, and Tribal air quality regulatory agencies to establish air pollution control requirements more (but not less) stringent than federal requirements. In addition, under the CAA and FLPMA, federal agencies cannot authorize any activity that does not conform to all applicable local, state, Tribal, and federal air quality laws, statutes, regulations, standards, and implementation plans. Before oil shale development could occur, additional project-specific NEPA analyses would be performed, subject to public and agency review and comment. The applicable air quality regulatory agencies (including the states and EPA) would also review site-specific preconstruction permit applications to examine potential projectwide air quality impacts. As part of these permits (depending on source size), the air quality regulatory agencies could require additional air quality impact analyses or mitigation measures. Those evaluations would take into consideration the specific project features being proposed (e.g., specific air pollutant emissions and control technologies) and the locations of project facilities (including terrain, meteorology, and spatial relationships to sensitive receptors.) Project-specific NEPA assessments would predict site-specific impacts, and these detailed assessments (along with BLM consultations) would result in the required actions by the applicant to avoid or mitigate significant impacts. Under no circumstances can the BLM conduct or authorize activities that would not comply with all applicable local, state, Tribal, or federal air quality laws, regulations, standards, or implementation plans. Ongoing scientific research has

identified the potential effects of so-called "greenhouse gas" (GHG) emissions (including CO2, methane, NOx, water vapor; and several trace gases) on global climate. Recent industrialization and burning of fossil carbon sources have caused CO2 concentrations to increase dramatically and are likely to contribute to overall climatic changes. Increasing CO2 concentrations also leads to preferential fertilization and growth of specific plant species. The assessment of GHG emissions and climate change is in its formative phase, and it is not yet possible to know with confidence the net impact on climate. However, the IPCC (2007) recently concluded that "warming of the climate system is unequivocal" and "most of the observed increase in globally average temperatures since the mid-20th century is very likely due to the observed increase in anthropogenic [man-made] greenhouse gas concentrations." Global mean surface temperatures have increased nearly 1.0°C (1.8°F) from 1890 to 2006 (Goddard Institute for Space Studies 2007). However, the northern latitudes (above 24°N ? which includes all of the United States) have exhibited temperature increases of nearly 1.2°C (2.1°F) since 1900, with nearly a 1.0°C (1.8°F) increase since 1970 alone. Without additional meteorological monitoring systems, it is difficult to determine the spatial and temporal variability and change of climatic conditions, but increasing concentrations of GHG, however, are likely to accelerate the rate of climate change. The direct emissions of climate change air pollutants from oil shale development facilities are likely to be a small fraction of global emissions. 4.6.1.1 Impacts from Emissions Sources for Oil Shale Facilities To estimate total potential air pollutant emissions, emission factors for a specific activity must be identified and then multiplied by activity levels and engineering control efficiencies. The emission factors from proposed project activities would be estimated in future NEPA analyses by using appropriate equipment manufacturer's specifications, testing information, EPA AP-42 emission factor references (EPA 1995), and other relevant references. Anticipated levels of operational activities (e.g., load factors, hours of operation per year, and vehicle miles traveled) would be computed. Emission inventories would be made for selected years during the assumed plant life (including construction, operation, maintenance, and reclamation). 4.6.1.1.1 Construction. Mining and surface process technologies may include construction of a surface or underground mine and mine bench, with primary crushing facilities, processing and upgrading facilities, spent material disposal areas, and reservoirs for flood control and a catchment dam below the disposal pile. For thermally conductive in situ conversion processes, considerable construction and prep roduction development work include extensive drilling, placement of heating elements, construction of upgrading/refining facilities, power plants, and possibly cryogenic (freeze wall) plants. Irrespective of surface or in situ technologies, additional construction activities include access roads, power supply and distribution systems, pipelines, water storage and supply facilities, construction staging areas, hazardous materials handling facilities, housing, and auxiliary buildings. Impacts on air quality associated with these construction activities include fugitive dust emissions and engine exhaust emissions of heavy equipment, as well as commuting and delivery vehicles on paved and/or unpaved roads. Another emission source affecting air quality is wind erosion of soil disturbed by construction activities or from soil stockpiles. 4.6.1.1.2 Production. Emissions impacting air quality could result from surface operations, such as mining and crushing, processing (such as pyrolysis of the base material at high temperatures), upgrading the hydrocarbon products, support utilities, and disposing of waste products. Major processing steps for in situ processes would include heating the base material in place, extracting the liquid from the ground, and transporting it to an upgrading/refining facility. Because in situ processing does not involve mining, with limited waste material disposal, it does not permanently modify land surface topography and therefore produces fewer air pollutant emissions. 4.6.1.1.3 Maintenance. Maintenance activities primarily include access road maintenance and periodic visits to facilities and structures away from the main facilities. The primary emissions that could affect air quality would be fugitive dust and engine exhaust emissions. 4.6.1.1.4 Reclamation. During reclamation activities, which proceed continuously throughout the life of the project, waste material disposal piles would be smoothed and contoured by bulldozers. Topsoil would be placed on the graded

spoils, and the land would be prepared for revegetation by furrowing, mulching, and the like. From the time an area is disturbed until the new vegetation emerges, all disturbed areas are subject to wind erosion. Fugitive dust and engine exhaust emissions from reclamation activities are similar to those from construction activities, although with a lower level of activity. 4.6.1.1.5 Population Growth. Population growth and related emission increases associated with potential development would include direct employment; other industry workers (such as those associated with additional power plants); workers from suppliers (e.g., related to equipment, materials, supplies, and services); consumer effects (e.g., related to additional retail stores); additional employment in federal, state, and local governments; and families. 4.6.1.1.6 Mobile (onroad and nonroad). Additional air pollutant emissions that could affect air quality would be associated with on-road mobile sources (e.g., cars, trucks, and buses), and nonroad mobile sources (e.g., graders and backhoes used in construction). 4.6.2 Mitigation Measures Since all activities either conducted or approved through use authorizations by the BLM must comply with all applicable local, state, Tribal, and federal air quality laws, statutes, regulations, standards, and implementation plans, it is unlikely that future oil shale development would cause significant adverse air quality impacts. However, on a case-by-case basis, future individual leases and use authorizations could include specific measures to minimize potential air quality impacts. These mitigation measures could include but are not limited to (1) treating access roads with water or other surfactants to reduce fugitive dust from traffic; (2) reducing vehicle speeds on dirt roads to reduce fugitive dust from traffic; (3) specifying emission control devices on production equipment to reduce potential CO, NOx, PM2.5, PM10, and VOC emissions; (4) specifying low-sulfur-content fuels to reduce potential SO2 emissions; and/or (5) regulating the timing of emissions to reduce the formation of O3 in the atmosphere from NOx and VOC emissions. In addition, to ensure that BLM-authorized activities comply with applicable ambient air quality standards, as well as potential impacts on AQRVs (such as visibility, atmospheric deposition, noise, etc.), specific monitoring programs may be established. Potential global warming impacts could be reduced if oil shale substitutes for the use of other fossil carbon-based energy sources, or if atmospheric loadings are reduced by emission controls or sequestration methods.

Response for Document 52167

52167-001: Sections 4.6, 5.6, 6.1.1.5, 6.1.2.5, 6.1.3.5, 6.1.4.5, 6.1.5.3.5, 6.1.6.1.4, 6.2.2.5, 6.2.3.5, 6.2.4.5, 6.2.5.3.5, and 6.2.6.1.4 of the Draft PEIS all address potential impacts to air quality. However, no air pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

The computation of EROI is not within the scope of the PEIS.

Thank you for your comment, David Schneider.

The comment tracking number that has been assigned to your comment is OSTSD52168.

Comment Date: February 19, 2008 09:53:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD52168

First Name: David
Middle Initial:
Last Name: Schneider
Organization:
Address: 213 Crystal Lake Road
Address 2:
Address 3:
City: Tolland
State: CT
Zip: 06084
Country: USA
Email: margedavidpeace@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We need alternative solutions to fossil fuels to assure a safe environment for the future. Delays in achieving this are not the way to go. | 52168-001

Response for Document 52168

52168-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52170.

Comment Date: February 19, 2008 11:11:59AM
Oil Shale and Tar Sands
Comment ID: OSTSD52170

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Extracting oil from shale is and and shall always be a huge net energy loss.Any money spent studying,or testing it is a total waste. An discussing it is a total waste of time. | 52170-001

Response for Document 52170

52170-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Alex Kish.

The comment tracking number that has been assigned to your comment is OSTSD52178.

Comment Date: February 19, 2008 20:58:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52178

First Name: Alex
Middle Initial:
Last Name: Kish
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I would like to express my strong support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

With advances in technology, this enhanced development can be conducted in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, to protect our economic vitality.

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. 52178-001

Finally, development of unconventional fuels will produce a strong workforce and will support the local and regional economies of Utah, Colorado and Wyoming.

The utilization of oil shale and tar sands from these leasing areas will offer significant benefits to the local communities and will strengthen our national energy security while bringing the necessary supplies of oil into the markets to offset increased global demand. I encourage developing these areas while protecting the environment, local communities and other economic interests.

Response for Document 52178

52178-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, John Gaffin.

The comment tracking number that has been assigned to your comment is OSTSD52179.

Comment Date: February 19, 2008 22:48:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD52179

First Name: John
Middle Initial:
Last Name: Gaffin
Organization:
Address: 10985 Dyerville Loop
Address 2:
Address 3:
City: Myers Flat
State: CA
Zip: 95554
Country: USA
Email: gaffin@asis.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is astonishing that the BLM is considering leases for oil shale and tar sands development. It is well known that the amount of energy consumed and the greenhouse emissions of CO2 produced are a large fraction of the net usable energy produced.

If President Bush's promise to take global warming seriously and engage in voluntary efforts to reduce CO2 emission is respected, then you can't possibly go forward with this proposed boondoggle. And I haven't even mentioned the deleterious effects on the local environment and wildlife affected.

52179-001

Response for Document 52179

52179-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Rosalie Hewitt.

The comment tracking number that has been assigned to your comment is OSTSD52180.

Comment Date: February 19, 2008 23:33:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD52180

First Name: Rosalie
Middle Initial:
Last Name: Hewitt
Organization:
Address: 13 Brown St
Address 2:
Address 3:
City: Norwich
State: NY
Zip: 13815
Country: USA
Email: rosalieg@citlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The short-sighted benefits we will gain from blighting our land are so not worth it. We should be looking up, to greener ways of providing our energy, to conserving what is left of our wild land. It enables us to live. | 52180-001

Response for Document 52180

52180-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jill Griswold.

The comment tracking number that has been assigned to your comment is OSTSD52184.

Comment Date: February 20, 2008 11:19:31AM
Oil Shale and Tar Sands
Comment ID: OSTSD52184

First Name: Jill
Middle Initial:
Last Name: Griswold
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I fully disagree with the Bush Administration's decision to open up land for oil drilling and tar sands. I am a freshman in high school and this year's curriculum has been mostly about educating this generation about renewable resources, green power, etc. I believe it is apalling that at a time where we should be trying our hardest to switch over to renewable resources, the choice would be made to take a step back to what everyone knows is damaging our planet. I am shocked and disappointed and will try everything in my power to stop this because I know how this can affect my life and my generation as well. 52184-001

Thank you.

Response for Document 52184

52184-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Bob & Robin Porter.

The comment tracking number that has been assigned to your comment is OSTSD52185.

Comment Date: February 20, 2008 14:07:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD52185

First Name: Bob & Robin
Middle Initial:
Last Name: Porter
Organization:
Address: 12219 Parasol Drive
Address 2: PO Box 1701
Address 3:
City: Havasu Lake
State: CA
Zip: 923621701
Country: USA
Email: bobmp@email.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

February 2008

Bureau of Land Management Oil Shale and Tar Sands Draft Programmatic EIS Comments 9700 South Cass Avenue Argonne, IL 60439

RE: Responsible Development of National Oil Shale and Tar Sands Resources

Dear Sherri Thompson:

We would like to express my strong support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed for leasing have enough oil to meet America's gasoline demand for more than 18 years. 52185-001

With today's technology, this enhanced development can be conducted in an environmentally sound manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example:

* In spite of significant conservation efforts, world energy demand is projected to increase by 50% during the next 20 years and could double in 50 years. * Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years. * The United States military currently uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will produce a strong workforce and will support the local and regional economies of Utah, Colorado and Wyoming.

52185-001 (cont.)

The utilization of oil shale and tar sands from these leasing areas will offer significant benefits to the local communities and will strengthen our national energy security while bringing the necessary supplies of oil into the markets to offset increased global demand. We encourage developing these areas while protecting the environment, local communities and other economic interests.

Sincerely, Bob & Robin Porter

Response for Document 52185

52185-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Fran Levine.

The comment tracking number that has been assigned to your comment is OSTSD52186.

Comment Date: February 20, 2008 18:31:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD52186

First Name: Fran
Middle Initial:
Last Name: Levine
Organization:
Address: 13 Cross Street
Address 2:
Address 3:
City: Montpelier
State: VT
Zip: 05602
Country: USA
Email: f_levine@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please leave our treasure undespoiled. | 52186-001

Response for Document 52186

52186-001: Thank you for your comment.

Thank you for your comment, elizabeth kelson.

The comment tracking number that has been assigned to your comment is OSTSD52190.

Comment Date: February 21, 2008 08:18:00AM
Oil Shale and Tar Sands
Comment ID: OSTSD52190

First Name: elizabeth
Middle Initial: a
Last Name: kelson
Organization:
Address: 29904 lee rd
Address 2:
Address 3:
City: evergreen
State: CO
Zip: 804397247
Country: USA
Email: bkelson@ix.netcom.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. If you ran your numbers, to get the oil shale out of the ground, refined, and transported, the energy needed to do this would far outway the benefit of oil shale. The technologu is not there yet

52190-001

52190-002

52190-003

Responses for Document 52190

52190-001: The BLM acknowledges the commentor's preference for Alternative A.

52190-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52190-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52192.

Comment Date: February 21, 2008 09:29:20AM
Oil Shale and Tar Sands
Comment ID: OSTSD52192

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM blueprint for oil shale

, UT

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

American energy must be utilized to a greater extent in order for America to overcome its current energy problems. Instead of consistently ignoring the vast energy potential of the United States, America should instead start to use the rich energy supply it has in order to satisfy its energy needs.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52192-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Response for Document 52192

52192-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52193.

Comment Date: February 21, 2008 09:34:49AM
Oil Shale and Tar Sands
Comment ID: OSTSD52193

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale has potential environmental issues

Thomas Barton 365 North 9th Street Laramie, WY 82072-3380

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

After samples of oil shale from Wyoming, Utah and Colorado were tested for mercury loss versus temperature, a poster of the results was presented at the 27th Oil Shale Conference in Golden Colorado on October 16th. The results showed that oil shale from each of the three principal western oil state producing states have potential issues with mercury loss to the environment during processing. Both above ground and in situ processing is likely to emit mercury with the gas phase material produced. No evidence has been found that would show significant mercury concentrations staying with underground solids, water condensed or oil recovered. All experiments showed the mercury in the gas phase as elemental vapor. The results were generally well received at the conference. A commercial company associated with mercury absorption technologies shared our poster area to explain possible solutions to mercury production from oil share processing. To date we have not been successful in establishing collaborations with the principal in situ oil shale processors to more closely examine the exact conditions of mercury emission from oil shale. 52193-001

Sincerely,

Response for Document 52193

52193-001: Thank you for your comment.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52194.

Comment Date: February 21, 2008 09:37:34AM
Oil Shale and Tar Sands
Comment ID: OSTSD52194

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development and foreign oil dependance

Kurt Cox 1885 N 400 E Orem, UT 84097-2240

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I don't understand why there is no major development in the oil shale of the west. I thought the main problem was cost of oil but the cost/barrell has long past the critical level to make it profitable.

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

52194-001

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing

American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

Sincerely,

Response for Document 52194

52194-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52195.

Comment Date: February 21, 2008 09:40:54AM
Oil Shale and Tar Sands
Comment ID: OSTSD52195

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: DO NOT SUPPORT Commerical oil shale development

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There is NOT a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production.

We only have one planet. What will our future generations do when the oil shale is gone? What then?

Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground. Please, let's just leave it alone. Actions must be taken to protect our natural resources in Utah and all of our western states! 52195-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all look to new technology to run Americas energy demands.

Let's place our money and attention on developing sustainable energy sources that will serve us and our future generations!

Sincerely,

Response for Document 52195

52195-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52196.

Comment Date: February 21, 2008 09:40:59AM
Oil Shale and Tar Sands
Comment ID: OSTSD52196

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America needs to utilize oil shale to promote energy independence

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Decreasing our dependence on foreign energy supplies will positively impact our economy and also positively impact our trade deficit.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52196-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American

energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52196-001 (cont.)

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52196

52196-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52197.

Comment Date: February 21, 2008 09:41:07AM
Oil Shale and Tar Sands
Comment ID: OSTSD52197

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Foreign energy dependence must end - oil shale can help

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

While in an ideal world America could satisfy its energy demands by neither importing foreign energy nor developing its own energy resources, the fact remains that American energy must be developed in order to stem American dependence on foreign energy sources and satisfy its energy demands. BLM has taken a major step towards that end in the draft PEIS for oil shale and tar sands.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52197-001

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52197-001
(cont.)

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52197

52197-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52198.

Comment Date: February 21, 2008 09:41:14AM
Oil Shale and Tar Sands
Comment ID: OSTSD52198

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: 18 years worth of transportation fuel found in oil shale

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Many lament America's dependence on foreign energy, but seemingly every time America has an opportunity to enhance its capacity for domestic energy production, politics trumps prudent policymaking. In its recommendation for commercial oil shale development, BLM has taken a bold step in the right direction.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government.

52198-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52198

52198-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52199.

Comment Date: February 21, 2008 09:41:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD52199

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Draft PEIS for oil shale and tar sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

American energy must be utilized to a greater extent in order for America to overcome its current energy problems. Instead of consistently ignoring the vast energy potential of the United States, America should instead start to use the rich energy supply it has in order to satisfy its energy needs.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

52199-001

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52199

52199-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52200.

Comment Date: February 21, 2008 09:41:26AM
Oil Shale and Tar Sands
Comment ID: OSTSD52200

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale and tar sands will make us more energy independent

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's security and energy is threatened by its continual refusal to develop its own energy to address its own energy problems. We must reduce consumption of foreign energy and instead develop American energy in order for these problems to be remedied.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52200-001

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52200

52200-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52201.

Comment Date: February 21, 2008 09:44:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD52201

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support More American Energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground. 52201-001

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

We need to be be energy independent from the middle-east. Let's take away their dollars that fund terroism and keep our costs low at the same time.

Sincerely,

Response for Document 52201

52201-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52202.

Comment Date: February 21, 2008 09:44:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD52202

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
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Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale and tar sands will make us more energy independent

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but until such technologies mature to the point that they significantly contribute to our domestic energy needs, the development of unconventional energy resources like oil shale and tar sands can bridge the gap between now and our renewable energy future.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52202-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis. 52202-001

Sincerely,

Response for Document 52202

52202-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52203.

Comment Date: February 21, 2008 09:45:19AM
Oil Shale and Tar Sands
Comment ID: OSTSD52203

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale can help end dependence on foreign oil

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

American energy must be utilized to a greater extent in order for America to overcome its current energy problems. Instead of consistently ignoring the vast energy potential of the United States, America should instead start to use the rich energy supply it has in order to satisfy its energy needs.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52203-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands. 52203-001 (cont.)

Sincerely,

Response for Document 52203

52203-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52204.

Comment Date: February 21, 2008 09:46:07AM
Oil Shale and Tar Sands
Comment ID: OSTSD52204

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Draft PEIS

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52204-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country. 52204-001 (cont.)

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52204

52204-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52205.

Comment Date: February 21, 2008 09:46:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD52205

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale study should be taken seriously

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's energy problems will not simply fix themselves. Our government and businesses must take substantive action to increase domestic production in order to diminish America's alarming dependence on foreign energy sources. Oil Shale and other energy resources afford America this opportunity.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52205-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to

American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52205-001 (cont.)

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52205

52205-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52206.

Comment Date: February 21, 2008 09:47:25AM
Oil Shale and Tar Sands
Comment ID: OSTSD52206

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am 84 years old and we have supported the Arab countrys most of my life. I am in favor of developing the shale and sand deposits, if done in a sensible way, without ruining every thing around. 52206-001

Response for Document 52206

52206-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52207.

Comment Date: February 21, 2008 09:54:26AM
Oil Shale and Tar Sands
Comment ID: OSTSD52207

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: 18 years worth of transportation fuel found in oil shale

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I agree with the exploration of this vast resource. It makes sense that what the earth creates that the earth is able to deal with its opposite forms once used. Until alternate forms of energy are developed it will require, for our economy and way of life to continue, that oil production continue in a safe and viable manner.

Unlock this door and stop hindering our life style in the name of your agenda. We users of these fuels don't want to harm our environment either, but it is a necessary part of life, which I believe is provided by a Supreme Creator who knows its effects and benefits better than all of us put together. If it was so wrong and bad for us, I'm sure he would have kept it hidden from our view. 52207-001

Simply put...we need to be independent or one day we will lose total control to those who will deprive us of our freedoms without discretion. That means you too! Man is not capable of killing this planet. We are a part of nature. We are at the top of nature and yes we should use it appropriately. Let technology prove itself and let these companies work. After all, everything you use including toilet paper is made or transported by oil. Try using a pine cone from now on. Let's see how long our trees last.

Sincerely,

Response for Document 52207

52207-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52208.

Comment Date: February 21, 2008 09:54:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD52208

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
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Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: I support Oil Shale Developement

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I think that America can and will develop these energy resources in a responsible manner. No matter what we need energy independence.

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52208-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing

even the most plentiful oil reserves of every other country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

52208-001 (cont.)

I also support Nuclear and hydrogen research. In the meantime lets get our own oil.

Sincerely,

Response for Document 52208

52208-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52209.

Comment Date: February 21, 2008 09:57:36AM
Oil Shale and Tar Sands
Comment ID: OSTSD52209

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale is needed

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52209-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security. 52209-001 (cont.)

Sincerely,

Response for Document 52209

52209-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52210.

Comment Date: February 21, 2008 09:57:41AM
Oil Shale and Tar Sands
Comment ID: OSTSD52210

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
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Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support More American Energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52210-001

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

This is the time to provide Americans job security through energy security. Failure to grant drilling rights is tantamount to allowing the war in Iraq to continue because you are just supporting the

status quo. I am a professional civil engineer, so I know this technology is not only possible, but environmentally friendly when compared to offshore oil drilling. Please act now before it is too late. 52210-001 (cont.)

Sincerely,

Response for Document 52210

52210-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52211.

Comment Date: February 21, 2008 09:57:47AM
Oil Shale and Tar Sands
Comment ID: OSTSD52211

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
Organization:
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support More American Energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Many lament America's dependence on foreign energy, but seemingly every time America has an opportunity to enhance its capacity for domestic energy production, politics trumps prudent policymaking. In its recommendation for commercial oil shale development, BLM has taken a bold step in the right direction.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52211-001

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52211

52211-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52212.

Comment Date: February 21, 2008 09:57:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD52212

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: Develop oil shale for an energy independent America

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We strongly support the development of oil shale resources in western Colorado for the significant growth of economic development it would have on the region.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

52212-001

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a

trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52212-001 (cont.)

Increasing domestic energy production is the only real solution to America's energy problems, thus it is time to look to emerging energy sources like oil shale.

Sincerely,

Response for Document 52212

52212-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52213.

Comment Date: February 21, 2008 09:57:59AM
Oil Shale and Tar Sands
Comment ID: OSTSD52213

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: Oil shale development should move forward

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Decreasing our dependence on foreign energy supplies will positively impact our economy and also positively impact our trade deficit.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52213-001

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a

trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

52213-001 (cont.)

Sincerely,

Response for Document 52213

52213-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52214.

Comment Date: February 21, 2008 09:58:05AM
Oil Shale and Tar Sands
Comment ID: OSTSD52214

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America should run on American energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but it is obvious that our country's reliance on traditional liquid fuels (oil and gas) will remain and grow into the foreseeable future. We need to develop all of the energy resources at our disposal, including oil shale and tar sands.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52214-001

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

52214-001 (cont.)

I love the out doors and the beautiful natural resources my family and I enjoy here in Utah. In no way do I want to harm the enviroment but it just makes sense to tap this resource to help the U.S. become independent in our energy consumption. I believe we need to move in this direction now!

Thanks for listening and God Bless America!

Sincerely,

Response for Document 52214

52214-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52215.

Comment Date: February 21, 2008 10:01:12AM
Oil Shale and Tar Sands
Comment ID: OSTSD52215

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Plan

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I definitely support the development and use of our own oil reserves. We have brillient patriots in this country who can make this work for us without destroying our environment. We must put our freedom above our environment.

America's energy problems will not simply fix themselves. Our government and businesses must take substantive action to increase domestic production in order to diminish America's alarming dependence on foreign energy sources. Oil Shale and other energy resources afford America this opportunity.

52215-001

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the

disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52215-001 (cont.)

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52215

52215-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52216.

Comment Date: February 21, 2008 10:01:23AM
Oil Shale and Tar Sands
Comment ID: OSTSD52216

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support for balanced oil shale development

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We obviously need the development of oil shale and tar sands resources, and it appears in the PEIS that BLM is on track with a good process to assure these resources are prudently development after careful review of environmental, social and economic impacts.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country. 52216-001

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52216

52216-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52217.

Comment Date: February 21, 2008 10:01:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD52217

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM oil shale report

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Our country has come to a crossroads in energy that if the right path is not taken our country will be in very serious trouble. I believe it is our responsibility to develop all the energy sources that we have in this country including oil shale and tar sands. I support wholly the development of these resources.

It's time that we take control of our destiny before the middle east does it for us by cutting off our oil dependence on their oil.

It's time for the majority to stand up and say no to all the so called environmental protectors of the land who continually try to take the land away from us. I fully believe that it is possible that development of these resources is possible without causing undue damage to the environment that we live it.

52217-001

Please allow this type of progress to take place so my kids and grand kids experience all that is great in America.

Sincerely,

Response for Document 52217

52217-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52218.

Comment Date: February 21, 2008 10:01:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD52218

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale is a vital asset and should be developed

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet our country has not taken any substantive steps towards establishing energy independence.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. 52218-001

Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world.

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its increasing dependence upon foreign energy.

Sincerely,

Response for Document 52218

52218-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52219.

Comment Date: February 21, 2008 10:02:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD52219

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commercial leasing for oil shale should be approved

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Logistics Planning Services provides transporation & logistics services to over 80 US Companies including 30 from the Electric Utility Industry. We are therefore very aware of the Energy issues in this country that range from skyrocketing fuel costs for transporation, to road and bridge deterioration, congestion to major electricity generation issues. The US government has failed to plan ahead in these crucial areas of need and our government has mismanaged much of the funds that should have been targeted for these fundamental needs of the country.

We agree that America's security and energy is threatened by its continual refusal to develop its own energy to address its own energy problems. We must reduce consumption of foreign energy and instead develop American energy in order for these problems to be remedied. 52219-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

52219-001 (cont.)

I encourage all congressional senators and representatives to step above the fraye and attend the real needs of our country and do so quickly.

Sincerely,

Response for Document 52219

52219-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52220.

Comment Date: February 21, 2008 10:05:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD52220

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale and Tars Sands Draft Impact Statement

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Many lament America's dependence on foreign energy, but seemingly every time America has an opportunity to enhance its capacity for domestic energy production, politics trumps prudent policymaking. In its recommendation for commercial oil shale development, BLM has taken a bold step in the right direction.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52220-001

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

52220-001 (cont.)

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52220

52220-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52221.

Comment Date: February 21, 2008 10:10:12AM
Oil Shale and Tar Sands
Comment ID: OSTSD52221

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale and tar sands will make us more energy independent

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Additionally, this new oil shale venue for creating jobs for local residents exists in stimulating the local economy in additional support services for miners and mining companies.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52221-001

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as

America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52221-001 (cont.)

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52221

52221-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52222.

Comment Date: February 21, 2008 10:10:25AM
Oil Shale and Tar Sands
Comment ID: OSTSD52222

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America should run on American energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but it is obvious that our country's reliance on traditional liquid fuels (oil and gas) will remain and grow into the foreseeable future. We need to develop all of the energy resources at our disposal, including oil shale and tar sands.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52222-001

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52222

52222-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52223.

Comment Date: February 21, 2008 10:10:31AM
Oil Shale and Tar Sands
Comment ID: OSTSD52223

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale Will Development Will Destroy Public Lands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Isn't it interesting that some people can't even look at a landscape without seeing dollar signs? It is reprehensible that anyone would condone an agenda to degrade the country's remaining wilderness quality and public lands by sacrificing them to oil, gas, and mining companies, irresponsible recreation groups and other multi-interests. They justify this in the name of national security, anti-terrorism, anti-environmental propaganda, anti-access discrimination, and other ludicrous claims. and outright lies.

Hopefully, the BLM will not play this game. Saving what remains of the planet is not radical, liberal or discriminatory. America's children deserve a future that includes pristine landscapes, not to have what remians of the natural world sacrificed to the blight of industry and the relentless abuse of extractive development for short-term economic gain. 52223-001

Don’t believe for a moment that energy companies' intentions are for the national interest, lower energy costs or anything other than a long, greedy drink at the public trough. They are hell-bent on claiming as their own what rightfully belongs to all Americans. Don't let them get away with it.

Sincerely,

Response for Document 52223

52223-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52224.

Comment Date: February 21, 2008 10:10:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD52224

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Balanced oil shale development will strengthen our economy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant. 52224-001

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Response for Document 52224

52224-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52225.

Comment Date: February 21, 2008 10:13:48AM
Oil Shale and Tar Sands
Comment ID: OSTSD52225

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Foreign energy dependence must end - oil shale can help

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's security and energy is threatened by its continual refusal to develop its own energy to address its own energy problems. We must reduce consumption of foreign energy and instead develop American energy in order for these problems to be remedied.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence. 52225-001

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52225

52225-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52226.

Comment Date: February 21, 2008 10:14:14AM
Oil Shale and Tar Sands
Comment ID: OSTSD52226

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Draft PEIS for oil shale and tar sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant. 52226-001

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52226

52226-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52227.

Comment Date: February 21, 2008 10:14:28AM
Oil Shale and Tar Sands
Comment ID: OSTSD52227

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale study should be taken seriously

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

52227-001

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to

American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52227-001 (cont.)

Increasing domestic energy production is the only real solution to America's energy problems, thus it is time to look to emerging energy sources like oil shale.

Sincerely,

Response for Document 52227

52227-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52228.

Comment Date: February 21, 2008 10:17:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD52228

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America needs oil shale and tar sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Decreasing our dependence on foreign energy supplies will positively impact our economy and also positively impact our trade deficit.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52228-001

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as

America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

52228-001 (cont.)

Sincerely,

Response for Document 52228

52228-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52229.

Comment Date: February 21, 2008 10:21:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD52229

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale has tremendous potential

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52229-001

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government.

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

I support this issue and use this fomat becasue it express's my opinion correctly.

Stop this denial of opportunities to gain our freedom from foreign oil dependance and the control it gives our enimies in the world!

Sincerely,

52229-001 (cont.)

Response for Document 52229

52229-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52230.

Comment Date: February 21, 2008 10:21:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD52230

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM oil shale plan provides support for oil shale development

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to address its growing energy problems with the obvious solution: develop more American energy. The Bureau of Land Management?s draft PEIS for oil shale and tar sands sets us on the right path to accomplishing this.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52230-001

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

52230-001 (cont.)

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Sincerely,

Response for Document 52230

52230-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52231.

Comment Date: February 21, 2008 10:21:40AM
Oil Shale and Tar Sands
Comment ID: OSTSD52231

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Develop oil shale for an energy independent America

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We obviously need the development of oil shale and tar sands resources, and it appears in the PEIS that BLM is on track with a good process to assure these resources are prudently development after careful review of environmental, social and economic impacts.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52231-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

52231-001
(cont.)

Sincerely,

Response for Document 52231

52231-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52232.

Comment Date: February 21, 2008 10:21:47AM
Oil Shale and Tar Sands
Comment ID: OSTSD52232

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Balanced oil shale development will strengthen our economy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

With rising energy prices and decreasing supply overseas, it is time for Americans to use the oil shale we have here. I encourage you to judiciously pursue developing the oil shale in our country. 52232-001

Sincerely,

Response for Document 52232

52232-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52233.

Comment Date: February 21, 2008 10:33:16AM
Oil Shale and Tar Sands
Comment ID: OSTSD52233

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM's PEIS is a good first step for oil shale development

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Recovering oil from the vast U. S. oil shale resources has been severely criticized recently for producing excessive CO2 emissions. This criticism may be justified if the oil were to be produced with old technology. Much has been learned from prior experimental and demonstration processing plants and recent studies have shown that advanced technology can eliminate CO2 emissions. The BLM Oil Shale draft PEIS will permit and encourage development of advanced oil shale processing technology so that we can all benefit from use of this valuable energy resource. 52233-001

Sincerely,

Response for Document 52233

52233-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52234.

Comment Date: February 21, 2008 10:35:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD52234

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale aids America's attempt to increase domstic energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Forget it. We have the technology to develop alternate forms of energy from solar, wind, hydro, etc., instead of ripping up the envoronment. As I understand it, oil shale developement uses more energy to extract than it produces. We have got to STOP feeding big oil companies, who had record profits last year. They care nothing for clean air or water if it infringes on their profits. Bush and his buddies play right along and this cycle must be broken. No, the BLM is supposed to manage our public land for ALL Americans, not just those who stand to profit most. 52234-001

Sincerely,

Response for Document 52234

52234-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52235.

Comment Date: February 21, 2008 10:35:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD52235

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale will lessen our dependence on foreign oil

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52235-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a

resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52235-001 (cont.)

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52235

52235-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52236.

Comment Date: February 21, 2008 10:39:08AM
Oil Shale and Tar Sands
Comment ID: OSTSD52236

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: More American Energy, Less Foreign Energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We obviously need the development of oil shale and tar sands resources, and it appears in the PEIS that BLM is on track with a good process to assure these resources are prudently development after careful review of environmental, social and economic impacts.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52236-001

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Increasing domestic energy production is the only real solution to America's energy problems, thus it is time to look to emerging energy sources like oil shale. We need to move on this now. 52236-001 (cont.)

Sincerely,

Response for Document 52236

52236-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52237.

Comment Date: February 21, 2008 10:42:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD52237

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commercial leasing for oil shale should be approved

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I feel that the USA should develop these oil shales and tar sands to help eliminate our dependance on the Mid East and thier noose around our necks.

Tax and royalty revenues that would result from oil shale and tar sands development would provide great benefit to the socioeconomic infrastructure of the nation and the region. A growing oil shale and tar sands industry would provide great employment opportunities in the region.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves. 52237-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing

resource, for some reason oil shale has been overlooked.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52237-001 (cont.)

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Sincerely,

Response for Document 52237

52237-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52238.

Comment Date: February 21, 2008 10:43:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD52238

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Plan

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

52238-001

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52238-001 (cont.)

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52238

52238-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52239.

Comment Date: February 21, 2008 10:43:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD52239

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale will lessen our dependence on foreign oil

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Many American's are frustrated with rising oil and gas prices and the fact that we send all of our money for energy to countries that wihs to destroy us. However, America seems reluctant to develope that vast resources available right here. In regards to oil shale development, BLM has taken a bold step in the right direction.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52239-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a

resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52239-001 (cont.)

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Response for Document 52239

52239-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52240.

Comment Date: February 21, 2008 10:59:00AM
Oil Shale and Tar Sands
Comment ID: OSTSD52240

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale is needed

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's security and energy is threatened by its continual refusal to develop its own energy to address its own energy problems. We must reduce consumption of foreign energy and instead develop American energy in order for these problems to be remedied.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence. 52240-001

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

Despite all the benefits that might be accrued, the federal government seems to deny America the

chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

52240-001 (cont.)

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

Sincerely,

Response for Document 52240

52240-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52241.

Comment Date: February 21, 2008 11:06:07AM
Oil Shale and Tar Sands
Comment ID: OSTSD52241

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS is a good first step

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Please do everything within your power to encourage and develop U.S. oil production, including from oil shale. Everybody including the oil companies want to protect the environment. The problem is not the environment, it is the environmentalists . They are wrong.

The Draft PEIS is a good first step towards U.S. energy independence and national security. Let the entire nation benefit from our national lands and do not let a few simpletons lock it away in the name of preserving it. Keep up the good work.

52241-001

Thanks,

Sincerely,

Response for Document 52241

52241-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52242.

Comment Date: February 21, 2008 11:06:13AM
Oil Shale and Tar Sands
Comment ID: OSTSD52242

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for oil shale and sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

52242-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52242-001 (cont.)

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

Sincerely,

Response for Document 52242

52242-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52243.

Comment Date: February 21, 2008 11:09:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD52243

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Please develop oil shale for an energy independent America

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

INDEPENDANT oil production is needed in this country. Please work with all praties to advance the shale oil recovery process. The environment needs to be protected, and I believe that we can do that and develop a much needed energy resource at the same time. I have worked with many people in the BLM and know that smart people work there. If given the chance the low cost energy and a clean environment are possible. 52243-001

Best regards

Response for Document 52243

52243-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52244.

Comment Date: February 21, 2008 11:14:04AM
Oil Shale and Tar Sands
Comment ID: OSTSD52244

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM oil shale plan a solid start

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground. 52244-001

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52244

52244-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52245.

Comment Date: February 21, 2008 11:14:09AM
Oil Shale and Tar Sands
Comment ID: OSTSD52245

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale and tar sands will make us more energy independent

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Decreasing our dependence on foreign energy supplies will positively impact our economy and also positively impact our trade deficit.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52245-001

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American

energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52245-001 (cont.)

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52245

52245-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52246.

Comment Date: February 21, 2008 11:17:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD52246

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale development will strengthen energy security

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52246-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy. 52246-001 (cont.)

Sincerely,

Response for Document 52246

52246-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52247.

Comment Date: February 21, 2008 11:17:34AM
Oil Shale and Tar Sands
Comment ID: OSTSD52247

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale can help end dependence on foreign oil

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Many lament America's dependence on foreign energy, but seemingly every time America has an opportunity to enhance its capacity for domestic energy production, politics trumps prudent policymaking. In its recommendation for commercial oil shale development, BLM has taken a bold step in the right direction.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52247-001

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources. 52247-001 (cont.)

Sincerely,

Response for Document 52247

52247-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52248.

Comment Date: February 21, 2008 11:21:04AM
Oil Shale and Tar Sands
Comment ID: OSTSD52248

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale is needed

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Many lament America's dependence on foreign energy, but seemingly every time America has an opportunity to enhance its capacity for domestic energy production, politics trumps prudent policymaking. In its recommendation for commercial oil shale development, BLM has taken a bold step in the right direction.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government.

52248-001

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52248

52248-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52249.

Comment Date: February 21, 2008 11:21:15AM
Oil Shale and Tar Sands
Comment ID: OSTSD52249

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Balanced oil shale development will strengthen our economy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but until such technologies mature to the point that they significantly contribute to our domestic energy needs, the development of unconventional energy resources like oil shale and tar sands can bridge the gap between now and our renewable energy future.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52249-001

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52249

52249-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52250.

Comment Date: February 21, 2008 11:24:29AM
Oil Shale and Tar Sands
Comment ID: OSTSD52250

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for oil shale

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52250-001

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52250

52250-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52251.

Comment Date: February 21, 2008 11:28:50AM
Oil Shale and Tar Sands
Comment ID: OSTSD52251

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: PEIS for oil shale and tar sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but it is obvious that our country's reliance on traditional liquid fuels (oil and gas) will remain and grow into the foreseeable future. We need to develop all of the energy resources at our disposal, including oil shale and tar sands.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence. 52251-001

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52251-001 (cont.)

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52251

52251-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52252.

Comment Date: February 21, 2008 11:36:09AM
Oil Shale and Tar Sands
Comment ID: OSTSD52252

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development should move forward

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant. 52252-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

52252-001 (cont.)

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52252

52252-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52253.

Comment Date: February 21, 2008 11:40:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD52253

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: PEIS for oil shale and tar sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Many lament America's dependence on foreign energy, but seemingly every time America has an opportunity to enhance its capacity for domestic energy production, politics trumps prudent policymaking. In its recommendation for commercial oil shale development, BLM has taken a bold step in the right direction.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52253-001

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. It would be pure suicidal stupidity to not develop our own resources for our own use.

52253-001
(cont.)

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52253

52253-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52254.

Comment Date: February 21, 2008 11:43:40AM
Oil Shale and Tar Sands
Comment ID: OSTSD52254

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale aids America's attempt to increase domstic energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Energy prices are based on supply and demand. Expanding supply is the best strategy for keeping gasoline prices affordable. A key component is tapping oil shale and tar sands.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52254-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52254

52254-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52255.

Comment Date: February 21, 2008 11:43:48AM
Oil Shale and Tar Sands
Comment ID: OSTSD52255

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Let americans drill for there own oil, and stop foriegn depandance.

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's security and energy is threatened by its continual refusal to develop its own energy to address its own energy problems. We must reduce consumption of foreign energy and instead develop American energy in order for these problems to be remedied.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52255-001

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves. Public land is supposed to be ours as american's, but we get left out to dry by special interest groups doing what ever they want, while we pay high fuel prices to countries that aren't our friends, open up our resources!

Sincerely,

Response for Document 52255

52255-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52256.

Comment Date: February 21, 2008 11:44:09AM
Oil Shale and Tar Sands
Comment ID: OSTSD52256

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commerical oil shale development should move forward

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

WITH OIL OVER 100.00 PER. BARREL. IT DOESN'T SEEM THAT WE HAVE ANY CHOICE IN THE MATTER. WE HAVE TO DEVELOP THE OIL SHALE DEPOSIT. WE ALSO HAVE TO HAVE MORE THERMAL, WIND AND NUCULER SOURCES. | 52256-001

Sincerely,

Response for Document 52256

52256-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52257.

Comment Date: February 21, 2008 11:47:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD52257

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for oil shale

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Tax and royalty revenues that would result from oil shale and tar sands development would provide great benefit to the socioeconomic infrastructure of the nation and the region. A growing oil shale and tar sands industry would provide great employment opportunities in the region.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves. 52257-001

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

I for one am fully for development and exstraction of this resorce we have here in the usa .

Sincerely,

Response for Document 52257

52257-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52258.

Comment Date: February 21, 2008 11:47:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD52258

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America needs to stop oil shale and tar sand development

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I am strongly in favor of an alternate and renewable energy future, and I believe America needs to be putting money into research of renewable energy sources.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish, with nearly a trillion barrels of oil that are recoverable... IF we give energy companies permission to destroy the landscape. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and American companies are just waiting to tear up the countryside to gain access to something that can only be described as a "theoretical energy source". To allow development could permanently damage this fragile area. As an example, I would point out the tank tracks still visible in the California desert, left by American armored troops training during World War 2... over 60 years ago. To say that drilling equipment would leave little trace of their passing is total hogwash. Much of this equipment weighs much more than a military tank built in 1943. 52258-001

I support stopping the development of oil shale and other resources. This unproven technology will destroy acres and acres of pristine countryside, rather than helping America reduce our dependence on hydrocarbon energy sources.

Sincerely,

Response for Document 52258

52258-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52259.

Comment Date: February 21, 2008 11:50:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD52259

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for oil shale

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52259-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52259

52259-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52260.

Comment Date: February 21, 2008 11:51:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD52260

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
Organization:
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Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale Development

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I support oil shale development. That is my declaration of becoming independant. 52260-001

Sincerely,

Response for Document 52260

52260-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52261.

Comment Date: February 21, 2008 11:51:26AM
Oil Shale and Tar Sands
Comment ID: OSTSD52261

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
Organization:
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Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support for balanced oil shale development

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is important for America to continue to develop new technologies; such as those we are developing to tap unconventional sources like oil shale and tar sands in the U.S.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

52261-001

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

Oil shale is a realistic option in America's quest for energy independence. Developing this

resource will ensure safe and reliable energy for generations of Americans.

Technologies have already been developed for extracting oil from shale and tar sands in an environmentally responsible, low-impact manner. It is critical that our governmental policies and regulations be structured in such a way that these new technologies can have a chance to be demonstrated and developed into viable options.

Please do not listen only to the voices and opinions of environmental extremists. Please also take into account the voices and opinions of the vast majority of Americans who are more reasonable and realistic in their attitudes.

America has the opportunity to develop its own energy resources and to begin reducing dependence on other countries. Please allow us to do so.

Sincerely,

52261-001
(cont.)

Response for Document 52261

52261-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52262.

Comment Date: February 21, 2008 11:54:49AM
Oil Shale and Tar Sands
Comment ID: OSTSD52262

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale is needed

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

52262-001

Sincerely,

Response for Document 52262

52262-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52263.

Comment Date: February 21, 2008 11:58:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD52263

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale will lessen our dependence on foreign oil

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but until such technologies mature to the point that they significantly contribute to our domestic energy needs, the development of unconventional energy resources like oil shale and tar sands can bridge the gap between now and our renewable energy future.

I totally support that we go about this responsibly. That we do as little damage to the earth as possible, but I don't believe that we leave this resource untapped. Our dependence on the middle-east and other areas of the world for our oil needs to stop or it will be our downfall.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52263-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52263

52263-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52264.

Comment Date: February 21, 2008 12:01:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD52264

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Develop oil shale for an energy independent America

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but until such technologies mature to the point that they significantly contribute to our domestic energy needs, the development of unconventional energy resources like oil shale and tar sands can bridge the gap between now and our renewable energy future.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52264-001

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

Sincerely,

Response for Document 52264

52264-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52265.

Comment Date: February 21, 2008 12:01:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52265

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale and Tar Sands PEIS

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Twenty eight years ago I went on an oil shale exploration trip in eastern Utah. We saw vast stores of oil shale and even an old oil retort that early day pioneers had used to extract oil from the shale. The engineers on that trip were sure that oil shale would be processed soon and free the United States from it's dependency on foreign oil. But nothing has happened. I support the effort to use our own resources in the area of oil shale development. 52265-001

Sincerely,

Response for Document 52265

52265-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52266.

Comment Date: February 21, 2008 12:05:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD52266

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
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Zip: [Withheld by requestor]
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Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: BLM's PEIS is a good first step for oil shale development

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Tax and royalty revenues that would result from oil shale and tar sands development would provide great benefit to the socioeconomic infrastructure of the nation and the region. A growing oil shale and tar sands industry would provide great employment opportunities in the region.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52266-001

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

Sincerely,

Response for Document 52266

52266-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52267.

Comment Date: February 21, 2008 12:05:44PM
Oil Shale and Tar Sands
Comment ID: OSTSD52267

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: New sources of energy are key to energy independence

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I strongly support the development of oil shale resources in western Colorado, eastern Utah and southern Wyoming as a step to reduce or eliminate oil imports to the United States. I believe that this resource's importance has been ignored for too long. Overlooking oil shale's abundance and potential is a mistake.

I support the significant economic growth that development of this resource would have on the region, which has always been economically depressed. However, revenues produced by development of the oil shale would benefit not only the immediate region, but through mineral lease revenues to the respective State government agencies, it would benefit everyone living in the states where the development takes place.

52267-001

As a "surprise" side note, I also support the development of other resources that give America a chance to reach energy independence, including drilling off the west coast, in ANWR and in other sensitive areas. The welfare of our country is more important than the potential impact of developing these important resources. It is time for the United States to step up to the plate and develop all of its energy reserves.

Sincerely,

Response for Document 52267

52267-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52268.

Comment Date: February 21, 2008 12:21:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52268

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale PEIS

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is important for America to continue to develop new technologies; such as those we are developing to tap unconventional sources like oil shale and tar sands in the U.S.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52268-001

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52268

52268-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52270.

Comment Date: February 21, 2008 12:30:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52270

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
Organization:
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale - The US resource worth using

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is important for America to continue to develop new technologies; such as those we are developing to tap unconventional sources like oil shale and tar sands in the U.S.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52270-001

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

A wise steward of this resource would recognize the value of using our own oil reserves and reducing or eliminating our dependency on oil from potentially hostile countries. Please do everything in your power to free the United States from dependency on foreign oil by allowing development of safe, clean, reasonable development of shale oil and tar sands.

Sincerely,

Response for Document 52270

52270-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52271.

Comment Date: February 21, 2008 12:34:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52271

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: Draft PEIS for oil shale and sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I strongly urge you to consider this National security problem. It will not simply fix its self. Our government and businesses must take substantive action to increase domestic oil production in order to diminish America's alarming dependence on foreign energy sources. Oil Shale and other energy resources afford America this opportunity.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52271-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52271

52271-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52272.

Comment Date: February 21, 2008 12:38:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52272

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America should run on American energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

While in an ideal world America could satisfy its energy demands by neither importing foreign energy nor developing its own energy resources, the fact remains that American energy must be developed in order to stem American dependence on foreign energy sources and satisfy its energy demands. BLM has taken a major step towards that end in the draft PEIS for oil shale and tar sands.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52272-001

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52272-001 (cont.)

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52272

52272-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52273.

Comment Date: February 21, 2008 12:43:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD52273

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS is a good first step

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There are no perfect energy solutions. Each energy source has its pro's and con's. The only way to be successful is to assure a diversity of supply by working to develop all of our nation's energy resources including oil shale.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52273-001

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52273

52273-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52274.

Comment Date: February 21, 2008 12:54:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD52274

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: PEIS for oil shale and tar sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

52274-001

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52274

52274-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Rich Miller.

The comment tracking number that has been assigned to your comment is OSTSD52275.

Comment Date: February 21, 2008 12:55:44PM
Oil Shale and Tar Sands
Comment ID: OSTSD52275

First Name: Rich
Middle Initial:
Last Name: Miller
Organization:
Address:
Address 2:
Address 3:
City: Denver
State: CO
Zip:
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Stop your assault on our environment for oil and gas industry greed!! | 52275-001

Response for Document 52275

52275-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52276.

Comment Date: February 21, 2008 13:03:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD52276

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale and Tar Sands PEIS

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but it is obvious that our country's reliance on traditional liquid fuels (oil and gas) will remain and grow into the foreseeable future. We need to develop all of the energy resources at our disposal, including oil shale and tar sands.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence. 52276-001

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52276

52276-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52277.

Comment Date: February 21, 2008 13:33:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD52277

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development can occur with environmental protections

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There are no perfect energy solutions. Each energy source has its pro's and con's. The only way to be successful is to assure a diversity of supply by working to develop all of our nation's energy resources including oil shale.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52277-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52277

52277-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52278.

Comment Date: February 21, 2008 13:41:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD52278

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: STRONGLY AGAINST Oil Shale Development!

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Oil Shale drilling has a devestating effect on our environment, and I am STRONGLY AGAINST allowing this type of drilling! We need to adopt CLEAN ENERGY that preserves our environment, not destroys it! 52278-001

Sincerely,

Response for Document 52278

52278-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52280.

Comment Date: February 21, 2008 13:54:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52280

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale development will strengthen energy security

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is important for America to continue to develop new technologies; such as those we are developing to tap unconventional sources like oil shale and tar sands in the U.S.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52280-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Response for Document 52280

52280-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52281.

Comment Date: February 21, 2008 14:03:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD52281

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
Organization:
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale aids America's attempt to increase domstic energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Tax and royalty revenues that would result from oil shale and tar sands development would provide great benefit to the socioeconomic infrastructure of the nation and the region. A growing oil shale and tar sands industry would provide great employment opportunities in the region.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground. 52281-001

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52281

52281-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52282.

Comment Date: February 21, 2008 14:07:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52282

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
Organization:
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City: [Withheld by requestor]
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Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Foreign energy dependence must end - oil shale can help

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There are no perfect energy solutions. Each energy source has its pro's and con's. The only way to be successful is to assure a diversity of supply by working to develop all of our nation's energy resources including oil shale.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

52282-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy.

Sincerely,

Response for Document 52282

52282-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52283.

Comment Date: February 21, 2008 14:07:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD52283

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
Organization:
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City: [Withheld by requestor]
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Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale PEIS

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Energy prices are based on supply and demand. Expanding supply is the best strategy for keeping gasoline prices affordable. A key component is tapping oil shale and tar sands.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country. 52283-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52283

52283-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52284.

Comment Date: February 21, 2008 14:21:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52284

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
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Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Plan

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Tax and royalty revenues that would result from oil shale and tar sands development would provide great benefit to the socioeconomic infrastructure of the nation and the region. A growing oil shale and tar sands industry would provide great employment opportunities in the region.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves. 52284-001

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources. WE should develop the oil shale NOW. WE are being had buy the other countrys. NOW is the time to move

Sincerely,

Response for Document 52284

52284-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52285.

Comment Date: February 21, 2008 14:25:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD52285

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commercial leasing for oil shale should be approved

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to address its growing energy problems with the obvious solution: develop more American energy. The Bureau of Land Management's draft PEIS for oil shale and tar sands sets us on the right path to accomplishing this.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52285-001

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52285

52285-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52286.

Comment Date: February 21, 2008 14:29:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD52286

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: Oil Shale is a great resource

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52286-001

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52286

52286-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52287.

Comment Date: February 21, 2008 14:40:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD52287

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I'm not much of a scientist, politician or investor. But I love my grandkids and want them to be able to avoid future military conflicts and the fear of freely exploring our great nation and this wonderful planet.

The most cost effective way to difuse war in much of the world today is to reduce the income and dominance of middle eastern oil. The ability to produce oil from our own tar sands and oil shale will do this and provide untold jobs to deserving American workers as we explore, produce, refine and even export these energy sources.

Please do not let special interests defeat efforts to move forward, at the quickest possible speed, to develop these tar sands and oil shale reserves. Each day that it takes may mean, in one way or another, that an American serviceman has unnecessarily lost his life somewhere in the world.

We must protect our freedom, but the significant threats against it will all but disappear if those funding terror throughout the world can no longer foot the bill.

52287-001

Response for Document 52287

52287-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52288.

Comment Date: February 21, 2008 14:40:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD52288

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
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Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale is needed

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but until such technologies mature to the point that they significantly contribute to our domestic energy needs, the development of unconventional energy resources like oil shale and tar sands can bridge the gap between now and our renewable energy future.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52288-001

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52288

52288-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52289.

Comment Date: February 21, 2008 14:44:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD52289

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development should move forward

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

While in an ideal world America could satisfy its energy demands by neither importing foreign energy nor developing its own energy resources, the fact remains that American energy must be developed in order to stem American dependence on foreign energy sources and satisfy its energy demands. BLM has taken a major step towards that end in the draft PEIS for oil shale and tar sands.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52289-001

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale

resources.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52289-001 (cont.)

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52289

52289-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52290.

Comment Date: February 21, 2008 14:48:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD52290

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support oil shale and tar sands development

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country. 52290-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy.

Sincerely,

Response for Document 52290

52290-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52291.

Comment Date: February 21, 2008 14:56:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD52291

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support More American Energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

52291-001

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American

energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

52291-001 (cont.)

I understand that many companies are hoping to determine the most efficient method to extract oil from tar sands and oil shale. Until these methods are tested we will not know what method will be successful. Please move ahead with the EIS for these companies so that exploration and recovery can begin.

Thank you for your help in this matter of national security.

Sincerely,

Response for Document 52291

52291-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52292.

Comment Date: February 21, 2008 15:03:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52292

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale and Tars Sands Draft Impact Statement

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We obviously need the development of oil shale and tar sands resources, and it appears in the PEIS that BLM is on track with a good process to assure these resources are prudently development after careful review of environmental, social and economic impacts.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52292-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Sincerely,

Response for Document 52292

52292-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52293.

Comment Date: February 21, 2008 15:03:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD52293

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support oil shale and tar sands development

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Tell the self-styled environmentalists to go straight to ---- and let's get going on developing our own resources.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country. 52293-001

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy.

Sincerely,

Response for Document 52293

52293-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52294.

Comment Date: February 21, 2008 15:16:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52294

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale will lessen our dependence on foreign oil

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Decreasing our dependence on foreign energy supplies will positively impact our economy and also positively impact our trade deficit.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country. 52294-001

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52294

52294-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52295.

Comment Date: February 21, 2008 15:21:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52295

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale and Tar Sands PEIS

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

52295-001

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52295

52295-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52296.

Comment Date: February 21, 2008 15:24:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD52296

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM's PEIS is a good first step for oil shale development

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Decreasing our dependence on foreign energy supplies will positively impact our economy and also positively impact our trade deficit.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52296-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52296

52296-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52297.

Comment Date: February 21, 2008 15:28:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52297

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale is a vital asset and should be developed

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There are no perfect energy solutions. Each energy source has its pro's and con's. The only way to be successful is to assure a diversity of supply by working to develop all of our nation's energy resources including oil shale.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant. 52297-001

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government.

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52297

52297-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52298.

Comment Date: February 21, 2008 15:36:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD52298

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development can occur with environmental protections

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's energy problems will not simply fix themselves. Our government and businesses must take substantive action to increase domestic production in order to diminish America's alarming dependence on foreign energy sources. Oil Shale and other energy resources afford America this opportunity.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52298-001

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52298

52298-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52299.

Comment Date: February 21, 2008 15:37:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52299

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: Oil Shale and Tar Sands Are Needed

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but it is obvious that our country's reliance on traditional liquid fuels (oil and gas) will remain and grow into the foreseeable future. We need to develop all of the energy resources at our disposal, including oil shale and tar sands.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52299-001

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Response for Document 52299

52299-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Dana Stewart.

The comment tracking number that has been assigned to your comment is OSTSD52300.

Comment Date: February 21, 2008 18:33:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52300

First Name: Dana
Middle Initial: L
Last Name: Stewart
Organization:
Address: 2660 N. Farrell Drive
Address 2:
Address 3:
City: Palm Springs
State: CA
Zip: 92262
Country: USA
Email: abccdana@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

You are re-arranging the deck chairs on the Titanic! We have had 2 silver bullets for energy for decades - SOLAR and BIOMASS Fuels. They are sources for ENDLESS ENERGY. Coal, Oil and Nuclear energy are expensive and deadly. Are you corrupt, or just plain stupid?	52300-001

Response for Document 52300

52300-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52302.

Comment Date: February 21, 2008 20:35:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52302

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
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Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale and Tars Sands Draft Impact Statement

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

American energy must be utilized to a greater extent in order for America to overcome its current energy problems. Instead of consistently ignoring the vast energy potential of the United States, America should instead start to use the rich energy supply it has in order to satisfy its energy needs.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52302-001

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government.

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Response for Document 52302

52302-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52303.

Comment Date: February 21, 2008 21:16:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD52303

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commerical oil shale development should move forward

Richard Clark 213 shadowood alamosa, CO 81101

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to address its growing energy problems with the obvious solution: develop more American energy. The Bureau of Land Management?s draft PEIS for oil shale and tar sands sets us on the right path to accomplishing this.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52303-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52303-001 (cont.)

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Richard Clark

Response for Document 52303

52303-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52304.

Comment Date: February 21, 2008 21:19:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD52304

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Develop oil shale for an energy independent America

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is important for America to continue to develop new technologies; such as those we are developing to tap unconventional sources like oil shale and tar sands in the U.S.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52304-001

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

Sincerely,

Response for Document 52304

52304-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52305.

Comment Date: February 21, 2008 21:19:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD52305

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Balanced oil shale development will strengthen our economy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I'm tired of groups like the Wilderness Society having the country in a tailspin. Let's rely less on foreign countries and be more self-reliant. 52305-001

Sincerely,

Response for Document 52305

52305-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52306.

Comment Date: February 21, 2008 21:22:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD52306

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: PEIS for oil shale and tar sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

52306-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Sincerely,

Response for Document 52306

52306-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52307.

Comment Date: February 21, 2008 21:27:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD52307

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale is a vital asset and should be developed

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There are no perfect energy solutions. Each energy source has its pro's and con's. The only way to be successful is to assure a diversity of supply by working to develop all of our nation's energy resources including oil shale.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

52307-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52307

52307-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52308.

Comment Date: February 21, 2008 21:29:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD52308

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft BLM oil shale and tar sands report

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Many lament America's dependence on foreign energy, but seemingly every time America has an opportunity to enhance its capacity for domestic energy production, politics trumps prudent policymaking. In its recommendation for commercial oil shale development, BLM has taken a bold step in the right direction.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52308-001

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy.

Sincerely,

Response for Document 52308

52308-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52309.

Comment Date: February 21, 2008 21:30:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52309

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Foreign energy dependence must end - oil shale can help

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Tax and royalty revenues that would result from oil shale and tar sands development would provide great benefit to the socioeconomic infrastructure of the nation and the region. A growing oil shale and tar sands industry would provide great employment opportunities in the region.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves. 52309-001

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52309

52309-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52310.

Comment Date: February 21, 2008 21:32:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52310

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Draft PEIS for oil shale and tar sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to address its growing energy problems with the obvious solution: develop more American energy. The Bureau of Land Management's draft PEIS for oil shale and tar sands sets us on the right path to accomplishing this.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52310-001

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52310

52310-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52311.

Comment Date: February 21, 2008 21:36:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD52311

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Develop oil shale for an energy independent America

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to address its growing energy problems with the obvious solution: develop more American energy. The Bureau of Land Management?s draft PEIS for oil shale and tar sands sets us on the right path to accomplishing this.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

52311-001

I don't understand why America hasn't already looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

Sincerely,

Response for Document 52311

52311-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52312.

Comment Date: February 21, 2008 21:40:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD52312

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America needs to utilize oil shale to promote energy independence

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but until such technologies mature to the point that they significantly contribute to our domestic energy needs, the development of unconventional energy resources like oil shale and tar sands can bridge the gap between now and our renewable energy future.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52312-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52312-001 (cont.)

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52312

52312-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52313.

Comment Date: February 21, 2008 21:54:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD52313

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for oil shale and sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is important for America to continue to develop new technologies; such as those we are developing to tap unconventional sources like oil shale and tar sands in the U.S.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. I was in parachute colorado in the 80s when the big corps left due to financial concerns to bad that stopped then maybe we would not have this problem with opec as we do today. . Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52313-001

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52313

52313-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52314.

Comment Date: February 21, 2008 21:56:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD52314

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale development will strengthen energy security

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There are no perfect energy solutions. Each energy source has its pro's and con's. The only way to be successful is to assure a diversity of supply by working to develop all of our nation's energy resources including oil shale.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant. 52314-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

I don't understand why America hasn't looked internally to solve its own energy problems. It

seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52314-001 (cont.)

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52314

52314-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52315.

Comment Date: February 21, 2008 21:59:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD52315

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: We have more oil than the Middle East and should develop it

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is important for America to continue to develop new technologies; such as those we are developing to tap unconventional sources like oil shale and tar sands in the U.S.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence. 52315-001

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

as a member of the international brotherhood of electrical workers local 354 ,utah, and as a former delagate and officer of the same, I hope you will consider this issue carefully for the sake of our region and nation in mind.

Sincerely,

Response for Document 52315

52315-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Brad Oldfather.

The comment tracking number that has been assigned to your comment is OSTSD52316.

Comment Date: February 21, 2008 22:00:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD52316

First Name: Brad
Middle Initial:
Last Name: Oldfather
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

We don't need more Oil + Gas development. We need more efficient solutions and renewable energy option developed. | 52316-001

Response for Document 52316

52316-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52317.

Comment Date: February 21, 2008 22:02:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52317

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development can't occur with environmental protections

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Save the Earth that we have now. STOP big oil from killing off our plant and our home. Lives are more important then dirty money. | 52317-001

Sincerely,

Response for Document 52317

52317-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52318.

Comment Date: February 21, 2008 22:02:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD52318

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Draft PEIS for oil shale and tar sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's security and energy is threatened by its continual refusal to develop its own energy to address its own energy problems. We must reduce consumption of foreign energy and instead develop American energy in order for these problems to be remedied.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence. 52318-001

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Response for Document 52318

52318-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52319.

Comment Date: February 21, 2008 22:04:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD52319

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
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Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Draft PEIS for oil shale and tar sands

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Many lament America's dependence on foreign energy, but seemingly every time America has an opportunity to enhance its capacity for domestic energy production, politics trumps prudent policymaking. In its recommendation for commercial oil shale development, BLM has taken a bold step in the right direction.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52319-001

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52319-001 (cont.)

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52319

52319-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52320.

Comment Date: February 21, 2008 22:09:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52320

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
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Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support More American Energy

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

52320-001

Sincerely,

Response for Document 52320

52320-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52321.

Comment Date: February 21, 2008 22:12:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD52321

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
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Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale PEIS

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

While in an ideal world America could satisfy its energy demands by neither importing foreign energy nor developing its own energy resources, the fact remains that American energy must be developed in order to stem American dependence on foreign energy sources and satisfy its energy demands. BLM has taken a major step towards that end in the draft PEIS for oil shale and tar sands.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52321-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight

for America's energy independence.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

52321-001 (cont.)

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

Sincerely,

Response for Document 52321

52321-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52322.

Comment Date: February 21, 2008 22:14:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52322

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
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Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for oil shale

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52322-001

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

Sincerely,

Response for Document 52322

52322-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52323.

Comment Date: February 21, 2008 22:15:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD52323

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Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for oil shale

February 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

THE INFO BELOW WAS PROVIDED FOR ME. BUT THE MESSAGE I WANT TO SEND IS ALL MINE AND MY FAMILY'S. AT THIS TIME IN OUR COUNTRY'S HISTORY, MORE THAN EVER BEFORE, WE NEED TO SEND A MESSAGE TO THE WORLD THAT WE DO KNOW HOW TO TAKE CARE OF OURSELVES. PLEASE, PLEASE GIVE OIL SHALE DEVELOPMENT A CHANCE. THIS ISSUE CANNOT BE DETERMINED BY EMOTIONS OF THOSE WHO CARE MORE FOR TREES AND ANIMALS FOR THEIR CHILDREN THAN THEIR CHILDREN BEING ABLE TO TAKE CARE OF THEIR OWN FAMILIES AND GET AROUND.

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems. 52323-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing

resource, for some reason oil shale has been overlooked.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

52323-001 (cont.)

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

VERY Sincerely

Response for Document 52323

52323-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52324.

Comment Date: February 21, 2008 23:15:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD52324

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale development will strengthen energy security

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Decreasing our dependence on foreign energy supplies will positively impact our economy and also positively impact our trade deficit.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country. 52324-001

Increasing domestic energy production is the only real solution to America's energy problems, thus it is time to look to emerging energy sources like oil shale.

Sincerely,

Response for Document 52324

52324-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52325.

Comment Date: February 22, 2008 00:15:23AM
Oil Shale and Tar Sands
Comment ID: OSTSD52325

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
Organization:
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: Commerical oil shale development should move forward

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

LET'S USE OUR OWN RESOURCES TO FREE US FROM OUR BONDAGE TO FOREIGN RESOURCES.

WE HAVE THE RESOURCES!!! IT'S TIME TO BE FREE OF OTHER'S DEMANDS

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

52325-001

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52325

52325-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52326.

Comment Date: February 22, 2008 00:27:39AM
Oil Shale and Tar Sands
Comment ID: OSTSD52326

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Last Name: [Withheld by requestor]
Organization:
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: Oil shale is a vital asset and should be developed

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is important for America to continue to develop new technologies; such as those we are developing to tap unconventional sources like oil shale and tar sands in the U.S.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52326-001

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52326

52326-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52327.

Comment Date: February 22, 2008 06:35:29AM
Oil Shale and Tar Sands
Comment ID: OSTSD52327

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
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Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: Oil shale development can occur with environmental protections

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to address its growing energy problems with the obvious solution: develop more American energy. The Bureau of Land Management?s draft PEIS for oil shale and tar sands sets us on the right path to accomplishing this.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52327-001

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52327-001 (cont.)

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52327

52327-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52328.

Comment Date: February 22, 2008 06:35:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD52328

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Last Name: [Withheld by requestor]
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Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM oil shale plan provides support for oil shale development

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52328-001

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government.

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52328

52328-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52329.

Comment Date: February 22, 2008 07:30:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD52329

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Last Name: [Withheld by requestor]
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Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale PEIS

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52329-001

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52329

52329-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52330.

Comment Date: February 22, 2008 07:40:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD52330

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Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: More American Energy, Less Foreign Energy

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Tax and royalty revenues that would result from oil shale and tar sands development would provide great benefit to the socioeconomic infrastructure of the nation and the region. A growing oil shale and tar sands industry would provide great employment opportunities in the region.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

52330-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52330

52330-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52331.

Comment Date: February 22, 2008 08:17:31AM
Oil Shale and Tar Sands
Comment ID: OSTSD52331

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Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
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Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: Oil shale study should be taken seriously

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52331-001

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52331

52331-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52332.

Comment Date: February 22, 2008 08:50:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD52332

First Name: [Withheld by requestor]
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Last Name: [Withheld by requestor]
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Develop oil shale for an energy independent America

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52332-001

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Response for Document 52332

52332-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52333.

Comment Date: February 22, 2008 09:09:24AM
Oil Shale and Tar Sands
Comment ID: OSTSD52333

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale will lessen our dependence on foreign oil

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

While in an ideal world America could satisfy its energy demands by neither importing foreign energy nor developing its own energy resources, the fact remains that American energy must be developed in order to stem American dependence on foreign energy sources and satisfy its energy demands. BLM has taken a major step towards that end in the draft PEIS for oil shale and tar sands.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52333-001

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale

resources.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

52333-001 (cont.)

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52333

52333-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52334.

Comment Date: February 22, 2008 09:25:57AM
Oil Shale and Tar Sands
Comment ID: OSTSD52334

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development should move forward

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

52334-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest

unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence. Reliance on other countries for resources is a mistake. America needs to be independent and self reliant. Development of our own energy sources is a step in that direction.

52334-001 (cont.)

Sincerely,

Response for Document 52334

52334-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52335.

Comment Date: February 22, 2008 09:29:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD52335

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale will lessen our dependence on foreign oil

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Many lament America's dependence on foreign energy, but seemingly every time America has an opportunity to enhance its capacity for domestic energy production, politics trumps prudent policymaking. In its recommendation for commercial oil shale development, BLM has taken a bold step in the right direction.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52335-001

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

I don't understand why America hasn't looked internally to solve its own energy problems. It

seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52335-001 (cont.)

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52335

52335-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52336.

Comment Date: February 22, 2008 09:40:30AM
Oil Shale and Tar Sands
Comment ID: OSTSD52336

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM's PEIS is a good first step for oil shale development

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52336-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

I don't understand why America hasn't looked internally to solve its own energy problems. It

seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52336-001 (cont.)

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52336

52336-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52337.

Comment Date: February 22, 2008 10:05:47AM
Oil Shale and Tar Sands
Comment ID: OSTSD52337

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale and Tars Sands Draft Impact Statement

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but until such technologies mature to the point that they significantly contribute to our domestic energy needs, the development of unconventional energy resources like oil shale and tar sands can bridge the gap between now and our renewable energy future.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground. 52337-001

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52337

52337-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52338.

Comment Date: February 22, 2008 10:06:20AM
Oil Shale and Tar Sands
Comment ID: OSTSD52338

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale and Tars Sands Draft Impact Statement

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but until such technologies mature to the point that they significantly contribute to our domestic energy needs, the development of unconventional energy resources like oil shale and tar sands can bridge the gap between now and our renewable energy future.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground. 52338-001

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52338

52338-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52339.

Comment Date: February 22, 2008 10:09:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD52339

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: PEIS for oil shale and tar sands

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52339-001

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to

American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52339-001 (cont.)

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52339

52339-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52340.

Comment Date: February 22, 2008 10:10:00AM
Oil Shale and Tar Sands
Comment ID: OSTSD52340

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commerical oil shale development should move forward

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to address its growing energy problems with the obvious solution: develop more American energy. The Bureau of Land Management's draft PEIS for oil shale and tar sands sets us on the right path to accomplishing this.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52340-001

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Sincerely,

Response for Document 52340

52340-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52341.

Comment Date: February 22, 2008 10:20:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD52341

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale and Tar Sands Are Needed

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We strongly support the development of oil shale resources in western Colorado for the significant growth of economic development it would have on the region.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves. 52341-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

Sincerely,

Response for Document 52341

52341-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52342.

Comment Date: February 22, 2008 10:35:23AM
Oil Shale and Tar Sands
Comment ID: OSTSD52342

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Develop renewable energy for high speed electric rail, also walkable neighborhoods and energy efficiency. Nobody is paying me to say this. Sincerely, Tim Skoglund

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

See subject line above:

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52342-001

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to

enrich other oil-rich foreign nations that are often hostile to our country.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52342-001 (cont.)

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy.

Sincerely,

Response for Document 52342

52342-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Thomas Brinkman.

The comment tracking number that has been assigned to your comment is OSTSD52343.

Comment Date: February 22, 2008 11:38:15AM
Oil Shale and Tar Sands
Comment ID: OSTSD52343

First Name: Thomas
Middle Initial: C
Last Name: Brinkman
Organization:
Address: 1623 Teton Ct. NE
Address 2:
Address 3:
City: Rochester
State: MN
Zip: 55906
Country: USA
Email: tombrinkman@charter.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. 52343-001

Because of this I oppose all development of oil shale and tar sands on public lands.

Thomas Brinkman

Response for Document 52343

52343-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52345.

Comment Date: February 22, 2008 12:10:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52345

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Draft PEIS

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We strongly support the development of oil shale resources in western Colorado for the significant growth of economic development it would have on the region.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves. 52345-001

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Sincerely,

Response for Document 52345

52345-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52346.

Comment Date: February 22, 2008 12:35:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD52346

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale Will Help America Become Energy Independent

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Decreasing our dependence on foreign energy supplies will positively impact our economy and also positively impact our trade deficit.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52346-001

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to

American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52346-001 (cont.)

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52346

52346-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Kathy Lloyd.

The comment tracking number that has been assigned to your comment is OSTSD52347.

Comment Date: February 22, 2008 12:56:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52347

First Name: Kathy
Middle Initial:
Last Name: Lloyd
Organization:
Address: 503 State St.
Address 2:
Address 3:
City: Helena
State: MT
Zip: 59601
Country: USA
Email: drakekath@hughes.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We are opposed to the development of oil shale and tar sands on public lands. The industrializaton of lands that belong to the public and support fish and wildlife populations is not appropriate. Too much of remaining public land is being developed for the benefit of a few corporations, industrialized, ravaged by ORVs, and other "developement" schemes. Pleaase protect public land from such invasive, intensive, and offensive development. 52347-001

Kathy Lloyd 503 State St. Helena, MT 59601

Response for Document 52347

52347-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52348.

Comment Date: February 22, 2008 13:07:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD52348

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development should move forward

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We strongly support the development of oil shale resources in western Colorado for the significant growth of economic development it would have on the region.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52348-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Response for Document 52348

52348-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52349.

Comment Date: February 22, 2008 13:20:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52349

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commercial leasing for oil shale should be approved

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

American energy must be utilized to a greater extent in order for America to overcome its current energy problems. Instead of consistently ignoring the vast energy potential of the United States, America should instead start to use the rich energy supply it has in order to satisfy its energy needs.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52349-001

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Sincerely,

Response for Document 52349

52349-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52350.

Comment Date: February 22, 2008 14:33:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD52350

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commerical oil shale development should move forward

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52350-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy.

Sincerely,

Response for Document 52350

52350-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52351.

Comment Date: February 22, 2008 14:50:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD52351

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale study should be taken seriously

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

American energy must be utilized to a greater extent in order for America to overcome its current energy problems. Instead of consistently ignoring the vast energy potential of the United States, America should instead start to use the rich energy supply it has in order to satisfy its energy needs.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

52351-001

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52351

52351-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52353.

Comment Date: February 22, 2008 15:38:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD52353

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale has tremendous potential

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's security and energy is threatened by its continual refusal to develop its own energy to address its own energy problems. We must reduce consumption of foreign energy and instead develop American energy in order for these problems to be remedied.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52353-001

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Sincerely,

Response for Document 52353

52353-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52354.

Comment Date: February 22, 2008 15:42:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52354

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM oil shale report

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52354-001

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52354

52354-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Srikanth Jammulapati.

The comment tracking number that has been assigned to your comment is OSTSD52355.

Comment Date: February 22, 2008 16:13:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD52355

First Name: Srikanth
Middle Initial:
Last Name: Jammulapati
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please do not fast-track leasing of land for shale operations without a detailed study of the impact it would have on the environment. The technology is unproven which makes it all the more important to wait and analyze the results of an environmental impact study. The output from these operations is going to have a very low impact on the oil supply but a very high detrimental impact on the environment for generations to come. 52355-001

Response for Document 52355

52355-001: The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA processes.

Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1 of the PEIS. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action.

Thank you for your comment, Gary Gaz.

The comment tracking number that has been assigned to your comment is OSTSD52356.

Comment Date: February 22, 2008 16:14:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD52356

First Name: Gary
Middle Initial:
Last Name: Gaz
Organization:
Address: 2386 S. 1440 W
Address 2:
Address 3:
City: Salt Lake
State: UT
Zip: 84119
Country: USA
Email: ggaz@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil Shale & Tar Sands EIS.

To Whom it may concern:

I have not read the EIS and I don't feel I need to. My opinion is that you should decide and you should take into consideration all sides and all aspects of the subject. The fact is I believe, they will be extracted eventually. A logical and as evironmentally friendly plan as possible should be made to extract the tar sands and shale. Suwa's biased and selfish attitude should be placed in the garbage and something in between all other groups should be implemented. 52356-001

I for one, appreciate all you do and wish that you could do you job as it was intended instead of having to deal with the radicals on both ends.

Sincerely

Gary Gaz ggaz@juno.com

Response for Document 52356

52356-001: Thank you for your comment.

Thank you for your comment, Levi Kepsel.

The comment tracking number that has been assigned to your comment is OSTSD52358.

Comment Date: February 22, 2008 16:52:44PM
Oil Shale and Tar Sands
Comment ID: OSTSD52358

First Name: Levi
Middle Initial: N
Last Name: Kepsel
Organization:
Address: 133 Greenfield Cr
Address 2:
Address 3:
City: Heber
State: UT
Zip: 84032
Country: USA
Email: levikepsel@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I do not think it is wise or necessary to lease and develop more wilderness for the sake of oil shale and tar sands. These technologies are undeveloped and destructive to places that are indefensible and fragile, particularly 9 mile canyon in wellington, utah. Please do not go forward with these plans in a rash manner. Short term greed is not a subtitute for long term sustainability. 52358-001

Thanks, Levi

Response for Document 52358

52358-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52359.

Comment Date: February 22, 2008 17:18:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD52359

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale and Tars Sands Draft Impact Statement

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's security and energy is threatened by its continual refusal to develop its own energy to address its own energy problems. We must reduce consumption of foreign energy and instead develop American energy in order for these problems to be remedied.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52359-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52359

52359-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52360.

Comment Date: February 22, 2008 17:38:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD52360

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for oil shale

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but until such technologies mature to the point that they significantly contribute to our domestic energy needs, the development of unconventional energy resources like oil shale and tar sands can bridge the gap between now and our renewable energy future.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52360-001

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52360

52360-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52361.

Comment Date: February 22, 2008 17:59:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD52361

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS is stupid first step

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and would not lessen boom/bust type impacts. currently we americans have no control of our glutenous appetites, business and industry have great stakes in keeping us that way

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken to control exploitation until we can understand how to utilize oil shale in a manner that does not add to our inexcusable pollution level,greenhouse gas emissions and the high asthma rates in our children

52361-001

Oil shale is not a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious

time, America must start to wake up to our destructive impact we are having on the world and the environment, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be in the long run add to the degradation of the environment.

Oil shale is an energy resource that is both vast and able to be utilized with max. disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The disadvantages far exceed the advantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52361-001 (cont.)

Now is the time to deny America the opportunity to increase domestic energy production. do not Support oil shale development in the near future.

If you missed my point DO NOT EXPLOIT my land! That is a big no to development of oil shale

Sincerely,

Response for Document 52361

52361-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Kathryn Fitzgerald.

The comment tracking number that has been assigned to your comment is OSTSD52362.

Comment Date: February 22, 2008 18:10:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52362

First Name: Kathryn
Middle Initial: R
Last Name: Fitzgerald
Organization:
Address: 1385 Butler Ave
Address 2:
Address 3:
City: Salt lake City
State: UT
Zip: 84102
Country: USA
Email: kathryn.fitzgerald@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please slow down and consider the archeological aesthetic qualities of the beautiful lands you are about to lease for minerals extraction. The BLM plan lays the groundwork to destroy the landscape in the heart of Utah's redrock canyon country and wild Book Cliffs for decades to come.	52362-001 52362-002
It is impossible for the BLM to truly assess environmental impacts when the potential technologies to be used are not even fully developed yet. Do not lease now and destroy the environment forever!	52362-001 (cont.)

Responses for Document 52362

52362-001: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures a commercial oil shale program that both meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offers opportunities for states, local communities, and the public to participate in the process.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. The BLM will involve the state, local communities, and the public throughout the subsequent NEPA processes.

Since the alternatives in the PEIS do not authorize the immediate leasing of the lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The PEIS's analysis provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents will analyze the direct, indirect and cumulative effects of the proposed action.

52362-002: The potential impacts to archaeological resources and aesthetic qualities that could result from future oil shale and tar sands development are considered and discussed in Sections 4.9, 4.10, 5.9, and 5.10 in the PEIS. However, the primary focus of the PEIS is the analysis of the environmental consequence of proposed land use allocation decisions that do not commit any resources or grant any lease rights. Prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with, and appropriate consultation as required by the NHPA and other authorities specific to Native American concerns. Subsequent NEPA analyses will be conducted to assess the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52363.

Comment Date: February 22, 2008 18:27:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52363

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: We have more oil than the Middle East and should develop it

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52363-001

Increasing domestic energy production is the only real solution to America's energy problems, thus it is time to look to emerging energy sources like oil shale. It the past we were told that it was too expensive to develop this resource. With the ever increasing price of oil we desperately need this oil to be available. I believe the oil industry must be given a chance to prove they can develop this oil and to show they can be responsible in reducing the impact on the environment while doing it.

Sincerely,

Response for Document 52363

52363-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, jack greene.

The comment tracking number that has been assigned to your comment is OSTSD52364.

Comment Date: February 22, 2008 18:44:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD52364

First Name: jack
Middle Initial: d
Last Name: greene
Organization:
Address: 500 summit creek dr
Address 2:
Address 3:
City: smithfield
State: UT
Zip: 84335
Country: USA
Email: jackisgreene@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please don't allow the leasing of eastern Utah wild lands which include the White River, Upper Desolation Canyon, and a large swath of the Book Cliffs along with western Colorado and southern Wyoming for oil shale and tar sand extraction. Places like the San Rafael Swell, Fiddler Butte, and Nine Mile Canyon are on the chopping block in this planning process. While Utah is the only state in the nation to have any measurable amount of tar sands, these resources absolutely pale in comparison to the tar sands being developed in Alberta, Canada and their development would do little to ease America's "energy crunch. Removal and processing of these minerals is energy intensive, water consumptive, and would heavily impact some of the west's most valued wildlife habitat, recreational activity, and our state's economy. If our children are to have a future, we must transition away from fossil fuels to clean, renewable, energy efficient resources. Further, industrial leaders are saying that successful commercial-scale oil shale development is at least 11-15 years out, if it's even feasible.

52364-001

52364-002

52364-003

Responses for Document 52364

52364-001: Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sands resources among other unconventional fuels, if it can be done in an environmentally sound manner. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives when considering whether lands should be opened or closed for application for commercial oil shale or tar sands leasing. The PEIS analyzes the environmental consequences of this allocation decision. The PEIS also describes the requirement for additional site-specific NEPA analysis prior to both issuance of commercial leases and approval of proposed exploration or development project. The BLM believes that this phased or staged approach ensures that commercial oil shale and tar sands development programs meet the intent of Congress and make areas available for oil shale and tar sands development while taking advantage of the best available practices to minimize impacts and offering opportunities for states, local communities, and the public to participate in the process.

52364-002: The PEIS provides a general discussion of the impacts associated with water and power requirements associated with potential future oil shale and tar sands development. At present, water and power requirements are very speculative due to the variation in technology currently available, and because the source of the water and power (and, therefore, the impacts) is unknown. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power and water requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52364-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An alternative of using renewable, energy efficient resources was brought up during scoping and was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52365.

Comment Date: February 22, 2008 19:20:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52365

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please, please resist oil shale extraction. Oil shale is an incredibly poor energy resource. Too much energy is required to extract the oil and too much environmental damage is done to mine it. Why is this such a difficult concept? It's not worth sacrificing our last open landscapes for this poor energy resource.

I am just an ordinary citizen watching with great sadness as our last open lands are mutilated in the name of short sited profit. The frenzied energy development on the Pinedale Anticline is shameful. Oil Shale development will be unforgivable. Lets invest in energy conservation and save our public lands.

52365-001

Response for Document 52365

52365-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mark Tilby.

The comment tracking number that has been assigned to your comment is OSTSD52366.

Comment Date: February 22, 2008 19:29:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD52366

First Name: Mark
Middle Initial: R
Last Name: Tilby
Organization: None
Address: 805 Swiss Haven Circle
Address 2:
Address 3:
City: Santa Clara
State: UT
Zip: 84765
Country: USA
Email: mbtilby@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am opposed to leasing land in Utah for the development of oil shale and tar sands. I believe the cost (environmental damage) is greater than the return (minimal fuel).

If I would have told my grandparents years ago that in 2008 people would pay money regularly for clean drinking water in a bottle I doubt if they would have believed it. Water was clean, free, and plentiful. Now we pay because our springs, rivers,and streams are unclean. Lets not let it happen to Utahs unprotected wilderness. 52366-001

Response for Document 52366

52366-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

Thank you for your comment, Laura Cotts.

The comment tracking number that has been assigned to your comment is OSTSD52367.

Comment Date: February 22, 2008 20:21:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD52367

First Name: Laura
Middle Initial:
Last Name: Cotts
Organization:
Address:
Address 2:
Address 3:
City: Cedar City
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear BLM, Please delay you plans for leasing permits for oil shale and tars sands development. It is impossible to do a reliable Impact Statement while the technology is so unknown. Current practices require too much energy to be expended for the energy gained; and the environmental damage in the form of needed coal mines, power plants, greenhouse gas and other pollutants produced - as well as overuse of scarce water - make such leasing plans premature. You do not want Utah to look like the Tar sands area in Alberta.

52367-001

52367-002

Responses for Document 52367

52367-001: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures a commercial oil shale program that meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offers opportunities for states, local communities, and the public to participate in the process.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts, will be applied as a result of site-specific NEPA evaluations. The BLM will involve the state, local communities, and the public throughout the subsequent NEPA processes.

52367-002: The PEIS provides a general discussion of the impacts associated with water and power requirements associated with potential future oil shale and tar sands development. At present, water and power requirements are very speculative due to the variation in technology currently available, and because the source of the water and power (and, therefore, the impacts) is unknown. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power and water requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52369.

Comment Date: February 22, 2008 20:34:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD52369

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale and tar sands will make us more energy independent

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but it is obvious that our country's reliance on traditional liquid fuels (oil and gas) will remain and grow into the foreseeable future. We need to develop all of the energy resources at our disposal, including oil shale and tar sands.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence. 52369-001

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

I am familiar with technologies developed by Shell Oil Company to extract the oil using refrigerant solvents to prevent water contaminmation. Also, Orlo Childs was president of the Colorado school of Mines and did much work for the U.S.G.S. prior to that. I am a relative of his.

52369-001 (cont.)

Sincerely,

Response for Document 52369

52369-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52370.

Comment Date: February 22, 2008 20:38:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD52370

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale and Tars Sands Draft Impact Statement

February 22, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is important for America to continue to develop new technologies; such as those we are developing to tap unconventional sources like oil shale and tar sands in the U.S.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52370-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52370

52370-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Tessa Hall.

The comment tracking number that has been assigned to your comment is OSTSD52371.

Comment Date: February 22, 2008 21:03:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD52371

First Name: Tessa
Middle Initial: D
Last Name: Hall
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This type of development is incredibly polluting and destructive to the environment, as well as inefficient. Our future will be based on renewable energy, not energy-intensive fossil fuels. The oil shale and tar sands extraction process is extremely detrimental to the landscape and wildlife in the affected areas. Please choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 52371-001

Response for Document 52371

52371-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Margaret Wheatley.

The comment tracking number that has been assigned to your comment is OSTSD52372.

Comment Date: February 22, 2008 21:07:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD52372

First Name: Margaret
Middle Initial:
Last Name: Wheatley
Organization:
Address: P.O. Box 1407
Address 2:
Address 3:
City: Provo
State: UT
Zip: 84603
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This proposed plan makes no sense whatsoever, committing to unknown technologies that are untested to extract low level amounts of oil from the most beautiful wilderness and landscapes of America.

I constantly bring visitors from other nations to behold this magnificent land. I can't believe you'd be willing to risk this land for such questionable results.

Please leave the land alone--it's our ultimate resource

52372-001

Response for Document 52372

52372-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Dave Drapac.

The comment tracking number that has been assigned to your comment is OSTSD52373.

Comment Date: February 22, 2008 22:24:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD52373

First Name: Dave
Middle Initial:
Last Name: Drapac
Organization:
Address: 1148 Jenifer St.
Address 2:
Address 3:
City: Madison
State: WI
Zip: 53703
Country: USA
Email: drdra55@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I find it completely irresponsible to be considering mining oil from oil shale and tar sands an option when there are far more effective ways to reduce our dependence on foreign oil and oil in general. Our country needs to put conservation and efficiency as top priorities. Far too much land has already been degraded by highly consumptive uses such as agriculture, coal mining, logging and general infrastructure development such as highways and low-density housing. At a time when we need to be doing everything possible to transition from fossil fuels and radically reduce carbon emissions, I urge you to protect our environment and economy by supporting the development of a renewable energy future and providing strict regulations to stop any expansion in fossil fuel mining efforts, especially that of oil shale and tar sands. 52373-001

Response for Document 52373

52373-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52374.

Comment Date: February 22, 2008 23:23:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD52374

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commerical oil shale development should move forward

February 23, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52374-001

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

52374-001 (cont.)

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52374

52374-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52375.

Comment Date: February 23, 2008 00:20:23AM
Oil Shale and Tar Sands
Comment ID: OSTSD52375

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale and tar sands will make us more energy independent

February 23, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to address its growing energy problems with the obvious solution: develop more American energy. The Bureau of Land Management?s draft PEIS for oil shale and tar sands sets us on the right path to accomplishing this.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52375-001

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future. Please start drilling in Anwar also. It doesn't hurt the environment and helps the Caribou herds prosper even more because it gives the animals a place to go under the pipes and get warmer as was proven in other Alaskan pipelines.

Sincerely,

Response for Document 52375

52375-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52376.

Comment Date: February 23, 2008 00:26:39AM
Oil Shale and Tar Sands
Comment ID: OSTSD52376

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support More American Energy

February 23, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52376-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security. PLEASE ALSO DRILL OFF ALL OF OUR COASTS. WHY WOULD YOU LET MEXICO , VENEZUELA, AND CHINA AND OTHER COUNTRIES GET THE OIL WE COULD USE HERE AT HOME/

52376-001 (cont.)

Sincerely,

Response for Document 52376

52376-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, bonnie nelson.

The comment tracking number that has been assigned to your comment is OSTSD52378.

Comment Date: February 23, 2008 09:54:55AM
Oil Shale and Tar Sands
Comment ID: OSTSD52378

First Name: bonnie
Middle Initial: m
Last Name: nelson
Organization:
Address: 4976 naniloa drive
Address 2:
Address 3:
City: Salt Lake Citys
State: UT
Zip: 84117
Country: USA
Email: bmnelson18@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I concure with yesterday's editorial in the SLC Tribune" The Anasazi ruins and rock art have survived for 1,000 years. It is indefensible to destroy them now." | 52378-001

Response for Document 52378

52378-001: Thank you for your comment. No Anasazi ruins will be destroyed as a result of the proposed action, which is a proposed land use allocation. The proposed land use allocation decisions do not commit any resources or grant any lease rights. In addition, prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with, and appropriate consultation as required by the NHPA and other authorities specific to Native American concerns. Subsequent NEPA analyses will be conducted to assess the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis, if traditional cultural properties or other significant cultural resources are present or found to be present during requisite surveys and consultations, may include mitigation such as use of BMPs, specific protections, or avoidance to mitigate or eliminate adverse effects to historic properties.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52379.

Comment Date: February 23, 2008 09:56:39AM
Oil Shale and Tar Sands
Comment ID: OSTSD52379

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am strongly opposed to oil sands exploration throughout southern Utah. The development of renewable energy sources are the answer to future energy needs and jobs. Our quality of life depends upon the future of renewable energy resources. The technology is already there we just need money and funds to go into renewable energy. Oil sands are wasteful and far to expensive to extract. Oil sand technology once again will go nowhere because we already know how much water it takes to cool during extraction, this alone should be enough for those involved in the technology that renewable energy will bring in more revenew while at the same time protecting pristine southern Utah. 52379-001

Response for Document 52379

52379-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, James Allred.

The comment tracking number that has been assigned to your comment is OSTSD52380.

Comment Date: February 23, 2008 10:05:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD52380

First Name: James
Middle Initial: G
Last Name: Allred
Organization:
Address: 3310 Oakwood St.
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84109
Country: USA
Email: cojallre@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The December 21, 2007 draft plan for commercial oil shale and tar sands leasing in Utah and neighboring states should not be adopted without modifications to exempt Utah lands that hold much more value for the state for their recreation and tourism value such as the White River, Upper Desolation Canyon, Book Cliffs, San Rafael Swell, Fiddler Butte, and Nine Mile Canyon. | 52380-001

Any energy development that requires significant water resources is not sustainable for Utah and the the technology for oil shale and tar sands does not meet that test. | 52380-002

Responses for Document 52380

52380-001: Thank you for your comment. The analysis in the PEIS takes into consideration the general geologic, wildlife, recreation, and scenic values of areas such as the San Rafael Swell and the other areas you mention. Since the BLM is analyzing an allocation decision in the PEIS, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of the area prior to a decision being made.

52380-002: The amount of water required would depend on many factors, including scale of development, technologies used in the development, national agricultural economy, and the locations and hydrologic conditions of project sites. Finally, whether enough water is available for development depends on the results of intensive negotiations between various parties, including water rights owners, state and federal agencies, and municipal water providers as well as the developers.

Thank you for your comment, Marsha McLean.

The comment tracking number that has been assigned to your comment is OSTSD52381.

Comment Date: February 23, 2008 10:31:28AM
Oil Shale and Tar Sands
Comment ID: OSTSD52381

First Name: Marsha
Middle Initial: L
Last Name: McLean
Organization:
Address: 149 N 2970 W
Address 2:
Address 3:
City: Provo
State: UT
Zip: 84601
Country: USA
Email: marsha@mmmutah.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

To Whom it Matters:

The devastating affect of the drilling for gas in Nine Mile Canyon, Utah, is so mind-boggling, I wish to have no more drilling in our state of Utah for any type of gas or oil. There is no regard for anything of nature or the past as the trucks plow through our beautiful canyons.

Futhermore, there can be little sense in this drilling, at the financial cost to the American public, let alone, the cost to our environment. 52381-001

DO NOT ALLOW ANY MORE DEVELOPMENT IN A MOST UNPLANNED, UNSAFE, AND UNCLEAN WAY IN OUR WILDERNESs.

Marsha McLean

Response for Document 52381

52381-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mike Cannon.

The comment tracking number that has been assigned to your comment is OSTSD52382.

Comment Date: February 23, 2008 11:03:37AM
Oil Shale and Tar Sands
Comment ID: OSTSD52382

First Name: Mike
Middle Initial:
Last Name: Cannon
Organization:
Address: 1136 Milton Ave
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84105
Country: USA
Email: cannonball0130@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment: Cannon OSTS DPEIS comment.doc

Comment Submitted:

See Attachment.

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

February 23, 2008

To Whom It May Concern:

As a professional archaeologist (and native of Utah), I must object to the analysis of cumulative impacts to cultural resources that is presented on p. 6-162 and pp. 6-277-278 of the Oil Shale and Tar Sands Draft Programmatic Environmental Impact Statement. This analysis is very cursory and completely fails to take into account the true cumulative impacts to cultural resources that would likely occur if extensive oil shale and/or tar sands development were allowed to occur under either Alternatives B or C of the draft PEIS.

The extent of the analysis of cumulative impacts that is presented in the document boils down to a statement that "Unless a concentration of unique resources is found to exist within a small area and that area was the location of [oil shale and/or tar sands development], these individual site losses from construction and operation of an [oil shale and/or tar sands] facility would be unlikely to have a major incremental adverse impact on cultural resources in the area." This is not really an analysis of cumulative impacts. Any loss of cultural resources – whether "unique" or not – could have an "incremental adverse impact", and the number of such incremental adverse impacts could skyrocket if either Alternatives B or C are adopted. However, the cumulative effects of an increase in incremental adverse impacts – both minor and "major" – are not at all considered in this document.

An appropriate analysis of cumulative impacts would consider both the losses and the gains that would follow from the destruction of a substantial portion of the regional archaeological record, which could occur if either Alternatives B or C are adopted. Impacts on "concentrations of unique resources in small areas" are not truly cumulative impacts. Rather, the cumulative impacts that must be considered are those that would occur from widespread development of oil shale and tar sands: what would be the overall consequences to the regional archaeological record and to our knowledge about that archaeological record? 52382-001

Simply stating that cultural resource evaluations and mitigations conducted pursuant to oil shale and tar sands development "would increase knowledge about cultural resources in the region" does not answer this question. The document presents no estimate of the degree to which our knowledge might be increased, and there is no estimate of the potential cumulative losses (including in value to Native American communities) against which the benefit of improved knowledge might be weighed.

In sum, if Alternatives B or C of the draft PEIS as written are adopted, the process will be open to challenge on the grounds that the document does not adequately consider cumulative impacts to cultural resources. Consideration of *cumulative* impacts should be the main focus of a Programmatic EIS such as this, but this document does not do this with respect to cultural resources.

Thank you for the opportunity to comment,

Mike Cannon, Ph.D., Registered Professional Archaeologist

Response for Document 52382

52382-001: A cumulative effects analysis for amending the RMPs was presented to the extent possible. However, because of the limited character of the decision to be made on the basis of this PEIS (allocation of lands where applications for leasing can be considered), and because there will be additional environmental analysis prior to leasing, it is neither required nor possible to present a cumulative effects analysis showing the specific level or degree of impacts associated with leasing and development. There are no cumulative effects on cultural resources from the proposed action, which is a land allocation decision. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. In order for oil shale or tar sands leasing or development to occur if lands become available as a result of this PEIS, additional NEPA analysis would have to be conducted, including an analysis of direct, indirect, and cumulative effects on the natural, cultural, and social environment. What will constitute an adverse effect on historic properties will be determined on the basis of location-specific and project-specific details in combination with an analysis of reasonable foreseeable future actions as required by CEQ regulations. In addition, compliance with Section 106 of the NHPA will be addressed at the project-specific level, again taking into consideration possible direct, indirect, and cumulative effects on historic properties.

Thank you for your comment, Susanna Bean.

The comment tracking number that has been assigned to your comment is OSTSD52383.

Comment Date: February 23, 2008 11:06:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD52383

First Name: Susanna
Middle Initial:
Last Name: Bean
Organization:
Address:
Address 2:
Address 3:
City:
State: AZ
Zip:
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I do not support the collection of oil shale and tar sands on public land. | 52383-001

Response for Document 52383

52383-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52384.

Comment Date: February 23, 2008 11:26:51AM
Oil Shale and Tar Sands
Comment ID: OSTSD52384

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale aids America's attempt to increase domstic energy

February 23, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There are no perfect energy solutions. Each energy source has its pro's and con's. The only way to be successful is to assure a diversity of supply by working to develop all of our nation's energy resources including oil shale.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant. 52384-001

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52384

52384-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52385.

Comment Date: February 23, 2008 11:53:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD52385

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Foreign energy dependence must end - oil shale can help

February 23, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I am extremly dissappointed with the economic impact being caused by international dependance on oil. I am strongly in favor of an alternate and renewable energy future, but it is obvious that our country's reliance on traditional liquid fuels (oil and gas) will remain and grow into the foreseeable future. With proper management, our natural resources can and should be made available for production. This abrupt surge of alternative fuel sources are causing serious impact on the economy and should be developed at a pace that does not impact the economy. We need to develop all of the energy resources at our disposal, including oil shale and tar sands.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence. 52385-001

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Response for Document 52385

52385-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Jon Hager.

The comment tracking number that has been assigned to your comment is OSTSD52386.

Comment Date: February 23, 2008 12:03:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD52386

First Name: Jon
Middle Initial:
Last Name: Hager
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

To Whom it may concern, The proposal to extract oil and tar shale from Utah, COlorado and Wyoming is shortsighted at best and disastrous at its worst. This oil shale is dirty and will cost an enormous amount of money to extract from the land. The process of extraction will cause great envirnomental damage to the lands in the proposal. This proposal only obfuscates the fact that weaning our nation from fossil fuels will only be that much more difficult. This nation needs to move in the direction of renewable energy sources and move away from dirty, polluting and non-renewable energy sources. Global warming is a fact, and mankind is exascerbating the problem. Thank you for your time and consideration to my comments. 52386-001 52386-002

Jon Hager Riverton, Utah

Responses for Document 52386

52386-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52386-002: Thank you for your comment.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52387.

Comment Date: February 23, 2008 12:13:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52387

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America needs to utilize oil shale to promote energy independence

February 23, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52387-001

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52387

52387-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52388.

Comment Date: February 23, 2008 12:16:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52388

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am strongly opposed to the leasing of any property in Southern Utah by any State, Federal or Private entity for the purpose of oil shale and/or tar sands development. What possible short term profit to be made is not worth the destruction of these beautiful and amazing lands. | 52388-001

Response for Document 52388

52388-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

Thank you for your comment, c tuke.

The comment tracking number that has been assigned to your comment is OSTSD52391.

Comment Date: February 23, 2008 13:39:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD52391

First Name: c
Middle Initial:
Last Name: tuke
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I'm writing to voice my concerns for plans to open up our wildlands for leasing commercial oil shale and tar sands development in Utah, Wyoming and Colorado. To permit leasing with unproven technologies will ultimately have devastating impacts on our water, air, wildlife and agricultural resources and will compound already apparent impacts from the current oil and gas boom on our public lands.

This plan will destroy magnificent public landscapes in eastern Utah and the state's red rock wilderness over the next several decades. How can the BLM to truly assess environmental impacts when the potential technologies to be used are not even fully developed yet. No leases should be issued until the impacts are clearly known and then maybe not even then. 52391-001

Oil shale development requires an incredible amount of energy heating large amounts of rock to extremely high temperatures up to about 900° F to release the oil. Studies show that at least 40% of the energy value of the shale is consumed in production, since the shale has to be mined, transported, cooked, and then the by-products disposed of. Not a very high yield for the amount of energy put into the process. It seems ridiculous to even consider this type of fuel production when clearly a more sustainable option would be the best option. 52391-002

Increasing fuel efficiency, and increasing mass transportation options and availablilty is a more viable direction to be going into. These lands are irreplaceable and full of historical as well as archeological sites and should be protected they are definately not worth the sacrifice for a few barrels of oil. 52391-003

The oil shale and tar sands region of eastern Utah, western Colorado, and southwestern Wyoming is dry country. Water supplies are scarce and relied upon heavily. Oil shale and tar sands extraction and processing will require significant amounts of water, as will the associated growth in local communities. For these reasons, water issues have long been viewed as a major constraint on 52391-004

large-scale development of these so-called "unconventional fuels." Surface mining and processing of oil shale would use up to five barrels of water for each barrel of oil produced. What's more, greenhouse gas emissions from the production of synthetic crude are more than three times those from conventional crude. 52391-004 (cont.) 52391-005

Lets make intelligent informed decisions and ones that everyone agrees with and that truely benefit everyone, not just filling the pockets of beurocrats and Oil mongers that don't even live in this state or this part of the country. I mean, don't they have enought money at others expense already ? 52391-006

Responses for Document 52391

52391-001: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures a commercial oil shale program that both meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offers opportunities for states, local communities, and the public to participate in the process.

The decisions analyzed in the PEIS include no commitment by BLM to offer for lease public lands without additional site specific NEPA analysis. This additional analysis will consider any new or site specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases, or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts, will be applied as a result of site specific NEPA evaluations. The BLM will involve the State, local communities and the public throughout the subsequent NEPA processes

52391-002: Thank you for your comment.

52391-003: The analysis in the PEIS takes into consideration the general geologic, archeological, cultural, and scenic values of areas within the study area. Since the BLM is analyzing an allocation decision, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of the area prior to a decision being made.

52391-004: The BLM recognizes that water is a major constraint in developing oil shale and/or tar sands. Therefore, the BLM is not committing to development in this PEIS. The PEIS is a programmatic-level document that analyzes allocation decisions. These allocations do not authorize the immediate leasing of the lands for commercial development, nor do they authorize commercial development. The water needed for oil shale and/or tar sands development depends on many factors, including scale of development, technologies used in the development, national agricultural economy, and the locations and hydrologic conditions of project sites. Finally, whether enough water is available for development depends on the results of intensive negotiations between various parties, including water rights owners, state and federal agencies, and municipal water providers as well as the developers.

52391-005: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally,

the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

52391-006: The BLM acknowledges the commentor’s preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, ira goodsmith.

The comment tracking number that has been assigned to your comment is OSTSD52392.

Comment Date: February 23, 2008 14:24:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD52392

First Name: ira
Middle Initial: l
Last Name: goodsmith
Organization:
Address: 8892 so. kings hill dr.
Address 2:
Address 3:
City: slc.
State: UT
Zip: 84121
Country: USA
Email: goodsmithira@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

geologist know that processing oil shale and tar sands is not only a very expensive proposition but there is no technology to do so now.There is no process that makes it feasable now as we realized in the 80's. why do we need to give these distroyers of our childrens heritage and utah's senic beauty the chance to waste our beautiful resources. we don't want any more strip mining in utah and we don't want large thoughtless companies capitalizing on our puble lands! 52392-001

Response for Document 52392

52392-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52395.

Comment Date: February 23, 2008 18:06:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52395

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale and Tars Sands Draft Impact Statement

February 23, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

52395-001

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52395

52395-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52397.

Comment Date: February 23, 2008 18:26:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD52397

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale is a vital asset and should be developed

February 23, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We strongly support the development of oil shale resources in western Colorado for the significant growth of economic development it would have on the region.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

52397-001

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a

trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52397-001 (cont.)

We support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy.

Sincerely,

Response for Document 52397

52397-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Ione MacBass.

The comment tracking number that has been assigned to your comment is OSTSD52398.

Comment Date: February 23, 2008 19:15:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD52398

First Name: Ione
Middle Initial:
Last Name: MacBass
Organization:
Address: P.O Box 672
Address 2: Heyburn.Id
Address 3:
City: Heyburn
State: ID
Zip: 83336
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I want to tell the BLM that I feel it urgent that you support increased energy securityand the ballanced developmentof oil shale and tar sands. I support American energy and less foreign energy. | 52398-001

Sincerely

Ione MacBass

Response for Document 52398

52398-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52399.

Comment Date: February 23, 2008 19:24:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD52399

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America should look to oil shale and tar sands for future energy needs

February 23, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52399-001

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans. 52399-001 (cont.)

Sincerely,

Response for Document 52399

52399-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Michael Derr.

The comment tracking number that has been assigned to your comment is OSTSD52400.

Comment Date: February 23, 2008 19:27:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52400

First Name: Michael
Middle Initial: F
Last Name: Derr
Organization:
Address: 1636 Laird Ave
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84105
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

My family and I wish to state our opposition to the development of shale and tar sands resources for oil in UTAH - including the exploration phase. | 52400-001

Response for Document 52400

52400-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Terry Massoth.

The comment tracking number that has been assigned to your comment is OSTSD52401.

Comment Date: February 23, 2008 19:57:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52401

First Name: Terry
Middle Initial: W
Last Name: Massoth
Organization:
Address: 2398 Broadview Court
Address 2:
Address 3:
City: Sandy
State: UT
Zip: 84092
Country: USA
Email: twmassoth@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

My comments regarding the PEIS and BLM's future forward action are:

1. I support the BLM's view on "Alternative 'B' for Application for Leasing for Commercial Oil Shale Development within the Most Geologically Prospective Areas in Utah". This alternative, I feel as a professional geologist, would be in the overall best interests of the American public.

2. I support the BLM's view on "Alternative 'B' for Application for Leasing for Commercial Tar Sands Development within the STSAs in Utah". This alternative, I feel as a professional geologist, would be in the overall best interests of the American public. 52401-001

Two follow-on points on the tar sands areas are: a. Leasing in the STSAs of San Rafael, Tar Sand Triangle, White Canyon, and Circle Cliffs should be withheld, as no prudent private entity will seek leasing in those areas, and no viable development will proceed in those areas, because of insurmountable environmental concerns (with which I would agree). 52401-002

b. Leasing should also be denied in the Grand County portion of the P.R. Spring STSA, as no commercially viable tar sand resources are present there. Reference: Anderson, P.B., and Massoth, T.W., 2006, Book Cliffs Block Oil Shale and Tar Sand Resources, Grand County, Utah: report prepared for Utah School Institutional Trust Lands Administration, February 2006. 52401-003

Responses for Document 52401

52401-001: The BLM acknowledges the commentor's preference for Alternative B.

52401-002: The BLM acknowledges the importance and value of natural and cultural resources in STSAs and the most geologically prospective oil shale areas. These resources are described in Chapter 3 of the PEIS. In this PEIS, the BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any resources or authorize any BLM action that would have any direct or indirect impacts on sensitive resources. There would be no impacts to these resources caused by the amendment of land use plans to identify lands available for commercial oil shale or tar sands leasing, other than possible impacts to property values, as discussed in the PEIS. Subsequent project-specific NEPA analyses will be required to determine the direct and indirect impacts of oil shale and tar sands leasing and development on natural, cultural, and socioeconomic resources.

52401-003: The STSAs were determined by Secretarial Orders of November 20, 1980 (45 FR 76800-76801) and January 21, 1981 (46 FR 6077-6078). Commercial viability can change with different technologies. For that reason, the BLM is retaining the referenced portion of the P.R. Springs STSA for future consideration for commercial leasing.

Thank you for your comment, Stephen Unterfranz.

The comment tracking number that has been assigned to your comment is OSTSD52402.

Comment Date: February 23, 2008 21:45:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52402

First Name: Stephen
Middle Initial: D
Last Name: Unterfranz
Organization:
Address: 44 South Broadway, Floor 17
Address 2:
Address 3:
City: White Plains
State: NY
Zip: 10601
Country: USA
Email: unter@blueskystudios.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson:

During my teens and early twenties I lived in Darien, hiking and biking near Argonne. At 25 I left for New Zealand to work on 'Lord of the Rings' and then traveled the world. Having seen how small our Earth truly is, I ask you to please protect our fragile environment whenever and wherever a right decision can be made. I would like to voice my support for the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. I strongly urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 52402-001

Sincerely, Stephen Unterfranz New York

Response for Document 52402

52402-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52405.

Comment Date: February 24, 2008 01:08:05AM
Oil Shale and Tar Sands
Comment ID: OSTSD52405

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America should look to oil shale and tar sands for future energy needs

February 24, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Oil shale is abundant in our country. We must stop our dependence upon foreign oil using American know how and ingenuity. This too is abundant in America and we must use those resources to ensure our children and generations beyond independence from foreign dominance. Please consider the consequences of NOT doing this! 52405-001

Sincerely,

Response for Document 52405

52405-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52406.

Comment Date: February 24, 2008 06:24:14AM
Oil Shale and Tar Sands
Comment ID: OSTSD52406

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Foreign energy dependence must end - oil shale can help

February 24, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Decreasing our dependence on foreign energy supplies will positively impact our economy and also positively impact our trade deficit.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52406-001

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52406

52406-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Merrill Bitter.

The comment tracking number that has been assigned to your comment is OSTSD52407.

Comment Date: February 24, 2008 07:37:30AM
Oil Shale and Tar Sands
Comment ID: OSTSD52407

First Name: Merrill
Middle Initial:
Last Name: Bitter
Organization:
Address: 1890 E. Millbrook Rd.
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84106
Country: USA
Email: merril_bitter@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I'm Writing to express my opposition to commercial oil shale and tar sands development in Utah, Colorado, and Wyoming. Proposed areas of leasing will be devastated by this development. 52407-001

Water, Air and wildlife resources as well as cultural, scenic and "quality of life" resoures will be profoundly diminished by this development. The results are plain to see in the Canadian developments. I urge the BLM to reject these wasteful and destructive and highly innefficient proposals. The BLM must move slowly and more thoroughly asses the impacts that will result from the leasing of irreplaceable landscapes for oil shale and tar sands development. 52407-002

52407-003

Responses for Document 52407

52407-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52407-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

52407-003: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures a commercial oil shale program that meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offers opportunities for states, local communities, and the public to participate in the process.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. The BLM will involve the state, local communities, and the public throughout the subsequent NEPA processes.

Thank you for your comment, Roy Murray.

The comment tracking number that has been assigned to your comment is OSTSD52408.

Comment Date: February 24, 2008 10:34:18AM
Oil Shale and Tar Sands
Comment ID: OSTSD52408

First Name: Roy
Middle Initial: A
Last Name: Murray
Organization:
Address: 1394 N Main
Address 2:
Address 3:
City: Centerville
State: UT
Zip: 84014
Country: USA
Email: ramurray59@netzero.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I have read about tar sands mining in Alberta, CA. Basically the environmental equivalent of dropping thermo-nuclear bombs. I can't believe anyone is seriously considering tars sands mining in the U.S. It's time to quit subsidizing this kind of extraction and move into the future. JUST SAY NO. | 52408-001

Response for Document 52408

52408-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Kim Forrest.

The comment tracking number that has been assigned to your comment is OSTSD52409.

Comment Date: February 24, 2008 12:34:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52409

First Name: Kim
Middle Initial:
Last Name: Forrest
Organization:
Address: 784 Bluff Drive
Address 2:
Address 3:
City: Los Banos
State: CA
Zip: 93635
Country: USA
Email: kforrest@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bush administration is preparing to open up millions of acres of public land in Colorado, Utah, and Wyoming for extraction and development of oil shale and tar sands. The production of these fossil fuels would ravage the landscape and produce unacceptable quantities of greenhouse gases and other pollutants at a time when we desperately need to transition to non-polluting, renewable energy sources. | 52409-001 | 52409-002 | 52409-003

I oppose all development of oil shale and tar sands on public lands. | 52409-001 (cont.)

Responses for Document 52409

52409-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52409-002: Thank you for your comment.

52409-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment, mary williams.

The comment tracking number that has been assigned to your comment is OSTSD52410.

Comment Date: February 24, 2008 16:03:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52410

First Name: mary
Middle Initial: b
Last Name: williams
Organization:
Address: 841 S. 500 E., #8
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84102
Country: USA
Email: bishwake@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We do not need any oil shale or tar sands development on public lands. | 52410-001

Response for Document 52410

52410-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52411.

Comment Date: February 24, 2008 16:21:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD52411

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support More American Energy

February 24, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Energy prices are based on supply and demand. Expanding supply is the best strategy for keeping gasoline prices affordable. A key component is tapping oil shale and tar sands.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves. 52411-001

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52411

52411-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Harrison Grathwohl.

The comment tracking number that has been assigned to your comment is OSTSD52412.

Comment Date: February 24, 2008 16:40:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD52412

First Name: Harrison
Middle Initial: L
Last Name: Grathwohl
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Don't destroy our wonderful public lands by developing oil shale and tar sands. | 52412-001

Response for Document 52412

52412-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Valerie Wenzel.

The comment tracking number that has been assigned to your comment is OSTSD52413.

Comment Date: February 24, 2008 16:50:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52413

First Name: Valerie
Middle Initial:
Last Name: Wenzel
Organization:
Address:
Address 2:
Address 3:
City: Athena
State: OR
Zip: 97813
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Considering that shale and tar sand oil are just other forms of petroleum dependence and that we are suffering economically, environmentally and health-wise already from petroleum dependence, pursuing these oil forms is moving exactly in the wrong direction. Any time and resources spent in this pursuit, and not invested into alternative, liberating energy sources, are wasted. | 52413-001

Response for Document 52413

52413-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Miki Laws.

The comment tracking number that has been assigned to your comment is OSTSD52414.

Comment Date: February 24, 2008 17:02:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD52414

First Name: Miki
Middle Initial:
Last Name: Laws
Organization:
Address: 1073 Old Stone House Way
Address 2:
Address 3:
City: Park City
State: UT
Zip: 84098
Country: USA
Email: mikilaws@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Over the years, all scientific studies have shown that it is not economically feasible to develop oil shale on a commercial level, and that the damage to the environment, air, water, wildlife, and historical sites will far outway any possible benefits of such development. Even industry leaders are saying that successful commercial-scale oil shale development is at least 11-15 years out, if it's even feasible. Any fast-track to leasing with unproven technologies will have devastating impacts on our water, air, and wildlife resources. 52414-001

In addition, the draft plan calls for leasing and development of "tar sands" in some of Utah's most stunning red rock landscapes. Places like the San Rafael Swell, Fiddler Butte, and Nine Mile Canyon are on the chopping block in this planning process. While Utah is the only state in the nation to have any measurable amount of tar sands, these resources absolutely pale in comparison to the tar sands being developed in Alberta, Canada and their development would do little to ease America's "energy crunch." We must go slow and remember that we are planning for the ages, not for the short term--what we do with the landscape and resources God has blessed us with cannot be undone. We don't want to creat a disaster that will jeopardize the health and welfare of those who come after us. 52414-002

52414-001 (cont.)

Responses for Document 52414

52414-001: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures a commercial oil shale program that meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offer opportunities for states, local communities, and the public to participate in the process.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. The BLM will involve the state, local communities, and the public throughout the subsequent NEPA processes.

52414-002: In consultation with our Cooperating Agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. The limited action of amending the RMPs will not cause risks to the environment or society. Furthermore, this PEIS uses the available information to analyze impacts from the types of projects that might be proposed later for commercial operations. As stated elsewhere, future leasing decisions will be accompanied by a NEPA document that will analyze impacts using available information.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52415.

Comment Date: February 24, 2008 17:59:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52415

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: We have more oil than the Middle East and should develop it

February 24, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

While in an ideal world America could satisfy its energy demands by neither importing foreign energy nor developing its own energy resources, the fact remains that American energy must be developed in order to stem American dependence on foreign energy sources and satisfy its energy demands. BLM has taken a major step towards that end in the draft PEIS for oil shale and tar sands.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52415-001

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

The presidential candidates talk about reducing our dependence on foreign oil, but talk is cheap. We need people with courage and wisdom to move forward with projects like this. There needs to be balance between meeting our oil needs and preserving natural lands, but we need to be more aggressive in the pursuit of oil independence.

Sincerely,

Response for Document 52415

52415-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52416.

Comment Date: February 24, 2008 19:31:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD52416

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM oil shale plan provides support for oil shale development

February 24, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52416-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

52416-001 (cont.)

Sincerely,

Response for Document 52416

52416-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Karen Chamberlain.

The comment tracking number that has been assigned to your comment is OSTSD52417.

Comment Date: February 24, 2008 23:42:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD52417

First Name: Karen
Middle Initial:
Last Name: Chamberlain
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

At a time when the planet and all life on it, including humans, are threatened by the devastating consequences of global climate change; and at a time when water resources are dwindling and becoming uncertain,I find it the outrageous height of irresponsibility to propose obtaining petroleum by the dirtiest, most water-consuming means——that of oil shale extraction and especially of tar sands mining. 52417-001

This country desperately needs to change its energy policy direction away from polluting,petroleum-based resources, and toward the many renewable options that would be much more profitable——and in fact are the only options that might prevent the worst consequences of global climate change. 52417-002

Responses for Document 52417

52417-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52417-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An alternative of using renewable energy resources was brought up during scoping and was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

Thank you for your comment, George Latta.

The comment tracking number that has been assigned to your comment is OSTSD52418.

Comment Date: February 24, 2008 23:54:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52418

First Name: George
Middle Initial: H
Last Name: Latta
Organization:
Address: 3802 South Kent Street
Address 2:
Address 3:
City: Visalia
State: CA
Zip: 93277
Country: USA
Email: ghlatta3@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

On December 21, 2007 BLM released a draft plan for commercial oil shale and tar sands leasing and development in Utah Colorado, and Wyoming. This plan lays the groundwork for a large scale commercial-scale oil shale boom that would be far greater than the west experienced 30 years ago. But while the federal government is pushing a plan to lease immense acreage in eastern Utah including the White River, Upper Desolation Canyon, and a large swath of the Book Cliffs as well as western Colorado and southern Wyoming, industry leaders are saying that successful commercial-scale oil shale development is at least 11-15 years out, if it's even feasible. This fast-track to leasing with unproven technologies will have devastating impacts on our water, air, and wildlife resources. 52418-001

In addition, the draft plan calls for leasing and development of "tar sands" in some of Utah's most stunning red rock landscapes. Places like the San Rafael Swell, Fiddler Butte, and Nine Mile Canyon are on the chopping block in this planning process. 52418-002

I oppose any infringement of these type of processes on the public land I value and use; I wish them preserved for our future generations and therefore oppose the BLM plan of action. 52418-003

Responses for Document 52418

52418-001: The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site specific NEPA evaluations.

The analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios and pertinent federal or nonfederal actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as best management practices to avoid or mitigate short-term and long-term adverse impacts.

52418-002: Thank you for your comment. The analysis in the PEIS takes into consideration the general geologic, cultural, and scenic values of areas such as the San Rafael Swell and Nine Mile Canyon. Since the BLM is analyzing an allocation decision in the PEIS, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of the area prior to making a decision.

52418-003: The BLM acknowledges the commentor’s preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52419.

Comment Date: February 24, 2008 23:58:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD52419

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for oil shale and sands

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but it is obvious that our country's reliance on traditional liquid fuels (oil and gas) will remain and grow into the foreseeable future. We need to develop all of the energy resources at our disposal, including oil shale and tar sands.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence. 52419-001

Increasing domestic energy production is the only real solution to America's energy problems, thus it is time to look to emerging energy sources like oil shale.

Sincerely,

Response for Document 52419

52419-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52420.

Comment Date: February 25, 2008 04:06:26AM
Oil Shale and Tar Sands
Comment ID: OSTSD52420

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support for balanced oil shale development

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

American energy must be utilized to a greater extent in order for America to overcome its current energy problems. Instead of consistently ignoring the vast energy potential of the United States, America should instead start to use the rich energy supply it has in order to satisfy its energy needs.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52420-001

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government.

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52420

52420-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Jennifer Wallace.

The comment tracking number that has been assigned to your comment is OSTSD52423.

Comment Date: February 25, 2008 09:15:37AM
Oil Shale and Tar Sands
Comment ID: OSTSD52423

First Name: Jennifer
Middle Initial:
Last Name: Wallace
Organization:
Address: 123 Arbor Drive
Address 2:
Address 3:
City: Moab
State: UT
Zip: 84532
Country: USA
Email: jennifer.h.wallace@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 52423-001

From what I have read about oil shale and tar sands oil extraction in Canada is that current "steam based" extraction methods are ecologically unsound, and use large amounts of fresh water. I don't believe that is appropriate for the drought stricken Southwest. 52423-002

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 52423-003 52423-004

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 52423-005

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 52423-001 (cont.)

Thank you for your time.

Sincerely,

Jennifer Wallace

Responses for Document 52423

52423-001: The BLM acknowledges the commentor's preference for Alternative A.

52423-002: The PEIS provides a general discussion of the impacts associated with water and power requirements associated with potential future oil shale and tar sands development. At present, water and power requirements are very speculative due to the variation in technology currently available, and also because the source of the water and power (and therefore the impacts) is unknown. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analyses for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power and water requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52423-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA

analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52423-004: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

52423-005: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and

3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52424.

Comment Date: February 25, 2008 10:27:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD52424

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Plan

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's energy problems will not simply fix themselves. Our government and businesses must take substantive action to increase domestic production in order to diminish America's alarming dependence on foreign energy sources. Oil Shale and other energy resources afford America this opportunity.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52424-001

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy.

Sincerely,

Response for Document 52424

52424-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52425.

Comment Date: February 25, 2008 10:42:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD52425

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: 18 years worth of transportation fuel found in oil shale

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but until such technologies mature to the point that they significantly contribute to our domestic energy needs, the development of unconventional energy resources like oil shale and tar sands can bridge the gap between now and our renewable energy future.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52425-001

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52425-001 (cont.)

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52425

52425-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52426.

Comment Date: February 25, 2008 10:58:36AM
Oil Shale and Tar Sands
Comment ID: OSTSD52426

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
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Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America needs oil shale and tar sands development

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I support the development of oil shale and other alternative fuels resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy.

We need to employ every means possible to speed up the process for development including government grants, price supports and tax incentives. Every day we delay is one more day of dire shortages when a supply crisis hit in the near future (whch it surely will). 52426-001

Sincerely,

Response for Document 52426

52426-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52427.

Comment Date: February 25, 2008 11:31:39AM
Oil Shale and Tar Sands
Comment ID: OSTSD52427

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development should move forward

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

While in an ideal world America could satisfy its energy demands by neither importing foreign energy nor developing its own energy resources, the fact remains that American energy must be developed in order to stem American dependence on foreign energy sources and satisfy its energy demands. BLM has taken a major step towards that end in the draft PEIS for oil shale and tar sands.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52427-001

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52427-001 (cont.)

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale. Please, let us become oil independent. Develop our own sources in oil shale, and tell the wacko environmentalists to get off their crazy soap boxes and find some common sense.

Sincerely,

Response for Document 52427

52427-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52429.

Comment Date: February 25, 2008 12:05:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52429

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Develop oil shale for an energy independent America

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

While in an ideal world America could satisfy its energy demands by neither importing foreign energy nor developing its own energy resources, the fact remains that American energy must be developed in order to stem American dependence on foreign energy sources and satisfy its energy demands. BLM has taken a major step towards that end in the draft PEIS for oil shale and tar sands.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52429-001

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Even as we continue research to find alternative energy sources, we still need to continue the exploration and development of our existing Natural resources for a sustained healthy economy.

The wise use policies and laws that have been placed on developers have been put in place for, and have proven to protect the environment for a continued environmentally friendly natural resource harvest.

Please do not let this valuable economic resource slip out of our countries reach.

Sincerely,

52429-001
(cont.)

Response for Document 52429

52429-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Jacob Blackwelder.

The comment tracking number that has been assigned to your comment is OSTSD52431.

Comment Date: February 25, 2008 12:39:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52431

First Name: Jacob
Middle Initial:
Last Name: Blackwelder
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: jacob_t@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

BLM- Please consider the ramifications of long-term planning done on a short-time scale. By not allowing commercial companies to drill, explore, and excavate, you will help to put more pressure on these companies and our government to look into alternative energy resources. Please consider that when an area has been impacted by fossil fuel extraction and mining, we will not see it recover in our lifetime, or our grandchildren's grandchildren's lifetime. Our planet is small and there are no others for us to migrate to when we destroy this one. Just because money talks doesn't mean it says the right things... 52431-001

Response for Document 52431

52431-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52433.

Comment Date: February 25, 2008 13:24:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52433

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Please don't hurt America by stopping oil shale development

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I lament America's dependence on foreign energy, but seemingly every time America has an opportunity to enhance its capacity for domestic energy production, politics trumps prudent policymaking. In its recommendation for commercial oil shale development, BLM has taken a bold step in the right direction.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52433-001

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52433-001 (cont.)

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52433

52433-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52435.

Comment Date: February 25, 2008 14:28:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD52435

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS is a good first step

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Why has America neglected to develop this important resource before? I remember when the oil embargo of the 1970's occurred, oil shale was serously looked at then. But nothing was done because of lack of forward thinking. If processes were invented for economical production then, we would have a much stronger America economically now. I seriously have a problem paying $3.20 per gallon of gasoline to make some foreign arab muslims richer who coninually call for the extermination of all "infidels", to say nothing of the underhanded support our money is to extremist terrorism!!!

WE ARE AMERICA!!! We must become self sufficient in the future or run the risk of becoming a second class nation. Too many of our dollars are going overseas now with the balance of payments always in the negative. As an American I have a choice not to buy a foreign automobile sending dollars overseas, but I do not have a choice in gasoline! If there was an oil company who advertised selling only American gasoline, I would be a customer even if the price was much higher!! 52435-001

Since I live in Utah, the most beautiful state in the Union, (in my opinion, and I have lived in numerous states between Maine and California) and I work for a very environmentally conscious

company (ISO 14001 certified), I am against flat-out defiling of the environment. But this would not cause significant damage as long as all appropriate laws and permits were followed, and it can be done as I have seen from my current employer and my previous one, a hazardous waste incinerator.

I strongly urge the BLM and any other agencies involved to quickly issue the required permits necessary for full-scale development of oil shale and ignore complainte from "tree-huggers" that would tie up the permitting process for years with frivolous lawsuits. See the example of the legacy highway in Utah which ended up costing approximately $400 million more than the $200 million budgeted due to lawsuit from enviromental terrorists. WE NEED THIS OIL!!!!! Please do not delay any longer!

52435-001 (cont.)

Sincerely,

Response for Document 52435

52435-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52436.

Comment Date: February 25, 2008 15:55:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD52436

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale can help end dependence on foreign oil

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52436-001

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy.

The United State has the largest per-capita consummer of energy in the world. Our way of life is dependent on cheap energy. Today, America will consume 19 million bbls of crude oil of which 63

percent will come from outside of the USA. This situation is an unacceptable risk to our national security.

Coal is under attack as a source of energy and new technology is not ready for commerical use. So the development of our own resources NOW is necessary.

We are fools to not develop the resources we have within our own boards As a Chemical Engineer, with 35 years of expierence in the energy field, there is no reason why we cannot develop our shale and tar sands for our own use. In not doing so, we put at risk our way of life and our security as a free nation. 52436-001 (cont.)

I demand that this developemnt move forward with the up-most speed, and believe it can be done in a reasonable time frame and while employing best engineering standards we can protect our lands. But in order to do this, we must begin now and cut the red tape that is present today.

Sincerely,

Response for Document 52436

52436-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52437.

Comment Date: February 25, 2008 17:05:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52437

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Draft PEIS for oil shale and tar sands

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52437-001

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

Simply purchasing more foreign oil is not the answer to America's energy problems. Developing American energy resources like oil shale is a much more astute policy in addressing our energy crisis.

Sincerely,

Response for Document 52437

52437-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52439.

Comment Date: February 25, 2008 17:53:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52439

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Plan

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52439-001

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52439-001 (cont.)

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52439

52439-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Joanna Bettmann.

The comment tracking number that has been assigned to your comment is OSTSD52441.

Comment Date: February 25, 2008 19:30:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52441

First Name: Joanna
Middle Initial: E
Last Name: Bettmann
Organization:
Address: 3936 Cove Road
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84108
Country: USA
Email: jbettmann@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The BLM plan lays the groundwork to destroy the landscape in the heart of Utah's redrock canyon country and wild Book Cliffs for decades to come. It is impossible for the BLM to truly assess environmental impacts when the potential technologies to be used are not even fully developed yet. The BLM needs to go slow and carefully assess first. 52441-001

Response for Document 52441

52441-001: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures a commercial oil shale program that meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offer opportunities for states, local communities, and the public to participate in the process.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. The BLM will involve the state, local communities, and the public throughout the subsequent NEPA processes.

Thank you for your comment, Bob Brister.

The comment tracking number that has been assigned to your comment is OSTSD52442.

Comment Date: February 25, 2008 19:53:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52442

First Name: Bob
Middle Initial:
Last Name: Brister
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I attended your public meeting today in Salt Lake City. I strongly oppose any oil shale or tar sands development on our public lands. I support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. This type of development would destroy much of our public lands. It would result in unacceptable quantities of greenhouse gas and other pollutants. Your EIS should include the issue of greenhouse gas production. Where would the water required come from? Why would you even be doing this EIS when so little is known about the technology to be use? 52442-001

As a resident of Utah who loves to visit our public lands, I urge you to kill this project now and choose the No Action alternative. 52442-001 (cont.)

Responses for Document 52442

52442-001: The BLM acknowledges the commentor's preference for Alternative A.

52442-002: Thank you for your comment.

52442-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

52442-004: The source of water needed for any oil shale and/or tar sands development projects would be specified in the project-specific NEPA documents and not in this PEIS. Physically, the water would be from surface water bodies and

subsurface aquifers. The water is unlikely to be diverted from public use water. Agricultural water might be a candidate for sources of water rights. Impacts on water resources caused by transfers of water from agricultural uses to oil shale and tar sands development on water resources have been added to Sections 4.5 and 5.5 of the PEIS. It would be a lessee's responsibility to obtain and maintain water rights necessary for its operations in accordance with state law. Thus, it would be conjecture to attempt an analysis of impacts from water demands for operations that might not obtain water rights.

Thank you for your comment, Roberta Glidden.

The comment tracking number that has been assigned to your comment is OSTSD52443.

Comment Date: February 25, 2008 20:17:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD52443

First Name: Roberta
Middle Initial:
Last Name: Glidden
Organization:
Address: 1009 23rd St
Address 2:
Address 3:
City: Ogden
State: UT
Zip: 84401
Country: USA
Email: rglidden@mailaka.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I was shocked to learn of the possibility of leasing land in Utah for future oil and gas development, anywhere but esp. in protected areas. We need to see the writing on the wall re. our energy future and develop other resources for the sake of the planet--and our sanity. I am unable to attend any of the public forums but am glad to have the opportunity to weigh in on this issue. AGAINST. Thanks

52443-001

Response for Document 52443

52443-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Charlie Ayers.

The comment tracking number that has been assigned to your comment is OSTSD52444.

Comment Date: February 25, 2008 20:29:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD52444

First Name: Charlie
Middle Initial:
Last Name: Ayers
Organization:
Address: 6365 Heughs Canyon Dr
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84121
Country: USA
Email: bigskychuck@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose the use of public lands for oil shale and tar sand development, secondary, chiefly, to it's adverse environmental consequences.

Such development has been considered since I was a geology student in the 1970's. Unfortunately, the U.S. government has done essentially nothing since then to promote conservation and ensure energy independence, as would have been prudent.

52444-001

Response for Document 52444

52444-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52445.

Comment Date: February 25, 2008 21:33:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52445

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Draft PEIS

February 25, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52445-001

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52445

52445-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52450.

Comment Date: February 26, 2008 06:13:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD52450

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM oil shale plan a solid start

February 26, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52450-001

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52450

52450-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52451.

Comment Date: February 26, 2008 09:41:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD52451

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commerical oil shale development should move forward

February 26, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

52451-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52451

52451-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52452.

Comment Date: February 26, 2008 10:40:43AM
Oil Shale and Tar Sands
Comment ID: OSTSD52452

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM oil shale plan provides support for oil shale development

February 26, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's security and energy is threatened by its continual refusal to develop its own energy to address its own energy problems. We must reduce consumption of foreign energy and instead develop American energy in order for these problems to be remedied.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

52452-001

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy.

Sincerely,

Response for Document 52452

52452-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52456.

Comment Date: February 26, 2008 14:37:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD52456

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Plan

February 26, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52456-001

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

52456-001 (cont.)

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52456

52456-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Dakota Jones.

The comment tracking number that has been assigned to your comment is OSTSD52457.

Comment Date: February 26, 2008 19:06:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52457

First Name: Dakota
Middle Initial:
Last Name: Jones
Organization:
Address: 4088 thurman ct.
Address 2:
Address 3:
City: moab
State: UT
Zip: 84532
Country: USA
Email: dogonabyke00@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please preserve our natural environment. Eastern Utah is one of the few places left in America that is so widely untouched, and places like the Book Cliffs, Desolation Canyon, the San Rafael Swell, and on are much more valuable to Americans when left the way they are. Please keep the wilderness in mind. | 52457-001

Response for Document 52457

52457-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, James Johnson.

The comment tracking number that has been assigned to your comment is OSTSD52458.

Comment Date: February 26, 2008 22:11:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD52458

First Name: James
Middle Initial: D
Last Name: Johnson
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Their seems to be no possible way to justify the amount of damage this would do to the environment and landscape except to line the already billowing pockets of the oil industry. Not enough product could be obtained to make a stratigic differance except in the lives of controllers of these companies. Profits in the oil industry should be a national shame instead of a framework for future goals. 52458-001

Response for Document 52458

52458-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Robert Andrews.

The comment tracking number that has been assigned to your comment is OSTSD52459.

Comment Date: February 26, 2008 22:28:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD52459

First Name: Robert
Middle Initial:
Last Name: Andrews
Organization:
Address: 1971 E Herbert Ave
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84108
Country: USA
Email: bob8lunch@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please take no action, Alternative A. Wait for a new administration, one that has some respect for the environment. It's just crap to depend on fossil fuels. | 52459-001

Response for Document 52459

52459-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Sharon Wright.

The comment tracking number that has been assigned to your comment is OSTSD52461.

Comment Date: February 27, 2008 09:33:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD52461

First Name: Sharon
Middle Initial: L
Last Name: Wright
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

BLM Project Manager:

Dear Sherry Thompson,

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. | 52461-001

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. | 52461-002

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. | 52461-001 (cont.)

Please develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. | 52461-003

Sincerely, Sharon Wright

Responses for Document 52461

52461-001: The BLM acknowledges the commentor's preference for Alternative A.

52461-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52461-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

Thank you for your comment, Arie Sitthichai.

The comment tracking number that has been assigned to your comment is OSTSD52462.

Comment Date: February 27, 2008 09:37:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD52462

First Name: Arie
Middle Initial:
Last Name: Sitthichai
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I have been told that it is very energy-intensive to harvest oil shale and tar sands. I would like to see the ratio of cost of energy required to harvest to profit from energy. If the ratio is low, the environmental impact is not worth it. While the land is not as visually stunning as many of Utah's national parks it is undisturbed open space that offers its own kind of value. It is one of the things I miss most about Utah, quiet open spaces. 52462-001

Response for Document 52462

52462-001: The PEIS provides a general discussion of the impacts associated with water and power requirements associated with potential future oil shale and tar sands development. At present, water and power requirements are very speculative due to the variation in technology currently available, and because the source of the water and power (and, therefore, the impacts) is unknown. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power and water requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

Thank you for your comment, Preston Driver.

The comment tracking number that has been assigned to your comment is OSTSD52463.

Comment Date: February 27, 2008 09:56:08AM
Oil Shale and Tar Sands
Comment ID: OSTSD52463

First Name: Preston
Middle Initial:
Last Name: Driver
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the BLM's OSTS PEIS for commercial oil shale and tar sands development as a means to developing domestic energy resources. We rely too heavily on foreign oil. Such reliance is unwise, particularly when we have energy resources available right here at home. Because of this concern, I am writing this letter to share my concern about Alternative C in the Draft OSTS PEIS (Oil Shale-Tar Sands Programmatic Environmental Impact Statement).

Through the scoping process, the BLM has identified 2.3 million acres in Colorado, Utah and Wyoming (geologically, the "Green River Formation") where oil shale and tar sands might be present. These lands should be open for exploration and commercial leasing. Development of these unconventional fuels is good for local economies and can help bolster our domestic energy supply. I do not support Alternative C, which appears to restrict development and make it less efficient. 52463-001

Critics of development may argue that oil shale and tar sands development conflicts with existing land use plans. I disagree. Oil shale development can occur in conjunction with other land uses.

In conclusion, I again want to respectfully ask that the BLM not proceed with Alternative C. Thank you.

Response for Document 52463

52463-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands, and the preference for BLM to not select Alternative C.

Thank you for your comment, Harvey Childers.

The comment tracking number that has been assigned to your comment is OSTSD52464.

Comment Date: February 27, 2008 09:59:30AM
Oil Shale and Tar Sands
Comment ID: OSTSD52464

First Name: Harvey
Middle Initial:
Last Name: Childers
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I write to express my support for oil shale and tar sands development as set forth in the draft PEIS (Programmatic Environmental Impact Statement). An active shale program is important for strengthening communities and developing our country's domestic energy supply.

These resources can be developed in an environmentally responsible way and they are important for fostering economic growth. Western Colorado, as one of the affected areas, would see significant growth by allowing for oil shale development. The infrastructure in our area would benefit from the tax and royalty dollars created by such development. Further, development would increase economic opportunities for existing AND new businesses, which directly translates into more jobs. Economic development is important to me and to my family, as is environmental protection. I support projects, such as this, that can be done in an environmentally responsible way AND that are good for our economy.

52464-001

Response for Document 52464

52464-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Jason Kuzov.

The comment tracking number that has been assigned to your comment is OSTSD52465.

Comment Date: February 27, 2008 10:03:14AM
Oil Shale and Tar Sands
Comment ID: OSTSD52465

First Name: Jason
Middle Initial:
Last Name: Kuzov
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Responsible oil shale and tar sands development is important for supporting local economies in the West. I respectfully ask that you include this letter in the public record for the Draft Programmatic Environmental Impact Statement in support of oil shale and tar sands exploration and development in Colorado, Utah and Wyoming.

As you know, we are fortunate to have an abundance of natural resources in the West. For many decades, we have learned how to develop these resources in a way that mitigates and reduces environmental impacts. I support projects, such as the plan mentioned above, because the approximate 2.3 million acres of lands administered by the Bureau of Land Management are suitable for exploration. Resource development has been critical for western economies. Aside from the tax and royalties generated by future oil shale and tar sands development, this project also means increased economic opportunities and new employment. It's also important to keep in mind that new jobs are not only created in the energy industry – small businesses and local economies also benefit from responsible development. 52465-001

Please support exploration and development of oil shale and tar sands. It's good for helping our country diversify its energy portfolio and it's good for western communities.

Response for Document 52465

52465-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, UTAH REINER.

The comment tracking number that has been assigned to your comment is OSTSD52466.

Comment Date: February 27, 2008 10:04:36AM
Oil Shale and Tar Sands
Comment ID: OSTSD52466

First Name: UTAH
Middle Initial:
Last Name: REINER
Organization:
Address: 2749 ½ CHEYENNE DR
Address 2:
Address 3:
City: Grand Junction
State: CO
Zip: 81503
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I ASK FOR YOUR SUPPORT ON OIL SHALE & TAR SANDS DEVELOPMENT AS SET FORTH IN THE DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT (DPEIS). PLEASE MOVE FORWARD WITH AN ALTERNATIVE THAT WILL MAXIMIZE THE AMOUNT OF POTENTIAL RESOURCES AVAILABLE FOR LEASING WHILE SIMULTANEOUSLY PROVIDING AN ENVIRONMENTALLY SOUND PROGRAM.

LIKE ALL AMERICANS, I CARE ABOUT OUR ENVIRONMENT. I BELIEVE THAT ENERGY DEVELOPMENT AND RESOURCE EXTRACTION CAN BE DONE IN AN ENVIRONMENTALLY SOUND WAY. WHILE ENVIRONMENTAL CONCERNS ARE IMPORTANT, I ALSO WANT TO EMPHASIZE HOW IMPORTANT RESOURCE DEVELOPMENT IS FOR LOCAL COMMUNITIES. ENERGY HAS CREATED JOBS AND ECONOMIC DEVELOPMENT OPPORTUNITIES THROUGHOUT THE WESTERN UNITED STATES. A GROWING OIL SHALE AND TAR SANDS INDUSTRY WOULD CERTAINLY PROVIDE GREATER OPPORTUNITIES FOR NEW BUSINESS GROWTH AND DEVELOPMENT. THIS IN TURN WOULD HELP MAINTAIN EMPLOYMENT DIVERSITY AND STABILITY FOR MANY WESTERN ECONOMIES. 52466-001

IN ADDITION TO THE ECONOMIC BENEFITS, DEVELOPING OIL SHALE AND TAR SANDS IS ALSO AN IMPORTANT WAY TO IMPROVE AND MAINTAIN OUR INFRASTRUCTURE. DEVELOPMENT WILL CERTAINLY PROVIDE INCREASED TAX AND ROYALTY REVENUES THAT CAN BE REINVESTED IN OUR COMMUNITIES. STATES AND TOWNS NEED THIS REVENUE TO MAKE SURE OUR INFRASTRUCTURAL NEEDS ARE BEING MET.

Response for Document 52466

52466-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, David Weller.

The comment tracking number that has been assigned to your comment is OSTSD52467.

Comment Date: February 27, 2008 10:06:36AM
Oil Shale and Tar Sands
Comment ID: OSTSD52467

First Name: David
Middle Initial: E
Last Name: Weller
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please include this letter as my comments regarding the Oil Shale & Tar Sands Draft Programmatic EIS. This environmental document sets forth a plan to develop oil shale and tar sands in several western states (Wyoming, Utah and Colorado). I support development of these resources for several reasons. 52467-001

First, I believe that development is necessary for improving the United States' domestic energy reserve. I do not feel comfortable relying on politically unstable foreign countries for energy.

Second, and more importantly, I am writing this letter because development is important for supporting local economies. Wyoming, Utah and Colorado are well familiar with the benefits that energy development can provide. Our region would further benefit from royalties and other taxes generated by a robust and active oil shale program. Plus, local economies in our region would also see significant growth. In addition to new jobs directly created in the industry, development would also provide great opportunities for new businesses. The importance of supporting strong western economies should not be ignored as the Bureau of Land Management moves forward with the Oil Shale & Tar Sands Draft Programmatic EIS. 52467-002

Responses for Document 52467

52467-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52467-002: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

Thank you for your comment, Andrew Miller.

The comment tracking number that has been assigned to your comment is OSTSD52468.

Comment Date: February 27, 2008 10:10:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD52468

First Name: Andrew
Middle Initial:
Last Name: Miller
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Responsible oil shale and tar sand development is good for local economies. I support the BLM's Oil Shale and Tar Sand PEIS as a means to develop these resources. Of the millions of acres administered by the BLM in Utah, Colorado and Wyoming, these lands are bound to provide important oil shale and tar sand reserves. These resources are critical for helping achieve increased energy independence. 52468-001

Development is also important for economic growth. Economies in this region rely on strong, active development and use of natural resources. A growing oil shale and tar sand industry would provide new opportunities for business growth and development for numerous towns in our region. These resources can be developed in an environmentally responsive manner and they will provide much needed tax and royalty revenues. These dollars are important for ensuring that our region's infrastructure is being maintained. Too often, economic interests aren't considered in environmental planning, yet these interests are important to people like me who live and work in this area. 52468-002

Responses for Document 52468

52468-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52468-002: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

Thank you for your comment, Dustin Welsh.

The comment tracking number that has been assigned to your comment is OSTSD52469.

Comment Date: February 27, 2008 10:11:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD52469

First Name: Dustin
Middle Initial:
Last Name: Welsh
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the BLM's commercial shale and tar sands development proposal (Oil Shale and tar Sand PEIS). It is essential that these products be developed to help meet our country's energy needs.

Consumers, industries and businesses throughout this country have been hit hard with increasing energy prices. This increase results from tight supply. To increase supply, I think it is much more prudent to develop energy resources domestically, rather than increase our reliance on foreign imports – particularly from countries that have animosity towards the United States. Ideally, we could rely more on renewable energy to help domestic supply. However, the technology for these resources still needs to mature before they can contribute significantly to our domestic energy needs. Oil shale and other non-conventional fuels can help address our country's energy challenges. 52469-001

The proposal identifies a few million acres where oil shale and tar sands are most likely present. These lands can and should support development. I commend the BLM for putting together a comprehensive plan to open these lands for exploration and commercial leasing.

Response for Document 52469

52469-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Matt Keefe.

The comment tracking number that has been assigned to your comment is OSTSD52470.

Comment Date: February 27, 2008 10:11:58AM
Oil Shale and Tar Sands
Comment ID: OSTSD52470

First Name: Matt
Middle Initial:
Last Name: Keefe
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

It is important now more than ever for the Bureau of Land Management to pursue a balanced energy solution. This solution should include development of alternative sources of energy, like oil shale and tar sands. As such, I write to ask that the Bureau of Land Management move forward with the Oil Shale and Tar Sands Draft Programmatic Environmental Impact Statement

Developing these resources is essential to help meet our nation's domestic energy needs. The Bureau of Land Management should investigate and analyze the many positive impacts to the American people that would result in developing these valuable resources.

52470-001

With our nation's high energy demands and tight supply, it is no wonder that energy prices are expensive. These costs not only impact businesses and industries; families are also feeling the pinch. Rather than relying on foreign oil, our nation should step up its development of domestic energy.

Tar sand and oil shale should be developed to help address energy supply and it will also diversify our nation's energy portfolio.

Response for Document 52470

52470-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Curtis Harvey.

The comment tracking number that has been assigned to your comment is OSTSD52471.

Comment Date: February 27, 2008 10:13:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD52471

First Name: Curtis
Middle Initial:
Last Name: Harvey
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

We can't afford to rely on foreign countries, particularly from the Middle East, to meet our energy demands. These countries are politically unstable and their attitude toward our country is even more troublesome.

I support the OSTS PEIS Draft (Oil Shale Tar Sands Programmatic Environmental Impact Statement) which would allow for domestic exploration and commercial leasing of unconventional resources.

52471-001

Throughout the West, particularly in Wyoming, Colorado and Utah, energy resources have provided our country with a reliable source of energy. The federal government has a responsibility and duty to expand reasonable and responsible access to our nation's energy resources in order to reduce our reliance on foreign energy imports.

We have some of the best environmental laws in the world and I would prefer see production occur here.

Response for Document 52471

52471-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Don Walker .

The comment tracking number that has been assigned to your comment is OSTSD52472.

Comment Date: February 27, 2008 10:14:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD52472

First Name: Don
Middle Initial:
Last Name: Walker
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the BLM's Draft Programmatic EIS for commercial oil shale and tar sands development. Unconventional resources can greatly help address our domestic energy needs and can be developed in an environmentally responsive manner. As a matter of the utmost important public policy, the United States should remain committed to developing domestic energy sources, which includes oil shale and tar sands. The BLM's Draft Programmatic EIS is a step in that direction and should be supported. I hope the interested parties who participated in the scoping process (some 5,000 comments) are serious about supporting domestic energy production and are not just paying lip service to the concept. Supporting domestic energy means looking at the greatest area possible where oil shale and tar sands may be present. Those who would limit these areas, in my view, are not serious about supporting domestic energy production. Oil shale and tar sands provide a more balanced solution for our energy challenges.

52472-001

Response for Document 52472

52472-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Richard Waite.

The comment tracking number that has been assigned to your comment is OSTSD52473.

Comment Date: February 27, 2008 10:22:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD52473

First Name: Richard
Middle Initial: A
Last Name: Waite
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

port the Bureau of Land Management's efforts to see that oil shale and tar sand resources are developed. The "Oil Shale, Tar Sands and Other Strategic Unconventional Fuels Act of 2005" declares that these resources be developed to reduce the nation's growing dependence on oil from politically and economically unstable foreign countries. At this point in time, it is critical for the United States to pursue a balanced energy policy that is inclusive of conventional fuels (such as oil and gas), renewable energy (such as solar and wind) and unconventional fuels (such as oil shale and tar sands).In addition to addressing our country's energy needs, developing oil shale and tar sands is certain to have additional benefits. For local communities near the affected areas, economic development opportunities are sure to arise. Oil Shale and Tar Sands can help address our nation's energy supply challenges. Please include this letter in the public comment record.

52473-001

Response for Document 52473

52473-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Joe Boucher.

The comment tracking number that has been assigned to your comment is OSTSD52474.

Comment Date: February 27, 2008 11:43:25AM
Oil Shale and Tar Sands
Comment ID: OSTSD52474

First Name: Joe
Middle Initial:
Last Name: Boucher
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to express my support for the BLM's Draft Programmatic E.I.S. for commercial oil shale and tar sands development. These resources are essential to developing our domestic energy supply. I am deeply concerned with our country's reliance on foreign energy sources, particularly when energy resources are available in this country. A strong, active shale program should be supported so as to diversify our country's energy portfolio. In addition to conventional and renewable sources of energy, oil shale and tar sands will help create a stable domestic energy supply. Development is also good for local economies in Colorado, Wyoming and Utah. These areas already provide our country with important energy resources. These areas should be explored for oil shale and tar sands, which will balance all of the resources in affected areas. 52474-001

Response for Document 52474

52474-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Philip Rangel.

The comment tracking number that has been assigned to your comment is OSTSD52475.

Comment Date: February 27, 2008 11:44:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD52475

First Name: Philip
Middle Initial:
Last Name: Rangel
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please support the Oil Shale and Tar Sands Draft PEIS. As you know, this document deals with potential commercial oil shale and tar sands development. These resources are necessary to bolstering our nation's domestic energy supply.

These resources can be developed in an environmentally sensitive manner. I hope you will continue to move forward through environmental planning processes to see that exploration of these resources happens. These resources are too important not to develop. The United States, as directed by Congress as a matter of public policy, should stay focused on diversifying our energy portfolio.

52475-001

In addition to diversifying our energy portfolio, development is also important for communities located near development areas. Development will surely help strengthen these communities.

I greatly appreciate your consideration of my views and ask that you include this letter in the public comment record.

Response for Document 52475

52475-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Claude Czencz.

The comment tracking number that has been assigned to your comment is OSTSD52476.

Comment Date: February 27, 2008 11:45:50AM
Oil Shale and Tar Sands
Comment ID: OSTSD52476

First Name: Claude
Middle Initial: J
Last Name: Czencz
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing this letter to share my support for the BLM's proposed draft of the Oil Shale & Tar Sands PEIS (programmatic environmental impact statement).

FIRST, commercial oil shale and tar sands development is important for bolstering our domestic energy resources. Our country already relies too heavily on foreign oil. In 2005, Congress made it clear that unconventional fuel sources, such as oil shale and tar sands, should be developed to address our country's energy needs. I support development and believe the PEIS is a step in the right direction.

SECOND, development of these resources is good for western communities and economies. Not only does development create jobs in the energy industry, it also creates new business opportunities. The potential economic development is important to people living out here in the West.

52476-001

FINALLY, development of these resources can be done in an environmentally sensitive manner. Those who argue otherwise are nothing more than pessimistic contrarians.

Thank you for listening to my concerns and for supporting a reasonable and sensible oil shale and tar sands development program.

Response for Document 52476

52476-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Gary Reeves.

The comment tracking number that has been assigned to your comment is OSTSD52477.

Comment Date: February 27, 2008 11:51:28AM
Oil Shale and Tar Sands
Comment ID: OSTSD52477

First Name: Gary
Middle Initial:
Last Name: Reeves
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support a robust and active oil shale and tar sands development program! Such development is critical for diversifying our country's energy portfolio. With the rising costs of energy and the United States' reliance on foreign oil, we should be doing all that we can to support domestic energy production. Conventional fuels and renewable energy sources are important, but more can and needs to be done! The 2005 Energy Policy Act clearly contains a section that directs the BLM to identify areas where unconventional fuels are present and to undertake steps to develop a commercial leasing program for oil shale and tar sands. I support the resulting document – the Oil Shale and Tar Sands Draft Programmatic EIS. 52477-001

Oil shale and tar sands, along with renewable energy sources like solar and wind, are essential for creating a stable energy supply. This stability translates into more predictable and affordable prices to U.S. consumers. This is really important to me and my neighbors. Further, development also benefits our local communities by creating economic development.

Response for Document 52477

52477-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Amy Hansen.

The comment tracking number that has been assigned to your comment is OSTSD52478.

Comment Date: February 27, 2008 13:38:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD52478

First Name: Amy
Middle Initial: M
Last Name: Hansen
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment: PEIS comments Amy Hansen.doc

Comment Submitted:

Please find attached file for comments. I think America should do as much as possible to promote the development of oil shale and tar sands. See Attachment.

Oil Shale and Tar Sands PEIS Comments
February 27, 2008

To Whom It May Concern:

As a working mother of three children, I am writing to express my concern about the lack of effort by U.S. Government leaders to end America's dependence on foreign oil. I think more must be done to encourage the development of domestic energy sources.

Everyday, our family, like millions of other families, begins our busy day by getting ready for school and work. My husband and I help our children with their homework and then it's carpooling for ballet and soccer lessons. My husband and I work very hard so that our kids can take advantage of the opportunities afforded us in this great country. We stretch each dollar as far as it can possibly stretch and are grateful for the blessings our family enjoys.

I feel compelled to express my concern, today, because our family life, similar to millions of other families, is threatened more and more each day. The cost of living is out of control, and much of it is driven by the rising price of oil. Not only is it reflected in the price of a gallon of gas, but in the groceries I buy to feed my family. Skyrocketing oil prices directly affects the cost of milk because it costs the delivery person more to fill his fuel tank.

Earlier this month a Newsweek journalist interviewed FEDEX founder Fred Smith, who is on a mission to advocate greater American energy independence. In the article, Smith says, "The country's continued and increasing dependence on imported petroleum has created an enormous economic and national-security risk probably second only to terrorism and the proliferation of weapons of mass destruction." 52478-001

This is a very frightening and eye-opening statement. And while I understand that a loud and extreme group of environmentalists are righteous in their cause and have stopped drilling in ANWAR, and fight new exploration and energy development, they are perpetuating America's national security risk. These extreme environmentalists fight many new BLM lease applications for drilling oil and gas in the west. The extremists keep trumpeting a deafening message of "development is bad and is devastating our earth" However, there must be more to the discussion, more that will allow the families of America a safe and sound existence.

I've been doing some research of my own. In an address to a small business conference in Vernal, Utah in 2006, Kathleen Clarke, former Director of the BLM reported that less than one tenth of on percent of BLM land is disturbed due to energy development or resource extraction. I have also become aware of many reclamation projects spearheaded by developers that have reclaimed affected land. For example, Kennecott Utah Copper has spent millions of dollars to reclaim Butterfield Canyon with re-forestation programs. Natural gas wellheads on BLM land are minimal, capped and camouflaged to match the surroundings and the land is re-vegetated once the well is producing.

Federal, state and local government agencies, environmental groups and industry are pro-actively working together to ensure proper reclamation. In most cases, a disturbed area is left in better condition than before the development took place. These groups continue to work together and the solutions they utilize have been successful.

If America is going to become energy secure, leaders need to steer clear of the extreme groups who have no interest in working together to find solutions to the energy crisis in this country. We need to ignore the extremists who say that developing unconventional fuel resources and being good stewards to the environment are mutually exclusive issues. We should reject those who would use political tactics that on the surface seem like the correct path to follow and the "feel good choice," but in truth undermines progress at every turn.

We need to embrace and encourage those who are dedicated and tireless in finding a solution to reducing America's dependence on foreign oil. We must embrace those who visualize a diverse set of energy sources including conventional and unconventional fuel sources such as oil shale and tar sands as well as renewables such as wind, solar, and geothermal and other alternatives. We must embrace American leaders who see that resource development and environmental stewardship can reside together in an overall solution to our energy security.

52478-001
(cont.)

In conclusion, I believe our children should have a safe existence and a healthy environment. I want my kids to be able to raise their own families, be able to buy affordable groceries and drive their own children's carpools. It is my great hope they can live in a state where the natural resources can be responsibly developed allowing a safer and more secure country.

America has the resources and the ability to develop unconventional fuel resources like coal to liquid, oil shale and tar sands, renewable energy and to develop new technologies more compatible for a clean environment. It will take all of these efforts to dig America out of the grave situation we find ourselves in today.

Sincerely,

Amy M. Hansen

I

Response for Document 52478

52478-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Jeramy McLoud.

The comment tracking number that has been assigned to your comment is OSTSD52479.

Comment Date: February 27, 2008 13:57:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD52479

First Name: Jeramy
Middle Initial:
Last Name: McLoud
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I recently became aware of the BLM's efforts to amend 12 land use plans in three states – Colorado, Wyoming and Utah – to explore the most geologically prospective areas where oil shale and tar sands resources are present and which of those lands should be open for development. I support the BLM's Oil Shale/Tar Sands Draft Programmatic Environmental Impact Statement (OSTS PEIS) because these resources are important for supporting domestic energy.

I am concerned with our country's reliance on conventional fuels, particularly because these fuels are provided by politically and economically unstable countries (example: Middle East). I agree that renewable energy resources are important, but I do not think we should neglect the potential opportunities that oil shale and tar sands development could offer. Not only would these resources bolster our domestic energy supply – they would diversify our country's energy portfolio. 52479-001

In addition to addressing our country's energy needs, I support development because it would benefit numerous communities in Colorado, Wyoming and Utah. I respectfully ask that you consider these impacts as well as you proceed in the planning process.

Response for Document 52479

52479-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Dan Graffis.

The comment tracking number that has been assigned to your comment is OSTSD52480.

Comment Date: February 27, 2008 13:59:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD52480

First Name: Dan
Middle Initial:
Last Name: Graffis
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

To Whom It May Concern:

I am writing to express my support for the Bureau of Land Management's Oil Shale and Tar Sands Programmatic Environmental Impact Statement. The oil shale and tar sands resources scattered across Wyoming, Colorado and Utah are paramount to ensuring our homegrown energy supply.

Across the news these past few weeks have been reports from the Venezuelan president threatening to cut off American's supply of energy unless we complied with their wishes. It's disgusting that we are in a position where other countries can make demands such as this. Now more than ever we need to reduce our over-reliance on foreign sources of energy. And we have that resource, right here in our back yard! A strong, active shale program should be supported so as to diversify our country's energy portfolio. In addition to conventional and renewable sources of energy, oil shale and tar sands will help create a stable domestic energy supply. 52480-001

The oil shale and tar sands development will benefit local economies in Colorado, Wyoming and Utah. These areas already provide our country with important energy resources. These areas should be explored for oil shale and tar sands, which will balance all of the resources in affected areas.

In short, I support the BLM's decision to conduct a PEIS for oil shale and tar sands development. Please keep moving forward and keep me informed on the process.

Response for Document 52480

52480-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, David Breckenridge-Reast.

The comment tracking number that has been assigned to your comment is OSTSD52481.

Comment Date: February 27, 2008 14:00:46PM
Oil Shale and Tar Sands
Comment ID: OSTSD52481

First Name: David
Middle Initial:
Last Name: Breckenridge-Reast
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Thank you for taking the time to review my comment. I support the Oil Shale and Tar Sands Draft PEIS and I think that the BLM should also support the process.

The oil shale and tar sands resources could be a shot in the arm for our lagging economy. These resources are necessary to bolstering our nation's domestic energy supply.

These resources will be developed in an environmentally sensitive manner. I hope you will continue to move forward through environmental planning processes to see that exploration of these resources happens. These resources are too important not to develop. Our policy makers have made it clear that we should stay focused on diversifying our energy portfolio.

52481-001

In addition to diversifying our energy portfolio, development will also be the proverbial shot in the arm for communities located near development areas.

I greatly appreciate your consideration of my views and ask that you include this letter in the public comment record.

Response for Document 52481

52481-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Damian Bennett.

The comment tracking number that has been assigned to your comment is OSTSD52482.

Comment Date: February 27, 2008 14:02:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD52482

First Name: Damian
Middle Initial:
Last Name: Bennett
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing this letter to share my support for the Bureau of Land Management's draft Oil Shale and Tar Sands programmatic environmental impact statement.

To begin with, commercial oil shale and tar sands development is important for bolstering our domestic energy resources. Our country already relies too heavily on foreign oil. In 2005, Congress made it clear that unconventional fuel sources, such as oil shale and tar sands, should be developed to address our country's energy needs. The unconventional fuel source measures proposed by Congress passed with bipartisan support; if it gets a nod from both sides of the aisle, then I support development and believe the PEIS is a step in the right direction.

The development of the oil shale and tar sands will also be really good for western communities and economies. Development of these resources will create new business opportunities and in turn create new jobs. I don't know if you are aware, but many of the communities in the three oil shale rich states (Wyo, Colo, Uta) rely on energy-related jobs to help keep the economies diverse and vibrant. Here in Western Colorado, we are able to have many different (less revenue producing) industries because energy creates a firm safety net for our economy. Oil shale will help to keep our cities and towns strong. 52482-001

Lastly, I know that the development of oil shale and tar sands can be done in a manner that protects this land that we love so dear. The overall proposed acreage is less than 2 million acres. That sounds like a lot, but there are over 1 million acres of land in Mesa County, Colorado. Spread over three states, 1.99 million acres isn't that much and won't leave a huge footprint of devastation.

Response for Document 52482

52482-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Michael Hansen.

The comment tracking number that has been assigned to your comment is OSTSD52483.

Comment Date: February 27, 2008 14:03:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD52483

First Name: Michael
Middle Initial:
Last Name: Hansen
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I, like many Americans, am an energy consumer. And I can't tell you how irked I get when there are massive shifts in energy prices. Its so important to make sure we have a steady STABLE supply of energy. It's also important to have a diverse sources of energy. In addition to pursuing natural gas and oil resources, I support alternative energy resources and unconventional sources such as oil shale and tar sands. It is the last of the energy resources that I would like to discuss. Oil shale and tar sands development is critical for diversifying our country's energy portfolio.

The costs of energy have been steadily rising and it seems that our reliance on foreign sources of oil has also been increasing. Conventional fuels and renewable energy sources are important, but more can and needs to be done. And need to be done today! The 2005 Energy Policy Act clearly contains a section that directs the BLM to identify areas where unconventional fuels are present and to undertake steps to develop a commercial leasing program for oil shale and tar sands. I support the resulting document – the Oil Shale and Tar Sands Draft Programmatic EIS. 52483-001

Oil shale and tar sands, along with renewable energy sources like solar and wind, are essential for creating a stable energy supply. This stability translates into more predictable and affordable prices to U.S. consumers. This is really important to me and my neighbors. Further, development also benefits our local communities by creating economic development.

Response for Document 52483

52483-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Kenneth Bloomquist.

The comment tracking number that has been assigned to your comment is OSTSD52484.

Comment Date: February 27, 2008 14:04:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD52484

First Name: Kenneth
Middle Initial:
Last Name: Bloomquist
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the BLM's Oil Shale/Tar Sands Draft Programmatic Environmental Impact Statement (OSTS PEIS) because these resources are important for supporting domestic energy. The BLM's efforts to amend 12 land use plans in three states – Colorado, Wyoming and Utah should continue. The necessity to explore the most geologically prospective areas where oil shale and tar sands resources present is critical.

I am concerned with our country's reliance on conventional fuels, particularly because these fuels are provided by politically and economically unstable countries. Of course renewable energy sources are important but we shouldn't overlook the importance of unconventional resources in our race to an alternative energy future. Not only would these resources help our domestic energy supply – they would diversify our country's energy portfolio.

52484-001

In addition to addressing our country's energy needs, I support development because it would benefit numerous communities in Colorado, Wyoming and Utah. I respectfully ask that you consider these impacts as well as you proceed in the planning process.

To reiterate, I support the BLM's Oil Shale/Tar Sands Draft Programmatic Environmental Impact Statement (OSTS PEIS) because these resources are important for supporting domestic energy.

Response for Document 52484

52484-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Jimmy Sexton.

The comment tracking number that has been assigned to your comment is OSTSD52485.

Comment Date: February 27, 2008 14:05:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52485

First Name: Jimmy
Middle Initial:
Last Name: Sexton
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Thank you for the opportunity to voice my comments of the Draft Programmatic E.I.S. for commercial oil shale and tar sands.

I support the steps to create commercial oil shale and tar sands program because the resources are essential to developing our domestic energy supply.

I am deeply concerned with our country's reliance on foreign energy sources, particularly when energy resources are available in this country. A strong, active shale program should be supported so as to diversify our country's energy portfolio. 52485-001

Development is also good for local economies in Colorado, Wyoming and Utah. These areas already provide our country with important energy resources. These areas should be explored for oil shale and tar sands, which will balance all of the resources in affected areas.

Response for Document 52485

52485-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Peter Manning.

The comment tracking number that has been assigned to your comment is OSTSD52486.

Comment Date: February 27, 2008 14:06:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD52486

First Name: Peter
Middle Initial:
Last Name: Manning
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please support the Oil Shale and Tar Sands Draft PEIS. As you know, this document deals with potential commercial oil shale and tar sands development. These resources are necessary to bolstering our nation's domestic energy supply. In addition to diversifying our energy portfolio, development is also important for communities located near development areas. Development will surely help strengthen these communities. These resources can be developed in an environmentally sensitive manner. I hope you will continue to move forward through environmental planning processes to see that exploration of these resources happens. These resources are too important not to develop. The United States, as directed by Congress as a matter of public policy, should stay focused on diversifying our energy portfolio. 52486-001

Response for Document 52486

52486-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Mark Hisel.

The comment tracking number that has been assigned to your comment is OSTSD52487.

Comment Date: February 27, 2008 14:07:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52487

First Name: Mark
Middle Initial:
Last Name: Hisel
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing this letter to show my support for the BLM's proposed draft of the Oil Shale & Tar Sands PEIS (programmatic environmental impact statement). I support the program for the following reasons:

• commercial oil shale and tar sands development is important for bolstering our domestic energy resources. Our country already relies too heavily on foreign oil.

• development of these resources is good for western communities and economies. Not only does development create jobs in the energy industry, it also creates new business opportunities. The potential economic development is important to people living out here in the West. 52487-001

• development of these resources can be done in an environmentally sensitive manner. Those who argue otherwise are nothing more than pessimistic contrarians.

I support development and believe the PEIS is a step in the right direction.

Response for Document 52487

52487-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, James Pallack.

The comment tracking number that has been assigned to your comment is OSTSD52488.

Comment Date: February 27, 2008 14:08:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52488

First Name: James
Middle Initial: R
Last Name: Pallack
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support a robust and active oil shale and tar sands development program because it is critical for diversifying our country's energy portfolio.

With the rising costs of energy and the United States' reliance on foreign oil, we should be doing all that we can to support domestic energy production.

Oil shale and tar sands, along with renewable energy sources like solar and wind, are essential for creating a stable energy supply. 52488-001

This stability translates into more predictable and affordable prices to U.S. consumers. This is really important to me and my neighbors.

Further, development also benefits our local communities by creating economic development.

Response for Document 52488

52488-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Michael Osborn.

The comment tracking number that has been assigned to your comment is OSTSD52489.

Comment Date: February 27, 2008 14:10:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD52489

First Name: Michael
Middle Initial:
Last Name: Osborn
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the BLM's Oil Shale/Tar Sands Draft Programmatic Environmental Impact Statement (OSTS PEIS) because these resources are important for supporting domestic energy.

I am concerned with our country's reliance on conventional fuels, particularly because these fuels are provided by politically and economically unstable countries. 52489-001

In addition to addressing our country's energy needs, I support development because it would benefit numerous communities in Colorado, Wyoming and Utah.

I respectfully ask that you consider these impacts as well as you proceed in the planning process. 52489-002

Responses for Document 52489

52489-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52489-002: Estimates of the economic impacts of oil shale and tar sands power plant and coal mine facility development on direct and indirect employment and income in each ROI indicate that oil shale, tar sands, and ancillary facility development would provide substantial employment and income in each ROI, together with higher wages for some occupations. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities.

Thank you for your comment, Kevin Cave.

The comment tracking number that has been assigned to your comment is OSTSD52490.

Comment Date: February 27, 2008 14:11:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD52490

First Name: Kevin
Middle Initial:
Last Name: Cave
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to express my support for the Bureau of Land Management's Oil Shale and Tar Sands Programmatic Environmental Impact Statement. The oil shale and tar sands resources scattered across Wyoming, Colorado and Utah are paramount to ensuring our homegrown energy supply. The oil shale and tar sands development will benefit local economies in Colorado, Wyoming and Utah. These areas already provide our country with important energy resources. These areas should be explored for oil shale and tar sands, which will balance all of the resources in affected areas. I support the BLM's decision to conduct a PEIS for oil shale and tar sands development. Please keep moving forward and keep me informed on the process. 52490-001

Response for Document 52490

52490-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Al Murray.

The comment tracking number that has been assigned to your comment is OSTSD52491.

Comment Date: February 27, 2008 14:15:19PM
Oil Shale and Tar Sands
Comment ID: OSTSD52491

First Name: Al
Middle Initial:
Last Name: Murray
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Thank you for taking the time to review my comment. I support the Oil Shale and Tar Sands Draft PEIS and I think that the BLM should also support the process.

These resources will be developed in an environmentally sensitive manner. I hope you will continue to move forward through environmental planning processes to see that exploration of these resources happens. These resources are too important not to develop. Our policy makers have made it clear that we should stay focused on diversifying our energy portfolio. In addition to diversifying our energy portfolio, development will also help communities located near development areas.

52491-001

I greatly appreciate your consideration of my views and ask that you include this letter in the public comment record.

Response for Document 52491

52491-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Ben Compton.

The comment tracking number that has been assigned to your comment is OSTSD52492.

Comment Date: February 27, 2008 14:16:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52492

First Name: Ben
Middle Initial:
Last Name: Compton
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support for the Bureau of Land Management's draft Oil Shale and Tar Sands programmatic environmental impact statement. Commercial oil shale and tar sands development is important for bolstering our domestic energy resources. Our country already relies too heavily on foreign oil. In 2005, Congress made it clear that unconventional fuel sources, such as oil shale and tar sands, should be developed to address our country's energy needs. The unconventional fuel source measures proposed by Congress passed with bipartisan support; if it gets a nod from both sides of the aisle, then I support development and believe the PEIS is a step in the right direction. The development of the oil shale and tar sands will also be really good for western communities and economies. Development of these resources will create new business opportunities and in turn create new jobs. I don't know if you are aware, but many of the communities in the three oil shale rich states rely on energy-related jobs to help keep the economies diverse and vibrant. I know that the development of oil shale and tar sands can be done in a manner that protects this land that we love so dear.

52492-001

Response for Document 52492

52492-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Brian Simmons.

The comment tracking number that has been assigned to your comment is OSTSD52493.

Comment Date: February 27, 2008 14:18:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52493

First Name: Brian
Middle Initial:
Last Name: Simmons
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Oil shale and tar sands development is critical for diversifying our country's energy portfolio. The costs of energy have been steadily rising and it seems that our reliance on foreign sources of oil has also been increasing. Oil shale and tar sands, along with renewable energy sources like solar and wind, are essential for creating a stable energy supply. 52493-001

Response for Document 52493

52493-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Steve Arter.

The comment tracking number that has been assigned to your comment is OSTSD52494.

Comment Date: February 27, 2008 14:19:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD52494

First Name: Steve
Middle Initial:
Last Name: Arter
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the BLM's Oil Shale/Tar Sands Draft Programmatic Environmental Impact Statement (OSTS PEIS) because these resources are important for supporting domestic energy. The necessity to explore the most geologically prospective areas where oil shale and tar sands resources present is critical. | 52494-001

I support development because it would benefit numerous communities in Colorado, Wyoming and Utah. I respectfully ask that you consider these impacts as well as you proceed in the planning process. | 52494-002

I support the BLM's Oil Shale/Tar Sands Draft Programmatic Environmental Impact Statement (OSTS PEIS) because these resources are important for supporting domestic energy. | 52494-001 (cont.)

Responses for Document 52494

52494-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52494-002: Estimates of the economic impacts of oil shale and tar sands power plant and coal mine facility development on direct and indirect employment and income in each ROI indicate that oil shale, tar sands, and ancillary facility development would provide substantial employment and income in each ROI, together with higher wages for some occupations. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities.

Thank you for your comment, Ryan Northrop.

The comment tracking number that has been assigned to your comment is OSTSD52495.

Comment Date: February 27, 2008 14:20:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52495

First Name: Ryan
Middle Initial:
Last Name: Northrop
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Oil Shale and Tar Sands can help address our nation's energy supply challenges. I write to support the Bureau of Land Management's efforts to see that these resources are developed. Please include this letter in the public comment record.

The "Oil Shale, Tar Sands and Other Strategic Unconventional Fuels Act of 2005" (included in the Energy Policy Act) declares that these resources be developed to reduce the nation's growing dependence on oil from politically and economically unstable foreign countries. I support this Act and was pleased to see the Bureau of Land Management's efforts to draft a Programmatic Environmental Impact Statement that would allow for exploration and potential commercial leasing in the Green River Formation (located in the Colorado-Utah-Wyoming region). At this point in time, it is critical for the United States to pursue a balanced energy policy that is inclusive of conventional fuels (such as oil and gas), renewable energy (such as solar and wind) and unconventional fuels (such as oil shale and tar sands). 52495-001

In addition to addressing our country's energy needs, developing oil shale and tar sands is certain to have additional benefits. For local communities near the affected areas, economic development opportunities are sure to arise. For energy consumers throughout the country, development of oil shale and tar sands also would mean a more predictable, stable supply of energy, which would hopefully translate into more affordable prices.

Response for Document 52495

52495-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, David Jenkins.

The comment tracking number that has been assigned to your comment is OSTSD52496.

Comment Date: February 27, 2008 14:22:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD52496

First Name: David
Middle Initial:
Last Name: Jenkins
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the BLM's Draft Programmatic EIS for commercial oil shale and tar sands development. Although unconventional, these resources can greatly help address our domestic energy needs and can be developed in an environmentally responsive manner.

There is no question that the cost of energy is important to a lot of people in the United States. Families, businesses and industry are all paying more for energy. Our domestic supply is stretched and consequently, we have developed an unhealthy reliance on foreign oil. Sadly, many of these foreign countries that provide us with energy are politically and economically unstable. It makes little sense to continue to allow the current situation to continue.

As a matter of the utmost important public policy, the United States should remain committed to developing domestic energy sources, which includes oil shale and tar sands. The BLM's Draft Programmatic EIS is a step in that direction and should be supported. I hope the interested parties who participated in the scoping process (some 5,000 comments) are serious about supporting domestic energy production and are not just paying lip service to the concept. Supporting domestic energy means looking at the greatest area possible where oil shale and tar sands may be present. Those who would limit these areas, in my view, are not serious about supporting domestic energy production.

Oil shale and tar sands provide a more balanced solution for our energy challenges.

52496-001

Response for Document 52496

52496-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Joe Gant.

The comment tracking number that has been assigned to your comment is OSTSD52497.

Comment Date: February 27, 2008 14:23:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD52497

First Name: Joe
Middle Initial:
Last Name: Gant
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Our country's energy demands require attention and action! We can't afford to rely on foreign countries, particularly from the Middle East, to meet our energy demands. These countries are politically unstable and their attitude toward our country is even more troublesome. I support the OSTS PEIS Draft (Oil Shale Tar Sands Programmatic Environmental Impact Statement) which would allow for domestic exploration and commercial leasing of unconventional resources.

Throughout the West, particularly in Wyoming, Colorado and Utah, energy resources have provided our country with a reliable source of energy. The federal government has a responsibility and duty to expand reasonable and responsible access to our nation's energy resources in order to reduce our reliance on foreign energy imports. With the rising costs and tight supply of energy, the federal government should be doing all it can to promote domestic energy production, rather than relying on foreign countries to meet our need. With all due respect, I fail to understand the so-called "environmentalist" philosophy that would rather see no new domestic energy projects. We have some of the best environmental laws in the world and I would rather see production occur here, where environmental concerns are addressed, rather than the Middle East where environmental laws are non-existent. 52497-001

Beyond energy demands, I would only add that oil shale and tar sands development can bring important economic development opportunities to local western communities.

Response for Document 52497

52497-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, John Ansbro.

The comment tracking number that has been assigned to your comment is OSTSD52498.

Comment Date: February 27, 2008 14:24:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52498

First Name: John
Middle Initial:
Last Name: Ansbro
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

It is important now more than ever for the Bureau of Land Management to pursue a balanced energy solution. This solution should include development of alternative sources of energy, like oil shale and tar sands. As such, I write to ask that the Bureau of Land Management move forward with the Oil Shale and Tar Sands Draft Programmatic Environmental Impact Statement

Developing these resources is essential to help meet our nation's domestic energy needs. The Bureau of Land Management should investigate and analyze the many positive impacts to the American people that would result in developing these valuable resources. With our nation's high energy demands and tight supply, it is no wonder that energy prices are expensive. These costs not only impact businesses and industries; families are also feeling the pinch. Rather than relying on foreign oil, our nation should step up its development of domestic energy. Tar sand and oil shale should be developed to help address energy supply and it will also diversify our nation's energy portfolio.

52498-001

I appreciate your consideration of my letter and support for the Oil Shale and Tar Sands Draft Programmatic Environmental Impact Statement.

Response for Document 52498

52498-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Ben Elliss.

The comment tracking number that has been assigned to your comment is OSTSD52499.

Comment Date: February 27, 2008 14:25:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD52499

First Name: Ben
Middle Initial:
Last Name: Elliss
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the BLM's commercial shale and tar sands development proposal (Oil Shale and tar Sand PEIS). It is essential that these products be developed to help meet our country's energy needs.

Consumers, industries and businesses throughout this country have been hit hard with increasing energy prices. This increase results from tight supply. To increase supply, I think it is much more prudent to develop energy resources domestically, rather than increase our reliance on foreign imports – particularly from countries that have animosity towards the United States. Ideally, we could rely more on renewable energy to help domestic supply. However, the technology for these resources still needs to mature before they can contribute significantly to our domestic energy needs. Oil shale and other non-conventional fuels can help address our country's energy challenges. 52499-001

The proposal identifies a few million acres where oil shale and tar sands are most likely present. These lands can and should support development. I commend the BLM for putting together a comprehensive plan to open these lands for exploration and commercial leasing.

Our country's energy demands require action. Please do not let development plans be derailed by special interest groups.

Response for Document 52499

52499-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52500.

Comment Date: February 27, 2008 14:30:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52500

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I've read through the various alternatives regarding oil shale and tar sands in the PEIS and I have to say Alternative C would be nothing but a detriment to Western economies. Under no circumstance should the BLM choose Alternative C. I think Alternative B should be implemented. I also think that as we move forward with a national tar sands and oil shale program, local governments should be included in the planning process for both the benefit of the BLM and the local governing bodies. 52500-001

Response for Document 52500

52500-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Todd Smith.

The comment tracking number that has been assigned to your comment is OSTSD52501.

Comment Date: February 27, 2008 14:53:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD52501

First Name: Todd
Middle Initial:
Last Name: Smith
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support commercial development of oil shale and tar sands in the United States. Thanks to the BLM for its work in drafting the Programmatic Environmental Impact Statement. This is an important beginning to allow for development of unconventional fuels to greatly help address our country's energy needs. I am deeply concerned about our country's reliance on foreign oil and support reasonable and responsible development of energy resources in the United States.

In my opinion, oil shale and tar sands can be developed in a way that is conscientious of environmental concerns. However, I am sure there are critics who would argue that development will forever ruin the environment. I hope the BLM is not persuaded by these types of scare tactics. If the BLM does not allow oil shale and tar sand development to occur, I ask that the BLM justify its actions as doing so will continue, if not increase, our country's reliance on foreign sources of oil. In my view, this is unacceptable.

52501-001

Response for Document 52501

52501-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Ted Salazar.

The comment tracking number that has been assigned to your comment is OSTSD52502.

Comment Date: February 27, 2008 14:58:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52502

First Name: Ted
Middle Initial:
Last Name: Salazar
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

A robust and active oil shale program is important for strengthening communities and reducing our dependence on foreign oil. After reviewing the Oil Shale and Tar Sands PEIS, I wanted to take a moment to express my support for commercial development of these resources on public lands located throughout the Colorado, Utah and Wyoming region. These resources can be developed in an environmentally sound manner.

With the rising cost of energy, our federal government has a duty to support innovative solutions to address our energy challenges. Supporting renewable energy and unconventional fuels falls into that category. Despite the potential benefits of unconventional fuels like oil shale and tar sands, I am aware of opponents who are fighting against this development. I hope that the Bureau of Land Management continues to move forward with a plan to allow for development of oil shale and tar sands. However, if the Bureau of Land Management chooses a "no-action" position, I would ask that the agency explain how such a decision would affect our reliance on foreign oil and the effect such a decision would have on energy prices for American families. I would suspect that our reliance on foreign oil would increase, as would the cost of energy. 52502-001

I am counting on the Bureau of Land Management to do the reasonable and responsible thing – support commercial development of oil shale and tar sands.

Response for Document 52502

52502-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Glen Shannon.

The comment tracking number that has been assigned to your comment is OSTSD52503.

Comment Date: February 27, 2008 15:06:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD52503

First Name: Glen
Middle Initial:
Last Name: Shannon
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I think commercial development of oil shale and tar sands is a good thing for the United States and for the American people. With the rising costs of energy, the federal government has an obligation to support efforts that will ease our current tight energy supply. In this regard, I am writing to encourage the Bureau of Land Management to continue supporting new technologies to develop unconventional resources like oil shale and tar sands. The Oil Shale – Tar Sands Programmatic Environmental Impact Statement (OSTS PEIS) was developed to further a congressional objective explained in the 2005 Energy Policy Act – to develop oil shale and tar sands as strategically important domestic resources that will help reduce the nation's growing dependence on oil from politically and economically unstable foreign sources. I agree with this important policy objective – our reliance on foreign oil is out of hand. 52503-001

If for some reason the BLM were to decide against development of oil shale and tar sands, I would certainly expect the BLM to justify such a decision in writing. In my opinion, such a decision would inevitably increase our reliance on foreign oil, or at the very least, maintain the status quo. 52503-002

Responses for Document 52503

52503-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52503-002: Thank you for your comment. As required by 40 CFR 1505.2, the BLM will prepare a concise public record of its decisions, which will include the rationale for that decision.

Thank you for your comment, Danny Samples.

The comment tracking number that has been assigned to your comment is OSTSD52504.

Comment Date: February 27, 2008 15:07:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52504

First Name: Danny
Middle Initial:
Last Name: Samples
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Thank you to the BLM for drafting the Oil Shale and Tar Sands Programmatic Environmental Impact Statement (PEIS). I support commercial development of these resources for several reasons. First, I think that environmentally responsible energy development is good for local economies located near development areas (often, such development helps rural communities). 52504-001

Second, I support development as a means to help reduce our reliance on foreign oil. I am uncomfortable with the fact that the United States relies so heavily on politically unstable countries for oil. Energy independence should be a serious priority for government leaders in this country. If the BLM were to decide against supporting development of oil shale and tar sands, I would expect the BLM to fully explain its reasoning behind such a decision. Such a decision would undoubtedly do little to help address our nation's domestic energy challenges or would reduce our reliance on foreign oil. Thank you for reviewing my comments. I also ask that this letter be included in the public record on the PEIS. 52504-002

Responses for Document 52504

52504-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52504-002: Thank you for your comment. As required by 40 CFR 1505.2, the BLM will prepare a concise public record of its decision, which will include the rationale for that decision.

Thank you for your comment, Valerie Friedman.

The comment tracking number that has been assigned to your comment is OSTSD52505.

Comment Date: February 27, 2008 15:08:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD52505

First Name: Valerie
Middle Initial: G
Last Name: Friedman
Organization:
Address: 7948 Snowberry Circle
Address 2:
Address 3:
City: Orlando
State: FL
Zip: 32819
Country: USA
Email: valgale795@cfl.rr.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

RE: Dumping oil shale and tar sands on public land. What happened? Did you already run out of poor cummunities to dump this awful stuff on? PUBLIC Lands should not be used for PRIVATE interests. The fact that this is even being considered is disgusting. | 52505-001

Response for Document 52505

52505-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gary Smith.

The comment tracking number that has been assigned to your comment is OSTSD52506.

Comment Date: February 27, 2008 15:08:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52506

First Name: Gary
Middle Initial:
Last Name: Smith
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please support oil shale and tar sands development!! I have reviewed the Oil Shale & Tar Sands Programmatic Environmental Impact Statement and was pleased to see the Bureau of Land Management providing a road map to allow for development of these important resources in the Green River Formation. Developing unconventional fuels can help bolster our nation's domestic energy supply, which provides greater energy security and more affordable prices for American energy consumers.

Despite the important benefits of development, there is no doubt in my mind that your office has received letters from people who do not want to see these resources developed. This mentally is out-of-touch with reality. If these types of resources are not developed domestically, where else will we get our energy? To me, increasing our already unhealthy reliance on foreign oil is the least desirous option!! Oil shale and tar sands can be developed under a plan that is also environmentally sound. 52506-001

Please also keep in mind that Congress made it clear in the Energy Policy Act of 2005 that these types of resources be developed. If the BLM does not allow for development, I respectfully request that the BLM justify a path that will certainly increase our reliance on foreign oil. 52506-002

Responses for Document 52506

52506-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52506-002: Thank you for your comment.

Thank you for your comment, Stanley Klickner Jr..

The comment tracking number that has been assigned to your comment is OSTSD52508.

Comment Date: February 27, 2008 16:33:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD52508

First Name: Stanley
Middle Initial: E
Last Name: Klickner Jr.
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am a supporter of environmentally sound energy development projects. I write to share my support for development of oil shale and tar sands in the Green River Formation, an area covering some two million acres in the Colorado-Utah-Wyoming region. Oil shale and tar sands can help strengthen our national energy security and make up for the decline of traditional oil production in the United States.

52508-001

I am glad to see that the BLM is developing a plan to tap these unconventional resources. Our federal government really should be supporting the use of new technologies, such as those to tap unconventional sources like oil shale and tar sands. These resources can help establish a more balanced national energy portfolio.

In conclusion, I would also ask that the BLM carefully consider the needs of local communities and the impact that development would have local economies. As someone who lives and works in this area, I can tell you first hand that energy development projects mean good paying jobs and they create economic development opportunities for rural communities that need it the most.

52508-002

Responses for Document 52508

52508-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52508-002: Estimates of the economic impacts of oil shale and tar sands power plant and coal mine facility development on direct and indirect employment and income in each ROI indicate that oil shale, tar sands, and ancillary facility development would provide substantial employment and income in each ROI, together with higher wages for some occupations. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities.

Thank you for your comment, William Holland.

The comment tracking number that has been assigned to your comment is OSTSD52509.

Comment Date: February 27, 2008 16:35:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD52509

First Name: William
Middle Initial:
Last Name: Holland
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Your team has an important task to implement the objectives set forth in the 2005 Energy Policy Act to see that unconventional energy resources, such as oil shale and tar sands are developed. I have reviewed the "Oil Shale and Tar Sands Programmatic Environmental Impact Statement" (OSTS PEIS) Draft and wanted to express my support for commercial development of these resources. At this point in time, our country must become more supportive of innovative ideas that will help address our nation's energy needs. Relying on foreign countries that are antagonistic towards the United States is foolish and dangerous. 52509-001

There is a strong need to develop unconventional hydrocarbon resources in the United States to compensate for declining domestic oil production. Our nation's energy security is at stake. Although it would be nice to rely more on renewable energy sources, the technology for these resources still needs time to mature before than can significantly contribute to our domestic energy needs.

Sincerely,

William Holland

Response for Document 52509

52509-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Vince Duckworth.

The comment tracking number that has been assigned to your comment is OSTSD52510.

Comment Date: February 27, 2008 16:37:46PM
Oil Shale and Tar Sands
Comment ID: OSTSD52510

First Name: Vince
Middle Initial:
Last Name: Duckworth
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support commercial development of oil shale and tar sands in Wyoming, Colorado and Utah. Unconventional hydrocarbon fuels should be developed to offset the decline of tradition oil production in the United States. I am concerned and frustrated with our country's current reliance on foreign oil. As a matter of public policy, the United States government should support developing new technologies that make unconventional sources like oil shale and tar sands more viable.

The OSTS PEIS or Oil Shale Tar Sands Programmatic Environmental Impact Statement is an important beginning to allow for development of these resources. This document illustrates that development can occur in an environmentally responsible way. I understand that your office is in the process of receiving comments from the public on the OSTS PEIS. Please know that I support making the largest amount of potential resources available for application for leasing, while still providing for an environmentally sound program. The preferred alternative is reasonable, as it would also provide the greatest flexibility in locating future development sites. 52510-001

As someone familiar with this area, I am encouraged to see another resource that could help alleviate our reliance on foreign oil. It is important for your office to support efforts to develop new technologies to tap unconventional resources, like oil shale and tar sands in the United States.

Response for Document 52510

52510-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Curtis Ness.

The comment tracking number that has been assigned to your comment is OSTSD52511.

Comment Date: February 27, 2008 16:39:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD52511

First Name: Curtis
Middle Initial:
Last Name: Ness
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Thanks to the U.S. Bureau of Land Management for developing a reasonable and responsible plan that will help reduce our nation's dependence on foreign oil!! After reviewing the Oil Shale – Tar Sands PEIS, which would allow for development of these unconventional fuels in parts of Colorado, Wyoming and Utah, I wanted to express my support for commercial development. Development of these resources is essential to strengthening our nation's energy security in the future.

We are very lucky in the United States to have vast energy resources available domestically. Other countries are not as fortunate. Although traditional oil production is still important, I think it is essential to also develop unconventional resources to address our nation's energy needs. Oil shale and tar sands can be developed in a way that is environmentally sound and I appreciate the PEIS as a first step toward establishing a plan for that development. 52511-001

Please do not be influenced by naysayers who do not want to see any increase in domestic energy production. We simply cannot afford to pass up on opportunities to develop energy at home while increasing our reliance on foreign oil. Please support this plan and other measures that will promote development of new technologies to tap unconventional resources, like oil shale and tar sands. Thank you.

Response for Document 52511

52511-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52512.

Comment Date: February 27, 2008 16:40:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD52512

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I support domestic development of energy resources as a way to bolster our domestic energy supply. It is important for our government to support the development of new technologies, such as those to tap unconventional energy sources like oil shale and tar sands. Thus, I am writing to ask that the BLM continue to support development of oil shale and tar sands in the Draft PEIS, which would allow for development in Colorado, Wyoming and Utah.

Development of these resources is critical to decreasing the United State's dependence on foreign oil and for strengthening national energy security. There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands to offset the decline of traditional oil production. 52512-001

American consumers are feeling the pinch of a tight energy supply. With the rising costs of energy, our country should be doing more to support new domestic energy resources. Oil shale and tar sands can be developed in a way that still provides for an environmentally sound program. Please support this and other unconventional energy resources.

Response for Document 52512

52512-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Vincent Taylor.

The comment tracking number that has been assigned to your comment is OSTSD52513.

Comment Date: February 27, 2008 16:41:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD52513

First Name: Vincent
Middle Initial:
Last Name: Taylor
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support commercial development of oil shale and tar sands and appreciate the BLM's work in putting together the Programmatic Environmental Impact Statement ("PEIS"). Please move forward with a plan that allows for the largest amount of potential resources available for application for leasing. 52513-001

More importantly, I would also like to ask that the PEIS be amended to elaborate on the socioeconomic benefits associated with development. The Economic Impact Section could be expanded to describe the benefits gained from increased jobs, taxes and energy independence. For the thousands of people living in communities where oil shale and tar sands are present, development would create new jobs. Employment in this industry often includes health insurance, retirement packages and other benefits. The workers receiving this pay and these benefits infuse local economies with increased dollars. For small businesses, this source of income cannot be underestimated. The PEIS should better analyze the positive economic effects that oil shale and tar sands development would provide to local communities! 52513-002

Thank you for your consideration of my comments. Please include this letter in the public comment record for the PEIS. Also, please know that I will continue to monitor the BLM's development of a final PEIS to see that my concerns have been addressed.

Responses for Document 52513

52513-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52513-002: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

Thank you for your comment, Daniel Hawkins.

The comment tracking number that has been assigned to your comment is OSTSD52514.

Comment Date: February 27, 2008 16:43:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52514

First Name: Daniel
Middle Initial: R
Last Name: Hawkins
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This letter is my submission of a comment regarding the OSTS PEIS, otherwise known as the Oil Shale Tar Sands Programmatic Environmental Impact Statement. I support commercial development of these resources! First, these resources can be developed in a way that is environmentally responsible. Second, these resources are also critical for helping our country become less dependent on foreign energy sources. Third, and most importantly, I support development because of the many positive impacts it would have on local communities. 52514-001

Although I support the OSTS PEIS, I think the economic impact section could better identify and elaborate on the benefits gained through increased jobs, increased economic opportunities and revenue generated through taxes. Any approved development proposal would stimulate the economy by providing quality employment in the energy industry – jobs which normally provide health insurance, retirement benefits, etc. Development would also help local economies, particularly small businesses which provide goods and services to these energy workers. 52514-002

Understandably, environmental impacts should be fully analyzed in the OSTS PEIS. The BLM has done a good job in this regard. However, the OSTS PEIS could do more to fully capture the full economic impact that development would have. Please amend this document to strengthen and lengthen the economic impact section.

Responses for Document 52514

52514-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52514-002: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

Thank you for your comment, Stanley Klickner Jr..

The comment tracking number that has been assigned to your comment is OSTSD52515.

Comment Date: February 27, 2008 16:48:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52515

First Name: Stanley
Middle Initial: E
Last Name: Klickner Jr.
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am a supporter of environmentally sound energy development projects. I write to share my support for development of oil shale and tar sands in the Green River Formation, an area covering some two million acres in the Colorado-Utah-Wyoming region. Oil shale and tar sands can help strengthen our national energy security and make up for the decline of traditional oil production in the United States.

52515-001

I am glad to see that the BLM is developing a plan to tap these unconventional resources. Our federal government really should be supporting the use of new technologies, such as those to tap unconventional sources like oil shale and tar sands. These resources can help establish a more balanced national energy portfolio.

In conclusion, I would also ask that the BLM carefully consider the needs of local communities and the impact that development would have local economies. As someone who lives and works in this area, I can tell you first hand that energy development projects mean good paying jobs and they create economic development opportunities for rural communities that need it the most.

52515-002

Responses for Document 52515

52515-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52515-002: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

Thank you for your comment, Joyce Carlson-Leavitt.

The comment tracking number that has been assigned to your comment is OSTSD52517.

Comment Date: February 27, 2008 17:27:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD52517

First Name: Joyce
Middle Initial: j
Last Name: Carlson-Leavitt
Organization:
Address: 944 Green Valley Rd. NW
Address 2:
Address 3:
City: Los Ranchos
State: DE
Zip: 87107
Country: USA
Email: jcleavi@unm.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear sirs, It is crucial that you not go ahead with development of mining from shale. This causes much too much environmental damage. Joyce Carlson-Leavitt | 52517-001

Response for Document 52517

52517-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52518.

Comment Date: February 27, 2008 20:15:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD52518

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale will lessen our dependence on foreign oil

February 27, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's energy problems will not simply fix themselves. Our government and businesses must take substantive action to increase domestic production in order to diminish America's alarming dependence on foreign energy sources. Oil Shale and other energy resources afford America this opportunity.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52518-001

We must stop enriching foreign nations and condoning America's energy dependence. America needs to develop its own energy resources, starting with oil shale.

Sincerely,

Response for Document 52518

52518-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Richard Rasmussen.

The comment tracking number that has been assigned to your comment is OSTSD52519.

Comment Date: February 28, 2008 10:15:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD52519

First Name: Richard
Middle Initial: L
Last Name: Rasmussen
Organization:
Address: 12520 manor dr
Address 2:
Address 3:
City: homer glen
State: IL
Zip: 60491
Country: USA
Email: Itchie222@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Do we need to destroy such much to get so little energy. | 52519-001

Response for Document 52519

52519-001: Thank you for your comment.

Thank you for your comment, Steven Klein.

The comment tracking number that has been assigned to your comment is OSTSD52520.

Comment Date: February 28, 2008 12:09:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD52520

First Name: Steven
Middle Initial:
Last Name: Klein
Organization:
Address: 6620 GARRETT ROAD
Address 2:
Address 3:
City: DERWOOD
State: MD
Zip: 20855
Country: USA
Email: steve@theateam-1.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear PEIS Project Manager:

I strongly support the development of our national oil shale and tar sands resources – including the leasing in Utah, Colorado and Wyoming, as proposed by BLM in its Draft Programmatic EIS. The federal government must allow for the thoughtful and appropriate use of our nation's natural energy resources in order to reduce our reliance on foreign energy imports.

Consumers, industry and businesses throughout the nation are struggling with rising energy prices, tighter supplies and increased dependence on imports from politically unstable areas. Government estimates conclude that the oil shale and tar sands in those areas of Utah, Colorado and Wyoming that BLM has proposed offering for lease have enough oil to meet America's gasoline demand for more than 18 years.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels such as oil shale and tar sands in a ways that reduce environmental impacts and increases socio-economic benefits for the community. 52520-001

Further, production of domestic unconventional fuels will have a positive impact on America's energy security. For example:

• In spite of significant conservation efforts, world energy demand is projected to increase by 50% over the next 20 years and could double in 50 years. • Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years. • The United States currently military uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the US.

Finally, development of unconventional fuels will create a vibrant workforce and will strengthen the local and regional economies of Utah, Colorado and Wyoming.

Development of oil shale and tar sands in Utah, Colorado and Wyoming provide tremendous benefits to the local communities will strengthen our national energy security and bring much-needed supplies of oil into the markets to offset increased demand in China and India. I support developing these areas while protecting the environment, local communities and other economic interests. 52520-001 (cont.)

Sincerely, Steven Klein

Response for Document 52520

52520-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Sharon wendt.

The comment tracking number that has been assigned to your comment is OSTSD52521.

Comment Date: February 28, 2008 12:29:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD52521

First Name: Sharon
Middle Initial:
Last Name: wendt
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please Go Slowly, giving permits to process shale/tar from our unique and beautiful land, without even knowing how this will be done is reckless at best. The end product is so far into the future it will have no impact on our current energy crunch. I am sure we will have come up with a much better energy alternatives before this shale/tar product is removed. Then the damage to our state will already be done. 52521-001

Thank you

Response for Document 52521

52521-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52523.

Comment Date: February 28, 2008 15:44:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD52523

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale Draft PEIS

February 28, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

While in an ideal world America could satisfy its energy demands by neither importing foreign energy nor developing its own energy resources, the fact remains that American energy must be developed in order to stem American dependence on foreign energy sources and satisfy its energy demands. BLM has taken a major step towards that end in the draft PEIS for oil shale and tar sands.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52523-001

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

52523-001 (cont.)

Increasing domestic energy production is the only real solution to America's energy problems, thus it is time to look to emerging energy sources like oil shale.

Sincerely,

Response for Document 52523

52523-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Alisha Maves.

The comment tracking number that has been assigned to your comment is OSTSD52524.

Comment Date: February 28, 2008 16:25:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD52524

First Name: Alisha
Middle Initial: J
Last Name: Maves
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. The Bureau of Land Management should reconsider the proposed development completely, choose the No Action alternative, or, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 52524-001 52524-002

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected. 52524-003

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 52524-001 (cont.)

Sincerely,

Alisha Maves

Responses for Document 52524

52524-001: The BLM acknowledges the commentor's preference for Alternative A.

52524-002: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

52524-003: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and

3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Joan Woodward.

The comment tracking number that has been assigned to your comment is OSTSD52525.

Comment Date: February 28, 2008 16:28:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD52525

First Name: Joan
Middle Initial: M
Last Name: Woodward
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to urge the BLM to go slow with oil shale development in western Colorado. BLM acknowledges that such development would supplant virtually all other uses of the affected land. Agriculture, ranching, hunting, and fishing cannot afford such losses. Moreover, the obvious water shortages in our area make oil shale development potentially disastrous; we simply do not have the supply to feed this giant industry and leave sufficient amounts for residents of the area. Finally, the need for more coal fired plants to enable this extraction would blight our air quality. There are other energy options available to us. PLEASE GO SLOW! 52525-001

Sincerely,

Joan Woodward Grand Junction, Colorado

Response for Document 52525

52525-001: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures a commercial oil shale program that meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offers opportunities for states, local communities, and the public to participate in the process.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. The BLM will involve the state, local communities, and the public throughout the subsequent NEPA processes.

Thank you for your comment, Tyler Blaine.

The comment tracking number that has been assigned to your comment is OSTSD52527.

Comment Date: February 29, 2008 00:01:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD52527

First Name: Tyler
Middle Initial: t
Last Name: Blaine
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

We did not inherit this land from our fathers, rather we are barrowing it from our children. Public lands are reserved for the enjoyment of the public. Not to fill the pockets of the officials who would sell their daughters virginity to make a buck. God did not give you the right to rape the land, you are not "chosen", therefore you ought to find alternative fuel sources to keep the economy rolling. For they are not infinite.	52527-001

Response for Document 52527

52527-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, ryan ferguson.

The comment tracking number that has been assigned to your comment is OSTSD52528.

Comment Date: February 29, 2008 06:56:19AM
Oil Shale and Tar Sands
Comment ID: OSTSD52528

First Name: ryan
Middle Initial: p
Last Name: ferguson
Organization:
Address: 1201 E Lori Circle
Address 2:
Address 3:
City: Sandy
State: UT
Zip: 84094
Country: USA
Email: ryan.ferguson@hsc.utah.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I would like to oppose the plans for oil shale and tar sands leasing and development on sensitive and wild public lands in Utah, Colorado and Wyoming. The environmental impact far outways any minimal energy benfit as these methods are inefficent and lack the technology to make them economically viable. This push to lease public lands for this type of energy extraction is a misguided attempt by the Bush administration to sacrifice our public lands for perceived corporate gain with little to now benefit to the American public. The impact to the ecosystem with respect to animal migrations such as the North American antelope and other indigenous flora and fauna that will be decimated by the exploration and added activity this impulsive fire sale of land leasing will bring is irresponsible. Please take into account the actual benefit vs the very real negative impact risks associated with this impulsive push. 52528-001

Sincerely, Ryan Ferguson, MD Sandy, UT

Response for Document 52528

52528-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52530.

Comment Date: February 29, 2008 10:28:05AM
Oil Shale and Tar Sands
Comment ID: OSTSD52530

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM oil shale plan provides support for oil shale development

February 29, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52530-001

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52530

52530-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Rex Sacco.

The comment tracking number that has been assigned to your comment is OSTSD52532.

Comment Date: February 29, 2008 11:09:40AM
Oil Shale and Tar Sands
Comment ID: OSTSD52532

First Name: Rex
Middle Initial: L
Last Name: Sacco
Organization: Carbon County, Utah
Address: 120 East Main Street
Address 2:
Address 3:
City: Price
State: UT
Zip: 84501
Country: USA
Email: rex.sacco@carbon.utah.gov
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

CARBON COUNTY PUBLIC LANDS DEPARTMENT Rex Sacco, Director 120 East Main Street Price, Utah. 84501 Phone 435-636-3712 Fax 435-636-3264 rex.sacco@carbon.utah.gov

February 28, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne IL 60439

Carbon County, Utah Comments on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and the Programmatic Environmental Impact Statement

Carbon County offers these comments with the intent that they be made a part of the administrative record and used to assist the BLM in making a more informed determination as to any potential impacts and the effects of implementation on Carbon County, its citizens and future viability of our culture, lifestyle opportunities.

Carbon County has been aware of the interest by DOI to promote new tar sands and oil shale technology for some time. We have be supporters of this Initiative. We fully support and welcome this EIS. In our review this document seems to be in accordance with the CEQ guidelines governing NEPA and the Congressional intent of FLPMA. 52532-001

Energy development is and has been the main stay of Carbon County's economy for more than 100 years. Since the mid 1990's natural gas production has replaced coal as our main economic contributor in terms of jobs and royalty income. While coal mining is still very viable it has taken a seat behind gas production. Together both industries provide many high paying jobs with many 52532-002

benefits in our county. Energy and service industry personnel regularly fill up our area hotels and restaurants. A large share of donations into our communities has been from these companies. Many new and some older existing small business have come to directly depend on oil and gas extraction to bring work to them. The addition of oil shale and tar sands technology related extraction techniques will assist in further promoting our economic development insuring our children of jobs and our communities with economic stability. 52532-002

OIL SHALE ANDTARSANDS COMMENTS PAGE 2

The preliminary mapping does not recognize any areas in Carbon County having a potential for commercial oil shale development technologies. The document in further mapping and discussion does recognize those areas of high potential for tar sands and some possible oil shale development to exist in Carbon County. We support the fact that this document would allow areas within our county; some intermingled with split estate and some with private mineral rights to be considered for commercial development in this EIS. 52532-003

Carbon County also supports the manner in which the EIS recognizes under both alternatives that BLM will make certain lands within highest prospective oil shale areas available for application for commercial leases. Being able to place this in the land planning documents for each affected Field Office Area would seem to reduce RMP planning burdens but would still ensure that additional NEPA analyses would occur on each area proposed for development prior to the issuance of a commercial leases. In our view using the Site-specific NEPA analyses from the evaluation and approval portion of development process to identify potential project-specific impacts and define appropriate lease stipulations and mitigation measures is a more efficient and appropriate way to utilize the data and information for implementation on the ground. 52532-004

Carbon County supports Alternative B as the preferred alternative for this EIS. It appears that the planning and methodology is consistent with our Master Plan goals and objectives and would promote an outcome that would benefit both our environment and the socioeconomic stability of our area. 52532-001 (cont.)

We look forward to the approval of this EIS and a ROD favoring the preferred alternative. We appreciate the opportunity to comment. Please contact us if you have further questions or need other information. rls (hard copy to follow)

CARBON COUNTY PUBLIC LANDS DEPARTMENT
Rex Sacco, Director
120 East Main Street Price, Utah. 84501
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February 28, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

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Energy development is and has been the main stay of Carbon County's economy for more than 100 years. Since the mid 1990's natural gas production has replaced coal as our main economic contributor in terms of jobs and royalty income. While coal mining is still very viable it has taken a seat behind gas production. Together both industries provide many high paying jobs with many benefits in our county. Energy and service industry personnel regularly fill up our area hotels and restaurants. A large share of donations into our communities has been from these companies. Many new and some older existing small business have come to directly depend on oil and gas extraction to bring work to them. The addition of oil shale and tar sands technology related extraction techniques will assist in further promoting our economic development ensuring our children of jobs and our communities with economic stability.

The preliminary mapping does not recognize any areas in Carbon County having a potential for commercial oil shale development technologies. The document in further mapping and discussion does recognize those areas of high potential for tar sands and some possible oil shale development to exist in Carbon County. We support the fact that this document would allow areas within our county; some intermingled with split estate and some with private mineral rights to be considered for commercial development in this EIS.

Carbon County also supports the manner in which the EIS recognizes, under both alternatives, that the BLM will make certain lands within highest prospective oil shale areas available for application
for commercial leases. Being able to place this in the land planning documents for each affected Field Office Area would seem to reduce RMP planning burdens but would still ensure that additional NEPA analyses would occur on each area proposed for development prior to the issuance of a commercial leases. In our view using the Site-specific NEPA analyses from the evaluation and approval portion of development process to identify potential project-specific impacts and define appropriate lease stipulations and mitigation measures is a more efficient and appropriate way to utilize the data and information for implementation on the ground.

Carbon County supports Alternative B as the preferred alternative for this EIS. It appears that the planning and methodology is consistent with our Master Plan goals and objectives and would promote an outcome that would benefit both our environment and the socioeconomic stability of our area.

We look forward to the approval of this EIS and a ROD favoring the preferred alternative. We appreciate the opportunity to comment. Please contact us if you have further questions or need other information.
rls

Responses for Document 52532

52532-001: The BLM acknowledges the commentor's preference for Alternative B.

52532-002: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

52532-003: Thank you for your comment. Portions of the Sunnyside STSA are identified as being available for application for commercial leasing in Alternatives B and C. Only BLM-administered lands (including split estate) are included in the alternatives.

52532-004: Thank you for your comment.

Thank you for your comment, Carol Strong.

The comment tracking number that has been assigned to your comment is OSTSD52533.

Comment Date: February 29, 2008 11:38:34AM
Oil Shale and Tar Sands
Comment ID: OSTSD52533

First Name: Carol
Middle Initial: J
Last Name: Strong
Organization:
Address: 438 I Street
Address 2:
Address 3:
City: idaho falls
State: ID
Zip: 83402
Country: USA
Email: tstrong@ida.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

There is such stupidity in these thought processes. Why in the world would we want to leave a polluted, dug up, ugly landscape and bad air for our future generations? It is so simple and logical to pursue new energy sources like solar and wind and geothermal... We are using up our water, we are using up our oil, our coal,our shales...we are digging and polluting to the very end....which is not a wise decision! Other alternatives are much cleaner AND renewable! Remember, we cannot renew our water, our oil, our coal, our shale, our sand tars....we CANNOT RENEW THEM. When they are gone, that is IT! But, sun and wind and geothermal are here to stay....please consider what is logical and good for the earth and for us as people. It is all being destroyed too fast..... 52533-001

Response for Document 52533

52533-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jean Corey.

The comment tracking number that has been assigned to your comment is OSTSD52534.

Comment Date: February 29, 2008 13:15:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD52534

First Name: Jean
Middle Initial:
Last Name: Corey
Organization:
Address: 2328 E Willow Brook Way
Address 2:
Address 3:
City: Sandy
State: UT
Zip: 84092
Country: USA
Email: jwc@apptech-cats.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Thank you for allowing me this opportunity for comment. I am just a private citizen, but believe that this is a very important issue for this time period.

I attended the recent Open House in the Salt Lake area. I left a comment on the computer there, but wanted to say, in addition, that the more I think about this subject, the more convinced I become that it is vitally important to go ahead with this project of oil and gas exploration.

There are probably countless unknown reserves within the U.S. that we could use, instead of paying throught the nose to numerous foreign nations. Jobs and prosperity would be the result.

Little spots of industry out in the wild do not spoil it, they are just an appropriate mixed usage of the land, for the good of all. Yes, treat the land responsibly, but not with just a narrow, one viewpoint, environmentalist vision.

52534-001

Response for Document 52534

52534-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, David Schmalzer.

The comment tracking number that has been assigned to your comment is OSTSD52536.

Comment Date: February 29, 2008 15:52:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD52536

First Name: David
Middle Initial:
Last Name: Schmalzer
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment: Shale-Tar Sands PEIS Comments.doc

Comment Submitted:

I may have inadvertently sent an earlier version of this file. The correct version should have a date of 2/29/08 See Attachment.

The following comments relate to site-upgrading of shale oil and the consequent transportation and road usage impacts that would occur should the hydrogen supply mechanism envisioned in the draft PEIS be utilized.

Specifically, Page 4-7, the first bulleted paragraph states, "Hydrogen used in upgrading would be supplied by a commercial vendor and stored temporarily in transport trailers (high-pressure tube trailers) before use in upgrading reactions; no long-term storage of hydrogen would take place on-site; no steam reforming of CH4 to produce hydrogen would be conducted on-site."

Further the draft PEIS states in Section 4.1.2, Page 4-7 that, "The information presented in Table 4.1.2-1 identifies the key assumptions associated with underground mining and surface retorting of oil shale for a facility of a size to support production of 50,000 bbl of shale oil per day."

As noted in the draft PEIS, raw shale oil is characterized by chemical nitrogen content much higher than typical of conventional petroleum crude oils. A recent report[1] prepared for DOE shows nitrogen contents ranging from 1 wt % to over 2 wt. % depending on the shale source and processing approach. Similar nitrogen contents were found earlier by the Office of Technology Assessment[2].

Early upgrading studies often utilized 2500-3000 SCF/B of chemical hydrogen consumption to upgrade shale oil to a suitable and acceptable refinery feedstock. The costs and energy requirements for such a level of hydrogenation were a major impediment to commercialization of shale oil.

52536-001

Several groups sought to reduce the hydrogenation requirements. Reference is made to U.S. Patent 5059303 and British Patent GB2073288 as representative of technical efforts to reduce the severity of hydrogenation. These references are intended to be representative of technical approaches, not to express a preferred approach. The patents disclose techniques for reducing the severity of hydrogenation by employing a relatively mild hydrogenation step followed by either an acid extraction or organic solvent extraction to substantially reduce the nitrogen in the material to be used as a refinery feedstock. Examples given in the noted patents indicate chemical hydrogen consumption of 772 to 1840 SCF/B. Total hydrogen consumption inevitably would be higher due to solution losses and purge losses in the process hydrogen recycle stream. Johnson et al[3] note that the use of extractive approaches in upgrading may be limited by the size of the market for nitrogen-based chemicals, indicating this approach may be attractive for one or more pioneer plants but is unlikely to be suitable for a substantial shale oil industry.

Using the low end of the hydrogen requirement and ignoring losses yields a daily hydrogen requirement of about 38.5 million SCF for the nominal 50,000 B/D shale oil single-site plant contemplated in the draft PEIS. At the high end, hydrogen requirements would exceed 86 million SCF/D. Berry[4] et al recently reported that conventional hydrogen tube trailers transport about 300 kg of hydrogen or approximately 124,600 SCF. This implies 300 to 700 trailer deliveries daily for a single 50,000 B/D plant.

Such deliveries would constitute a major increase in traffic trips on the secondary roads in the Piceance Basin (See Table 3.10.4-1, Page 3-324 of the draft PEIS).

In this author's view, the contemplated hydrogen delivery scheme is untenable economically and from its impact on traffic trips in the region.

It is not explicitly stated in the draft PEIS why hydrogen delivery rather than site generation of hydrogen was chosen. A reasonable surmise is that it was to avoid the site water demand associated with hydrogen manufacture as the draft PEIS contemplates natural gas pipelines being laid to production sites. As the entire region is arid and water-poor, little may be gained regionally by displacing hydrogen production from the production site.

52536-001 (cont.)

The draft PEIS should be revised to recognize on-site manufacture of hydrogen which seems highly probable or, at a minimum, to recognize the traffic burdens that would be created by the hydrogen supply approach envisioned in the draft.

DISCLOSURE – The author of this comment is affiliated with Argonne National Laboratory but this comment is submitted as an individual. It should not be construed to represent the views of Argonne National Laboratory, the University of Chicago, or the U.S. Department of Energy.

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[1] Johnson, H. R. et al, "Oil Shale Resources, Technology and Economics" Vol. II, U.S. Department of Energy, March 2004 (Table 2, Page 20)

[2] Office of Technology Assessment, "An Assessment of Oil Shale Technologies", NTIS #PB80-210115, June 1980 (Table 19, Page 156)

[3] Johnson, op. cit. Page 23, Column 1

[4] Berry, G., et al, "Inexpensive Delivery of Compressed Hydrogen with Advanced Vessel Technology", Hydrogen Delivery and On-Board Storage Analysis Workshop, Washington DC, January 25, 2006

Response for Document 52536

52536-001: Thank you for your comments. Producing hydrogen from steam reforming of methane is a major engineering undertaking, especially in arid areas. The BLM believes that in the early years of an emerging oil shale industry, it is more likely that the hydrogen would be supplied by outside vendors. As the oil shale industry matures, it is expected to become more self-sufficient in the production of needed resources (e.g., hydrogen, steam, electric power, process heat). The analysis did not extend to a calculation of the amount of hydrogen required since that would have required assumptions on the initial quality of the recovered raw shale oil as well as assumptions regarding the minimum acceptance criteria for crude feedstock of both the interstate pipeline carriers and refineries, all such criteria not now available for technologies still under development. In fact, early results for the Shell in situ retorting technology suggest that the recovered raw shale oil may need very little additional upgrading before being eligible for interstate pipeline transport and being acceptable for receipt at a refinery as an alternative feedstock to conventional crude oil. The central points of the comment are acknowledged, however. Mine-site upgrading in remote, arid areas will be difficult, and hydrogen may indeed prove to be the rate-limiting step in shale oil production.

Thank you for your comment, David Schmalzer.

The comment tracking number that has been assigned to your comment is OSTSD52537.

Comment Date: February 29, 2008 15:53:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52537

First Name: David
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Last Name: Schmalzer
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment: Water Requirements for Shale Oil Upgrading.doc

Comment Submitted:

See Attachment.

The following comments relate to site-upgrading of shale oil and the water utilization impact should the hydrogen supply mechanism envisioned in the draft PEIS not be utilized. The draft PEIS, specifically Page 4-7, envisions hydrogen being manufactured remotely and trucked to the production site. As discussed in a separate comment, remote production and truck transportation seems unlikely to be attractive either economically or in its highway transportation impacts.

If hydrogen for site-upgrading of produced shale oil is manufactured on-site or in the immediate vicinity rather than being truck-transported from a remote manufacturing facility, as seems likely based on economics and traffic constraints, additional water would be required for hydrogen production. Most deliberate hydrogen production (>90%) is based on steam reforming of methane (SMR) using natural gas which is primarily methane as the feedstock and fuel. The following discussion assumes hydrogen is produced by the SMR process.

In the comment regarding remote hydrogen production and truck transport it was estimated that the 50,000 b/d plant envisioned in the PEIS would require 38.5 to 86 million scf/d of hydrogen for site upgrading.

The chemistry of SMR involves the following:

$$CH4 + 2H2O \rightarrow CO2 + 4H2,$$

requiring one-half mole of water for each mole of hydrogen. This is the chemically consumed water so is the minimum water required. This ranges from 1.1 x 10^5 gal/day to 2.4 x 10^5 gal/day or 121 to 271 acre-feet/yr. 52537-001

Boiler feed water (BFW) which would include the water chemically consumed and water required for steam production was estimated by Gary & Handwerk[1] to be 1 gal/lb H2, King and Bochaw[2] estimate it to be 80 lb/Mscf. Shumake and Abudiab[3] estimate BFW requirements to be 72-133 lb/Mscf, depending on plant configuration and the amount of air preheat and the amount of export steam. Estimated BFW requirements range from 2.0 x 10^5 gal/day to 8.3 x 10^5 gal./day, or 225 to 924 acre-foot/yr.

Gary & Handwerk[4] estimate cooling water circulation, at a 30 F temperature rise, to be 65 gal/lb H2. This indicates cooling water circulation of 13 x 10^6 gal/day to 29 x 10^6 gal/day. In the arid region where shale production is contemplated, cooling water is most likely to be produced by using cooling towers rather than once-through cooling so consumptive water use would likely be 5-10% of circulating water requirement or 750 to 3,200 acre-ft/yr.

Actual water requirements would depend on details of both the hydrogen manufacturing facility and the overall plant configuration. Consequently, there is necessarily considerable uncertainty in estimates of water requirements.

The draft PEIS[5] estimates 6,400 – 41,000 acre-foot/yr water consumption without on site hydrogen production. Process water required if hydrogen were to be manufactured on site would be a modest increment on the base water requirements estimated in the draft PEIS but the cooling water required for hydrogen manufacture could constitute a substantial increase in water requirements, as much as 50% of the direct water

requirement without hydrogen production. The high end of the estimated water requirements of the draft PEIS assumes on-site power generation for electrically driven in-situ retorting. The bulk of that estimated water requirement was for cooling in the power generation facility.

52537-001

DISCLOSURE – The author of this comment is affiliated with Argonne National Laboratory but this comment is submitted as an individual. It should not be construed to represent the views of Argonne National Laboratory, the University of Chicago, or the U.S. Department of Energy.

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[1] Gary, J. H. and G. E. Handwerk, "Petroleum Refining Technology and Economics", 3rd Ed., Marcel Dekkar, Inc., New York, 1994, Chapter 13, Table 13.1
[2] King, D. L. and C. E. Bochaw, Jr., "What should an owner/operator know when choosing an SMR/PSA plant?", Hydrocarbon Processing, May 2000, Pages 39-48
[3] Shumake, G. and Thaer Abudiab, "Operation Hydrogen", Hydrocarbon Engineering, February 2006
[4] Gary, op. cit., Chapter 13, Table 13.1
[5] Draft OSTS PEIS, Table 4.5.2-1, Page 4-37

Response for Document 52537

52537-001: Thank you for your comments. As is acknowledged in your comment, there is great uncertainty about the amount of mine-site upgrading that would be required for raw shale oil before it could be transported in interstate crude oil pipelines or found acceptable as an alternative feedstock by refineries. Certainly, water availability is an important consideration for oil shale facilities operating in remote areas, especially when significant degrees of upgrading of raw shale oils would be required. The BLM believes that in the initial years of an emerging oil shale industry, mine-site upgrading would be practiced to the absolute minimum because of the difficult logistics. However, alternative relationships between oil shale producers and refineries are also possible, including the use of refinery-supplied diluents (e.g., raw naphtha) that can be used to adjust the API gravity of the raw shale oil, reduce the concentration of contaminants to acceptable levels for pipeline carriers, and deliver a mixture of diluent and raw shale oil to the refinery that is in a much better position to undergo the necessary upgrading and further processing. In fact, similar arrangements now exist between U.S. refineries and the Canadian purveyors of bitumen recovered from oil sands. Although some Canadian oil sands operators have the capability of upgrading the raw bitumen, many also offer bitumen that has not been upgraded, using diluents from the receiving refinery to adjust the API gravity of the bitumen so that it may be transported through conventional crude oil pipelines. With greater degrees of mine-site upgrading of raw shale oil, the BLM acknowledges that more water will be needed to support the refining processes (including water for steam used to reform methane to produce hydrogen on-site). The BLM will review future lease applications for proposed mine-site upgrading activities and estimates of water requirements and may make refinements to its current estimates in future NEPA documents.

Thank you for your comment, David Schmalzer.

The comment tracking number that has been assigned to your comment is OSTSD52538.

Comment Date: February 29, 2008 15:53:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD52538

First Name: David
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Organization:
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City: [Withheld by requestor]
State: [Withheld by requestor]
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Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment: Comments on Draft PEIS, Appendix A.doc

Comment Submitted:

See Attachment.

The following comments relate to Section A.3.3, "Upgrading Oil Shale", Pages A-45 through A-47 of Section A.3.3.

The second paragraph of A.3.3 states in part, "Crude oil fractions are separated (fractionated) by their boiling points in atmospheric and/or vacuum distillations. Distillation fractions are subjected to heat, causing the thermal decomposition of large molecules into smaller ones (coking or cracking)."

In the context of the paragraph regarding "crude oil refining", this is simply factually incorrect. In conventional petroleum refining, the distillate materials in the range of naphtha (gasoline precursor) and atmospheric gas oil (kerosene, diesel, and No. 2 heating oil precursor) from crude distillation virtually always go to catalytic, not thermal processing. The authors should review the general refinery description in Gary & Handwerk[1] or other standard text on petroleum refining. 52538-001

On Page A-46 the draft PEIS correctly notes that removing heavy metals and inorganic impurities from crude shale oil is a required part of shale oil upgrading. Early work found removing heavy metals and fine solids from the oil was doable but difficult and expensive. 52538-002

The statement on Page A-47, paragraph 5 that states, "Hydrogen at high temperatures and pressures is used to create a reducing atmosphere in which olefinic or aromatic hydrocarbons are converted to alkanes (or saturates), and organic compounds containing sulfur or nitrogen are destroyed with the sulfur and nitrogen being converted to H_2S and NH_3, respectively, which are then captured and removed. As upgrading converts crude shale oil to syncrude, the physical properties change significantly." is technically incorrect. The objective in hydrotreating is not to destroy compounds containing sulfur or nitrogen but to remove the heteroatoms with minimal destruction of the host molecules. Molecular destruction in hydrotreating produces very substantial methane yields and consumes large volumes of hydrogen, both of which are economically undesirable. See Gary and Handwerk[2]. 52538-003

The same paragraph continues, stating that, "… the pour point and the API gravity of the liquid fraction are substantially reduced …". This is simply incorrect. Hydrotreating virtually always increases the API of a hydrocarbon liquid.

DISCLOSURE – The author of this comment is affiliated with Argonne National Laboratory but this comment is submitted as an individual. It should not be construed to represent the views of Argonne National Laboratory, the University of Chicago, or the U.S. Department of Energy.

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[1] Gary, J. H. and G. E. Handwerk, "Petroleum Refining Technology and Economics", 3rd Ed., Marcel Dekkar, Inc., New York, 1994, Chapter 1

[2] Gary op. cit., Chapter 9

Responses for Document 52538

52538-001: Thank you for your comments. The specific pathway selected for refining crude oils is dependent on the chemical character of the crude feedstock, the processing capabilities of the refinery, and the suite of final products desired. Many pathways between crude feedstock and distillate products are possible, but virtually all start with separation through distillation. A more detailed description of upgrading or processing of crude shale oil is provided in Attachment A.1 of Appendix A.

52538-002: Thank you for your comment.

52538-003: Hydrogenation of crude shale oil will both saturate the olefinic and aromatic hydrocarbons present and convert nitrogen and sulfur-bearing compounds to ammonia and hydrogen sulfide. However, the comment does point out an error in the subsequent sentence. The pour point and the API gravity are increased, not decreased. A correction has been made to the text.

Thank you for your comment, Jeffrey Chivers.

The comment tracking number that has been assigned to your comment is OSTSD52539.

Comment Date: February 29, 2008 16:20:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD52539

First Name: Jeffrey
Middle Initial: F
Last Name: Chivers
Organization: Western Energy Partners, LLC
Address: 5242 South College Drive
Address 2: Suite 340
Address 3:
City: Murray
State: UT
Zip: 84123
Country: USA
Email: jfchivers@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

February 29, 2008

Bureau of Land Management Oil Shale and Tar Sands Draft Programmatic EIS Comments 9700 South Cass Avenue Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson: Americans are facing an energy crisis of historical proportions. Consider: • Analysts are predicting that gasoline will be over $4.00 per gallon this summer – due largely to the failure of international oil production to keep pace with increased international consumption of oil. • Americans now import over 60% of the oil that we use to make gasoline and diesel – and send over $1 billion a day to countries like Saudi Arabia, Venezuela and Iran

In order to help lower gasoline and diesel prices – and in order to strengthen our nation's energy security, the United States needs to expand access to its domestic energy resources. Domestic reserves of oil shale and tar sands are vital sources of domestic energy – in fact, the federal government estimates that oil shale deposits on public lands hold the equivalent of at least 1.23 trillion barrels of oil. These resources should be responsibly developed in order to lower gas and diesel prices, increase American energy security and reduce our dependence on imported oil. 52539-001

Because a robust and active oil shale program can be done in a balanced manner that simultaneously promotes energy production and provides comprehensive environmental protections, I strongly support Alternative B in the PEIS.

If BLM adopts Alternative A, the United States will be turning its back on an important domestic energy source, continue to increase our dependence on imported oil and driving up gasoline and diesel prices, and Alternative C does not allow for full recovery of oil shale and tar sands

resources and does not provide for sound or efficient management of the program.

Please ensure that these important national energy resources can be developed in an environmentally sound manner in order to help reduce gasoline and diesel prices, as well as our dependence on foreign oil by adopting Alternative B in the PEIS. 52539-001 (cont.)

Sincerely,

Jeffrey F. Chivers Western Energy Partners, LLC jfchivers@hotmail.com

Response for Document 52539

52539-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52541.

Comment Date: March 1, 2008 02:48:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD52541

First Name: [Withheld by requestor]
Middle Initial:
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Organization:
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Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for oil shale

March 1, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's energy problems will not simply fix themselves. Our government and businesses must take substantive action to increase domestic production in order to diminish America's alarming dependence on foreign energy sources. Oil Shale and other energy resources afford America this opportunity.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52541-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52541

52541-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52545.

Comment Date: March 1, 2008 14:54:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD52545

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Support oil shale and tar sands development

March 1, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Decreasing our dependence on foreign energy supplies will positively impact our economy and also positively impact our trade deficit. Why can't we tap into resources within our borders and lower gas and oil pices to the poor cosumers. The tell radical envior's to get off their "holier than thou" attitude! Is the tail wagging the dog???

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country. 52545-001

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence now!

Sincerely,

Response for Document 52545

52545-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Ann Gleason.

The comment tracking number that has been assigned to your comment is OSTSD52546.

Comment Date: March 1, 2008 19:55:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD52546

First Name: Ann
Middle Initial: D
Last Name: Gleason
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City: Boston
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Zip: 021162913
Country: USA
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Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The public lands belong to the public and should be preserved for the benefit of all. Abandon any and all efforts to inefficiently extract oil at such a high environmental cost for such a modest gain. Conserve the energy it takes to produce and preserve our resources!	52546-001

Response for Document 52546

52546-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jerry Unruh.

The comment tracking number that has been assigned to your comment is OSTSD52550.

Comment Date: March 3, 2008 09:40:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD52550

First Name: Jerry
Middle Initial: D
Last Name: Unruh
Organization:
Address: 225 Earthsong Way
Address 2:
Address 3:
City: Manitou Springs
State: CO
Zip: 80829
Country: USA
Email: jerryunruh42@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. Shale oil is the most energy poor or all the fossil fuels. I assume that the Shell Oil process is being counted on in this newest effort to develop the alleged resource. Even if it technically works, it is quite possible that the energy balance would be negative (more energy input than returned). Shell assumes an energy balance of 3:1, that is, 3 units of energy produced per unit of energy input. They assume the required electricity will come from combined cycle natural gas-fired power plants operating at about 60% efficiency (heat rate of 6,000 Btu/kWh). However, it is much more likely that the electricity will be from coal-fired plants operating at about 32% efficiency (10,500 Btu/kWh) that will drop the energy balance closer to 1.5:1. Unfortunately, in order to make a liquid fuel, the kerogen so obtained must be hydrogenated. The most likely source of hydrogen will be steam reforming of natural gas. If the hydrogen had to come from the kerogen itself, the energy balance would definitely be negative (energy output to input less than 1:1). Natural gas peaked in the United States in 1973 and is now about 85% of that peak. Since Natural gas has more important uses (home heating, chemical manufacture, electricity), it should not be wasted upgrading an extremely poor energy source. 52550-001

The climate change implications of the process are truly horrible. Two to three times more carbon dioxide will be produced than produced from fuels from crude oil. In fact, from a climate change perspective, it would be better to simply make liquid fuels from coal (as poor as that process is) rather than use the coal to make electricity to produce kerogen. 52550-002

I spend time on energy balance because it is so important. Our country has a tendency to focus only on the financial aspects of projects without dealing with energy balance issues. If using cheap energy (coal) and significant government subsidies makes a project appear profitable, it will go forward even if an energy audit would suggest otherwise. And, finally, there is almost assuredly not enough water to support a significant shale oil industry. 52550-003

Given all of the problems, it is difficult to understand why the BLM is rushing toward a commercial leasing program without even knowing if oil shale development is feasible economically. The development envisioned by the study would come at a time when our land is already experiencing severe pressure from the current energy boom and significant population growth across the West. I urge the BLM to consider the cumulative effects of this industry on wildlife habitat and protected areas across the West. This plan proposes development in some of the best hunting, fishing, and recreation areas in Colorado, Wyoming, and Utah. We can and should protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale development will displace every other public use of public land to benefit private companies. The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming, and Utah. I urge you to slow down and carefully consider the enormous effect commercial oil shale development would have before committing the West Slope to a future of industrial development and environmental degradation.

52550-003 (cont.)

52550-004

Sincerely,

Jerry D. Unruh, Ph.D. 225 Earthsong Way Manitou Springs, CO 80829

(719) 685-3084

jerryunruh42@msn.com

Responses for Document 52550

52550-001: Thank you for your comments.

52550-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52550-003: Oil shale has a tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable environmentally sound manner.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands. This analysis will balance any conflicting uses, as required by FLPMA.

52550-004: Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios and pertinent federal or nonfederal actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to mitigate short-term and long-term adverse impacts.

It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all

authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

Thank you for your comment, Bill Ingalls.

The comment tracking number that has been assigned to your comment is OSTSD52551.

Comment Date: March 3, 2008 11:10:00AM
Oil Shale and Tar Sands
Comment ID: OSTSD52551

First Name: Bill
Middle Initial:
Last Name: Ingalls
Organization:
Address: 208 East 4800 So.
Address 2:
Address 3:
City: Vernal
State: UT
Zip: 84078
Country: USA
Email: wvingalls@ubtanet.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

How insane this sounds to the American Public. Probably billions in this for industry leaders and the BLM. Same for Detroit and the firms suppling the huge amount of infrastructure to grind and pulverize millions of acres of rocks. What about the energy required to do so? How much carbon dioxide and other pollutants will such operations spew into an atmosphere we are all now concerned about? What's it going to look like when we have finished using our wildlands in this pathetic manner? Dust clouds blowing over hundreds of square miles of wasted lands? It seems like our government land agencies, have all of the sudden turned into enablers for any goldrush, get in, get out, make a fortune, hair-brained idea someone or a group of someones comes up with.

52551-001

Response for Document 52551

52551-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, R Glenn Vawter.

The comment tracking number that has been assigned to your comment is OSTSD52552.

Comment Date: March 3, 2008 12:44:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52552

First Name: R Glenn
Middle Initial:
Last Name: Vawter
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Address: 8 Gamba Drive
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Address 3:
City: Glenwood Springs
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Zip: 81601
Country: USA
Email: atpv@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment: Comments on Draft Oil Shale and Tar Sands PEIS 3.3.08.doc

Comment Submitted:

Executive Summary General Comment The document is not clear about the status of the BLM R,D& D leases issued in Colorado and Utah in 2007 that state they may be expanded to 5,120 Acres (or perhaps 5, 760 acres) if certain stipulations and conditions in those leases are met. It needs to be clarified in the final EIS that those leases may be expanded to commercial size irrespective of the final Alternative chosen by BLM. In addition the BLM Resource Management Plans for the effected BLM offices should also reflect the unique status of the BLM R,D& D Leases with respect to the lessee's right to exercise its preference rights per the executed R,D& D leases. 52552-001

BLM does not deal with the issues of development priority in the PEIS. The Resource Management Plans for each affected BLM Field Office need to be clear about how resources of oil shale, tar sand, oil and gas and other minerals will be prioritized and how each will accommodate the development of the other resources. The immense oil shale resource would suggest that oil shale should receive first priority in leasing decisions due to its potential importance to the energy and national security of the United States Table ES-1 – Resource Estimates The potential shale oil resource presented appears to be understated by at least of factor of ten (10) and likely very much more, particularly in Colorado where the resource under consideration is thicker and richer that the other two states. This is especially true for the center of the Piceance Basin where much of the BLM land is located. 52552-002

According to the 2005 Rand Report and the authors cited therein "Within the Piceance Basin, about a half trillion barrels of oil are contained in deposits yielding more than 25 gallons per ton (Dyni, 2003).… The potential yield per surface acre is enormous, with portions of the basin yielding 2.5 million barrels per acre." Others have conservatively estimated figures in the range of 0.5 to 1.5 million barrels per acre. If the most conservative of those estimates is applied to the acreages in Alternative B & C the following resource estimates result: Alternative B Alternative C Colorado, 359,798 acres Colorado, 40,325 acres Colorado, 180 Billion Barrels Colorado, 22 Billion Barrels 52552-003

The reason this understatement of the extent of the resource is important is because it misstates the value of the resource to the future energy and national security of the nation. 52552-003 (cont.)

Table ES -1 – Surface mining limitations

A 500 ft maximum overburden should not be the limit for surface mining when the resource is up to 1000 ft thick and up to 1000 ft deep. Mining practices in other minerals find a 1:1 stripping ratio to be acceptable based upon the value of the mineral and subject to the availability of interim overburden storage areas. 52552-004

Table ES-1 – Exclusions cited in Alternative C

Excluding all ACECs seems unreasonable as would seem to preclude any development where development for oil and gas and other minerals is already occurring because of mitigation measures that can be taken or other provision made with BLM to accommodate responsible development of energy resources. 52552-005

ES.7.1 – Alternative A for Oil Shale

As stated above the PEIS does not adequately state the rights of BLM R,D&D lessees to expand their leases beyond 160 acres if specified conditions and stipulations in their leases are met. 52552-006

2 – Description of Alternatives 2.3.2 – Alternative A No Action Alternative This Alternative is unrealistic, but it is understood that BLM must consider such an Alternative to comply with NEPA. The Energy Security Act of 2005 contemplated the need for oil shale as a source of energy for the nation and this alternative would not meet that mandate. Please note the understatement of resource shale oil barrels discussed earlier. 2.3.3.1 – Alternative B for a Commercial Oil Shale Leasing Program This Alternative B seems reasonable as it offers enough acreage to provide significant shale oil production for the nation, and a diversity of resource settings that could support surface and insitu processes. It opens prime resource areas to oil shale leasing that were earlier closed because of the priority given to other minerals (e.g. saline minerals and oil and gas). Also this Alternative does not close ACECs closed in Alternative C. It excludes Colorado and Utah Preference Right Lease Areas until such time as current R,D&D Lessees exercise their preference rights. Please note the understatement of resource shale oil barrels discussed earlier. 2.3.3.2 Alternative C for a Commercial Oil Shale Leasing Program This is an unrealistic Alternative for Colorado for a number of reasons. It does not offer enough acreage to provide significant shale oil production for the nation, nor a diversity of resource settings that could support surface and insitu processes. With minor exceptions this alternative does not offer tracts big enough to support a commercial venture as the acreage of individual blocks are as small as 160 acres or less. 52552-007

Figure 2.3.3-4 in not clear about the lands excluded from leasing in the existing R,D&D leases. Those areas should be delineated on the map. Are the areas shown in orange those that can or cannot be available for leasing by R,D&D Lessees? Please note the understatement of resource shale oil barrels discussed earlier. 52552-008

A process needs to be developed whereby R,D&D Lessees and bidders on leases can work with BLM to operate in "lands that would be excluded on the basis of existing land use plan decisions". Otherwise Alternative C becomes a very real, but unrealistic alternative, as discussed above. See Attachment. 52552-007 (cont.)

Comments on Draft Oil Shale and Tar Sands PEIS
Glenn Vawter, A Private Citizen

March 3, 2008

Comments on Oil Shale Sections only

Executive Summary

General Comment

The document is not clear about the status of the BLM R,D& D leases issued in Colorado and Utah in 2007 that state they may be expanded to 5,120 Acres (or perhaps 5, 760 acres) if certain stipulations and conditions in those leases are met. It needs to be clarified in the final EIS that those leases may be expanded to commercial size irrespective of the final Alternative chosen by BLM. In addition the BLM Resource Management Plans for the effected BLM offices should also reflect the unique status of the BLM R,D& D Leases with respect to the lessee's right to exercise its preference rights per the executed R,D& D leases.

BLM does not deal with the issues of development priority in the PEIS. The Resource Management Plans for each affected BLM Field Office need to be clear about how resources of oil shale, tar sand, oil and gas and other minerals will be prioritized and how each will accommodate the development of the other resources. The immense oil shale resource would suggest that oil shale should receive first priority in leasing decisions due to its potential importance to the energy and national security of the United States

Table ES-1 – Resource Estimates

The potential shale oil resource presented appears to be understated by at least of factor of ten (10) and likely very much more, particularly in Colorado where the resource under consideration is thicker and richer that the other two states. This is especially true for the center of the Piceance Basin where much of the BLM land is located.

According to the 2005 Rand Report and the authors cited therein "Within the Piceance Basin, about a half trillion barrels of oil are contained in deposits yielding more than 25 gallons per ton (Dyni, 2003).... The potential yield per surface acre is enormous, with portions of the basin yielding 2.5 million barrels per acre." Others have conservatively estimated figures in the range of 0.5 to 1.5 million barrels per acre. If the most conservative of those estimates is applied to the acreages in Alternative B & C the following resource estimates result:

Alternative B	Alternative C
Colorado, 359,798 acres	Colorado, 40,325 acres
Colorado, 180 Billion Barrels	Colorado, 22 Billion Barrels

The reason this understatement of the extent of the resource is important is because it misstates the value of the resource to the future energy and national security of the nation.

Table ES -1 – Surface mining limitations

A 500 ft maximum overburden should not be the limit for surface mining when the resource is up to 1000 ft thick and up to 1000 ft deep. Mining practices in other minerals find a 1:1 stripping ratio to be acceptable based upon the value of the mineral and subject to the availability of interim overburden storage areas.

Table ES-1 – Exclusions cited in Alternative C

Excluding all ACECs seems unreasonable as would seem to preclude any development where development for oil and gas and other minerals is already occurring because of mitigation measures that can be taken or other provision made with BLM to accommodate responsible development of energy resources.

ES.7.1 – Alternative A for Oil Shale

As stated above the PEIS does not adequately state the rights of BLM R,D&D lessees to expand their leases beyond 160 acres if specified conditions and stipulations in their leases are met.

2 – Description of Alternatives

2.3.2 – Alternative A No Action Alternative

This Alternative is unrealistic, but it is understood that BLM must consider such an Alternative to comply with NEPA. The Energy Security Act of 2005 contemplated the need for oil shale as a source of energy for the nation and this alternative would not meet that mandate.

Please note the understatement of resource shale oil barrels discussed earlier.

2.3.3.1 – Alternative B for a Commercial Oil Shale Leasing Program

This Alternative B seems reasonable as it offers enough acreage to provide significant shale oil production for the nation, and a diversity of resource settings that could support surface and insitu processes. It opens prime resource areas to oil shale leasing that were earlier closed because of the priority given to other minerals (e.g. saline minerals and oil and gas). Also this Alternative does not close ACECs closed in Alternative C. It excludes Colorado and Utah Preference Right Lease Areas until such time as current R,D&D Lessees exercise their preference rights.

Please note the understatement of resource shale oil barrels discussed earlier.

2.3.3.2 Alternative C for a Commercial Oil Shale Leasing Program

This is an unrealistic Alternative for Colorado for a number of reasons. It does not offer enough acreage to provide significant shale oil production for the nation, nor a diversity of resource settings that could support surface and insitu processes. With minor exceptions this alternative does not offer tracts big

enough to support a commercial venture as the acreage of individual blocks are as small as 160 acres or less.

Figure 2.3.3-4 in not clear about the lands excluded from leasing in the existing R,D&D leases. Those areas should be delineated on the map. Are the areas shown in orange those that can or cannot be available for leasing by R,D&D Lessees?

Please note the understatement of resource shale oil barrels discussed earlier.

A process needs to be developed whereby R,D&D Lessees and bidders on leases can work with BLM to operate in "lands that would be excluded on the basis of existing land use plan decisions". Otherwise Alternative C becomes a very real, but unrealistic alternative, as discussed above.

Responses for Document 52552

52552-001: In general, valid existing rights are considered administrative actions by the BLM and do not require a specific planning decision to implement. This is a planning criterion, and as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decisions are subject to valid existing rights. With respect to the federal government's commitment to issue commercial leases on the preference right lease areas (PRLAs) to the RD&D lease holders, a lease will be issued only if the terms and conditions of the lease are met. This includes evaluation pursuant to NEPA that concludes that commercial-scale operations of the applicant's technology at that site do not pose environmental or social risks unacceptable to the BLM. The discussion of the PRLAs, however, has been revised to reflect the language in the lease and clarified that this is a component of all of the PEIS oil shale alternatives.

52552-002: The FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c)). The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations.

Conflicts between resource uses are not new, and resolutions to such conflicts are not decided by the land use planning decisions analyzed in this PEIS. The amendments to the RMPs will close certain areas and open other areas to consideration for future leasing of oil shale and tar sands. The Secretary of the Interior retains discretion over leasing decisions. The NEPA analysis for future leasing decisions will analyze the compatibility and conflicts among resources.

52552-003: There has been some confusion regarding the "resource estimates" for each alternative shown in the Executive Summary and in the alternatives in the PEIS.

The numbers in question were created for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The numbers were developed with the understanding that they underestimate the actual in-place resource. The numbers were developed using the values that described the minimum quality and thickness that was deemed to be economic. Those values

are a minimum 25 ft thickness and a minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming, the values used were 15 ft thick and 15 gallons per ton. These values, coupled with the acreage in each of the alternatives, created the numbers in question. It is true that the use of more exact isopachs and quality data, had they been available, would have provided much higher values for each of the alternatives, but the alternatives remain comparable.

52552-004: The decision to limit the analysis of potential surface mining to areas of 500 ft or less was not based solely on surface area needed to dispose of the waste material, but on other factors such as projected economics, material rehandle and equipment capabilities. Development of a surface oil shale operation would most likely resemble an open pit operation with far greater material handling and storage issues than a strip mine operation.

52552-005: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). The BLM determined that a single alternative analyzing the protection of all ACECs would best provide the decision maker information to make a reasoned choice among the alternatives. Although Alternative B does not protect ACECs that are open to mineral development, the analyis is of the alternative discloses the impact of opening those lands to oil shale application. This gives the decision maker the ability to fully compare the consequences of protecting or not protecting the ACECs.

52552-006: Please see the response to Comment 52552-001.

52552-007: The BLM acknowledges the commentor’s preference for Alternative B.

52552-008: On the figure you have referenced, the lands shown in orange that are within the outline of the RD&D leases could be leased to another party should the initial lessee relinquish their lease. Please see response to Comment 52552-001 for the rights of existing lessees.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52553.

Comment Date: March 3, 2008 14:30:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD52553

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development can occur with environmental protections

March 3, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There are no perfect energy solutions. Each energy source has its pro's and con's. The only way to be successful is to assure a diversity of supply by working to develop all of our nation's energy resources including oil shale.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

52553-001

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52553

52553-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52554.

Comment Date: March 3, 2008 20:52:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD52554

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Balanced oil shale development will strengthen our economy

March 3, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I feel strongly that we should not lock away our resources with Wilderness, and I believe the BLM should manage this resource for use, and well to keep our lands open for recreation as well. We need the development of oil shale and tar sands resources, and it appears in the PEIS that BLM is on track with a good process to assure these resources are prudently development after careful review of environmental, social and economic impacts.

It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52554-001

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Response for Document 52554

52554-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Chad Whittaker.

The comment tracking number that has been assigned to your comment is OSTSD52556.

Comment Date: March 4, 2008 10:46:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD52556

First Name: Chad
Middle Initial: J
Last Name: Whittaker
Organization:
Address: [Withheld by requestor]
Address 2: [Withheld by requestor]
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am against the development of Oil Shale and Tar sands in Utah. I think there are better sources of energy to invest in. Oil and Tar sands is a limited resource and the impacts on our lands are not worth the cost. It is a very short-sighted energy source. The lands that the oil shale and tar sands exist on are popular destinations for international tourists. Everytime I visit these places I meet people from all over the world. 52556-001

We should not develope oil shale and tar sands as an energy source in Utah.

Thanks for your time.

Response for Document 52556

52556-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Ryan Smith.

The comment tracking number that has been assigned to your comment is OSTSD52557.

Comment Date: March 4, 2008 12:51:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD52557

First Name: Ryan
Middle Initial:
Last Name: Smith
Organization:
Address: 1255 E. 900 N.
Address 2:
Address 3:
City: Logan
State: UT
Zip: 84321
Country: USA
Email: hotel_splendid@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I've seen what oil shale and tar sands development has done to the land in Alberta. I vehemently oppose any development of this kind in our treasured lands of Utah. Places like Nine Mile Canyon and the San Rafael Swell should be absolutely off-limits to tar sand development. The little bit of energy that could be extracted by such development wouldn't even be a drop in the bucket of energy demand in the US. 52557-001

Response for Document 52557

52557-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52558.

Comment Date: March 4, 2008 13:56:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52558

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: New sources of energy are key to energy independence

March 4, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We need all the natural resources that are within our boders to be less dependent on foreign countries/terrorists! Tax and royalty revenues that would result from oil shale and tar sands development would provide great benefit to the socioeconomic infrastructure of the nation and the region. A growing oil shale and tar sands industry would provide great employment opportunities in the region.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken. 52558-001

Oil shale is a real solution to a serious problem, and the time is now for America to act and develop American energy to satisfy America's energy demands.

Sincerely,

Response for Document 52558

52558-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52559.

Comment Date: March 4, 2008 17:08:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52559

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for oil shale

March 4, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

My family and I are strongly in favor of an alternate and renewable energy future, but it is obvious that our country's reliance on traditional liquid fuels (oil and gas) will remain and grow into the foreseeable future. We need to develop all of the energy resources at our disposal, including oil shale and tar sands. Lets get moving on this, the longer the delay the more dependent on foriegn sources we become. Lets use our resources.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52559-001

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52559

52559-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Jason Cone.

The comment tracking number that has been assigned to your comment is OSTSD52560.

Comment Date: March 4, 2008 18:23:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52560

First Name: Jason
Middle Initial:
Last Name: Cone
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I'm proud to be a native Utahn. I'm ashamed that my state, however, still sees fit to sacrifice natural beauty, refuge, spiritual serenity, and therapeutic wilderness in the false name of "progress." The theory that money means progress is juvenile and short-sighted, and why else do we continue to allow the drilling and mining of non-renewable resources but for money? I would urge those who represent the best interests of this state, nation, and planet to reconsider offering new permissions and permits to drilling companies. I would hope said representatives would have the moral strength to stand up for what's right and not for what makes us monetarily wealthy. 52560-001

Response for Document 52560

52560-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Murray Hudson.

The comment tracking number that has been assigned to your comment is OSTSD52561.

Comment Date: March 4, 2008 21:35:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52561

First Name: Murray
Middle Initial: F
Last Name: Hudson
Organization:
Address: 109 S. Church St.
Address 2: POB 163
Address 3:
City: Halls
State: TN
Zip: 38040
Country: USA
Email: mapman@ecsis.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The wind in Wyoming can produce endless, clean energy compared to destructive, expensive conversion of tar sands and shale, which only makes sense to those who will profit at the expense of their country and its people. | 52561-001

Response for Document 52561

52561-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Terry Stuart.

The comment tracking number that has been assigned to your comment is OSTSD52562.

Comment Date: March 4, 2008 21:41:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD52562

First Name: Terry
Middle Initial:
Last Name: Stuart
Organization:
Address: 875 Quince Ave
Address 2:
Address 3:
City: Boulder
State: CO
Zip: 80304
Country: USA
Email: terry.stuart@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I moved to Grand Junction to work for TOSCO in 1980. I experienced the last boom and bust. A tremendous amount of oil shale reserves are currently under lease and several sites have benefitted from considerable engineering and constrution. It seems wasteful to spend 100s's of millions of dollars developing new sites and distrubing more land and water resources at this time. I recommend that the BLM press the companies to cooperate on existing sites and invest their money into developing/proving their technology. this is still a new technology and there will is much to learn before the most effecient processes are discovered. 52562-001

Response for Document 52562

52562-001: The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands development. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands.

Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sands resources among other unconventional fuels, if it can be done in an environmentally sound manner. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives when considering whether lands should be opened or closed for application for commercial oil shale or tar sand leasing. The PEIS analyzes the environmental consequences of this allocation decision. The PEIS also describes the requirement for additional site-specific NEPA analysis prior to both issuance of commercial leases and approval of proposed exploration or development project.

Thank you for your comment, Peter Stewart.

The comment tracking number that has been assigned to your comment is OSTSD52564.

Comment Date: March 5, 2008 22:34:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52564

First Name: Peter
Middle Initial:
Last Name: Stewart
Organization:
Address: 12422 S 2075 W
Address 2:
Address 3:
City: Riverton
State: UT
Zip: 84065
Country: USA
Email: pstewa@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am against tar sands and oil shale development. For each barrel of tar-sands oil, no less than two tons of sand and clay must be mined, using the widely reviled methods peoneered by the coal indiustry: forest-killing open-pit mining. With all the eviscerating procedures and additional treatment the tar sands require, extracting oil from the sands sucks up two-thirds of the energy they ultimately render, poisoning the atmosphere with carbon in the process. Producing a single barrel of oil from tar sands emits no less than six times more carbon dioxide than producing a barrel of conventional oil. The oil sands industry gorges on a quarter of Alberta's scarce fresh water and burns up to a fifth of the entire nation's natural gas supply. The procedure for extracting oil from shale is highly polluting, releasing three to six times fmore greenhouse gases into the atmosphere than conventional oil production. I am also against government subsidies for developing oil shale and tar sands. Thank you.

52564-001

52564-002

52564-003

52564-001 (cont.)

Responses for Document 52564

52564-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52564-002: Thank you for your comments.

52564-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

Thank you for your comment, Stacee (Sweetwater) Clayton.

The comment tracking number that has been assigned to your comment is OSTSD52565.

Comment Date: March 6, 2008 13:44:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD52565

First Name: Stacee (Sweetwater)
Middle Initial:
Last Name: Clayton
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

As someone concerned with preserving our precious land, I strongly oppose the leasing and development of public lands for commercial oil shale and tar sands.

This technology is not developed and therefore environmental impacts cannot be evaluated effectively to assure preservation of prehistoric sites, such as Nine-mile canyon in Utah, and will have a devastating impact on the proposed sites, their water, air and the wildlife in the area. Not to mention the irreparable damage that will be done to these archeological sites in the area-especially Nine-mile canyon with its myriad petroglyphs and vital links to the ancient Native Americans and their sacred places.

There are other problems with this plan as well. Specifically, while Utah does have measurable amount of tar sands,their development would do nothing to ease America's energy problems. Howver, the beautiful and irreplacable red rock country, replete with pre-historic dwellings and history will be forever ruined. The focus of energy should be on completely different, 'green' resources instead of raping our lands.

I exhort the BLM to slow their overzealous rush to lease & destroy our lands and wait until this technology is fully developed, then engage in appropriate environmental impact studies before any moves are taken on this destructive & unknown path.

52565-001

Thank you for considering my comments.

Response for Document 52565

52565-001: In developing the PEIS, the BLM used the best available information regarding existing oil shale and tar sands technologies and environmental resource characteristics in the most geologically prospective portions of oil shale basins and STSAs. The BLM believes that the RD&D program will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. An evaluation of future development impacts will be conducted for NEPA analysis on a project-specific basis using, among other things, the information gained in the RD&D program or as a result of studies in nonfederal lands.

Under all PEIS alternatives, the BLM would comply with all applicable requirements for cultural preservation. This includes identification of all resources within the Area of Potential Effect, whether or not affected areas are directly included in areas available for application for leasing. The BLM has policies in place for protecting significant cultural resources, such as those listed on or eligible for listing on the National Register of Historic Places, and the agency will comply with the NHPA, among other pertinent regulations, as described in Appendix D of the PEIS. During subsequent NEPA analysis, full consideration will be given to the protection of cultural resources in compliance with existing BLM policies and pertinent laws and regulations.

Thank you for your comment, Daniel Birch.

The comment tracking number that has been assigned to your comment is OSTSD52566.

Comment Date: March 6, 2008 15:06:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD52566

First Name: Daniel
Middle Initial: R
Last Name: Birch
Organization: Colorado River District
Address: POB 1120
Address 2: 201 Centennial Street, Suite 200
Address 3:
City: Glenwood Springs
State: CO
Zip: 81602
Country: USA
Email: dbirch@crwcd.org
Privacy Preference: Don't withhold name or address from public record
Attachment: PDEIS Comments.doc

Comment Submitted:

See Attachment.

Draft Oil Shale and Tar Sands Programmatic Draft Environmental Impact Statement

Comments of the Colorado River Water Conservation District
February 27, 2008

General Comments

1. The Colorado River Water Conservation District (CRWCD or River District) is a political subdivision of the State of Colorado created under state statute in 1937. The CRWCD encompasses all or part of the 15 counties that are located in the drainage of the Colorado River and its tributaries, including the Gunnison River, Yampa River, and White River basins. Garfield, Mesa, and Rio Blanco Counties, the focus of oil shale interest in Colorado, are in the District.

   The mission of the CRWCD is the protection, conservation, and beneficial use of waters within the district. The CRWCD has no regulatory or land use authority. The interests of the River District with respect to oil shale are:

   a. Promoting sound water planning including estimating water demands and identifying alternatives, including reservoirs that might be needed to accommodate demands.
   b. Try to avoid adverse impacts to existing beneficial uses of water including existing agricultural and municipal and industrial uses and instream uses of water.
   c. Seeking collaborative water supply solutions where multiple needs and objectives can be met.

2. The River District is helping lead and promote an energy development water needs study that is being completed under the Colorado and Yampa/White Basin Roundtables, created pursuant to Colorado House Bill 05-1177. This study is estimating water demands from all energy sectors, including oil shale, natural gas, and uranium, and including secondary demands from electrical power production and population growth stemming from energy development. The study will also explore alternatives to meeting water demands. Initial results from the study should become available in the next few months. We expect that results from the PDEIS will have use and value to the energy water needs study.

   One of the limitations of the PDEIS is that it does not put oil shale in the context of other energy development in other sectors and the resulting water demands. We hope that the results of the energy water needs assessment will also be used in the PEIS. 52566-001

Section 3.4.1-1 Water Allocation

3. The PDEIS distills a very complicated and extensive body of knowledge related to the Colorado River Compact to a very short section and analysis and arrives at 52566-002

the conclusion there is ample water available pursuant to the Compact to accommodate oil shale. Considering vagaries of climate and climate change and full use of existing water supply and delivery systems, that may not be the case.

The Colorado Water Conservation Board has just embarked on a study to estimate the amount of water available to Colorado under the 1922 and 1948 Compacts and the results of the study will not be available for several years.

52566-002 (cont.)

4. There are several amounts in Table 3.4.1-2 that may not be correct. It would be helpful to be able to see how the amounts were derived.
   - Colorado future consumptive uses are presumably from the 2004 State Water Supply Initiative but are significantly less than what SWSI reports. 52566-003
   - The Table shows a 176,000 AF import to the Dolores/San Juan/San Miguel basin. We're aware of imports from the Dolores to the San Juan (in a lesser amount) but insofar as these are exports from one basin of the Colorado to another basin of the Colorado, these should not be accounted for as an import. 52566-004
   - Colorado Basin export values remain constant from 2000 through 2030, which is probably not realistic. For example, Denver's North End Firming EIS and Northern Water Conservancy District's Windy Gap Firming EIS are currently underway and both would increase export. In addition, Denver has additional capacity in its Dillon Reservoir/Roberts Tunnel system and as system demands increase exports will increase. 52566-005

   The net effect is that water availability may be overestimated.

Section 4 – Water Demands

5. Power Plant demands appear a little low. See Yampa Valley Water Demand Study, 1998. Hayden and Craig power plants with a combined capacity of about 2,000 MW have demands of about 16,000 AF/yr. The PDEIS shows demands of 13,000 AF/yr for 2,400 MW of new generating capacity. 52566-006

Section 4 – Mitigation Measures

6. There is a significant amount of concern that oil shale development will result in perfection of certain conditional water rights that when perfected will call-out some existing uses of water, particularly agricultural and instream uses of water, or will entail conversion of existing agricultural water rights. We have suggested to industry representative that they consider meeting multiple purposes and objectives when planning for their water infrastructure needs and not only offset impact but also strive to make improvements. We think there will be opportunities to do so for very little incremental cost. 52566-007

Responses for Document 52566

52566-001: The water demands from other energy development in addition to oil shale and/or tar sands development are evaluated and described in the cumulative impact sections (Sections 6.1.5.3.4 and 6.2.5.3.4).

52566-002: The PEIS describes the water availability, water uses, and potential demands for oil shale and/or tar sands development in the oil shale basins and the STSAs. There is no intention to imply that all available water would be allocated to oil shale development. As stated in the PEIS (Section 4.3.1), whether enough water is available for development depends on the results of intensive negotiations between various parties, including water rights owners, state and federal agencies, and municipal water providers, as well as the developers.

The BLM recognizes that the Upper Colorado River Basin is experiencing drought conditions. Long-term hydrologic data is used to evaluate water availability. In the last century, the Colorado River has experienced both dry and wet years. It is speculative to claim that the current drought conditions are "normal" conditions. However, a prolonged drought condition can reduce water availability, as indicated in the PEIS.

The Congress directed the BLM to prepare the PEIS at this time. Future NEPA analyses will use the best available information, which could potentially include the results of the CWCB study if they are available.

52566-003: The table's data sources are the states' water plans and historical water uses in the Upper Colorado River Basin by state. The sources are listed in the footnotes of the table. The projected consumptive uses in Colorado are from the state's water plan.

52566-004: There is a minus sign in front of the value 176,000 AF, indicating a net import to the basin (see footnote d for an explanation). If the import is from another Colorado hydrologic basin, that basin would include an export of equal amount. The net effect would be zero.

See also response to Comment 52566-003.

52566-005: The pending increase or decrease of imports/exports is included because they are not committed. Their effects would be addressed during project-specific NEPA analyses.

52566-006: The water needed for a power plant depends on the technologies used for cooling and can vary widely. Newer power plants in arid or semi-arid areas tend to use cooling technologies that require less water. However, power needs at this programmatic stage of analysis are speculative and would need to be evaluated specifically at the project level prior to any oil shale development.

52566-007: Thank you for your comment. As stated in the PEIS (Section 4.3.1), the amount of water available for development will depend on the results of intensive negotiations between various parties, including water rights owners, state and federal agencies, and municipal water providers, as well as the developers.

Thank you for your comment, Brandon Childress.

The comment tracking number that has been assigned to your comment is OSTSD52567.

Comment Date: March 7, 2008 16:27:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD52567

First Name: Brandon
Middle Initial:
Last Name: Childress
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to share my support for the BLM's Oil Shale and Tar Sands Programmatic Environmental Impact Statement. Developing unconventional fuels such as these is essential for diversifying our country's energy portfolio and for reducing our dependence on foreign oil. As the cost of energy continues to increase, I think it is imperative for the BLM to encourage development of both renewable energy sources and unconventional fuels. 52567-001

Wyoming, Colorado and Utah have been identified as areas where these resources are most likely to be abundant. I support the programmatic alternatives which would utilize a lease-by-lease application process. This would require companies to identify specific federal lands (administered by the BLM) that they would like to develop as part of their application. This allows for complete NEPA review of these areas and would result in site-specific environmental mitigation. Such planning is time-tested and allows for environmentally responsible development of important energy resources. 52567-002

Creating a stable domestic energy supply should be the focus of the BLM's efforts for the next several decades. Developing oil shale and tar sands should be part of that long-term plan.

Response for Document 52567

52567-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52567-002: Thank you for your comment.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52568.

Comment Date: March 7, 2008 16:29:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD52568

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am writing to you to share my support for the OSTS PEIS, or more formally known as the Oil Shale and Tar Sands Programmatic Environmental Impact Statement. Developing a robust oil shale program will help strengthen communities and will help balance and diversify our nation's energy portfolio.

The rising cost of energy and our country's reliance on foreign oil are disconcerting. Oil shale and tar sands can help stabilize our domestic energy supply, which would translate into more predictable (and hopefully more affordable) energy prices. Importantly, developing these resources will also help reduce our country's unhealthy reliance on politically unstable countries that supply us with oil. 52568-001

I also want to mention that I am concerned about the environment and support the OSTS PEIS' provision that requires a lease-by-lease application process. This ensures that NEPA analysis will consider the direct, indirect and cumulative effects that development will have in particular areas. This time-tested process is environmentally sound and will ensure environmentally responsible development of these important resources. 52568-002

I greatly appreciate you taking the time to consider my support for the OSTS PEIS. Please include this letter in the comment record.

Responses for Document 52568

52568-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52568-002: Thank you for your comment.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52569.

Comment Date: March 7, 2008 16:31:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52569

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I support the BLM Oil Shale and Tar Sands Draft PEIS, which would allow for development of these unconventional resources throughout areas of Wyoming, Utah and Colorado. Developing these resources (as well as renewable sources) is critical if the United States is serious about diversifying our energy portfolio. We are already too reliant on foreign nations for conventional fuels. Developing unconventional fuels can go a long way towards stabilizing our domestic energy supply. 52569-001

Oil shale and tar sands are strategically important for reducing our dependence on foreign oil. I also want to see that development of oil shale and tar sands be done in an environmentally sound way. I support the PEIS because leasing would occur by utilizing a lease-by-lease application process, where companies would be required to identify the specific lands they are interested in as part of their lease application package. This time-tested, site-specific NEPA process ensures that the environmental mitigation occurs based on project-specific factors. 52569-002

Response for Document 52569

52569-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52569-002: Thank you for your comment.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52570.

Comment Date: March 8, 2008 18:49:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD52570

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development should move forward

March 8, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There are no perfect energy solutions. Each energy source has its pro's and con's. The only way to be successful is to assure a diversity of supply by working to develop all of our nation's energy resources including oil shale.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

52570-001

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52570

52570-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, collette novak.

The comment tracking number that has been assigned to your comment is OSTSD52572.

Comment Date: March 9, 2008 10:17:12AM
Oil Shale and Tar Sands
Comment ID: OSTSD52572

First Name: collette
Middle Initial:
Last Name: novak
Organization:
Address: 102 W. Palomino Dr. 233
Address 2:
Address 3:
City: chandler
State: AZ
Zip: 85225
Country: USA
Email: cnovak12@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is atrocious, and needs to stop!

52572-001

Response for Document 52572

52572-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52573.

Comment Date: March 10, 2008 09:51:45AM
Oil Shale and Tar Sands
Comment ID: OSTSD52573

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commercial leasing for oil shale should be approved

March 10, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

American energy must be utilized to a greater extent in order for America to overcome its current energy problems. Instead of consistently ignoring the vast energy potential of the United States, America should instead start to use the rich energy supply it has in order to satisfy its energy needs.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52573-001

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52573

52573-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52574.

Comment Date: March 10, 2008 09:58:41AM
Oil Shale and Tar Sands
Comment ID: OSTSD52574

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Draft PEIS

March 10, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

52574-001

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52574

52574-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52575.

Comment Date: March 10, 2008 10:34:23AM
Oil Shale and Tar Sands
Comment ID: OSTSD52575

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America should run on American energy

March 10, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Oil shale is America's largest untapped resource and we should do everything in our power to make certain that it is developed in an environmentally responsible and socially sustainable way. With all the US economy faces today, we need this vast energy resource now more than ever. It is a key part of our future energy security.

That said, the BLM should do all it can to allow for an oil shale industry to develop in the west. I support Alternative B in the Programmatic EIS as it provides the largest potential area for development of this massive resource. 52575-001

BLM policy makers should understand and appreciate the value of oil shale to the US and should do all possible to foster this new and growwing indistry here at home.

Thank you for allowing this process to move forward and for allowing future responsible development of this resource.

Sincerely,

Response for Document 52575

52575-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52576.

Comment Date: March 10, 2008 10:34:37AM
Oil Shale and Tar Sands
Comment ID: OSTSD52576

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: 18 years worth of transportation fuel found in oil shale

March 10, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Why does America continue to rely on often hostile or unstable nations for its energy needs? This problem is particularly perplexing when one considers the abundant resources unused within our own country, including an extremely rich supply of oil shale.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked.

52576-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52576

52576-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, A. William Alldredge.

The comment tracking number that has been assigned to your comment is OSTSD52577.

Comment Date: March 10, 2008 10:50:57AM
Oil Shale and Tar Sands
Comment ID: OSTSD52577

First Name: A. William
Middle Initial:
Last Name: Alldredge
Organization:
Address: 2518 Owl Creek Road
Address 2:
Address 3:
City: Thermopolis
State: WY
Zip: 82443
Country: USA
Email: alldredge@tctwest.net
Privacy Preference: Don't withhold name or address from public record
Attachment: Oil Shale PEIS.d3.doc

Comment Submitted:

See Attachment.

A. William Alldredge, Ph. D.
2518 Owl Creek Road
Thermopolis, Wyoming 82443
(307) 867-2518
alldredge@tctwest.net

10 March 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Dear Oil Shale/Tar Sands Planning Team:

I am A. William Alldredge, Ph.D., professional wildlife ecologist and concerned Wyoming resident, commenting on the Draft Oil Shale and Tar Sands Programmatic Environmental Impact Statement (PEIS). These comments, as were my scoping comments of 14 January 2006, are submitted on behalf of The Wilderness Society. Because my expertise is with large wild mammals, I restrict the majority of my comments to those species.

My resume accompanies this letter, but let me briefly establish my professional expertise. I earned a BS degree in wildlife biology, an MS degree in radiation ecology and a Ph.D. degree in earth resources from Colorado State University (CSU). I spent 30 years on the faculty at CSU retiring in 2001 as Professor and Chair of the Wildlife Major. In that employment I conducted research and taught courses in ecology, integrated ecosystems management, and conservation and management of large wild mammals. I helped establish the Center for Ecological Risk Assessment at CSU and was the Center's first director. I have personally been involved in research on deer, elk and pronghorn antelope in the Piceance, Washakie, and Green River Basins and I am knowledgeable regarding impacts to large mammal populations and their habitats that could arise from development of oil shale and tar sands resources. I remain professionally active by attending scientific meetings, workshops, and reading and reviewing manuscripts for professional journals.

The list of large wild mammals considered in the PEIS is inclusive and I am encouraged by the use of some of the more relevant, current literature cited in the document. Indeed, it is a daunting task to develop an environmental impact statement for a project that covers such a large geographic area and one for which the technology is largely unknown. This task does, however, represent an opportunity for the BLM to provide a landscape scale, region wide analysis from which Field Offices (FOs) can tier their resource management plan amendments. Such an analysis would be especially important when considering big game animals that often transcend several jurisdictional boundaries in the course of their seasonal migrations. **In my professional opinion, the current PEIS fails to meet this challenge and it does not fulfill the legal requirements of NEPA or the multiple use mandates of FLPMA.** In the following paragraphs I substantiate my opinion with scientific literature and my considerable professional experience.

52577-001

Alternatives

Because the technology is not yet proven and thus the impacts and amount of disturbance associated with the technology are also unknown, it would seem prudent to have selected Alternative A as the Preferred Alternative. This alternative commits the least amount of surface acreage, has localized impacts and allows industry opportunity to demonstrate that extraction of energy resources from oil shale and tar sands is economically viable. Once the technology has been proven and associated impacts better understood, then leasing could proceed in some judicious phased fashion. At that point, the BLM could perform a regional analysis of resources potentially impacted by development of oil shale and tar sands. This analysis offers the BLM an excellent opportunity to move toward regional, or at least, landscape scale analysis especially for natural heritage resources such as wildlife species that select habitats at the landscape level and transcend jurisdictional boundaries. Such an analysis would be especially useful for species such as sage-grouse and big game that may utilize habitats in several planning areas during the course of their seasonal migrations. This regional approach would also provide the best opportunity for a true cumulative effects analysis that is not being achieved at the resource management plan (RMP) or project level. **In my professional opinion, the BLM should take a more conservative approach and postpone extensive leasing for oil shale and tar sands development until the technology is proven and potential impacts are better understood.** 52577-002

From the onset, the PEIS indicates that the purpose of the proposed action is to amend 12 BLM land use plans in 3 states "to decide which of those areas will be open for application for commercial leasing, exploration, and development," for oil shale and tar sands resources (ES-1). The amendment of land use plans has been determined by the BLM to "have no impact on the environment" (ES-5). Yet, the potential for impacts resulting from development is acknowledged by stating that resulting impacts "will require site-specific NEPA evaluation" (ES-5). The problem appears to be, however, that the Preferred Alternative B makes available the most extensive acreage (1,991,222 acres) for oil shale and tar sands leasing (2-27) while ignoring "site-specific" NEPA analyses that have already occurred during development of resource management plans that established ACECs and constrained development where the protection of sensitive resources was considered necessary (Table ES-1). **The BLM must explain why previously conducted NEPA analyses were ignored in selection of a Preferred Alternative that maximizes acres available for lease for oil shale and tar sands development.** As currently presented, it appears that the only reason behind selection of Alternative B as the Preferred Alternative was to maximize the number of acres available for lease thereby perpetuating a single-minded focus on energy resource development at the expense of other resource uses and clearly violating the mandates of FLPMA. Alternative C is more respectful of previously completed NEPA analyses and site-specific experience (2-27, 2-33 Table 2.3.3-3). Alternative C still, however, makes significant acreages available for lease and these acreages would be vulnerable to an, as yet, unproven technology with unknown environmental impacts and/or reclamation potential. 52577-003

Since the ROD was signed for each of the 12 RMPs affected by this PEIS analysis, landscapes influenced by those RMPs have experienced considerable change from a variety of anthropogenic actions, chief among which is gas and oil development (see USDI, BLM 2004, 2006, 2007a, 2007b, 2007c). My experience in these areas is that crucial wildlife habitats are even more crucial today and thus in need of greater 52577-004

protection if impacts are to be minimized or mitigated. This is especially true for big game winter ranges, transition ranges and migration corridors that overlap areas designated for potential leasing. If it is not possible for the PEIS to provide detailed analyses of potential impacts to wildlife populations or suggest ways to mitigate these impacts, then it is surely counter-intuitive to, de-facto, remove site-specific protection of crucial habitats and open them for leasing. **BLM must explain why protected areas and protective measures set forth in previous NEPA processes would be overridden by the deficient analysis in the Oil Shale Tar Sands PEIS.**

52577-004 (cont.)

The BLM has, for far too long, waited to conduct a NEPA analysis until the leasing or project development stage. Once lands are leased, it is too late, or so it is claimed, to add protective measures for crucial wildlife habitats. Provisions of 43 CFR 3162.5-1(a) and Section 6 of standard lease terms (Form 3100-11) provides the BLM authority to stipulate measures necessary to reduce or mitigate impacts to wildlife habitat, but few mitigation measures have been applied which has resulted in substantial loss of wildlife habitat effectiveness (Tessmann et al. 2004). On the Pinedale Anticline in western Wyoming, the BLM granted all or part of 267 requests to waive timing limitations that would have helped protect wildlife populations from impacts of energy development; only 12% or industry requested exemptions were denied (USDI BLM 2007b). **The BLM must, during this programmatic environmental impact statement stage, at least maintain, if not increase, protection for crucial wildlife habitats that have been previously identified in the RMP process.** These protections include phased development, NSO and CSU designations as well as timing stipulations and even more importantly, non-lease designations. Actions predicted in this PEIS transcend BLM Field Office jurisdictional boundaries and would negatively affect extensive areas of wildlife habitats possibly extirpating indigenous wildlife populations. **The BLM should require phased development at a pace that allows for reclamation and habitat recovery in areas disturbed by development before additional disturbance is permitted.**

52577-005

Affected Environment

Chapter 3 begins with the disclaimer that it will "not provide detailed information about conditions at specific project locations," but instead will "provide the level of detail needed to assess the range of potential impacts that may occur because of future oil shale or tar sands resource leasing and development on BLM-administered lands." Here again, it would seem that if the BLM can make these lands available for leasing, ignoring previous RODs, they should provide site-specific descriptions of existing environmental conditions such that the public and decision makers can evaluate the potential ecological costs from development as a result of the leasing program. For big game animals this discussion should be at least at the state management herd unit level because the entire range of many of these species may be affected. This chapter lacks site specificity necessary to evaluate impacts that could result from development of oil shale and tar sands resources. Surely this information is available in existing RMPs and the PEIS should, at a minimum, acknowledge the locations critical wildlife habitats, migration corridors and sensitive areas. **The BLM must provide more site specific details such that the public and decision makers can evaluate the potential impacts to wildlife populations that could result from oil shale and tar sands development.**

52577-006

Discussions of "big game" animals beginning on page 3-143 provides a generic description of animals present and some of the challenges these populations currently

52577-007

face. Lacking, however, is any information of current population trends. For example, throughout most of the west, mule deer and pronghorn populations have been declining as have production ratios (Alldredge and Alldredge 2003). Cow:calf ratios for elk have also been declining in recent years throughout much of the area covered by the PEIS. The discussion does not include information about habitat losses, much of which has occurred because of urbanization and energy development. Using the figure of 21,000 gas/oil wells projected for the White River Planning Area (PEIS page 3-9) and an average of 18-20 acres per well pad, the direct habitat loss is in excess of 400,000 acres in that area alone. Throughout the west, much of this habitat loss has been crucial big game habitats. Furthermore, the PEIS makes no mention of the uniqueness of big game populations likely to be affected. The world's largest populations of migratory deer, elk and pronghorn antelope occur in the area covered by the PEIS and this area also provides some of the greatest recreational opportunity for both viewing and hunting big game animals. **In my professional opinion, the PEIS fails to provide an adequate evaluation of the affected environment for big game animals such that potential impacts can be placed in perspective.** BLM should have provided a landscape scale analysis of important big game habitats in the analysis area that could provide Field Offices (FO) with information to coordinate protective measures across FO boundaries.

52577-007 (cont.)

Effects of Technologies

Beginning on page 4-66, the PEIS attempts to assuage the reader's anxieties regarding impacts resulting from oil shale development with narrative about reclamation. This paragraph is misleading because the life of the project is never clarified nor is the extent of surface area disturbance. The reader has no way of knowing how long habitats will be unavailable during project development and production, nor is the spatial extent of this disturbance reported. In the arid environs covered by the PEIS, reclamation to functional systems similar to that found pre-disturbance will take in excess of 50 years (Baker 2006). Thus habitats disturbed by oil shale and tar sands development would be unavailable for a considerable length of time after reclamation has been initiated. Furthermore, industry has yet to demonstrate that they can and will successfully reclaim habitats disturbed by energy development. For example, in Wyoming's Powder River Basin, Kniola and Gil (2005) reported that most coal bed natural gas wells were out of compliance with reclamation requirements. Lastly, the aerial extent of habitat disturbance resulting from development could be so extensive that local wildlife populations might be extirpated. **BLM must explain how the extent of development will be contained and how reclamation will proceed so as to evaluate potential impacts and avoid extirpation of local wildlife populations.**

52577-008

In Table 4.8.1-1 (4-67) the BLM classifies impacts to various wildlife species as small, moderate or large. There is no explanation provided as to how these relative levels of impacts are scientifically justified. Expressing impact as a percentage of a population affected is a fallacious and incomplete assessment. The impact on the population also depends on the age and sex classes of animals affected. Furthermore, reduction of a population by 50% would hardly be considered moderate by most wildlife biologists and especially not by individuals whose livelihood depended on revenue obtained from wildlife-based recreation. Tessmann et al. (2004) provide an alternative discussion of ranking impacts based on habitat disturbance and capability of mitigation to reduce these impacts. **The BLM must provide valid justification for the relative scale of magnitudes for impacts discussed on pages 4-66 and 4-67 and if unable**

52577-009

to do so, must replace this scale with a more publicly defensible, scientifically credible scale.

52577-009 (cont.)

Discussion on page 4-68 rightfully indicates that big game animals will avoid areas of project activities and uses some scientific literature to support this fact. Additional research reports, however, that avoidance distances are far greater than the 0.25 miles reported. Elk avoidance of roads by elk has been demonstrated by Rowland et al. (2000, 2005) and those authors also indicate the importance of traffic density and spatial distribution of road influences that have not been considered in the PEIS. The BLM concluded that elk at Fortification Creek in the Powder River Basin of Wyoming were not using suitable habitats within 0.5 miles of existing roads and they were not using suitable habitats within 1.7 miles of existing conventional gas wells (USDI BLM 2007d). Sawyer et al. (2006), report avoidance distances for mule deer from oil field development of 3-4 miles and Powell (2003) reported that elk in open habitats avoided human disturbance for a distance of 1.2 miles. Although we have little data for pronghorn avoidance, my professional experience suggests that they too, will avoid areas of human activity for distances of at least a mile. Current studies in Wyoming by Berger et al. (2006) may provide quantitative information on disturbance avoidance by pronghorn. The ecological footprint of a project area considerably exceeds the area of actual surface disturbance (Weller et al. 2002) and this is not adequately reported n the PEIS. **The BLM must do a more credible job of placing impacts from oil shale and tar sands development in perspective by applying all available scientific literature.** The potential for disturbance to massive acreages of wildlife habitat and extensive fragmentation of remaining habitats necessitates a thorough spatial analysis at this programmatic environmental impact analysis stage. Hebblewhite (2008) provides a literature review of the effects of energy development on ungulates.

52577-010

Long-term displacement of big game animals from crucial habitats is discussed on page 4-69 but "long-term" is never defined and it needs to be. Lower reproductive potential (4-68) for displaced animals is a real concern. Our work with elk (Phillips and Alldredge 2000, Shively et al. 2005) demonstrated a major reduction in calf production caused by an activity as benign as recreational hiking in parturitional habitats. Kuck et al. (1985) concluded that simulated mining disturbance could lead to abandonment of calving areas by elk. Thus, impacts from oil shale and tar sands development will not only result in direct mortality to big game animals but there will also likely be a reduction in reproduction further impacting populations. Lowered reproduction reduces animals available for recruitment into populations, thus the population ages. An ageing population is even less productive and in jeopardy of significant reductions in the event of severe winters of extensive habitat losses such as could be associated with oil shale and tar sands development.

52577-011

Discussion on page 4-69 alludes to impacts resulting from disruption of migration and movement corridors (habitat fragmentation) but does not adequately represent the magnitude of these impacts. Habitat fragmentation is of real concern with projects of the magnitude discussed in the PEIS and are even more monumental considering that much of the area proposed for oil shale and tar sands development has already experienced considerable fragmentation for existing energy development projects. **The BLM must include a reasoned, scientifically defensible discussion of habitat fragmentation at a landscape or regional scale in order to adequately represent impacts that could result from oil shale and tar sands development.** Using GIS technology, available scientific literature (Franklin et al. 2002, D'Eon et al. 2002, Jaeger 2000, McGarigal and

52577-012

Cushman 2002) and existing surface disturbances in the area the BLM could conduct a spatial analysis that would provide a reasonable assessment of current habitat losses associated with anthropogenic activities. This approach could also be applied to various oil shale and tar sends development scenarios to better depict possible impacts to wildlife habitats. 52577-012 (cont.)

An often held misconception is that displaced wildlife can find habitats elsewhere. This assumes that displaced individuals can actually move to some alternative habitats and that these habitats are somehow available and waiting to them and not already at carrying capacity. Sawyer et al. (2006, cited on page 4-72) reported distribution shifts in mule deer as a direct result of energy development on the Pinedale Anticline, but those authors also reported a 46% reduction in mule deer wintering on the Anticline following 5 years of project activity and a physical disturbance of less than 2% of the available habitat. This observation supports the contention that mule deer at least, and likely most wildlife, cannot simply move over. A concomitant population reduction will also likely occur. This effect is considered density dependent (Bartmann et al. 1992, White et al. 1987) and animals demonstrate strong fidelity to habitats (Garrott et al. 1987). **The BLM must provide a more scientifically credible discussion of impacts to animals displaced from oil shale and tar sands development.** This discussion is necessary at the PEIS stage such that the public and decision makers can make valid interpretations of impacts likely to result from this technology. 52577-013

Another often held misconception is expressed on page 4-73; contrary to what is expressed in paragraph 4, impacts on most wildlife ***are not*** proportional to the amount of habitat lost directly and indirectly. Habitat is not all created equal, some areas of habitat are simply more valuable that others. Thus, impacts to a population using affected habitat is highly dependent on which acres of habitat are lost, the juxtaposition of these lost acres, the type of habitat, and, as indicated on page 4-73, the length of time the habitat is unavailable. **The BLM must indicate that at this time, they do not know what habitats will be lost to oil shale and tar sands development, nor do they know the importance of these habitats to indigenous wildlife populations.** Although, I contend, that much of the habitat information is likely available in existing RMPs and could have been included in the PEIS with little additional effort. This is especially critical in analyzing mobile species such as big game that transcend jurisdictional boundaries in their use of seasonal ranges. An analysis at the RMP level will be inadequate because it will not integrate impacts across jurisdictional boundaries. 52577-014

Although some literature does suggest that wildlife might habituate to anthropogenic disturbance (4-74), other literature suggests that it does not. Sawyer et al. (2006) reported no evidence of habituation by mule deer to energy development on the Pinedale Anticline after 5 years of exposure to disturbance. Elk in Wyoming's Powder River Basin are reported to show no signs of adapting to gas development there (USDI BLM 2007d). There is also potential for big game animals to be killed by vehicles and trains but the discussion on 4-77 grossly under-reports this impact. During the winters of 1978-79, 1983-84 and 2007-2008, in the Great Divide Basin of Wyoming, many hundreds of pronghorn antelope were killed by motor vehicles and trains. **The BLM must provide a more thorough presentation of existing information that considers responses and habituation of wildlife to disturbance and the impact of direct mortality.** 52577-015

Missing from discussion of impacts to big game animals that could result from oil shale and tar sands development is any mention of reduced water quality and availability. Section 6.1.2.4 suggests that "both surface and ground water resources could be affected." Reduction of water quality and availability would adversely affect wildlife populations and especially big game animals. **To provide an adequate disclosure if impacts from oil shale and tar sands development the BLM must consider effects of reduced water quality and availability in wildlife habitats.** 52577-016

The PEIS does not include any discussion of the economic impact of reduced wildlife populations that could result from impacts associated with oil shale and tar sands development. Wildlife related activities generate an excess of $2 billion yearly and some 2,200 jobs in Colorado alone. Loss of these economic benefits will severely impact local communities. Furthermore, state wildlife agencies are dependent on revenue from wildlife related activities to fund their management activities. Reduction in revenue will impair their ability to continue sound management of wildlife resources, which could further exacerbate impacts experienced from the energy resource development. **The BLM must consider economic impacts associated with effects on wildlife populations and their habitats that would result from development of oil shale and tar sands resources.** 52577-017

Mitigation

Mitigation measures discussed on pages 4-103 through 4-106 represent a good starting point, but must be improved. These measures ***should*** be required, not "could be used," as stated on page 4-102. Firearms and pets should be prohibited from project areas, proponents should contribute to a mitigation and monitoring fund, crucial wildlife habitats should be provided non-lease status and proponents should be required to improve, where possible, non-disturbed habitats. Purchase of conservation easements on undisturbed habitats is also a valuable mitigation measure. Phased development of oil shale and tar sands resources that allowed for reclamation and habitat recovery before additional development was permitted could be an effective mitigation measure for some populations. 52577-018

As currently presented, the mitigation section is inadequate and part of this inadequacy comes from the BLM not knowing what sort of technology might be employed, or where, when, and for what duration oil shale and tar sands development might occur. Here again, the BLM has missed an opportunity to provide mitigation guidance on a landscape, regional level from which RMP amendments could tier. **The BLM must be more demanding in their recommendations for mitigation, strengthen mitigation recommendations and provide a discussion of development scenarios that considers both temporal and spatial scales allowing for energy extraction and conservation of wildlife resources.**

Monitoring

The PEIS does not mention how impacts from oil shale and tar sands development to big game animals will be monitored. Monitoring methodologies need to be elucidated and triggers that will initiate mitigation responses need to be identified. Both monitoring methods and triggers should be standardized across the planning area to assure compatibility of results and consistency in approach. At this programmatic scale the BLM has the opportunity to assure standardization of monitoring. **The BLM** 52577-019

must include a discussion of monitoring protocols, methods and mitigation triggers for wildlife populations. Garrott and White (1984) provide a scientifically credible method for assessing impacts from oil shale development on ungulate populations. Those authors recommended that over-winter fawn survival was the key population parameter to monitoring when assessing impacts to mule deer populations. In my professional opinion, this recommendation would apply to all ungulate populations.

52577-019 (cont.)

Cumulative Impact

Discussion of cumulative impacts to wildlife populations (6-159) begins with a misleading statement that needs to be clarified. There is not enough information in Section 3.8 to support the statement that "current status of wildlife and their habitats, reflects the cumulative impacts of past and present activities." There is simply not enough information on the current status of wildlife and their habitats to make any sort of assessment. But here is another opportunity for the BLM to pioneer new ground and conduct a region-wide cumulative impact analysis.

The PEIS accurately points out (6-159) that cumulative effects of all sorts of land use activities "have caused widespread habitat loss and fragmentation of sagebrush ecosystems." If the BLM knows this to be fact, they should provide a supportive narrative of the existing conditions and then use this information and projected oil shale and tar sands development scenarios to conduct a region wide cumulative impact analysis. This is especially critical because of the potential for extensive habitat disturbance and massive habitat fragmentation. The GIS spatial analysis I suggest above would be a good first step in providing a credible cumulative impact analysis. Johnson et al. (2005) used resource selection models in an innovative approach to analyze cumulative effects of human development on arctic wildlife that merits consideration for application in the PEIS. If this analysis is not done at the programmatic stage, it will not be done at the RMP stage and cumulative impacts will not be elucidated. **To meet the disclosure of impacts required by NEPA, the BLM must include a thorough and quantified discussion of cumulative impacts to wildlife populations resulting from oil shale and tar sands development.** This discussion needs to be supported with current scientific literature.

52577-020

Conclusion

The Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS) has failed to meet the intent of NEPA and has ignored the multiple use mandates of FLPMA. It is irresponsible to select a preferred alternative that maximizes the number of acres made available for lease while ignoring existing NEPA process that provided protection for considerable portions of these lands. Furthermore, leasing such an extensive area for application of an as yet unknown technology for which the actual environmental impacts are unknown violates public trust. The PEIS has failed to take the required "hard look" because it:

- **Did not provide a complete discussion of the affected environment even though much of this information should have been available in existing resource management plans.**

- **Disregarded readily available scientific literature that discusses impacts to wildlife resulting from anthropogenic activities.**
- **Did not provide a thorough disclosure of impacts to wildlife populations.**
- **Did not adequately discuss mitigation.**
- **Did not discuss monitoring or triggers to initiate mitigation actions.**
- **Did not adequately address cumulative impacts.**

This programmatic environmental impact statement provides the BLM with a good opportunity to conduct a landscape scale, region-wide evaluation that transcends BLM Field Office jurisdictional boundaries and one from which FO personnel could tier when amending resource management plans. To this point, the BLM has failed at this task.

My input is offered constructively with the sincere hope that it will be useful in development of a final document that does provide a scientifically credible analysis that meets the intent of NEPA and the mandates of FLPMA. If the BLM disagrees with any of my comments, I request a documented justification for that disagreement. Thank you for considering my comments.

Respectfully,

Signed copy mailed 10 March 2008

A. William Alldredge, Ph. D.
Professor Emeritus, Wildlife Biology

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Responses for Document 52577

52577-001: Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sands resources among other unconventional fuels, if it can be done in an environmentally sound manner. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives when considering whether lands should be opened or closed for application for commercial oil shale or tar sands leasing. The PEIS analyzes the environmental consequences of this allocation decision. The PEIS also describes the requirement for additional site-specific NEPA analysis prior to both issuance of commercial leases and approval of proposed exploration or development projects. These site-specific evaluations will also include appropriate consideration of the cumulative effects on other resources including wildlife populations, which you reference in your comment.

The BLM believes that this phased or staged approach ensures that commercial oil shale and tar sands development programs meet the intent of Congress and make areas available for oil shale and tar sands development, while taking advantage of the best available practices to minimize impacts and offer opportunities for states, local communities, and the public to participate in the process.

52577-002: The BLM acknowledges the commentor's preference for Alternative A.

52577-003: The PEIS honors previous RMP decisions regarding environmental resource protection and mineral development. Alternative B excludes from consideration all ACECs that are closed to mineral leasing and only includes those ACECs that have been identified in existing RMPs as open to mineral development. Alternative C excludes from consideration all ACECs that have any stipulations that restrict surface occupancy and use including seasonal restrictions.

52577-004: Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale or tar sands leasing. Specific detailed descriptions of big game populations and habitats and analyses of impacts on big game crucial habitats will be deferred to subsequent project-level planning prior to lease development. The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. These documents will evaluate specific occurrences of species of concern, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. Site-specific NEPA analysis would

include mitigation such as BMPs, specific protections, or avoidance to mitigate impacts to big game species from commercial oil shale or tar sands development. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders.

52577-005: In the PEIS, the BLM has evaluated a range of alternatives that provide for more or less land being available for application for leasing. As stated in the response to Comment 52577-003, the alternatives in the PEIS honor existing RMP designations that restrict mineral development in certain areas to protect existing resource values. Alternative C further restricts the area available to leasing and excludes those locations that have any restrictions on surface occupancy and use. The BLM has not considered requiring phased development or site-specific restrictions such as no-surface occupancy or controlled surface use. The BLM believes that the RD&D program will provide the kind of information that could be used to make those decisions. Project-specific NEPA evaluations will include mitigation developed in consultation with the BLM and other federal and state agencies.

52577-006: The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and they provide an effective analytical foundation for subsequent project-specific NEPA documents. There is sufficient information pertaining to habitat impacts on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, the specific number and locations of projects cannot be identified within the PEIS. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. This will include an evaluation of the specific occurrences of key wildlife habitats, analyses of the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects (including those of other existing or reasonably foreseeable future oil shale and tar sands leases), reasonable alternatives, and mitigation measures to protect wildlife habitats, as well as what level of development may be anticipated. Project-specific NEPA analyses would also include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important wildlife habitats. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders.

52577-007: Specific detailed descriptions of big game populations and habitats and analyses of impacts on big game habitats will be deferred to subsequent project-level planning prior to lease development. See also response to 52577-006.

52577-008: The text in the first paragraph of Sections 4.8.1.3 and 5.8.1.3 has been modified to indicate that complete reclamation may not be possible under all circumstances and refers the reader to the respective sections on plant communities and habitats (Sections 4.8.1.2 and 5.8.1.2) that address reclamation potential in more detail. See also response to 52577-006.

52577-009: The impact analyses provided in the PEIS qualitatively indicates the types of impacts that could occur to wildlife based on the BLM's experience with other types of mineral development. The definitions of moderate and large impacts have been modified in Tables 4.8.1-1, 4.8.1-2, 5.8.1-1, and 5.8.1-2 of the Draft PEIS and some of the potential magnitude of impacts have also been changed, to indicate that a number of impacts to wildlife species could be large if not mitigated. See also response to 52577-006.

52577-010: The information presented in the PEIS that addresses disturbance impacts to wildlife is of sufficient detail for the purposes of the PEIS. See also response to Comment 52577-006.

52577-011: Specific detailed evaluation and comparison of long-term and short-term displacement of wildlife, indirect and direct habitat losses, and reductions in productivity will be deferred to subsequent project-level planning prior to lease development. See also response to Comment 52577-006.

52577-012: The information presented in the PEIS addressing habitat fragmentation impacts to wildlife is of sufficient detail for the purposes of the PEIS. The PEIS provides an overview of habitat fragmentation impacts that could occur from commercial oil shale and tar sands development. See also response to Comment 52577-006.

52577-013: The concerns raised in the comment related to the fate of displaced wildlife are addressed in Sections 4.8.1.3.1 and 5.8.1.3.1 in sufficient detail for purposes of the PEIS. See also response to Comment 52577-006.

52577-014: The wording at the end of Section 4.8.1.3.1 has been changed to reflect the overall conclusion on habitat disturbance. The conclusion was intended to indicate that impacts to a specific wildlife species would be proportional to the amount of a specific habitat that was lost (e.g., the more crucial winter habitat lost, the greater the impact).

52577-015: The information presented in the PEIS for wildlife is of sufficient detail for the purposes of the PEIS. The PEIS identifies basic life history and population information, existing threats, and the potential for the species to be affected by commercial oil shale and tar sands development.

The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and they provide an effective analytical foundation

for subsequent project-specific NEPA documents. There is sufficient information pertaining to the occurrence of important wildlife species on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, the specific number and locations of projects cannot be identified within the PEIS. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. This will include an evaluation of the specific occurrences of key wildlife habitats, analyses of the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects (including those of other existing or reasonably foreseeable future oil shale and tar sand leases), reasonable alternatives, and possible mitigation measures to protect wildlife habitats, as well as what level of development may be anticipated.

52577-016: Tables 4.8.1-1 and 5.8.1-1 of the Draft PEIS have been modified to add water depletion as an impact category that could potentially affect wildlife. A paragraph has also been added to the discussion of habitat disturbance (Sections 4.8.1.3.1 and 5.8.1.3.1) that qualitatively assesses the impacts of water depletions to wildlife.

52577-017: Text has been added to Section 4.11.1.4 to address the comment that OSTS and ancillary facility development may fragment or destroy wildlife habitat and affect the behavior of migratory big game species, and that loss of revenues from recreation activities may also affect wildlife and habitat agency management practices. The impact of the loss of recreational activities associated with wildlife in many parts of each ROI is assessed in the PEIS through a loss in employment and income in the sectors providing goods and services to recreational visitors.

52577-018: The list of mitigation measures presented in Chapters 4 and 5, as well as the conservation measures presented in Appendix F, are not meant to be a final list of measures to be employed and would be subject to modification on the basis of consultation with federal, state, and local agencies, and interested stakeholders at the project-specific lease and development stages.

52577-019: Monitoring and mitigation of ecological resources would be developed and conducted for each lease. See response to Comment 52577-0015. Monitoring and mitigation protocols would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders. It is anticipated that these protocols would be standardized and refined as further oil shale and tar sands leases are approved.

52577-020: The introductory statement in the wildlife cumulative impact discussion of Section 6.1.5.3.7 of the Draft PEIS was only meant to imply that the current status

of the wildlife populations in the project area (as described in Section 3.8) is the result of the natural and human-influenced activities to date. It was not meant to reflect a cumulative impact assessment of oil shale and tar sands development when combined with other land use developments.

The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on wildlife.

Cumulative impacts to wildlife are discussed in Sections 6.1.5.3.7 and 6.2.5.3.7 of the PEIS. At this time, it is not possible to provide a quantitative evaluation of cumulative effects as requested in the comment. There are many uncertainties regarding the amount of development that is reasonably foreseeable, the types of technologies that might be deployed, and the locations of potential projects. Once more is known about specific leasing and development proposals, quantitative cumulative impacts will be evaluated in project-specific NEPA assessments and consultations conducted prior to leasing and development. These evaluations could make use of the resource selection models used by Johnson et al. (2005) and/or other modeling and GIS analyses.

Text has been added to the introduction to Section 6.1.5 to clarify that there are fewer acres available for development under Alternative C than under Alternative B for both oil shale and tar sands, and that those acres are excluded from Alternative C are excluded due to potentially higher environmental vulnerability. In this respect, the cumulative impacts of future oil shale and tar sands development facilitated under Alternative B may be greater than those under Alternative C. However, the full magnitude of difference cannot be identified because under both alternatives, there is a lack of information on the magnitude of future actions on public land, how many projects might be undertaken, and the likely locations for future development (i.e., the same level of future development might occur under either alternative).

The projected levels of major activities over the next 20 years considered in the cumulative impact assessment are presented in Tables 6.1.5-4 thru 6.1.5-6 of the PEIS, while Table 6.1.5-9 summarizes the major industrial activities over this time frame. Overall, 200,000 to 970,000 acres of land could be disturbed by industrial activities within the next 20 years, most due to oil and gas development. A single oil shale facility could disturb up to 14,000 acres (which includes 4,800 acres for a new electric generating plant, if needed) and a single tar sands facility would disturb up to 9,500 acres. Thus, three oil shale projects (one in each state) and one tar sands project in Utah could disturb up to 51,500 acres. In comparison, oil and gas development would disturb 150,000 to 928,000 acres over the 20-year period.

Reference:

Johnson, C. J., et al., 2005. *Cumulative Effects of Human Developments on Arctic Wildlife*. Wildlife Monographs 160.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52578.

Comment Date: March 10, 2008 14:27:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52578

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America should look to oil shale and tar sands for future energy needs

March 10, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

America's security and energy is threatened by its continual refusal to develop its own energy to address its own energy problems. We must reduce consumption of foreign energy and instead develop American energy in order for these problems to be remedied.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52578-001

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources.

Sincerely,

Response for Document 52578

52578-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52579.

Comment Date: March 10, 2008 15:05:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD52579

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
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Privacy Preference: Withhold name and address from public record
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Comment Submitted:

RE: BLM oil shale plan a solid start

March 10, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Oil Shale is an important souce of domestic energy that we as Americans should continue to evaluate through pilot scale development. Early and small scale development will enable the US to improve the technologys associated with extracting the energy and the technologies necessary for protecting human health and the environment. Small scale development will enable us to assess the economics, engineer improvements, and establish market effeciencies for the future.

A growing oil shale and tar sands industry would provide great opportunities for new business growth and development and would probably occur about the same time as the current boom of natural gas drilling tapers off, therefore providing a continuance of the activity level, jobs for potentially displaced oil and gas industry workers, and thus prevent or lessen boom/bust type impacts. 52579-001

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy and the diversification of our energy portfolio, which will give us more stable and solid energy foundation.

In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52579-001
(cont)

BLM, the american public, and industry should move forward to establish oil shale as another source of commerical energy for the US. Pilot scale develpment is appropriate for proving the economics and establishing the infrastructure and technologies for the future.

Sincerely,

Response for Document 52579

52579-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52580.

Comment Date: March 10, 2008 15:41:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52580

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: 18 years worth of transportation fuel found in oil shale

March 10, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant. 52580-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Sincerely,

Response for Document 52580

52580-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Leila Shultz.

The comment tracking number that has been assigned to your comment is OSTSD52581.

Comment Date: March 10, 2008 17:00:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD52581

First Name: Leila
Middle Initial: M
Last Name: Shultz
Organization:
Address: 5230 Old Main Hill
Address 2:
Address 3:
City: Logan
State: UT
Zip: 84321
Country: USA
Email: sagewort60@hotmail.com
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Attachment:

Comment Submitted:

The oil shale and tar sands country of Utah and Colorado provide habitat for many unique species of plants. We do not know what will happen if they go extinct. Some may have medicinal use; all have something to teach us about survival in a harsh environment. What is being done to save these plants for future generations? 52581-001

Response for Document 52581

52581-001: A number of ACECs include such endemic plant species, and provide protections through RMP stipulations. All ACECs are excluded from leasing in Alternative C. BLM also protects Remnant Vegetation Associations, some of which include a number of such endemic species, and their habitats through RMP stipulations. Some of these endemic plant species are classified as BLM sensitive. BLM protects sensitive species, and their habitats, through RMP stipulations and must manage sensitive species in such a way as to prevent the need for their listing under the Endangered Species Act (ESA) in the future. Some of these endemic plant species are federally listed as threatened or endangered, and are protected by the requirements of the ESA, which are complied with by the BLM.

Thank you for your comment, sue king.

The comment tracking number that has been assigned to your comment is OSTSD52583.

Comment Date: March 11, 2008 13:58:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52583

First Name: sue
Middle Initial: b
Last Name: king
Organization:
Address: 1227 no 760 west
Address 2:
Address 3:
City: orem
State: UT
Zip: 84057
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

i ask you to set aside personal and corporate profit for the sake of leaving to future generations, incl other nations who frequent our unique redrock and amazing hill and mt formations, and the serene open spaces designated in between. Our past leaders had the vision to designate these locations as use for all,and not for development. Please honor that wisdom.

52583-001

Response for Document 52583

52583-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Kris Lodge.

The comment tracking number that has been assigned to your comment is OSTSD52584.

Comment Date: March 11, 2008 16:34:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD52584

First Name: Kris
Middle Initial:
Last Name: Lodge
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment: 03_11_08_PEISComment.pdf

Comment Submitted:

See Attachment.

March 11, 2008

Dramatically increased oil consumption in developing nations is placing serious new demands on worldwide oil supplies – a phenomenon that is at least in part responsible for the price of oil having reached historic levels. In the absence of available new supplies, such demand ensures that fuel prices will continue to rise. Prices at the pump will likely be upwards of $4.00 per gallon by summer 2008.

The U.S. now imports more than 60 percent of the oil we rely on to keep us moving *and* we are sending more than $1 billion a day to countries like Iran, Venezuela and Saudi Arabia. That strikes me as unacceptable and unnecessary.

It is my belief – based upon research I've undertaken and conversations I've sought out with knowledgeable people – that the enormous domestic supply of oil shale and tar sands in the U.S. can be responsibly and efficiently produced. According to government estimates, oil shale deposits on public lands hold the equivalent of more than one trillion barrels of oil – sufficient oil to keep America driving for at least 180 years.

I also believe that allowing environmentally responsible development of these resources can have a marked upside such as lower fuel prices at the pump; greater energy security and independence; diversity in the supply of oil we refine for gasoline; potentially beneficial and valuable bi-products.

52584-001

Because a leasing program on federal lands doesn't currently exist, development of a vital domestic energy resource – with emerging cost-effective and environmentally-responsible technologies – is prohibited. The Bureau of Land Management is working with 14 different federal, state and local agencies on a proposal – the Proposed Oil Shale and Tar Sands Programmatic Environmental Impact Statement – that will allow development of these resources while protecting the environment and minimizing impacts on local communities.

This proposal includes a much-appreciated qualitative assessment of the environmental, social and economic impacts of making lands available for future leasing of oil shale and tar sands resources on BLM-administered lands in Colorado, Utah and Wyoming.

The opportunity and economics are in place to add significantly to America's domestic oil reserves by tapping into our vast oil shale resources. Given America's longtime dependence on oil and our heightened need to increase energy security, it is past time for the U.S. to leverage solutions that have emerged to develop this important resource.

Thank you for accepting my comments.

Best regards,

Kris Lodge

Response for Document 52584

52584-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52585.

Comment Date: March 11, 2008 19:27:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD52585

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale development can occur with environmental protections

March 11, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There are no perfect energy solutions. Each energy source has its pro's and con's. The only way to be successful is to assure a diversity of supply by working to develop all of our nation's energy resources including oil shale.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant. 52585-001

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52585

52585-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52586.

Comment Date: March 12, 2008 11:35:01AM
Oil Shale and Tar Sands
Comment ID: OSTSD52586

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Plan

March 12, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is important for America to continue to develop new technologies; such as those we are developing to tap unconventional sources like oil shale and tar sands in the U.S.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant. 52586-001

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence.

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Sincerely,

Response for Document 52586

52586-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52587.

Comment Date: March 12, 2008 12:32:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD52587

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America should look to oil shale and tar sands for future energy needs

March 12, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Decreasing our dependence on foreign energy supplies will positively impact our economy and also positively impact our trade deficit.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52587-001

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52587

52587-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, John Harrison.

The comment tracking number that has been assigned to your comment is OSTSD52588.

Comment Date: March 12, 2008 15:40:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD52588

First Name: John
Middle Initial: M
Last Name: Harrison
Organization:
Address: 4431 Comanche Drive
Address 2:
Address 3:
City: Laramie
State: WY
Zip: 82072
Country: USA
Email: johnmh@uwyo.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am very disappointed to see the idea of oil shale development on public lands being pursued. Oil shale and other highly destructive extractive activities are not acceptable on public lands, especially where wilderness study areas, endangered species, historic values and scenic vistas are compromised or destroyed as a result. There are much more promising sustainable energy alternatives to be pursued. 52588-001

Response for Document 52588

52588-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Bart Geerts.

The comment tracking number that has been assigned to your comment is OSTSD52589.

Comment Date: March 12, 2008 15:45:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD52589

First Name: Bart
Middle Initial:
Last Name: Geerts
Organization:
Address: 222 Corthell Rd
Address 2:
Address 3:
City: Laramie
State: WY
Zip: 82070
Country: USA
Email: brtgeerts@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As an atmospheric scientist, I recommend that full-scale commitment to oil shale production should wait until after the oil industry proves that oil shale can be produced without unacceptable impacts to our lands, waters, and air quality, especially in the Western USA. Please adopt the No Action alternative. Do not move forward with commercial-scale oil shale leasing until results from the experimental Research and Development oil shale pilot projects become available. 52589-001

Response for Document 52589

52589-001: Since the alternatives in the PEIS do not authorize the immediate leasing of the lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing.

Subsequent NEPA analysis will be required prior to any leasing or plan of development decision and will include discussion of the direct, indirect, and cumulative effects of that action. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to avoid or mitigate short-term and long-term adverse impacts.

52589-002: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Sally Neary.

The comment tracking number that has been assigned to your comment is OSTSD52590.

Comment Date: March 12, 2008 16:07:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD52590

First Name: Sally
Middle Initial: A
Last Name: Neary
Organization:
Address: 22608 115th Pl. SE
Address 2:
Address 3:
City: Kent
State: WA
Zip: 98031
Country: USA
Email: sallyneary@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not allow the expansion of shale oil exploration until you know that it will not be harmful to the environment. It is worth moving cautiously to avoid making a mistake that could last forever. 52590-001

Thank you.

Response for Document 52590

52590-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Dianne Duncan Perrote.

The comment tracking number that has been assigned to your comment is OSTSD52591.

Comment Date: March 12, 2008 16:29:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52591

First Name: Dianne Duncan
Middle Initial:
Last Name: Perrote
Organization:
Address: 1712 Ord Street
Address 2:
Address 3:
City: Laramie
State: WY
Zip: 82070
Country: USA
Email: duncanperrote@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I find it reprehensible that the Bureau of Land Management is pursuing a program to lease out the rights to mine for oil shale across millions of acres in Wyoming, Colorado, and

Utah .

Oil shale production is among the dirtiest and most environmentally degrading land uses that the West has ever seen. It involves either massive strip mining or bulldozing the entire landscape where extraction occurs. It requires huge amounts of electricity to wring petroleum products from the rock, which will likely mean major increases in polluting coal-fired power plants, with heavy impacts to global warming. In addition, BLM predicts that full-scale oil shale operations would use up 2 to 15 percent of the flow of the 52591-001

Colorado River system, a waterway that is already badly overused. Left behind is slag that leaches heavy metals and other toxic compounds into surface and groundwater supplies.

The BLM is proposing to sell the rights to dig for oil shale on millions of acres of public land without adequately considering impacts to sensitive wildlife and treasured landscapes. At risk are key habitats for sage grouse and desert elk as well as spectacular places like the Adobe Town and the Kinney Rim proposed wilderness areas in the Red Desert.

I am speaking out now against the destruction of western public lands in the name of oil shale!

A full-scale commitment to oil shale production should wait until after the oil industry proves that oil shale can be produced without unacceptable impacts to our lands, waters, and air quality. I urge you to adopt the No Action alternative and not move forward with commercial-scale oil shale leasing until results from the experimental Research and Development oil shale pilot projects become available. 52591-002

Responses for Document 52591

52591-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52591-002: The BLM acknowledges the commentor’s preference for Alternative A.

Thank you for your comment, Maiken Winter.

The comment tracking number that has been assigned to your comment is OSTSD52592.

Comment Date: March 12, 2008 16:57:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD52592

First Name: Maiken
Middle Initial:
Last Name: Winter
Organization:
Address: 212 Tareyton Dr
Address 2:
Address 3:
City: Ithaca
State: NY
Zip: 14850
Country: USA
Email: mw267@cornell.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Newest research by world leading climae scientists Jim Hansen (USA) and John Schellnhuber (Germany) clearly show that we are getting very close to dangerous levels of CO2 in the atmosphere. If we do not immediately greatly reduce CO2 emissions, and simultaneously protect natural environments to help absorb CO2 by the biosphere, then we will set ourselves up for a humanitarian catastrophe we cannot even imagine yet. Please, reconsider your project for the sake of all of us. Thank you.

52592-001

Response for Document 52592

52592-001: Thank you for your comment.

Thank you for your comment, David Johnson.

The comment tracking number that has been assigned to your comment is OSTSD52593.

Comment Date: March 12, 2008 17:10:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD52593

First Name: David
Middle Initial:
Last Name: Johnson
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The Oil Shale and Tar Sands Programmatic Environmental Impact Statement, or OSTS PEIS, is so important for addressing our nation's energy needs! I support development of these unconventional resources because I believe that an active and robust oil shale program can be administered in an environmentally sound manner (by using time-tested, site-specific NEPA processes).

The primary reason I write to you today is to also share my opinions on the socioeconomic impacts associated with the proposed development. The OSTS PEIS identifies areas in the "Green River Formation" (an area encompassing some 2.3 million acres in Colorado, Wyoming and Utah) where oil shale and tar sands are present. Western Colorado economies would see numerous benefits by allowing for oil shale development. Oil shale will provide new job sources to help maintain employment diversity and stability. This would further give existing businesses and new businesses more customers for their goods and services. The economic opportunities associated with development will help strengthen local communities in our area. 52593-001

Please consider the economic benefits associated with development as you proceed in the OSTS PEIS process. You can include my name in the list of supporters for development of these strategic unconventional resources. 52593-002

Responses for Document 52593

52593-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52593-002: Estimates of the economic impacts of oil shale and tar sands power plant and coal mine facility development on direct and indirect employment and income in each ROI indicate that oil shale, tar sands, and ancillary facility development would provide substantial employment and income in each ROI, together with higher wages for some occupations. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities.

Thank you for your comment, David Brinkley.

The comment tracking number that has been assigned to your comment is OSTSD52594.

Comment Date: March 12, 2008 17:11:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD52594

First Name: David
Middle Initial:
Last Name: Brinkley
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please support oil shale and tar sands development in Wyoming, Colorado and Utah! These resources are necessary to help address our nation's energy needs. High energy costs and a tight energy supply illustrate the need for the federal government to support development of unconventional fuels, such as oil shale and tar sands.

In addition to meeting our energy demand, development will also have a positive impact on local communities throughout Wyoming, Colorado and Utah. The Oil Shale and Tar Sands PEIS identifies some 2.3 million acres in these states where tar sands and oil shale are most geologically abundant. There are a number of small towns and rural communities in these states that welcome economic development opportunities. Developing oil shale and tar sands would add employment diversity for many of these areas and also help sustain local businesses that depend on these workers as their customers. Further, these communities and towns would benefit from the tax and royalty revenues generated by development. These dollars are important for supporting infrastructural improvements. 52594-001

Thank you for reviewing my letter. Please move forward with a version of the Oil Shale and Tar Sands PEIS that is pro-development.

Response for Document 52594

52594-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Gary Hass.

The comment tracking number that has been assigned to your comment is OSTSD52595.

Comment Date: March 12, 2008 17:14:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52595

First Name: Gary
Middle Initial:
Last Name: Hass
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I write in support of the BLM's draft Oil Shale and Tar Sands Programmatic Environmental Impact Statement (OSTS PEIS). This document identifies an estimated 2.3 million acres where oil shale and tar sands are located. I care about the environment and was pleased to see that any development would be done on a lease-by-lease basis. This allows for a NEPA review that considers site-specific and project-specific factors.

Additionally, I want to emphasize my support for developing these unconventional fuels based on the positive economic impacts they would have throughout the Colorado-Utah-Wyoming region. A growing oil shale and tar sands industry would provide a number of opportunities for new business growth and development. For rural areas in the West, this growth is significant. Further, the region's socioeconomic infrastructure would benefit from the tax and royalty revenues generated by oil shale and tar sands development. These benefits are equally important to me and my family because we live and work in this area.

Please include my letter in the public comment record as supporting development of these important unconventional fuels. Thank you.

52595-001

Response for Document 52595

52595-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Jeff Nunn.

The comment tracking number that has been assigned to your comment is OSTSD52596.

Comment Date: March 12, 2008 17:15:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52596

First Name: Jeff
Middle Initial:
Last Name: Nunn
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please support oil shale and tar sands development as set forth in the OSTS PEIS. This plan identifies a few million acres in Colorado, Utah and Wyoming where these resources are located. As someone familiar with this area, I know that development would not only help address our nation's energy needs, but would also bring economic opportunities and prosperity to a number of communities out West. 52596-001

Western Colorado, in particular, would see significant growth by allowing oil shale development. Oil shale will provide new job sources to help maintain employment diversity and stability for the economy. Also, I think it's important to keep in mind that the jobs created in this industry are good-paying jobs that often have a number of benefits, including health care and retirement plans. Further, the wages these workers earn are spent in local communities, supporting local businesses. These benefits should not be dismissed during the BLM's review of the OSTS PEIS. 52596-002

Responses for Document 52596

52596-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52596-002: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

Thank you for your comment, Larry Bradley.

The comment tracking number that has been assigned to your comment is OSTSD52597.

Comment Date: March 12, 2008 17:16:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52597

First Name: Larry
Middle Initial:
Last Name: Bradley
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I write to support the BLM Oil Shale and Tar Sands Draft Programmatic EIS. This plan would allow for developing these unconventional resources in the Green River Formation, an area encompassing parts of Colorado, Utah and Wyoming. I support development as a necessary step in increasing domestic energy resources.

I also write to share my thoughts regarding the economic impact that development would have in this area. As someone familiar with this region, I can attest to the fact that development is good for many of these local economies. The jobs created in the energy industry give men and women a chance to make good money, and often, have health care and retirement benefits. A growing oil shale and tar sands industry would also provide new opportunities for new business growth and development. For rural communities, some of which are in an economic slump, the potential economic benefits associated with development are so important. 52597-001

I will conclude by also mentioning that the EIS leads the way for helping to develop an oil shale and tar sands program that is regulated by a time-tested, site-specific NEPA process which will help mitigate potential on/off site mitigations. This is a testament to my belief that energy can be developed in an environmentally sensitive manner.

Response for Document 52597

52597-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Micheal Johnson.

The comment tracking number that has been assigned to your comment is OSTSD52598.

Comment Date: March 12, 2008 17:16:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD52598

First Name: Micheal
Middle Initial:
Last Name: Johnson
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please accept this letter as my submission of comments regarding the Oil Shale and Tar Sands Programmatic Environmental Impact Statement (OSTS-PEIS). I support developing these unconventional resources for several reasons:

Development will help diversify our country's energy sources Development will help reduce our country's dependence on foreign oil Development can be done in a way that is environmentally sound — 52598-001

Additionally, I think the Bureau of Land Management could do more to describe the socioeconomic benefits associated with development. The affected region, which includes portions of Colorado, Wyoming and Utah, will benefit from tax and royalty revenues generated by development. These funds could be used to invest in necessary infrastructural improvements – something these rural areas could really use. Further, development also means the creation of new jobs and economic opportunities for new and existing businesses. — 52598-002

Please do not be persuaded by the scare tactics of anti-development advocates. Their plan would result in increasing our reliance on foreign oil, which is unacceptable to me. — 52598-001 (cont.)

Responses for Document 52598

52598-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52598-002: Estimates of the economic impacts of oil shale, tar sands, and ancillary facility development on direct and indirect employment and income in each ROI indicate that these facilities would provide substantial employment and income in each ROI, together with higher wages for occupations directly associated with construction and operations activities. Sections 4.11.1, 5.11.1, and 6.1.1.10 describe these benefits. There would also be benefits in addition to income associated with direct and indirect employment in each ROI, notably retirement programs and health care coverage. Sections 4.11 and 4.12 indicate that higher local government expenditures would create the potential for better-quality local public services and improved infrastructure in some communities. Increased revenues from various sources, notably property and sales taxes, in addition to revenues from severance taxes and royalties, would provide local governments with opportunities to expand the quality and scope of public services and provide new and expanded infrastructure capacity. Increases in the overall level of economic activity in each ROI would also provide opportunities for existing and new small businesses.

Thank you for your comment, Michelle Johnson.

The comment tracking number that has been assigned to your comment is OSTSD52599.

Comment Date: March 12, 2008 17:17:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD52599

First Name: Michelle
Middle Initial:
Last Name: Johnson
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to share my support for the Oil Shale and Tar Sands PEIS, which establishes an important beginning to allow for development of these critical unconventional energy sources. After reviewing this document, I want to briefly comment on and commend the BLM for recognizing the importance of reducing our nation's dependence on foreign oil and for developing a plan that is environmentally sound.

The main purpose of this letter is to also share my views regarding the economic impact that development would have in our area. Western Colorado economies would see significant growth by allowing oil shale development. It will provide new job sources that will in turn help maintain employment diversity and stability. Western Colorado would not be the only place to benefit. Portions of Utah and Wyoming would also be impacted. For rural communities in this area, the economic opportunities associated with development are considerable. This region's socioeconomic infrastructure will further benefit from the tax and royalty revenues generated by oil shale and tar sands development. 52599-001

Please consider the views of people like me and my family who live and work in this area. We support reasonable and responsible energy development because it is good for our country and our communities. Oil shale and tar sands development should be a part of our country's energy portfolio.

Response for Document 52599

52599-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Mikolas Kehoe-Albright.

The comment tracking number that has been assigned to your comment is OSTSD52600.

Comment Date: March 12, 2008 17:18:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD52600

First Name: Mikolas
Middle Initial:
Last Name: Kehoe-Albright
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support the BLM's OSTS PEIS Draft, or the Oil Shale and Tar Sands Programmatic Environmental Impact Statement. This plan would allow for commercial development of these strategic resources throughout areas in the West (Colorado, Utah and Wyoming). A robust and active oil shale program will help strengthen communities and can be done in an environmentally sensitive manner.

In terms of strengthening communities, development will create jobs in a new industry. These are good paying, quality jobs. Additionally, the people employed in this industry spend their time and money in nearby communities, which helps support local businesses and creates opportunities for new businesses. Development is also important for generating tax and royalty dollars – money which local governments can use to invest in infrastructural improvements. For rural communities in this area, these economic benefits are tremendously important. 52600-001

In terms of environmental responsibility, I think that the provisions to utilize a lease-by-lease application process are noteworthy. This requires companies to identify specific BLM lands as part of their lease application package. NEPA analysis would be conducted on a site-specific and project-specific basis, allowing for the development of appropriate mitigation measures as needed based on an individual lease.

Please move forward with a OSTS PEIS that allows for reasonable and responsible development. I would also ask that the BLM refrain from imposing overly restrictive measures that would discourage development.

Response for Document 52600

52600-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Rodney Long.

The comment tracking number that has been assigned to your comment is OSTSD52601.

Comment Date: March 12, 2008 17:19:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD52601

First Name: Rodney
Middle Initial:
Last Name: Long
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I would like to take this opportunity to share my support for the Oil Shale & Tar Sands PEIS, a plan which would allow for development of these valuable resources in parts of Colorado, Utah and Wyoming. I am familiar with this area and can tell you first hand that development would have numerous benefits. First, development would help the Untied States become less dependent on foreign oil, something of which I support. Second, development can be done in an environmentally sensitive manner. Utilizing a lease-by-lease application process allows for a NEPA review that considers the unique needs and circumstances of an area. Finally, and most importantly, development is good for local communities located near development areas.

Western Colorado would see meaningful growth by allowing for oil shale development. I am sure that other rural areas in Wyoming and Utah would see similar growth. The jobs created by the oil shale industry would further maintain employment diversity and stability in these economies. In addition to job creation, development would also positively impact businesses in these communities which provide goods and services to the workers. Also, the tax and royalty revenues generated by oil shale development would also benefit local communities, by giving local officials dollars to invest in infrastructural needs in the region. For rural places in the West, these improvements are important.

52601-001

Response for Document 52601

52601-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Scott Siegel.

The comment tracking number that has been assigned to your comment is OSTSD52602.

Comment Date: March 12, 2008 17:20:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD52602

First Name: Scott
Middle Initial:
Last Name: Siegel
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please include this correspondence as my comments on the BLM's Oil Shale and Tar Sands Draft Programmatic EIS. I support developing these unconventional resources as they are necessary for developing our domestic energy supply. I am deeply concerned about our country's reliance on foreign oil, particularly from politically and economically unstable foreign countries.

I also support domestic production of oil shale and tar sand because development has several important economic benefits. For affected communities located in the Colorado-Utah-Wyoming region, development brings new employment opportunities. These new employees help support existing businesses and provide great opportunities for new business growth.

52602-001

It's also important to note that development generates tax and royalty revenues that can be used on infrastructural improvements. These improvements strengthen and improve the quality of life for these local communities.

The economic benefits derived from development of oil shale and tar sands are important to me and my neighbors. Please move forward with an EIS that supports development without placing unnecessary restrictions that will deter development.

Response for Document 52602

52602-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Richard Waite.

The comment tracking number that has been assigned to your comment is OSTSD52603.

Comment Date: March 12, 2008 17:21:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD52603

First Name: Richard
Middle Initial: A
Last Name: Waite
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

THIS LETTER IS MY SUBMISSION OF COMMENTS FOR THE PUBLIC RECORD ON THE OS PEIS (OIL SHALE AND TAR SANDS PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT). AFTER HAVING REVIEWED THIS DOCUMENT, I WANTED TO TAKE A FEW MOMENTS TO SHARE MY SUPPORT FOR DEVELOPING UNCONVENTIONAL FUELS LIKE SHALE AND TAR SANDS IN AN EFFORT TO ADDRESS OUR NATION'S UNHEALTHY RELIANCE ON FOREIGN OIL. I ALSO SUPPORT DEVELOPMENT BECAUSE OF THE ECONOMIC BENEFITS.

ECONOMICALLY, ALLOWING FOR DEVELOPMENT HAS THE POTENTIAL TO CREATE THOUSANDS OF GOOD PAYING JOBS THROUGHOUT OUR REGION. DEVELOPMENT WOULD ALSO HELP LOCAL GOVERNMENTS PROVIDE FOR THEIR COMMUNITIES' INFRASTRUCTURAL NEEDS THROUGH FUNDS GENERATED BY TAXES AND ROYALTIES ON PRODUCTION. FOR RURAL AND REMOTE COMMUNITIES, THESE INFRASTRUCTURA IMPROVEMENTS ARE GREATLY NEEDED. 52603-001

I ALSO SUPPORT DEVELOPMENT BECAUSE OF THE POSITIVE EFFECT IT HAS ON LOCAL BUSINESSES. DEVELOPMENT CAN ALSO SPUR NEW BUSINESS OPPORTUNITIES, ALL OF WHICH HELPS STRENGTHEN LOCAL COMMUNITIES.

OIL SHALE AND TAR SANDS CAN BE DEVELOPED IN A WAY THAT IS ENVIRONMENTALLY SENSITIVE. I SUPPORT THE OSTS PEIS SECTION WHICH REQUIRES THAT DEVELOPMENT BE DONE ON A LEASE-BY-LEASE APPLICATION. THIS WILL ENSU THAT THE TIME-TESTED NEPA PROCESS WILL MITIGATE ENVIRONMENTAL EFFECTS WHILE CONSIDERING THE UNIQUENESS OF A PARTICULAR PROJECT PROPOSAL SITE

Response for Document 52603

52603-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Don Walker.

The comment tracking number that has been assigned to your comment is OSTSD52604.

Comment Date: March 12, 2008 17:23:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD52604

First Name: Don
Middle Initial:
Last Name: Walker
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Western Colorado economies will see significant growth by allowing for oil shale development. As a resident of this area, I am writing to you to support the OSTS PEIS, or Oil Shale and Tar Sands Programmatic Environmental Impact Statement. Not only would our area benefit – so would dozens of other communities located throughout Utah and Wyoming. These economic benefits are significant and should not be dismissed as trivial.

Development means good paying jobs for men and women in this area. Tens of thousands of jobs are lost every month in the United States. Energy production, however, is one area where jobs are being created. Development also means business opportunities for local communities and it also means an increase in tax and royalty revenues. This gives local leaders the financial resources to invest in necessary infrastructural expansion and improvement. 52604-001

I know there are critics of energy development in the United States who do not want any new development. To me, their rhetoric is empty and irresponsible. If we do not produce more energy domestically, we will continue to see rising energy costs and increasing reliance on foreign nations for oil. Oil shale and tar sands can be developed in an environmentally responsible way and the OSTS PEIS exemplifies this point.

Response for Document 52604

52604-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, curtis harvey.

The comment tracking number that has been assigned to your comment is OSTSD52605.

Comment Date: March 12, 2008 17:25:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD52605

First Name: curtis
Middle Initial:
Last Name: harvey
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to you today to support oil shale and tar sands development as described in the Oil Shale & Tar Sands PEIS. These resources are critical for addressing our nation's energy needs. A tight supply of energy has contributed to the growing cost of energy. Everyone in this country is feeling the pinch. Rather than increasing our reliance on foreign oil, I would much rather see more domestic energy production. The Bureau of Land Management has taken an important first step to allow for the development of strategic unconventional fuels. For this, I am thankful.

I also want to share my thoughts on the economic benefits associated with development. As you know, the Oil Shale & Tar Sands PEIS identifies some 2.3 million acres throughout Wyoming, Utah and Colorado where these resources are most geologically abundant. For communities located near development areas, the positive economic effects are numerous. First, development means the direct creation of new employment opportunities in a field that pays well and often includes medical and retirement benefits. Second, development indirectly helps stimulate local economies, particularly small businesses that provide goods and services to energy workers. Finally, development also means an increase in tax and royalty revenues, which can be used to invest in infrastructural improvement. Please do not neglect to consider these important impacts!!

52605-001

Response for Document 52605

52605-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Matt Keefe.

The comment tracking number that has been assigned to your comment is OSTSD52606.

Comment Date: March 12, 2008 17:26:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD52606

First Name: Matt
Middle Initial:
Last Name: Keefe
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to add my name to your list of people who support oil shale and tar sands development in Colorado, Utah and Wyoming. I have reviewed the Oil Shale and Tar Sands Programmatic Environmental Impact Statement draft and think this document marks and important first step to address our country's energy challenges. I believe that energy production conducted in the United States utilizes the best environmental practices. Foreign countries, particularly in the Middle East, are much less committed to environmentally responsible energy development. Domestic energy production should be the focus of our nation's energy policy – not relying more on foreign oil.

I also want to share my support for developing these unconventional fuels because of the numerous economic benefits it would give to communities located near development areas. Western Colorado, for example, would see sizeable growth by allowing oil shale development. Further, development also means an increase in tax and royalty revenues – these dollars can be used to support infrastructural needs of often remote areas throughout our region. Development is also important for encouraging economic opportunities for new businesses and existing businesses located near development sites. 52606-001

With the rising cost of energy, we cannot afford to sit back and do nothing. Please support efforts to develop these unconventional resources.

Response for Document 52606

52606-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Lorraine Thompson.

The comment tracking number that has been assigned to your comment is OSTSD52607.

Comment Date: March 12, 2008 17:56:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD52607

First Name: Lorraine
Middle Initial: M
Last Name: Thompson
Organization:
Address: 126 Cottage St.
Address 2:
Address 3:
City: Middletown
State: NY
Zip: 10940
Country: USA
Email: Laura45@frontiernet.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

WHY WOULD YOU WANT TO EXPLORE AND CAUSE MORE GREEN HOUSE GASES TO BE RELEASED IN A GLOBAL WARMING CATASTROPHE THAT THE WHOLE WORLD IS SUFFERING FROM? HOW ABOUT INVESTING IN SOLAR ENERGY AND ALTERNATIVE FUELS THAT WILL ENSURE A FUTURE FOR ALL MANKIND.....	52607-001

Response for Document 52607

52607-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gina Janett.

The comment tracking number that has been assigned to your comment is OSTSD52608.

Comment Date: March 12, 2008 18:23:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD52608

First Name: Gina
Middle Initial: C
Last Name: Janett
Organization:
Address: 730 W. Oak Street
Address 2:
Address 3:
City: Fort Collins
State: CO
Zip: 80521
Country: USA
Email: ginaciao@frii.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to urge the BLM to select the No Action alternative and to forego initiating leasees of federal land for full scale oil shale development until the industry can prove that it will not have deleterious impacts on water supplies, wildlife habitat, air quality and adjacent communities. 52608-001

BLM should wait until the results of the Demonstration Projects are completed before leasing thousands of acres of PUBLIC LAND to private companies for oil shale and tar development. 52608-002

Whether using above ground strip mining or underground methods of extracting oil shale, the methods all have huge negative impacts on the environment. Destruction of the surface would impact the habitat of wildlife including big game species as well as threatened smaller species. Waste rock volumes would be huge and would expose watersheds to heavy metals and other toxic substances. Underground oil shale processing has not been proven and could have deleterious impacts on groundwater and surface water alike.

It is estimated that oil shale development will use up to 2-15% of the remaining flow of the Colorado River which could negatively impact communities which depend on its water in Colorado as well as the other states into which it flows. Such a huge consumption of Colorado River water would possibly impact the interstate compact that divides up flows between the states, and could provoke more interstate legal battles. 52608-003

Full scale oil shale development would require huge amounts of electricity to process the oil shale, likely necessitating new electric power plants. Currently, recent studies have shown the high altitude lakes of Rocky Mountain National Park have higher levels of acidity and mercury due to air pollution traveling hundreds of miles from coal fired power plants in Colorado, Utah, and Nevada. We do not need to further damage our air quality and water supplies by extracting oil shale.

I urge you to professionally evaluate the true environmental impacts of full scale oil shale development. Please do not make a political decision to support the corrupt Bush administration, but use the science available to halt this destructive proposal. 52608-002 (cont.)

Please preserve the special qualities and landscape of our western lands for future generations. Do the right thing and choose the NO ACTION ALTERNATIVE. 52608-001 (cont.)

Thanks!

Responses for Document 52608

52608-001: The BLM acknowledges the commentor's preference for Alternative A.

52608-002: The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands within Colorado without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA process.

52608-003: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

Thank you for your comment, Anthony Howarth.

The comment tracking number that has been assigned to your comment is OSTSD52609.

Comment Date: March 12, 2008 18:31:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52609

First Name: Anthony
Middle Initial: M
Last Name: Howarth
Organization:
Address:
Address 2:
Address 3:
City:
State: NJ
Zip:
Country: USA
Email: anthonyhowarth@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment: PEIS-ChattCorp 12Mar08.doc

Comment Submitted:

Americans are facing an energy crisis of historical proportions: • Analysts are predicting that gasoline will be over $4.00 per gallon this summer – due largely to the failure of international oil production to keep pace with increased international consumption of oil. • Americans now import over 60% of the oil that we use to make gasoline and diesel – and send over $1 billion a day to countries like Saudi Arabia, Venezuela and Iran In order to help lower gasoline and diesel prices – and in order to strengthen our nation's energy security, the United States needs to expand access to its domestic energy resources. Domestic reserves of oil shale and tar sands are vital sources of domestic energy – in fact, the federal government estimates that oil shale deposits on public lands hold the equivalent of at least 1.23 trillion barrels of oil. These resources should be responsibly developed in order to lower gas and diesel prices, increase American energy security and reduce our dependence on imported oil. Because a robust and active oil shale program can be done in a balanced manner that simultaneously promotes energy production and provides comprehensive environmental protections, Chattanooga Corp and I strongly support Alternative B in the PEIS. The Chattanooga process is comprised of common commercial sub-processes and has been successfully demonstrated to extract and convert domestic materials such as oil sand, heavy oil, oil shale and liquid bitumen into petroleum fuel vapors. Our controlled internal gases are cleaned of particulates, cooled and separated. Recovery of waste heat, power co-generation and the utilization of the fuel gases produced in the reactor make the Chattanooga process virtually self sufficient with lower capital and production costs per bbl, and reduced energy requirements. If BLM adopts Alternative A, the United States will be missing a critical strategic opportunity to exploit these important domestic energy sources while continuing to increase our dependence on imported oil and driving up gasoline and diesel prices, and Alternative C does not allow for full recovery of oil shale and tar sands resources and does not provide for sound or efficient management of the program. It is important to have a Programmatic EIS in place to protect the environment while these resources are developed Please ensure that these important national energy resources can be developed in an environmentally sound manner in order to help reduce gasoline and diesel prices, as well as our dependence on foreign oil by adopting Alternative B in the PEIS. See Attachment.

March 12, 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Americans are facing an energy crisis of historical proportions:

- Analysts are predicting that gasoline will be over $4.00 per gallon this summer – due largely to the failure of international oil production to keep pace with increased international consumption of oil.
- Americans now import over 60% of the oil that we use to make gasoline and diesel – and send over $1 billion a day to countries like Saudi Arabia, Venezuela and Iran

In order to help lower gasoline and diesel prices – and in order to strengthen our nation's energy security, the United States needs to expand access to its domestic energy resources.

Domestic reserves of oil shale and tar sands are vital sources of domestic energy – in fact, the federal government estimates that oil shale deposits on public lands hold the equivalent of at least 1.23 trillion barrels of oil. These resources should be responsibly developed in order to lower gas and diesel prices, increase American energy security and reduce our dependence on imported oil.

Because a robust and active oil shale program can be done in a balanced manner that simultaneously promotes energy production and provides comprehensive environmental protections, Chattanooga Corp and I strongly support Alternative B in the PEIS. The Chattanooga process is comprised of common commercial sub-processes and has been successfully demonstrated to extract and convert domestic materials such as oil sand, heavy oil, oil shale and liquid bitumen into petroleum fuel vapors. Our controlled internal gases are cleaned of particulates, cooled and separated. Recovery of waste heat, power co-generation and the utilization of the fuel gases produced in the reactor make the Chattanooga process virtually self sufficient with lower capital and production costs per bbl, and reduced energy requirements. 52609-001

If BLM adopts Alternative A, the United States will be missing a critical strategic opportunity to exploit these important domestic energy sources while continuing to increase our dependence on imported oil and driving up gasoline and diesel prices, and Alternative C does not allow for full recovery of oil shale and tar sands resources and does not provide for sound or efficient management of the program.

It is important to have a Programmatic EIS in place to protect the environment while these resources are developed

Please ensure that these important national energy resources can be developed in an environmentally sound manner in order to help reduce gasoline and diesel prices, as well as our dependence on foreign oil by adopting Alternative B in the PEIS.

Sincerely,

Name: _____

Address: _____

E-mail: _____

Response for Document 52609

52609-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52610.

Comment Date: March 12, 2008 18:48:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD52610

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Commercial leasing for oil shale should be approved

March 12, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

I'm very much in favor of an alternate and renewable energy future. But until such technologies mature to the point that they significantly contribute to our domestic energy needs, the development of unconventional energy resources like oil shale and tar sands can bridge the gap between now and our renewable energy future.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52610-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

America's shortsightedness in dealing with its energy problems is deeply frustrating. Oil shale is a resource of great abundance and value, yet remains both America and the world's largest unexploited hydrocarbon resource in the world. It is appalling that as America's energy crisis only worsens, our federal government refuses to develop American energy and only seems willing to enrich other oil-rich foreign nations that are often hostile to our country.

52610-001 (cont.)

Now is the time for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52610

52610-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Martin Steitz.

The comment tracking number that has been assigned to your comment is OSTSD52611.

Comment Date: March 12, 2008 19:29:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD52611

First Name: Martin
Middle Initial: J
Last Name: Steitz
Organization:
Address: 21853 Iden Avenue Place N
Address 2:
Address 3:
City: Forest Lake
State: MN
Zip: 55025
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS.	52611-001
As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation.	52611-002
Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming.	52611-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information.

52611-001 (cont.)

Responses for Document 52611

52611-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52611-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

52611-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related

services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

Thank you for your comment, Jazmyn McDonald.

The comment tracking number that has been assigned to your comment is OSTSD52612.

Comment Date: March 12, 2008 19:35:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD52612

First Name: Jazmyn
Middle Initial:
Last Name: McDonald
Organization:
Address: PO Box 1808
Address 2:
Address 3: Lander
City: WY
State: WY
Zip: 82520
Country: USA
Email: jamcdona@wyoming.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale and Tar Sands PEIS

I urge the BLM to halt all further leasing of public lands for oil shale operations in Wyoming and Utah until such time as it can be proved that oil shale fields are the most efficient use of our current Colorado River water system and electric power plant supplies.

As a longterm resident of Wyoming, I have seen another oil shale boom and rush come and go, with the resultant empty towns and economic bust. As I recall the late 70s and early 80s, a lot of hope was placed in oil shale development; and frankly, it was a dud. 52612-001

It seems particularly shortsighted of the BLM to proceed with any leasing until results from the experimental Research and Development plots are available; and more to the point; that those results prove that this is a sensible, efficient, and lesser-impact form of energy source than our current uses of the public resource for coal, oil and gas.

Not to mention the other demands on our public lands, to ensure that our wildlife and water have the protection they need. I am particularly concerned at wasteful consumption of our increasingly scarce water resources, given that we are by no means out of the drought zone here in Wyoming, or Utah. 52612-002

Thank you for your consideration and your inclusion of these comments.

Responses for Document 52612

52612-001: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

The BLM believes that the RD&D program will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. The scope of the PEIS, in consultation with cooperating agencies, was changed from a leasing decision to an allocation decision. Consequently, new NEPA analysis will be required prior to offering parcels of land for lease for commercial oil shale exploration and development. This NEPA analysis will evaluate environmental impacts of the operation(s) and develop specific measures to mitigate or eliminate those impacts. This analysis will also contain any new information or circumstances relevant to the RD&D technology, which may be a consequence of research or lessons learned on the RD&D leases or as a result of studies on nonfederal lands.

52612-002: Thank you for your comment. Because water resources are valuable and tradable in the Colorado River Basin, users are conscious of water consumption. Future project-level NEPA analyses would consider the direct, indirect, and cumulative effects on water resources and of water consumption.

Thank you for your comment, Anne Guenzel.

The comment tracking number that has been assigned to your comment is OSTSD52613.

Comment Date: March 12, 2008 20:49:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD52613

First Name: Anne
Middle Initial:
Last Name: Guenzel
Organization:
Address:
Address 2:
Address 3:
City: Pinedale
State: WY
Zip:
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

After observing the impact of oil and gas operations in Sublette County, Wyoming on the environment, I urge you to WAIT and take NO ACTION on the proposed commitment to commercial oil shale leasing or production in Wyoming, Colorado or Utah. Any such commitment should wait until the technology exists to prove that oil shale can be produced without an unacceptable impact on global warming, air quality, land, water and wildlife habitat. Results from experimental R&D oil shale pilot projects are pending. Let's wait for those results. I am not opposed to energy development, just proceeding without fully protecting our total resource package, the whole environment, for future generations.

52613-001

Response for Document 52613

52613-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Mary Ann Budenske.

The comment tracking number that has been assigned to your comment is OSTSD52614.

Comment Date: March 12, 2008 20:51:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD52614

First Name: Mary Ann
Middle Initial:
Last Name: Budenske
Organization:
Address: 2535 Allendale Blvd.
Address 2:
Address 3:
City: Casper
State: WY
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Attachment:

Comment Submitted:

I am writing to object to the Bureau of Land Management plan to lease out the rights to mine for oil shale across millions of acres in Wyoming, Colorado, and Utah .	52614-001
Oil shale production involves either massive strip mining or bulldozing the entire landscape where extraction occurs. It requires huge amounts of electricity to wring petroleum products from the rock, which will likely mean major increases in polluting coal-fired power plants, with heavy impacts to global warming.	
BLM's own staff predict that full-scale oil shale perations would use up 2 to 15 percent of the flow of the Colorado River system, a waterway that is already badly overused. Left behind is slag that leaches heavy metals and other toxic compounds into surface and groundwater supplies.	52614-002
The proposal is moving forward without adequately considering impacts to sensitive wildlife and treasured landscapes. At risk are key habitats for sage grouse and desert elk as well as spectacular places like the Adobe Town and the Kinney Rim proposed wilderness areas in the Red Desert.	
Full-scale commitment to oil shale production should wait until after the oil industry proves that oil shale can be produced without unacceptable impacts to our lands, waters, and air quality. Please, adopt the No Action alternative and not move forward with commercial-scale oil shale leasing until results from the experimental Research and Development oil shale pilot projects become available.	52614-001 (cont.)

Responses for Document 52614

52614-001: The BLM acknowledges the commentor's preference for Alternative A.

52614-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

Thank you for your comment, dinda evans.

The comment tracking number that has been assigned to your comment is OSTSD52615.

Comment Date: March 12, 2008 22:09:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52615

First Name: dinda
Middle Initial: s
Last Name: evans
Organization:
Address: pob 178695
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Address 3:
City: san diego
State: CA
Zip: 92117
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Email: dindamcp4@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bureau of Land Management is pursuing a program to lease out the rights to mine for oil shale across millions of acres in Wyoming, Colorado, and

Utah .

Oil shale production is among the dirtiest and most environmentally degrading land uses that the West has ever seen. It involves either massive strip mining or bulldozing the entire landscape where extraction occurs. It requires huge amounts of electricity to wring petroleum products from the rock, which will likely mean major increases in polluting coal-fired power plants, with heavy impacts to global warming. In addition, BLM predicts that full-scale oil shale operations would use up 2 to 15 percent of the flow of the

Colorado River system, a waterway that is already badly overused. Left behind is slag that leaches heavy metals and other toxic compounds into surface and groundwater supplies.

The BLM is proposing to sell the rights to dig for oil shale on millions of acres of public land without adequately considering impacts to sensitive wildlife and treasured landscapes. At risk are key habitats for sage grouse and desert elk as well as spectacular places like the 52615-001

Adobe

Town and the Kinney Rim proposed wilderness areas in the

Red

Desert.

Speak out now against the destruction of western public lands in the name of oil shale!

Tell the BLM that a full-scale commitment to oil shale production should wait until after the oil industry proves that oil shale can be produced without unacceptable impacts to our lands, waters, and air quality. Tell BLM to adopt the No Action alternative and not move forward with commercial-scale oil shale leasing until results from the experimental Research and Development oil shale pilot projects become available. 52615-002

Responses for Document 52615

52615-001: The PEIS provides a general discussion of the impacts associated with water and power requirements associated with potential future oil shale and tar sands development. At present, water and power requirements are very speculative due to the variation in technology currently available, and because the source of the water and power (and, therefore, the impacts) is unknown. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power and water requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52615-002: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Barbara Fitzpatrick.

The comment tracking number that has been assigned to your comment is OSTSD52616.

Comment Date: March 13, 2008 08:54:37AM
Oil Shale and Tar Sands
Comment ID: OSTSD52616

First Name: Barbara
Middle Initial: E
Last Name: Fitzpatrick
Organization:
Address: 2500 W. Valley Dr.
Address 2:
Address 3:
City: Fayetteville
State: AR
Zip: 72703
Country: USA
Email: bfitz_1951@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale and Tar Sands PEIS

Back in the day (early 1980s), I was a junior editor on an Oil Shale and Tar Sands proposal for Bechtel. I know the process - and its results. Do not do this. There is no way to get this stuff out of the ground without causing massive problems in the watershed. Water is already getting scarce in the western states. Do not compound the problem. The energy industry needs to be moving to renewable alternatives and allowing them to trash the watershed in a last-ditch attempt to keep doing what they are doing will only "prolong the agony" before they start doing what's right. Don't allow mining of these lands for oil shale or tar sands. Thank you. 52616-001

Response for Document 52616

52616-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Nancy Chase.

The comment tracking number that has been assigned to your comment is OSTSD52617.

Comment Date: March 13, 2008 09:03:32AM
Oil Shale and Tar Sands
Comment ID: OSTSD52617

First Name: Nancy
Middle Initial: A
Last Name: Chase
Organization:
Address: P.O. Box 6613
Address 2:
Address 3:
City: Cincinnati
State: OH
Zip: 45206
Country: USA
Email: nchase@fuse.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Hello,

I believe using public lands, water and air for oil shale drilling is wrong. It is highly pollutant in nature, and will destroy our natural resources for future generations. Please take a No Action stance on this measure. Think about our countries future, and past mistakes, and make the responsible choice for all people. 52617-001

Thank you,

Nancy Chase

Response for Document 52617

52617-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Harley Winfrey.

The comment tracking number that has been assigned to your comment is OSTSD52618.

Comment Date: March 13, 2008 09:44:28AM
Oil Shale and Tar Sands
Comment ID: OSTSD52618

First Name: Harley
Middle Initial:
Last Name: Winfrey
Organization:
Address: 1450 Oriole Rd
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City: Boone
State: IA
Zip: 50036
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Email: hsbhwinfrey@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil shale production is among the dirtiest and most environmentally degrading land uses that the West has ever seen. It involves either massive strip mining or bulldozing the entire landscape where extraction occurs. It requires huge amounts of electricity to wring petroleum products from the rock, which will likely mean major increases in polluting coal-fired power plants, with heavy impacts to global warming. In addition, the BLM predicts that full-scale oil shale operations would use up 2 to 15 percent of the flow of the Colorado River system, a waterway that is already badly overused. Left behind is slag that leaches heavy metals and other toxic compounds into surface and groundwater supplies. 52618-001

The BLM is proposing to sell the rights to dig for oil shale on millions of acres of public land without adequately considering impacts to sensitive wildlife and treasured landscapes. At risk are key habitats for sage grouse and desert elk as well as spectacular places like the Adobe Town and the Kinney Rim proposed wilderness areas in the Red Desert. Above all, this would be a tragic misuse of the area's dwindling water resources.

Thank you for the opportunity to comment on this issue.

Response for Document 52618

52618-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

Thank you for your comment, Jeff Swanson.

The comment tracking number that has been assigned to your comment is OSTSD52619.

Comment Date: March 13, 2008 09:53:48AM
Oil Shale and Tar Sands
Comment ID: OSTSD52619

First Name: Jeff
Middle Initial: R
Last Name: Swanson
Organization:
Address: 880 North Lane
Address 2:
Address 3:
City: Lander
State: WY
Zip: 82520
Country: USA
Email: jeffswanson@wyoming.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please quit giving our public lands to these oil companies that rape a pilfer them and then leave the tax payer with the burden to rehab them. When is enough going to be enough? I know that these comments don't mean anything anyway, maybe if I attached a huge sum of money to it like these oil companies do, you would consider it. I find it absolutely ridiculous that the BLM continually throws the environment to the side when making your decisions. Pinedale, WY has had three ozone warnings in the past month due to the amount of oil and gas development in that area. Pinedale has air that is as bad as a major metropolitan area! What are you thinking!	52619-001

Response for Document 52619

52619-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Peter Robinson.

The comment tracking number that has been assigned to your comment is OSTSD52620.

Comment Date: March 13, 2008 11:09:56AM
Oil Shale and Tar Sands
Comment ID: OSTSD52620

First Name: Peter
Middle Initial:
Last Name: Robinson
Organization:
Address: Campus Box 265
Address 2: University of Colorado
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City: Boulder
State: CO
Zip: 803090265
Country: USA
Email: Peter.Robinson@colorado.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As is usual with EIS documents, the data about paleontological resources are minimal.However considering the format one can still make comments. In regard to the Piceance Creek Basin of NW Colorado, the description of the Uinta Formation (p.3-55)ignores the fact that it has considerable fossil insect remains, many of which have been found only recently thanks to EIS requirements of various oil/gas field developments. This data should be available in the pertinent BLM offices. I find that EIS data are often filed but ignored. It is my experience from participating in a number of these projects that there are significant data present that would be of use to the geologic community. This point is also made in the report on page 3-52. It is a pity that there is no mechanism for assembling this data in a useful format. I highly endorse the recommendations for monitoring during any development process. 52620-001

Response for Document 52620

52620-001: The discussion of specific fossil types located in individual formations would be identified and discussed in site-specific NEPA reviews. The intent of the PEIS is to provide an understanding of the types of formations present in the project area and the processes that would be applied if a project was proposed. The BLM appreciates your concern over the use of past environmental documents.

Thank you for your comment, Daniel Dale.

The comment tracking number that has been assigned to your comment is OSTSD52621.

Comment Date: March 13, 2008 12:12:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD52621

First Name: Daniel
Middle Initial:
Last Name: Dale
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

To Whom it May Concern,

I oppose a full-scale commitment to oil shale production in the Rocky Mountain West. Such a commitment should wait until after the oil industry proves that oil shale can be produced without unacceptable impacts to our lands, waters, and air quality. I urge you to adopt the No Action alternative and not move forward with commercial-scale oil shale leasing until results from the experimental Research and Development oil shale pilot projects become available. 52621-001

Sincerely, Daniel Dale

Response for Document 52621

52621-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Georgeanne Spates.

The comment tracking number that has been assigned to your comment is OSTSD52622.

Comment Date: March 13, 2008 12:23:44PM
Oil Shale and Tar Sands
Comment ID: OSTSD52622

First Name: Georgeanne
Middle Initial:
Last Name: Spates
Organization:
Address:
Address 2:
Address 3:
City:
State: [Withheld by requestor]
Zip:
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am totally opposed to this form of oil extraction especially now that the world is in the midst of global warming/climate change. It is so important that we limit our energy useage to that which is most efficient and least carbon dioxide producing. Our national and personal efforts should be aimed at alternative energies, energy conservation and reduction of oil usage. If we do not follow this route, we will not only be increasing climate change but leaving little in the way of oil resources for future generations. 52622-001

Response for Document 52622

52622-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, SUSAN Peirce.

The comment tracking number that has been assigned to your comment is OSTSD52623.

Comment Date: March 13, 2008 14:49:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD52623

First Name: SUSAN
Middle Initial: S
Last Name: Peirce
Organization:
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City: Lyons
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Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

A full-scale commitment to oil shale production should wait until after the oil industry proves that oil shale can be produced without unacceptable impacts to our lands, waters, and air quality. Adopt the No Action alternative and do not move forward with commercial-scale oil shale leasing until results from the experimental Research and Development oil shale pilot projects become available.	52623-001

Response for Document 52623

52623-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Lisa Wilson.

The comment tracking number that has been assigned to your comment is OSTSD52624.

Comment Date: March 13, 2008 15:48:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52624

First Name: Lisa
Middle Initial: D
Last Name: Wilson
Organization:
Address: [Withheld by requestor]
Address 2: [Withheld by requestor]
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 52624-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 52624-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 52624-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 52624-001 (cont.)

Responses for Document 52624

52624-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52624-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

52624-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related

services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

Thank you for your comment, David Lancy.

The comment tracking number that has been assigned to your comment is OSTSD52625.

Comment Date: March 13, 2008 15:51:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52625

First Name: David
Middle Initial: F
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Organization:
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Address 2:
Address 3:
City: Hyde Park
State: UT
Zip: 84318
Country: USA
Email: david.lancy@usu.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The current administration can only think in "quick fix" terms and expanding the exploitation of tar sands and oil shales to meet our fuel needs is akin to invading Iraq to solve the terrorism problem.

The majority of Americans now recognize the Iraq war as the disaster it was foretold to become, please don't let history repeat itself with this politically expedient and greed-catering debacle. 52625-001

Sincerely, David F. Lancy 448E 100 N. Hyde Park, UT, 84318

Response for Document 52625

52625-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Allan Chase.

The comment tracking number that has been assigned to your comment is OSTSD52626.

Comment Date: March 13, 2008 15:51:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD52626

First Name: Allan
Middle Initial: S
Last Name: Chase
Organization:
Address: 40 Freeman Street
Address 2:
Address 3:
City: Newton
State: MA
Zip: 02466
Country: USA
Email: achase@newenglandconservatory.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose the exploitation of oil shale and tar sands in any scenic, wilderness, recreational, or public lands in Utah and other parts of the Southwest. | 52626-001

Response for Document 52626

52626-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Alexa Doig.

The comment tracking number that has been assigned to your comment is OSTSD52627.

Comment Date: March 13, 2008 15:53:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52627

First Name: Alexa
Middle Initial: K
Last Name: Doig
Organization:
Address: 3640 Emigration CYN
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84108
Country: USA
Email: alexa.doig@nurs.utah.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am an engineer, a nurse, and faculty at the University of Utah. The BLM must make protecting our vanishing wilderness areas a priority. The irreversible damage caused by tar sands extraction processes is not worth what we will gain from it. I fully support SUWA's efforts to protect the Utah desert from this type of destruction.

I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 52627-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 52627-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of 52627-003

public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming.

52627-003 (cont.)

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information.

52627-001 (cont.)

Responses for Document 52627

52627-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52627-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

52627-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related

services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

Thank you for your comment, Joseph Friend.

The comment tracking number that has been assigned to your comment is OSTSD52628.

Comment Date: March 13, 2008 16:08:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD52628

First Name: Joseph
Middle Initial: F
Last Name: Friend
Organization:
Address: 10515 Tolling Clock Way
Address 2:
Address 3:
City: Columbia
State: MD
Zip: 210442216
Country: USA
Email: joseph.f.friend@verizon.net
Privacy Preference: Don't withhold name or address from public record
Attachment: JFF ltr to BLM re Shale.doc

Comment Submitted:

Letter attached in Word format. See Attachment.

Joseph F. Friend
10515 Tolling Clock Way
Columbia, Maryland 21044-2216
Telephone: (410) 730-5977 ** Email: joseph.f.friend@verizon.net

Friday, May 09, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Responsible Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Consumers, industry and businesses across the country are struggling with rising energy prices, tighter supplies and increased dependence on foreign imports. The federal government must allow for the thoughtful and appropriate use of our nation's oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Programmatic EIS.

Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels, such as oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community. The development of unconventional fuels in Utah, Colorado and Wyoming will produce a strong workforce and will support their local economies. 52628-001

I support the development of unconventional fuels in these areas while protecting the environment, local communities and other economic interests.

1. The mining process must include the requirement to return the surface to the same condition as environmentally possible.

Sincerely,

Joseph F. Friend

Response for Document 52628

52628-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Gayle STEVENS.

The comment tracking number that has been assigned to your comment is OSTSD52630.

Comment Date: March 13, 2008 16:31:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD52630

First Name: Gayle
Middle Initial: M
Last Name: STEVENS
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please give this issue priority. The San Rafael Swell is too important an area to drill!!! | 52630-001

Response for Document 52630

52630-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Rick Mandahl.

The comment tracking number that has been assigned to your comment is OSTSD52631.

Comment Date: March 13, 2008 16:42:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52631

First Name: Rick
Middle Initial:
Last Name: Mandahl
Organization:
Address:
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip:
Country: USA
Email: rmandahl@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM may authorize the destruction of large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 52631-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 52631-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 52631-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 52631-001 (cont.)

Responses for Document 52631

52631-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52631-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

52631-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related

services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

Thank you for your comment, JOHN CROCK.

The comment tracking number that has been assigned to your comment is OSTSD52632.

Comment Date: March 13, 2008 17:42:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD52632

First Name: JOHN
Middle Initial: E
Last Name: CROCK
Organization: NONE
Address: 402 S. MAIN ST
Address 2:
Address 3:
City: MOSCOW
State: ID
Zip: 83843
Country: USA
Email: HYPERSPUD1@YAHOO.COM
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sirs- I am very concerned about the BLM leasing land for oil/tar sand development and extraction. I, along with a group of friends, have traveled to Utah once or twice a year for the last 20 years to spend 7 to 10 days hiking kayaking, and sightseeing in the beautiful scenery that Southern Utah has to offer. I am worried that development of the tar sands will lead to increased air pollution, blocking the scenic vistas and large areas of surface disturbance that will be a blight on the landscape. While the economic gains from the tar sands will be short-lived, the damage to the landscape will be irreversible. The technology to extract the oil from the tar sands is unproven and may be environmentally disasterous. I urge the BLM to preserve the scenic and recreational value of the San Raphael Swell and deny the tar sand permits, pending a time when extraction technology is better so that the environmental impacts will be reduced. Sincerely; John Crock

52632-001

Response for Document 52632

52632-001: The BLM acknowledges the commentor's preference against tar sands development.

Thank you for your comment, Andrea Stavros.

The comment tracking number that has been assigned to your comment is OSTSD52633.

Comment Date: March 13, 2008 17:55:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD52633

First Name: Andrea
Middle Initial:
Last Name: Stavros
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development.

The documented damage to other countries of using tar sands excavation methods that are still in their infancy should be a large warning for BLM to stay away from this one ("...known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies").

This impacting lands far easier to permanently damage and subject to irreversible drought than California's lush hillsides and coasts of the California Gold Rush when high-pressure water blasting was used to extract gold. A terrible method that took decades to stop and finally outlaw. 52633-001

Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, the BLM should wait until specifically identifying how this program would be carried out before completing a programmatic EIS.

The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. 52633-002 The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. 52633-003 We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation.

Agency regulations and federal law require that the BLM manage its lands for multiple uses - yet this type of development will displace every other public use of public land to benefit a few private 52633-004

companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 52633-004 (cont.)

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 52633-001 (cont.)

= = =

Okay - a few plain lines straight from my heart:

The way this shale and tar sands proposal looks to me is that it has figured a quick way to return public lands back to private companies for private profit at the public's expense. It is certainly not multiuse and no longer public when such companies have to put up no-trespassing signs for their equipment, roads, and use of resources, and you can be sure there will be security guards. Then these same companies overcharge the public for spiraling fuel costs once the product is refined. So we not only will lose our lands in the name of multiuse until there is no land and no tar shale left to mine, we get to pay for the privilege both before and after, kind of like during the Gold Rush. 52633-005

We could be, should be spending this time and money on finding alternative power sources that don't require shale and tar sands development.

This land was "set aside" for wild lands and to use in a lower impact way so it can be enjoyed generations from now, not for this decade's land barons to figure out ways to pull it out from under the public for short-term goals and personal profit.

Thanks for listening, Andrea Stavros
, UT

Responses for Document 52633

52633-001: In consultation with our cooperating agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52633-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

52633-003: Evaluation of the complete impacts of power requirements for oil shale/tar sands development is considered to be too speculative for analysis at this time. The impacts of power requirements are very speculative because the amount of power required varies with the technology to be implemented, and because the source of the power (and therefore the impacts) is unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. When subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed.

52633-004: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

52633-005: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Teri Rasmussen.

The comment tracking number that has been assigned to your comment is OSTSD52634.

Comment Date: March 13, 2008 18:17:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD52634

First Name: Teri
Middle Initial:
Last Name: Rasmussen
Organization:
Address: 929 E 1300 S
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84105
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS.	52634-001
As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation.	52634-002
Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming.	52634-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information.

52634-001 (cont.)

Responses for Document 52634

52634-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52634-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

52634-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related

services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

Thank you for your comment, Linda Barnes.

The comment tracking number that has been assigned to your comment is OSTSD52635.

Comment Date: March 13, 2008 19:49:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD52635

First Name: Linda
Middle Initial: R
Last Name: Barnes
Organization:
Address: 3055 East 4th Ave
Address 2:
Address 3:
City: Durango
State: CO
Zip: 81301
Country: USA
Email: lrbarnes@frontier.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Just look at the destruction wrought in Canada from this extraction process. Oil is NOT in our future; our landscape IS our future. Please do no more harm. | 52635-001

Response for Document 52635

52635-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52636.

Comment Date: March 13, 2008 19:59:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD52636

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Foreign energy dependence must end - oil shale can help

March 13, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Our nation's energy security depends in part on the BLM's ability to complete the current PEIS and issue a record of decision implementing alternative B, the preferred alternative. Energy prices and our country's economic health are dependant on expanding our domestic supply of fuels, like oil shale.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground. 52636-001

In reviewing the PEIS, I am particularily concerned that the PEIS: - fails to recognize the tremendous benefits to our nation and it's citizens from this vast domestic energy supply - is moving way too slowly in creating a commercial leasing program - includes only one workable alternative, alternative B - the leasing program envisioned is too slow and complex - the potential impacts analyzed are overstated because existing permitting and regulatory programs aren't fully considered 52636-002

I support the development of oil shale and other energy resources. Increasing domestic production is essential for America to reduce its alarming dependence upon foreign energy. 52636-001 (cont.)

Thanks for considering my views!

Sincerely,

Responses for Document 52636

52636-001: The BLM acknowledges the commentor's preference for Alternative B.

52636-002: Thank you for your comments. The BLM is working diligently to comply with the requirements of the Energy Policy Act of 2005 to (1) complete a PEIS for a commercial leasing program for oil shale and tar sands resources on public lands, and (2) publish a final regulation reestablishing such a program. The BLM is conducting phased decision-making—proceeding from land use planning, to leasing, to operational permitting—as the BLM does for other resources such as oil and gas. This first step—RMP amendment to allow the BLM to consider applications for leasing—may be followed by the subsequent steps of leasing and plans of development. Secondly, the BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedures to implement a commercial leasing program.

Thank you for your comment, Dennis DAmico.

The comment tracking number that has been assigned to your comment is OSTSD52637.

Comment Date: March 13, 2008 20:52:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD52637

First Name: Dennis
Middle Initial: A
Last Name: DAmico
Organization:
Address: 3644 Woodland Park Ave. N
Address 2: Apt. 4
Address 3:
City: Seattle
State: WA
Zip: 98103
Country: USA
Email: dad39cu@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

First let me say, that I have lived in Canada under NAFTA for 3 years and it is widely known that the oil sands project based in Fort McMurray are an environmental disaster. I have personally experienced The San Rafeal Swell, as well as the other areas and they are truly special and a rarity in the U.S. today. We should do all we can to preserve these lands.

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 52637-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 52637-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 52637-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 52637-001 (cont.)

Sincerely, Dennis D'Amico

DOC - NOAA - NWS Seattle - Meteorologist

3644 Woodland Park Ave. N Apt. 4 Seattle, WA 98103

Responses for Document 52637

52637-001: In consultation with our cooperating agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52637-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

52637-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

Thank you for your comment, Virginia Carlson.

The comment tracking number that has been assigned to your comment is OSTSD52638.

Comment Date: March 13, 2008 21:14:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52638

First Name: Virginia
Middle Initial:
Last Name: Carlson
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

There was no public meeting within 100 miles of Moab or in SE Utah, yet BLM is planning on ammending RMP for the Book Cliffs and San Rafael.

It is too early in the engineering for extraction from tar sands for BLM to be able to prepare a meaningful EIS and/or to ammend the RMP which has gone through years of public input and does not yet have a ROD. 52638-001

Response for Document 52638

52638-001: Two sets of meetings were held in Price and Vernal. Scoping meetings were held on January 10 and 12, 2006, in Price and Vernal, respectively. Open-house style meetings to allow the public to ask the BLM questions regarding the Draft PEIS were held in Price and Vernal on February 26 and 27, 2008, respectively.

Thank you for your comment, George Copenhaver.

The comment tracking number that has been assigned to your comment is OSTSD52639.

Comment Date: March 13, 2008 22:40:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52639

First Name: George
Middle Initial: C
Last Name: Copenhaver
Organization: Geologist
Address: P.O. Box 191171
Address 2:
Address 3:
City: San Diego
State: CA
Zip: 92159
Country: USA
Email: glcopenhaver@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please forward any current information regarding oil shale-tar sand boundaries and the potential for extraction of minerals other than oil shale-tar sand within the boundaries. Will there be restrictions on exploitation of other minerals as there were within the old boundaries of 25 to 30 years ago ??

52639-001

Response for Document 52639

52639-001: Thank you for your comment. Unfortunately, your inquiry is outside the scope of the PEIS.

Thank you for your comment, Barr Taylor.

The comment tracking number that has been assigned to your comment is OSTSD52640.

Comment Date: March 13, 2008 23:31:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52640

First Name: Barr
Middle Initial:
Last Name: Taylor
Organization: None
Address: 850 Esplanada Way
Address 2:
Address 3:
City: Stanford
State: CA
Zip: 94305
Country: USA
Email: btaylor@stanford.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear Sir/Madam, I am writing to express concern over the BLMs plan to open up millions of acres in Southern Utah and Colorado to commercial oil shale development. The nation needs to decrease dependence on foreign oil but this is not the way to do it. Oil shale extract would provide very little net energy at an unacceptable cost to the environment. Vast tracts of the American West, including some of the most beautiful landscape on the planet, would be permanently marred for little gain. As an alternative, why not tuck a nuclear plant or two into some out-of-way location in this area--it would have less impact on the environment and be much more cost-effective. Thanks for your consideration, Barr Taylor, M.D. Professor of Psychiatry Stanford Medical School

52640-001

Response for Document 52640

52640-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Bill Delaney.

The comment tracking number that has been assigned to your comment is OSTSD52641.

Comment Date: March 14, 2008 00:20:45AM
Oil Shale and Tar Sands
Comment ID: OSTSD52641

First Name: Bill
Middle Initial: H
Last Name: Delaney
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I wish to let you know that I am ardently opposed to any tar sand or oil shale development on public lands in the West. The lands containing these deposits represent some of the most beautiful, pristine, and precious lands in this country. Tar sand development in Canada has demonstrated that extracting this inferior source of energy is devastating to the environment. Destroying these lands in that manner would be a crime against nature and a crime against future generations.

Furthermore, it would be a folly of incredible magnitude to commit ourselves to a new form of fossil carbon at a time when the evidence is incontrovertible that this energy source causes climate change that threatens the environment on a global scale. Any honest assessment of the environmental impact of oil shale or tar sand development must recognize that the environmental impacts are devastating on both a local and a planetary scale, and they cannot be mitigated. No other conclusion can be justified, except by intentional misrepresentation of the facts. 52641-001

I have spent many days, weeks and months exploring, enjoying, and loving these lands. The San Rafael Swell is an incredible place, which must be preserved pristine and unblemished. This evil plot to mar such a valuable public treasure must be stopped!

Sincerely,

Bill Delaney , Utah

Response for Document 52641

52641-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52642.

Comment Date: March 14, 2008 10:27:23AM
Oil Shale and Tar Sands
Comment ID: OSTSD52642

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM oil shale report

March 14, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is important for America to continue to develop new technologies; such as those we are developing to tap unconventional sources like oil shale and tar sands in the U.S.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

In the war for energy independence, oil shale is the cavalry that may rescue America from its alarming reliance on foreign energy. Oil shale in America is both recoverable and abundant, particularly in the Green River formation in the Rocky Mountains. In fact, a great majority - more than 70 percent - of the land in which oil shale resources lie is owned by the federal government. 52642-001

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52642

52642-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52643.

Comment Date: March 14, 2008 10:42:48AM
Oil Shale and Tar Sands
Comment ID: OSTSD52643

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear BLM:

90 days is insufficient time to analyze such a large document with profound consequences to the Western Slope of Colorado where I live. Therefore, my comments must be brief. 52643-001

I do not trust that the technology for oil shale extraction exists or that you know enough about the effects of such extraction to go forward with this EIS in good conscience. The amount of water necessary to extract oil shale will outstrip the supply of water, affecting municipalities, the agricultural industry and future growth in the region. The extraction process will take away the multiple use of these public lands because nothing is compatible with oil shale. This will affect our local and regional economy and quality of life for thousands of residents. The EIS sidesteps the social and economic impacts that will occur on local communities. The amount of energy required to extract oil shale makes no sense when looking at the amount of energy received. 52643-002

We cannot allow numerous coal fired power plants to be brought on-line to allow oil shale to occur. They would be an additional burden to the destruction oil shale would cause to some of Colorado's most sensitive lands. Has the effects of these coal fired power plants on global warming been adequately analyzed? 52643-003

From what I can tell, Oil shale is a bad idea with the damage and negative consequences far outweighing any benefits. 52643-004

Conservation and alternative energy must be included in the analysis to determine if oil shale is really needed. The costs of oil shale are too great, the benefits too low and unnecessary. 52643-005

Thank you for your consideration,

Responses for Document 52643

52643-001: Thank you for your comment. The BLM made the PEIS available for review for slightly over 120 days. The standard comment period for a Draft EIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provides a 90-day comment period, doubling the amount of time for the public to review and comment on the PEIS. In addition, the BLM extended the review period an additional 30 days.

52643-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52643-003: Speculation regarding the quantity and source of electrical power which might be needed for potential development is beyond the scope of this programmatic analysis.

As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and

the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52643-004: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52643-005: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jay (John) Griffith.

The comment tracking number that has been assigned to your comment is OSTSD52644.

Comment Date: March 14, 2008 10:43:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD52644

First Name: Jay (John)
Middle Initial: W
Last Name: Griffith
Organization:
Address: 3317 S Oakwood St.
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84109
Country: USA
Email: jaygriffith4@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment: BLM Oil Shale Letter.doc

Comment Submitted:

See Attachment.

3.14.08

Subject: Comments regarding Oil Shale Development in the West

Dear BLM,

I have read through the information on your "Oil Shale & Tar Sands Programmatic EIS site. Thank you for posting this information and making public input possible.

I feel strongly, after reviewing the materials you have provided, that extracting oil with the methods that would need to be employed would subject vital and beautiful public lands and air to unacceptable degradation. 52644-001

Not only am I opposed to the damage it would do to the landscape, but the air quality would also suffer. And at a time when water continues to grow at a premium in our desert state it makes no sense to use such a process with the enormous amount of water it requires.

Finally, it seems much wiser to invest our time and energy into renewable resources rather than limited ones that cost us in ways that cannot be adequately accounted for. 52644-002

Please refuse to provide shale & tar sand leases. It is a short-term solution with unacceptable long-term costs.

Thank you,

Jay Griffith
3317 S Oakwood St.
Salt Lake City, UT 84109

801-467-5084
jaygriffith4@comcast.net

Responses for Document 52644

52644-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

52644-002: The BLM acknowledges the commentor's preference to not support oil shale and tar sands development.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52645.

Comment Date: March 14, 2008 12:12:46PM
Oil Shale and Tar Sands
Comment ID: OSTSD52645

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Develop oil shale for an energy independent America

March 14, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There are no perfect energy solutions. Each energy source has its pro's and con's. The only way to be successful is to assure a diversity of supply by working to develop all of our nation's energy resources including oil shale.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

52645-001

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations.

Oil shale is an emerging energy source that can greatly assist American efforts to increase domestic production and promote energy security and independence. As a result, we must develop oil shale now!

Sincerely,

Response for Document 52645

52645-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Maureen Sheldon.

The comment tracking number that has been assigned to your comment is OSTSD52646.

Comment Date: March 14, 2008 12:47:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52646

First Name: Maureen
Middle Initial: A
Last Name: Sheldon
Organization:
Address: 189 Ruddsboro Road
Address 2:
Address 3:
City: Etna
State: NH
Zip: 03750
Country: USA
Email: maureen.sheldon@efi.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I have had the gift of visiting these regions many times in my life. I am in my mid-forties and can only say I wish I had discovered them earlier. I have taken my son to this region several times and am now leading groups from this eastern region of our country to see this magnificant area to help educate them about not only our country but as a place to find solitude in these formations.

I lead a multi-faceted perspective of what is out there, the natural formations-geology, the civilization history, and the modern issues.

We should not be throwing away our greatest gifts, and these gifts are not the oil companies digging away the surface.

52646-001

Response for Document 52646

52646-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Fred Kinsman.

The comment tracking number that has been assigned to your comment is OSTSD52647.

Comment Date: March 14, 2008 13:23:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD52647

First Name: Fred
Middle Initial:
Last Name: Kinsman
Organization:
Address: 1118 N Viewmont Dr
Address 2:
Address 3:
City: Mount Vernon
State: WA
Zip: 98273
Country: USA
Email: fishonfred@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please do not open any areas up for processing or exploring for Oil Shale & Tar Sands. So little of America is left unspoiled by commercial use. Some of America needs to be left pristeen. | 52647-001

Thank You Fred Kinsman

Response for Document 52647

52647-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, paul taylor.

The comment tracking number that has been assigned to your comment is OSTSD52648.

Comment Date: March 14, 2008 14:13:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52648

First Name: paul
Middle Initial: j
Last Name: taylor
Organization:
Address: po box 1427
Address 2:
Address 3:
City: laramie
State: WY
Zip: 82073
Country: USA
Email: pauldidj@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Dear BLM, I believe strongly that a full-scale commitment to oil shale production should wait until after the oil industry proves that oil shale can be produced without unacceptable impacts to our lands, waters, and air quality. I urge the BLM to adopt the No Action alternative and not move forward with commercial-scale oil shale leasing until results from the experimental Research and Development oil shale pilot projects become available. 52648-001

Response for Document 52648

52648-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52649.

Comment Date: March 14, 2008 14:15:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD52649

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale study should be taken seriously

March 14, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but it is obvious that our country's reliance on traditional liquid fuels (oil and gas) will remain and grow into the foreseeable future. We need to develop all of the energy resources at our disposal, including oil shale and tar sands.

I don't understand why America hasn't looked internally to solve its own energy problems. It seems reasonable enough that American businesses, homes, and cars should all run on American energy. Oil shale resources in America have the potential to accomplish just this, with nearly a trillion barrels of oil that are recoverable. The Green River formation in the states of Colorado, Utah, and Wyoming has enormous oil shale resources, and is just waiting to be used in the fight for America's energy independence. 52649-001

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

52649-001 (cont.)

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future.

Sincerely,

Response for Document 52649

52649-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Brent Fryer.

The comment tracking number that has been assigned to your comment is OSTSD52650.

Comment Date: March 14, 2008 15:41:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52650

First Name: Brent
Middle Initial: C
Last Name: Fryer
Organization:
Address: 2990 E Riverside Dr. Unit #100
Address 2:
Address 3:
City: ST. George
State: UT
Zip: 84790
Country: USA
Email: fryerbc1@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment: PEISfinal1.doc

Comment Submitted:

Please find attached file PEISfinal1 in Microsoft Word Format. Please acknowledge receipt of both this e-mail and the attached file. The paper copy of the Microsoft file printed out should be a total of 24 pages. Please also acknowledge that this file is printable.

Thank you, Brent C. Fryer, Sc.D. See Attachment.

1

Brent C. Fryer, Sc.D.
2990 E Riverside Dr. Unit #100
ST. George, UT 84790
Telephone: 435-652-0941
Email: fryerbc1@aol.com
Date: March 14, 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory
EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Subject : Comments on "Draft Oil Shale and Tar Sands Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS)".

Summary of Comments

The following (10) statements summarize my comments on the subject document:

1. The "Draft" is not a PEIS for commercial leasing as mandated by the Energy Policy Act of 2005 (EPA2005). The final PEIS for commercial leasing is now 1 year behind the required delivery schedule and will never be prepared by the Secretary of Interior as directed by the EPA2005. 52650-001
2. Since the final PEIS required by the EPA2005 for commercial leasing will not be prepared commercial leasing cannot go forward.
3. DOI/BLM has concluded that oil shale extraction technology is too undeveloped to conduct environmental impact analysis and cannot therefore complete the PEIS for commercial leasing. On the other hand, DOI/BLM has determined via the environmental assessments (EAs) that the 4 oil shale extraction technologies to be used in the 6 signed RDD leases have acceptable environmental impacts. This is totally inconsistent***. It is the policy of the United States per EPA2005 that both research- and commercial-scale development of oil shale and tar sands should be conducted in an environmentally sound manner using management practices that will minimize potential impacts.*** Either the PEIS for commercial leasing should have been completed on schedule, or the RDD leases should be recalled. 52650-002
4. There is adequate information available to quantify and qualify the environmental impact of the oil shale extraction technologies considered by the DOI/BLM—including the 4 technologies selected for the 6 BLM RDD leases. Therefore the PEIS for commercial leasing could have been prepared on schedule. For example it is documented that the foreign big oil company, Royal Dutch Shell's (RDS), ICP process selected for 3 separate BLM RDD leases will scalp the entire soil surface above the oil shale region to be processed underground. In addition this process will leave 40% of the 52650-003 52650-004

kerogen underground after processing as char to contaminate the ground water system. The "dilution solution to pollution" to be used by RDS of using 20 pore volumes of water over ten years after retorting to clean up toxic and carcinogenic materials from this residual char mess, such as unsaturated benzene ring compounds, has no credibility. The massive quantity of char to be left behind is a result of excessive coking of pyrolysis products brought on by the slow heat up process kinetics (3-4 years), and worse, results in only about 50% recovery of the Fischer Assay liquid oil. This is a terrible waste of a national treasure. This particular process, and others of the same ilk, should never have received an RDD lease and should be banned as a matter of National Policy. The impact of this type of process in terms of ground surface damage and underground water contamination is not even discussed in the Draft—except for the following one small phrase about underground water contamination. "*Degradation of groundwater quality resulting from injection of lower quality water; **from contributions of residual hydrocarbons or chemicals from retorted zones after recovery operations have ceased**; and, from spent shales replaced in either surface or underground mines;"* (Section 4.5.1)

52650-004 (cont.)

5. The arguments made by the DOI/BLM in response to public comments on the RDD BLM lease EA's, and within this Draft, that the technology is so undeveloped and the environmental impacts so unknown, and therefore that the RDD program is needed to determine these impacts—before the PEIS could have been completed, and before commercial leasing--is without merit.

52650-005

6. The Energy Policy Act of 2005, the DOI/BLM RDD program, the PEIS for commercial leasing, and the Rulemaking to establish commercial leasing are being treated as separate, compartmentalized, and serial steps that can't possibly culminate in a commercial oil shale industry with minimal environmental impact. The entire effort is flawed and will result in many **future "Black Sundays"**. A parallel, synergistic, integrated approach should have been taken. The initiation of the BLM RDD program before passing the EPA2005, the selection of shale oil processes for the BLM RDD program some of which should have been banned by public policy, the withdrawal of RDS's state permitting application after pushing congress about urgency to conduct the RDD program, Rulemaking, PEIS, etc., the BLM's elimination of any more RDD leases which are mandated by the Energy Policy Act of 2005, the failure of the DOI secretary to comply with the EPA2005 PEIS requirements, and initiation of Rulemaking for commercial leasing without a PEIS speaks volumes about the lack of responsibility by the past and current DOI secretary and the past and current BLM director in complying with the missions of the DOI/BLM.

52650-006

7. The lack of DOI/BLM/politician/task forces/interdisciplinary RDD lease review teams/cooperating agencies experience and understanding based on sound scientific and engineering principles in oil shale technology, coupled with political influence and maneuvering, particularly by foreign big oil interests, are at the root of the current mess.

8. American entrepreneurs and small businesses with far better technology are being systematically excluded from the development of these resources by barring them from access to the oil shale resource. 52650-007
9. The exclusion from commercial leasing of lands already legally committed to as BLM RDD leases and BLM RDD Program preference leases (except for current RDD lease holders) for Alternatives A, B, and C is but another example of DOI/BLM blundering. The true "do nothing" Alternative A does include the preference leases—the Draft "do nothing" alternative A does not. 52650-008
10. The BLM's minimum estimates for oil in place for Alternative A (zero barrels), Alternative B (61 billion barrels), and Alternative C (31 billion barrels) are meaningless and projects a mindset of the DOI/BLM of either accepting ridiculously low recovery rates, or wasting most of the resource through inefficient processes such as that of RDS. ***It is the policy of the United States per EPA2005 that both research- and commercial-scale development of oil shale and tar sands should occur with an emphasis on sustainability.*** Developing a PEIS or land use plan based on these ridiculously low estimates does not promote maximum resource recovery and therefore sustainability. The actual recoverable reserves based on Black Box Pyrolysis Processes I & I should be for True Alternative A (41 billion barrels), Alternative B (740 billion barrels), and Alternative C (160 billion barrels). 52650-009

Given the current state of affairs we can only conclude that the politicians who legislated and signed off on the EPA2005 and mandated the PEIS are either uninformed/incompetent when it comes to energy policy, schedule, technology, environment, economics, and the strategic interests of the United States--or the DOI/BLM is uniformed/incompetent with the Secretary being out of compliance and in defiance of Congress and the President when it comes to executing the requirements of the Energy Policy Act---or both. This becomes even more convoluted when the schedule, intent, and outcomes of the **BLM RDD Leasing Program**, the **Proposed Rulemaking (ANPR) To Establish a Commercial Leasing Program for Oil Shale, and House and Senate Hearings on Oil Shale** are considered. The United States oil shale and coal reserves are perhaps its two most valuable natural resources. Nothing short of a well thought out and well executed integrated/synergistic approach should be taken by the Federal government to develop this resource. What is being pursued is anything but what is needed. What we have is a piece meal, series, convoluted, horse before the cart mess that is politically and foreign big oil company driven and based on some oil shale technologies that should be banned as a matter of Federal Energy, Environmental, Economic, and Strategic Policy. A consequence of this mess is that there are red blooded American Entrepreneurs and small businesses, which are the nuero center of innovation and economic growth in America, and who have developed superior technology that are being systematically excluded from access to the American peoples' oil shale reserves and leases—both RDD and/or commercial—while a foreign big oil company carries off the lion's share. 52650-010

In recent musings about the nature of matter, particle physics, and the universe, Joe Lykken at Fermilab is quoted as saying, **"We had a theory that started out beautiful**

and elegant, and then someone beat on it and made it ugly". It may appear, in the following and my other documented public comments, that I'm beating on the politicians' and DOI/BLM's shale development legislation/programs and the pre-eminent role that a few BLM selected technological shale oil processes, such as the Royal Dutch Shell's ICP process (i.e. a foreign big oil company), currently have in the exploitation of this extremely important national resource. The oil shale development legislation, DOI/BLM programs, and selected BLM RDD program technological oil shale extraction processes also appeared beautiful and elegant at first blush—but once subjected to critical examination and analysis now appear to be very ugly, and clearly not in the national interest nor in compliance with the DOI/BLM missions for good stewardship of the American peoples' natural resources.

Its simply time to clean off the table, dump the current ill fated federal oil shale development program, and start over before **Black Sunday Returns**. If DOI/BLM, congress, and the Bush/Cheney administration need a road map I'll provide it upon request

52650-010 (cont.)

Given the fact that the development of a PEIS for commercial leasing will apparently never be completed, certainly not on the required schedule of, and not in compliance with, the Energy Policy Act, making any comments on this document may be worse than a waste of time—it may actually give it and other actions taken by politicians and the DOI/BLM some legitimacy. However, in the hope that providing a critical analysis of some of the glaring problems with this Draft as it stands will help re-direct and correct the mistakes of the past, rather than add legitimacy, my comments follow.

Details fleshing out the above follow. Direct extractions from the Draft are in italics with extraction locations noted. **Bold** and **Underlined Text** are used to emphasize issues that are dealt with in my comments. Comment details are followed with a paragraph on my credentials, and a chronology of relevant events associated with oil shale activities.

DETAILS AND BACKGROUND FLESHING OUT MY COMMMENTS

The subject draft document is not a programmatic environmental impact statement for a commercial leasing program and is over a year late.

By EPA2005 Congress and the President directed the Secretary of the Department of Interior to:

"…***Complete*** *a programmatic environmental impact statement* ***(PEIS) for a commercial leasing program*** *for oil shale and tar sands resources on public lands, with an emphasis on the most geologically prospective lands in Colorado, Utah, and Wyoming." (Section ES-1)*

52650-001 (cont.)

The subject draft document does not meet the requirements, intent, content, nor substance of the EPA2005 nor does it meet the scheduler requirements of the Act. The final version, not just the draft, of the PEIS was due over one year ago. Final regulations on commercial leasing were due over 6 months ago. At the BLM Draft public meeting in

Salt Lake City, Utah held on February 25, 2008 2:00-4:00 PM BLM representatives stated that after the first year of work on the PEIS they concluded that the shale oil extraction technologies were too undeveloped and therefore a PEIS to support an oil shale leasing program was not feasible. The draft repeats this conclusion but leaves the impression that this is a PEIS—e.g. the document title and in many other places within the report. Meanwhile commercial leasing was supposed to have been initiated by February 24, 2008.

52650-001 (cont.)

The Secretary of the Department of Interior has not completed the PEIS directive of Congress and President as outlined in EPA2005.

The Energy Policy Act mandated the following required schedule and deliverables.

The following summarizes the EPA2005 schedule and deliverables.

August 8, 2005 Pres. Bush signs Energy Policy Act of 2005, PEIS for commercial leasing required.

February 8, 2007 PEIS final issue deadline per Energy Policy Act of 2005—deadline passed, draft PEIS not even out for public comment which is required before final release.

August 24, 2007 Final regulations on commercial oil shale leasing deadline per Energy Policy Act of 2005 which was to be based on the PEIS.

February 24, 2008 DOI required to meet with Governors and begin commercial oil shale leasing per Energy Policy Act of 2005

Now what?

The actual DOI/BLM schedule and actual result are as follows.

The actual DOI/BLM schedule and deliverables—or non deliverables are as follows.

December 13, 2005 BLM issues Federal Register Notice announcing intent to prepare Programmatic Environmental Impact Statement (PEIS) and conduct public scoping meetings and receive comments.

January 10-20, 2005 BLM conducts PEIS public scoping and input meetings.

December, 2006 BLM changes scope and deliverable of PEIS and its relation to commercial leasing without informing the public or other interested stakeholders.

December 20, 2007 BLM Director Jim Caswell announces publication of the "Draft Programmatic Environmental Impact Statement (PEIS)" and 90 day comment period.

December 21, 2007 Michael Nedd, BLM, Assistant Director Minerals, Realty, and Resource Protection provides transmittal letter incorporated in the "Draft Oil Shale and Tar Sands Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS)".

February 11-28 BLM conducts open houses on Draft

March 20, 2008 Public comment period on Draft ends.

March 21---until when? Final Draft?, Commercial Leasing? Mandate of EPA2005 Met?

A reading of the Draft and attendance at one of the open houses revealed that the schedule is behind at least one year, and the Draft is not a PEIS for commercial leasing of oil shale—and that the scope was changed after a year of study with no public or other announcement, and that the Final PEIS for commercial leasing will never be produced. BLM Director Caswell stated in his official BLM announcement that the PEIS is pursuant to the directive of EPA205, however, no where does he state that the directive of the EPA2005 on the PEIS for commercial leasing was in fact complied with. Nedd's transmittal letter leaves the impression based on the Draft Title, which is referred to, that the PEIS for commercial leasing is the Draft—however; nowhere in that letter does he state that the Draft is the PEIS for commercial leasing required by the EPA2005.

BLM Rationalization Why No PEIS for Commercial Leasing Was Developed as Mandated by Congress

The PEIS for commercial leasing is required by EPA2005. The BLM's rationalization for why they could not do the job is discussed in the following which includes my comments interspersed with statements taken directly from the Draft.

The BLM has been working collaboratively with our cooperating agencies throughout the process. The ***BLM initially intended the final PEIS to provide the NEPA analysis*** *not only for the amendment of land use plans but also for the issuance of leases* ***for the commercial development of both oil shale*** *and tar sands resources. The BLM developed and circulated among cooperating agencies,* ***an internal draft PEIS****. Based on their review of the document, many of the cooperating agencies commented that the lack of information about specific technologies and their impacts caused BLM's analysis to be too speculative at this time to support a decision to issue any leases. As a result, the* ***BLM has elected not to issue leases for commercial development of oil shale on the basis of this PEIS.*** (Section ES.4)

No one, other than the "cooperating agencies" were informed of the decision by the DOI/BLM not to comply with EPA2005. The EPA2005 requires the Department of Interior to consult with Utah, Wyoming, and Colorado State Governors, representatives of local governments in those states, Indian Tribes, and **other interested persons** before

52650-002 (cont.)

commercial oil shale leases are issued. Clearly I am one of the other interested persons, this Draft involves commercial leasing, and why wasn't I informed?

Is the DOI/BLM saying in the above and the following that they would have issued the internal PEIS drafted a year ago as applicable to commercial leasing and fulfilling the directive of EPA2005, where it not for the review of the "cooperating agencies". Where is this review documented? Or is the DOI/BLM passing the buck for a job not done to the "cooperating agencies"? 52650-002 (cont.)

This section briefly describes the oil shale ***development technologies that the BLM believes may be used commercially in the 20-year time frame assessed in this PEIS****. The BLM has chosen a 20-year time frame because that is the customary time frame used in resource management planning cycles. Appendix A provides a more detailed discussion of potential technologies that may be used over the next 20 years, along with a history of oil shale development. Information presented in this section and Appendix A regarding technologies that could be used is taken from the best available published data. Because commercial oil shale development technologies are still largely in an R&D phase, many details regarding the specific technologies that would be used in the future to produce oil from oil shale are unknown. In the absence of complete and definitive information about the technologies that may be deployed, a number of assumptions have been made. These assumptions are discussed in Section 4.1.* (Section 2.3.1 pg 2-10, 2-12)

Oil shale is a 100-300 year resource before depletion. 20 years is not a justifiable time frame for any meaningful PEIS, or a land use plan, and certainly doesn't even come close to touching on the policy requirements of sustainability. 52650-002 (cont.)

Development of oil shale resources occurs in three major steps: (1) recovery or extraction from the natural setting, (2) processing to separate organic and inorganic constituents, and (3) upgrading the organic components in anticipation of further refining into conventional fuels. The physical and chemical features of oil shale deposits and other circumstantial factors associated with their deposition dictate the most appropriate development schemes. Typical development schemes always involve each of the above major steps, although many permutations of these steps are possible and many interim steps may also be necessary. ***In addition, all oil shale development projects also must stabilize and dispose of waste by-products.*** *(Section 2.3.1 pg. 2-12)*

For mining technologies, spent shale is a significant waste management concern. *Appendix A provides a detailed discussion of each of the individual technologies, some of the possible permutations, and some of the possible combinations of technologies.* (pg. 2-13)

52650-011

Massive quantities of char left underground on spent shale from the RDS ICP in situ process is an even larger significant waste management concern than for mining. It isn't even mentioned here. No comparisons are made to processes which de-char the spent

shale utilizing the chemical energy contained therein to drive the process, making them energy self sufficient, and minimizing environmental impacts from the spent shale. 52650-011 (cont.)

Processing technologies to separate the organic and inorganic constituents typically use retorting technologies that apply heat to the oil shale to pyrolyze the kerogen. Chemical treatment processes also may be applied. Aboveground retorting technologies are used to process mined oil shale; the retorting processes are typically preceded by a variety of pretreatment activities, including crushing, sizing, and sorting. ***A number of AGR technologies have been designed in the past and are considered to be potentially applicable for future commercial oil shale development. These technologies include the Union B retort, The Oil Shale Corporation (TOSCO) II retort, Paraho retort (both direct and indirect modes), Lurgi-Ruhrgas process, Superior Oil's circular grate retort, and the Alberta Taciuk Process (ATP) technology.*** *The indirect recovery methods mentioned above involve in situ processing to separate the organic and inorganic constituents of the oil shale. These processes typically involve the application of high temperatures to achieve pyrolysis of the kerogen and allow its in situ recovery.* ***Information from the BLM's ongoing oil shale RD&D projects that involve in situ processes is the primary source for defining the potential in situ technologies that may be used in the future***. (pg. 2-13,14) 52650-012

With exception of the ATP and possibly New Paraho processes I know of no one who is even considering using these other dinosaur AGR processes—why is the DOI/BLM considering them? Of the BLM RDD program three in situ processes selected (RDS ICP, EGL, CVX) two (RDS, & EGL) have disastrous quantifiable and qualifiable environmental impacts of underground water and surface soil scalping. The CVX process may be much more environmentally benign, provided certain changes are made. If the RDS and EGL process are the primary source for defining technologies and their impact—why are their impacts environmental impacts not exposed in this document?

As explained in Chapter 1, this PEIS analyzes the amendment of 12 land use plans to open certain public lands for the opportunity to lease oil shale and tar sands for commercial development. ***The BLM initially intended the Final PEIS to provide*** *the NEPA analysis and documentation not only for the amendment of the land use plans to add the development of oil shale resources to the allowable uses of the public lands in these areas,* ***but also for the issuance of leases for the commercial development of oil shale.*** *The BLM circulated a 15-project development scenario to the cooperating agencies for review and comment. The BLM developed the 15-project scenario by assuming that all 6 of the RD&D leases would convert to commercial oil shale productions, and that there would be 3 additional commercial oil shale leases issued in each of the states mentioned in Section 369 of the Energy Policy Act of 2005: Colorado (two using in situ and one underground mine and surface retort); Utah (one in situ, one underground mine and surface retort, and one surface mine and surface retort); and Wyoming (one in situ, one underground mine and surface retort, one surface mine and surface retort). The* ***cooperating agencies commented*** *that the* ***BLM's analysis would be***

too speculative at this point to support a decision to issue any leases *on the basis of this 15-project scenario.* Pg 2-15

The Department of Interior is required to consult with Utah, Wyoming, and Colorado State Governors, representatives of local governments in those states, Indian Tribes, and **other interested persons** before commercial oil shale leases are issued. Why was no one other than the cooperating agencies informed of this decision?

*Similarly, the **BLM considered** whether to present a development scenario of six projects, corresponding to **the six RD&D projects currently leased**, under the assumption that these RD&D projects would become viable commercial enterprises. These leases authorize research projects that will yield additional valuable insight as to the technological requirements for, and the impacts associated with commercial development of oil shale resources; however, the **BLM concluded** that trying to undertake this analysis at this time in order to anticipate a certain level of development **would be too speculative**, as well. (pg. 2-16)*

How can the DOI/BLM issue BLM RDD leases, EAs, and consume a year of study and analysis and then decide it can't go forward with commercial leasing when they are considering the same processes? How can the DOI/BLM provide preferences leases under the RDD program for lands that are not included in Alternative A, B, & C for new applicants under commercial leasing land use plans? This is nonsense. 52650-013

As a result, the BLM has elected not to attempt to issue leases for commercial development of oil shale on the basis of this PEIS*. Rather, as explained in Section 2.5.1, below, this Draft PEIS is being developed to analyze the proposed action to amend 12 existing land use plans to designate certain public lands as open for the opportunity for future oil shale and tar sands leasing. Therefore, this **PEIS includes descriptions and analyses** not of particular levels of development, but **of the possible impacts of each type of technology currently under consideration and research**, so far as this information is available to the BLM at this time. Analysis of this information will allow the BLM to determine whether or not to designate certain public lands where the resources are known to be located as open for application to lease these resources in the future.* (Section 2.3.1)

Does Congress and the President know that the Secretary of the Department of Interior is out of compliance and in defiance of the EPA2005? Where are the descriptions and analyses of the possible impacts of each type of technology evaluated by BLM—specifically where are the statements about the massive surface damage and underground water contamination and resource waste by the RDS ICP process?

After preparation and analysis of an internal draft PEIS and discussion with its cooperating agencies, the BLM has modified its proposed action and, therefore, the scope of analysis for this PEIS. (Vol. 2, Section 4, pg 4-1) 52650-014

Although ***the proposal analyzed in this PEIS has now shifted away from supporting issuance of commercial leases of oil shale*** *and tar sand resources, substantial information was identified regarding current and emerging development technologies that will still be useful for decision makers and the public with respect to the proposal to amend the land use plans.* (Vol. 2, Section 4, pg 4-1)

52650-014 (cont.)

Again, who found out about this until issuance of the Draft? There is next to no meaningful critical analysis of the technologies referred to in this Draft. That which is presented, ignored, or hidden is misleading for decision makers and the public relative to land use plans or development of an oil shale industry in the US.

THE FALICY THAT THE TECHNOLOGY IS SO UNDEVELOPED THAT A PROGRAMATIC ENVIRONMENTAL IMPACT CANNOT BE MADE

After a year of study the DOE/BLM determined that the shale oil extraction technology was so undeveloped that a programmatic environmental impact statement could not be conducted. This is fallacious reasoning for the following reasons.

1. The BLM primarily considered old dinosaur technologies and those 4 processes associated with the 5 BLM RDD leases issued in Colorado with 3 in situ processes on December 15, 2006 and the one above ground process issued in Utah on June 28, 2007. There are other processes out there which will ultimately be used because of their superior environmental, energy efficiency, energy self sufficiency, resource recovery, and economic performance characteristics that were given no consideration.

52650-015

2. There is adequate information available in the public domain from the 6 RDD leases' Environmental Assessments and Program Plans Documents for each of these leases and other data released publicly by the lessees to qualify and quantify the major environmental impacts to underground water resources, and above ground soil and air resources as a result of the respective shale oil extraction technologies. Take the ATP process for example. This Southern Pacific Petroleum Company used the ATP at commercial scale for over a decade in Australia, consuming hundreds of millions of dollars and producing commercially significant quantities of oil. To say there is inadequate data is ludicrous. There is also adequate data to qualify and quantify the energy efficiency, energy self sufficiency, and efficiency of resource recovery—all of which have an impact on the amount of environmental damage per unit of useful liquid and gaseous fuel that is recovered. To a large extent I have already conducted this type of analysis and supplied it to the BLM in response to the BLM's request for public comments on each of the EA's. Two of the 4 BLM selected processes would be found to be totally unacceptable from and environmental standpoint by any competent critical review.

52650-016

3. There are other processes available for which the environmental impact, energy efficiency, energy self sufficiency, and efficiency of recovery are much, much better

52650-017

than those considered by the BLM. The Black Box Pyrolysis I above ground process and the Black Box Pyrolysis II in situ process are two of these. 52650-017 (cont.)

4. It would be hard to find a process that is more environmentally destructive to underground water and surface damage, energy inefficient, energy dependent on outside sources, and wasteful in terms of resource recovery than the Royal Dutch Shell ICP process upon which most of the BLM technology review has focused. Yet it is the poster child upon which the BLM has approved 3 separate RDD leases, and is touted to be environmentally benign by RDS, politicians, and even some environmental groups. Any competent technical review of the RDS EA for their RDD leases will lead to the conclusion that this shale oil extraction process should be banned as a matter of US Energy Policy for many reasons—not just environmental. No PEIS for commercial oil shale development/leasing should be based on this process.

52650-018

5. The DOI/BLM argument and conclusion that oil shale technology is so undeveloped that a PEIS cannot be developed, and further that development through the BLM RDD program is needed to obtain the needed technological data has no credibility. Thorough and critical analysis based on available data would result in the conclusion that the environmental impact of the RDS ICP and EGL processes would be totally unacceptable—and not just from an environmental standpoint. No testing is needed. The Chevron/Texaco in situ process with certain modifications could greatly minimize ground water contamination and soil surface disturbance—perhaps to acceptable levels. The OSEC above ground Taciuk process may also possibly be executed in an environmentally acceptable manner. The Black Box Pyrolysis Processes I & II certainly could meet environmental standards.

6. The selection of the 4 out of 20 applicants for the BLM RDD program was supposedly based, in part, on the BLM's determination that the resultant environmental mess from each respective process could be adequately cleaned up based on the bondability of the lessee. To come to that conclusion the BLM had to make an assessment of the potential environmental damage of the technological processes involved and the respective resultant cost of cleanup and compare that to the bondability amount of each applicant. How can the BLM now conclude that for commercial leasing it is impossible to determine the environmental impact of the technologies involved, whereas for the RDD program the BLM could make this determination and even put a dollar value on the environmental cleanup required?? This is totally inconsistent. ***It is the policy of the United States per EPA2005 that both research- and commercial-scale development of oil shale and tar sands should be conducted in an environmentally sound manner using management practices that will minimize potential impacts.*** Either the PEIS for commercial leasing should have been completed on schedule, or the RDD leases should be recalled.

52650-019

The bottom line is that the environmental damage to be wrecked on the surface and the ground water/aquifer systems feeding the Colorado River Drainage is so large for at least two of the processes accepted for the BLM RDD program, that any PEIS based on those

52650-020

processes would conclude the environmental costs of a commercial oil shale program are just out of the question. This does not mean that there are no other processes out there which have acceptable environmental, energy efficiency, energy self sufficiency, resource recover, and economic performance characteristics—because there are—and a meaningful final PEIS could have been developed based on those processes by February 8, 2007 as mandated by the Energy Policy Act.

What is apparent is the lack of oil shale technological experience and competence within the decision making circles of the US legislative and executive branches, the DOE, D OI/BLM, and even the DOE and DOD who also influence the direction of oil shale development. That also appears to be true also of (a) cooperating agencies, and (2) the BLM interdisciplinary team responsible for selecting the 4 lessees and their respective processes for the RDD program. Lack of direct coupling between specific technologies considered, and the synergism between their energy efficiency, energy self sufficiency, environmental damage, economic viability, effectiveness of resource recovery, and US strategic and security interests is evident in every aspect of the current US oil shale development program. Where some connection is attempted between the technologies considered none of the processes unacceptable performance characteristics are ever exposed.

52650-020 (cont.)

The Big Environmental Issues are Not Identified, Qualified, Quantified, or Critically Analyzed in this Document

What are the big environmental issues? There a 4 major ones. Soil surface and in-ground damage, pollution of the air, ground and surface water contamination, and water consumption. The RDS ICP process illustrates the big ticket environmental damage to the soil surface and the underground water system. The RDS BLM RDD EA and Plan of Operations describes drilling wells every 8 feet around the freeze wall circumference and heater wells spaced at 25 feet within retorting zone interior to the freeze wall, plus all the above ground infrastructure required for product oil and gas processing, and above ground water treatment in an attempt to clean up massive underground water contamination. As a result the three160 acre RDS RDD tracts will be completely scalped above ground—this is equivalent to strip mining. With 40% of the kerogen left in the ground as char due to the resource wasting coking process that occurs from the 3-4 year heat up process, massive contamination of the underground water system can be expected to occur for perpetuity from toxic and carcinogenic residual materials produced during pyrolysis such as unsaturated benzene ring compounds. The proposed water de-contamination cleanup process involving flushing the contaminated formation with 20 pore volumes of water over a ten year period with subsequent above ground water treatment and evaporation is without credibility—and no bond will ever be large enough to clean up the crapping up of the White, Green, and Colorado Rivers that will ultimately result.

52650-021

The argument being made by the BLM that the environmental impact cannot be assessed until further process research and development occurs is not credible based on the

processes the BLM has considered. There is enough technical data available to do the job.

If there is emphasis by the BLM it is on overlooking environmental impact, rather than identifying and preventing the massive impacts as it relates to specific technologies in the first place. Where are the big environmental issues presented in Environmental Impact—Table 2.6.1 or anywhere else in the Draft. 52650-021 (cont.)

Land Use and Soil Resources—Surface Damage—The Draft speaks nothing to the massive scalping of the entire surface area above target resource extraction zones—and the surrounding area. For example in order to process on the order of 1/3 to 1/2 acre (plan view) of oil shale, RDS will scalp their entire 160 RDD track for wells, infrastructure, evaporation ponds, water treatment facilities etc.. Although the ratio of surface scalp area to target extraction area may decrease with commercial operation it will always exceed the target extraction area and therefore ultimately results in scalping the total surface area above the target area. This becomes equivalent to strip mining in terms of its impact on both land use and soil resource. 52650-022

Water Resources—Underground Water Contamination. The Draft speaks of accidental releases of hazardous materials (e.g., fuels and industrial solvents). Table 2.6-1

Kerogen in raw shale is a rather environmentally benign material. However, once pyrolyzed the resultant products are not so environmentally benign. The major problems are: (1) the H2S in the gas produced, which can be cleaned up if contained with sulfur processing units, and (2) the toxic and hydrocarbon carcinogenic materials contained within the char left on the spent shale, which can be eliminated by incineration of the char, with the resultant heat release being more than adequate to drive the pyrolysis process. 52650-023

Nothing is said here about the direct consequences of some processes (e.g. RDS's ICP) creating severe massive amounts of hazardous materials due to huge amounts of char being left behind and the inability of decontamination schemes to effectively remove this contamination and thus prevent it from polluting the ground water for decades or centuries to come. This is not an issue of accidental release of "fuels and industrial solvents", that's a minor issue, it's a major issue associated with the massive quantity of char left underground.

*Degradation of groundwater quality resulting from injection of lower quality water; **from contributions of residual hydrocarbons** or chemicals **from retorted zones after recovery operations have ceased**; and, from spent shales replaced in either surface or underground mines;* (Section 4.5.1)

This is the only statement in the entire 1400 pages that mentions environmental impact from residual hydrocarbons in spent shale presumably from in situ processes. Given the massive amount of char in spent shale left behind to contaminate underground water for example in the RDS ICP process and the lack of credibility in their approach to de-contaminating this char this implies either incompetence or bias by the BLM towards RDS. When you couple the massive amount of char involved coupled with making the retorted zones much more permeable than the pre-retorted shale before pyrolysis you have set the stage for endless contamination of the White, Green, and Colorado River 52650-024

drainage systems. This is particularly true given the change in the Minerals Leasing Act allowing one organization such as Royal Dutch Shell to control a total of 150,000 acres (234 square miles or sections) on a national basis. Given the nature of this massive environmental impact, perhaps at least one third of the entire document should have devoted to this issue—not just one obscure phrase that is unconnected to the rest of the document.

52650-024 (cont.)

Water Useage—Processes That Produce But Don't Consume

This Draft is prolific with the discussion of water usage in oil shale development—but speaks little of processes that are available which do not use water, but in fact produce water due to the connate water within the raw shale. The DOI/BLM and federal policy should seek out and support those processes that do not consume water, just like they should seek out and support processes that do not leave massive quantities of char behind and which have high energy efficiency and are energy self sufficient.

52650-025

PEIS is for Ammending Land Use Plan—Not Commercial Leasing—Programmatic-Level Analysis of Impact?—Aid to Decision Makers

If the PEIS is not for Commercial Leasing as mandated by the EPA2005 what is it for? It appears it's simply worthless. As stated below its purpose is to support amending the RMPs, but it also is stated that there is no resulting impact from amending the RMPs. From the onset wasn't it obvious that changing text on pages in the RMPs has no impact other than the cutting a few trees to get the necessary paper? It also states the Draft includes a "programmatic-level" analysis of potential impacts of technologies. What does that mean—if anything?

52650-026

This PEIS has been developed to analyze the direct, indirect, and cumulative environmental, cultural, and socioeconomic impacts of the three alternatives. While the BLM has determined that there are no environmental impacts associated with the amendment of land use plans, it is intending to establish a commercial leasing program to facilitate future development and has included a programmatic-level analysis of the potential impact of oil shale and tar sand development technologies as they are currently known. (Abstract)

This programmatic environmental impact statement (PEIS) evaluates the potential effects of amending these RMPs to make these designations. (Section 1, pg. 1-1)

This PEIS is being developed to support the amendment of the land use plans covering those areas where commercial leasing may eventually be proposed. (Section 1, pg. 1-1)

The BLM has determined that the amendment of land use plans to designate lands as available for application for commercial leasing would have no impact on the environment. (Section ES-7, pg. ES-5)

How could there possibly be an environmental impact based on amending land use plans—other than the waste of trees used to make the paper upon which the land use plan

52650-026 (cont.)

amendments are written? No wonder we have a federal budget deficit if we are wasting taxpayer money to come up with that conclusion!

As part of this PEIS, potential impacts of currently known technologies also have been described at the programmatic level to aid decision makers and readers in understanding the potential effects of future development. (Section ES-7, pg. ES-5)

52650-026 (cont.)

How?—their environmental impacts are known, can be qualified and quantified—but are never exposed in this document. In fact the Draft states that the technologies involved are so undeveloped that a PEIS cannot be developed.

Inconsistencies in Alternatives A, B, & C and Estimates of Minimum Shale Oil in Place for Alternatives A, B, & C are Indicative of a Lack of Understanding of the Resources Potential and the Pluses and Minuses Resulting from Its Development

Alternative A—"Do Nothing". The Draft states there are 6x160 or 960 acres, or 1.5 sections of land area in Alternative A. When in fact Do nothing involves past federal preference lease commitments and legal obligation to 5 x 8 sections in Colorado, or 40 sections (25,600acres) = 40 billion barrels of Fischer Assay recoverable oil plus TOSCO Assay recoverable gas, plus char energy. The Utah commitment is for 8 sections with perhaps up to 1 billion barrels of oil plus gas and char. A total of 48 sections or 30,720 acres and of the order of 41 billions of recoverable Fischer assay oil plus gas and char energy if efficient and available technologies were utilized.

52650-027

There is no rational basis for the BLM's "no action alternative" which is an underlying basis for the Draft. The no action Alternative A in reality should involve some 41 billion barrels of Fischer Assay recoverable oil, plus commensurate gas and char energy. Which is in fact 2/3 of the 61 billion barrels assumed by BLM for Alternative B. In other words, what's the purpose of the whole Draft, and Alternatives B and C, if doing nothing should produce almost as much oil?

Alternative B—BLM's Preferred One. The BLM's preferred alternative involves 1,991,222 total acres (3111 sections). 359798 acres (562 sections) are in Colorado with minimum of 16 billion barrels of oil present, 630971 acres (986 sections) in Utah with a minimum of 28 billion barrels of oil present , and 1,000,453 acres (1563 sections) in Wyoming with a minimum of 17 billion barrels of oil present for a total minimum of 61 billion barrels. With Colorado having the richest and thickest oil shale deposits it is inconsistent to estimate 16 billion barrels of resource present, while at the same time estimating 28 billion in Utah and 17 billion in Wyoming—even the Utah acreage is double that in Colorado, and the Wyoming acreage is 3 times Colorado's. This alternative and the estimates made are totally inconsistent with the US recoverable reserves in Colorado, Utah, and Wyoming which are in the 1-2 trillion barrels of Fischer Assay recoverable oil based on processes with energy efficient and energy self sufficiency characteristics which are currently available.. One has to conclude there is no rational basis for the acreage and barrels of oil present—which form the basis for this Draft.

52650-028

More reasonable resource recovery estimates would be 562 billion barrels for Colorado, 98 billion barrels for Utah, and Wyoming with 78 billion barrels for a total of 735 billion barrels. Based on these estimates the BLMs estimates through waste and inefficiencies assume only 3% recovery in Colorado, 28% recovery in Utah, and 21% recovery in Wyoming or a total overall efficiency of 8%. Again totally inconsistent with the acreage and quantity and quality of resource reserves involved.

52650-028 (cont.)

These estimates must assume extremely poor resource recovery on the order of 8% since the in place resource could approach 738 billion barrels of oil based on Fischer Assay plus corresponding amounts of Fischer/TOSCO Assay gas and char energy. In fact the worst resource recovery efficiency would be in Colorado which has the best quality reserves.

Note portions of OSEC's RDD program preference right lease are also excluded from Alternative B—under this Alternative commitments made under the RDD program would be honored to current lessees. See Section 2.3.3.1. However, no one else could apply for a lease in this area if the current RDD lessee terminated the lease, or let it expire.

As shown in Figures 2.3.3-1, 2.3.3-2, and 2.3.3-3, under Alternative B, the preference right lease areas for the five RD&D projects in Colorado coincide entirely with the area proposed to be available for application for commercial leasing. For the OSEC RD&D project in Utah, however, portions of the preference right lease area are not available for application for commercial leasing under Alternative B because of the presence of a potentially eligible WSR, Evacuation Creek (see Section 2.3.3).8 Under the terms of the RD&D program, the federal government has a commitment to grant the RD&D companies leases for commercial development within the preference right lease areas, provided that all conditions of the program are met (see Section 1.4.1). As a result, all lands within the preference right lease areas would be available for issuance of commercial leases to the RD&D companies under Alternative B if they meet all conditions of the program.

Alternative C. There are a total of 830,296 acres (1297 sections) in Alternative C. 40325 acres (63 sections) are in Colorado with minimum of 2 billion barrels of oil present, 490,460 acres (766 sections) in Utah with a minimum of 21 billion barrels of oil present, and 299,511 acres (468 sections) in Wyoming with a minimum of 8 billion barrels of oil present for a total minimum of 31 billion barrels, or about half the 61 billion estimated in Alternative B. Here relative to Alternative B, Colorado acreage has been cut by 90%, Utah reduced by 22%, Wyoming reduced by 70%.

Again with Colorado having the richest and thickest oil shale deposits it is inconsistent to estimate 2 billion barrels of resource present, while at the same time estimating 21 billion in Utah and 8 billion in Wyoming—even if from much large acreages. With 25,600 acres already committed to in Colorado under a do nothing alternative, this alternative only increases Colorado acreage by a mere 14725 acres (23 sections) or 57% over the do nothing alternative.

52650-028 (cont.)

A better estimate of recoverable reserves with efficient available technology is 63 billion barrels for Colorado, 77 billion barrels in Utah, and 23 billion barrels for Wyoming for a total of 163 billion barrels.
In addition, the 2 billion barrels of Colorado oil estimated to be present is only 5% of the recoverable Fischer Assay oil already committed to under a true do nothing alternative. One has to conclude there is no rational basis for the acreage and barrels of oil present—which form the basis for this Draft.

52650-028 (cont.)

Again these estimates must assume extremely poor resource recovery on the order of 19% since the in place resource could approach 163 billion barrels of oil based on Fischer Assay plus corresponding amounts of Fischer/TOSCO Assay gas and char energy and efficient processes currently available.

Note under Alternative C, preference right commitments made to all RDD lessee's in Colorado and Utah would be honored, see Section 2.3.3.2. However, no one else could apply for a lease in certain of these areas if the current RDD lessee's terminated their lease, or let them expire.

Under Alternative C, portions of three of the five preference right lease areas for the Colorado RD&D leases are not available for application for commercial leasing. These include portions of the areas associated with the Chevron, EGL, and Shell Site 2 RD&D projects. For the other two Colorado RD&D projects, Shell Sites 1 and 3, none of the preference right lease areas coincide with the area available for application for commercial leasing. As with Alternative B, for the OSEC RD&D project in Utah, portions of the area are not available for application for commercial leasing under Alternative C because they are excluded due to the presence of a potentially eligible WSR, Evacuation Creek (see Section 2.3.3).11 Under the terms of the RD&D program, the federal government has a commitment to grant the RD&D companies leases for commercial development within the preference right lease areas, provided that all conditions of the program are met (see Section 1.4.1). As a result, all lands within the preference right lease areas would be available for issuance of commercial leases to the RD&D companies under Alternative C if they meet all conditions of the program. For commercial oil shale development to occur on lands excluded by Alternative C, the specific land use plans would need to be amended to consider the excluded area for potential leasing. The federal government is not under an obligation to grant leases for commercial development within these areas to any other applicants.

This seems to be a major inconsistency with Alternative B rationale, and is obviously unfair to future potential lessees, and is just another classic case of politicians, the Dept. of Interior, and the BLM getting the cart before the horse in terms of well thought out Federal oil shale development. How can lands be leased to certain selected organizations under the BLM RDD program (including preference lands), and then become not available for leasing under a commercial leasing program to new applicants?

52650-029

Waste of resource—what we observe here is waste of a resource in the form of efficiency of recovery, residual hazardous byproducts, and waste in terms of the large amount of environmental damage per unit of useful high quality energy recovered. What's wrong here? First the amounts of recoverable oil assumed also imply the balance would either become non-recoverable, or be wasted. Wasting will immediately or inevitably lead to concomitant and massive environmental problems and waste of most of this valuable energy resource—and for which there is no other known substitute—there's no silver bullet out there.

52650-030

*Prior to issuance of any commercial leases on lands that may be designated as available for these uses, additional environmental analysis will be required to analyze the impacts of the proposed technology and of **any reasonable known alternative technologies** for development of the oil shale or tar sands resources. (Section 1, pg. 1-1)*

Does this mean that BDAT "Best Demonstrated Available Technology" must be applied? Both from a resource recovery efficiency and environmental standpoint. Are the oil and gas conservation laws going to be applied here., I certainly hope so.

Other Energy Policy Act Issues Relevant to This Draft

*In addition, Congress declared that **both research- and commercial-scale development** of oil shale and tar sands should (1) **be conducted in an environmentally sound manner using management practices that will minimize potential impacts**, (2**) occur with an emphasis on sustainability.** and (3) benefit the United States while taking into account concerns of the affected states and communities. To support this declaration of policy, Congress directed the Secretary of the Interior (the "Secretary") to undertake a series of steps, several of which are directly related to the development of a commercial leasing program for oil shale and tar sands.* (pg 1-1)

By EPA2005 Congress and the President directed the Secretary of the Department of Interior to:

- *"…Complete a programmatic environmental impact statement for a commercial leasing program for oil shale and tar sands resources on public lands, with an emphasis on the most geologically prospective lands in Colorado, Utah, and Wyoming";*
- *"…Not later than 6 months after completion of the programmatic environmental impact statement… the Secretary shall publish a final regulation establishing such program";*
- *"…Consult with the Governors of States with significant oil shale and tar sands resources on public lands, representatives of local governments in such States, interested Indian tribes, and other interested persons, to determine the level of support and interest in the States in the development of tar sands and oil shale resources"; and*
- *"If the Secretary finds sufficient support and interest exists in a State, the Secretary may conduct a lease sale in that State under the commercial leasing program." (Section 1 pg 1-1)*

On June 9, 2005, pursuant to its authority under Section 21 of the Mineral Leasing Act

(MLA) (30 USC 241), the BLM initiated an oil shale research, development, and demonstration (RD&D) program under which small tracts of land could be leased in support of activities to demonstrate the technical and economic feasibility of oil shale extractive technologies (70 FR 33753–33759). The BLM solicited the nomination of parcels, not to exceed 160 acres, to be used for oil shale RD&D activities. Applicants also were allowed to identify an additional contiguous 4,960 acres of land to be reserved as a preference right lease for future commercial development to be awarded following (1) demonstration that the applicant's technology tested in the original lease of up to 160 acres has the ability to produce shale oil in commercial quantities; (2) evaluation pursuant to the NEPA that concludes that commercial-scale operations of the applicant's technology at that site does not result in significant adverse environmental or social impacts; (3) provision of adequate bond to cover all costs associated with reclamation and abandonment of the expanded lease area; and (4) consultation with state and local governments on a strategy to mitigate socioeconomic impacts, including, but not limited to, the infrastructure needed to accommodate the required workforce. The 160-acre RD&D leases were issued for 10-year terms with an option to extend them up to another 5 years. Prior to beginning RD&D activities, the lessees also must obtain permits from the BLM and other governmental agencies (e.g., state-issued air quality permits). (Secion 1.4.1)

The cart was placed before the horse by initiating the BLM RDD program based on the MLA in place on June 9, 2005 before passage of the Energy Policy Act which required that RDD leases within 180 days after enactment (August 8, 2005) of the EPA2005. The BLM has no intention of leasing anymore RDD tracts.

The MLA in force on June 9, 2005 restricted BLM RDD program applicants to one 160 tract plus an additional preference lease on lands contiguous to the 160 acres bringing the total to 5120 acres, or 8 sections of land. How is it possible then that RDS applied for and received 3 separate leases of 160 acres (RDD) plus preference of for a total of 3 x 8 sections, or 24 sections in total? RDS applied for two leases on the day the RFP came out in the Federal Register, June 9, 2005. All other 17 applicants applied for only one lease per the MLA in force on June 9, 2005.

52650-031

The BLM received and reviewed a total of 20 nomination packages. Ultimately, six projects were selected for further consideration, including preparation of environmental assessments (EAs) under NEPA. The projects that were selected included five projects in the Piceance Basin, Colorado (one each submitted by Chevron Shale Oil Company and EGL Resources, Inc., and three submitted by Shell Frontier Oil & Gas), and one project in the Uinta Basin, Utah (submitted by Oil Shale Exploration Company [OSEC]).

The RD&D leases for the five Colorado projects were issued January 1, 2007 **(actually signed by Asst. Sec. Allred on December 15, 2006)***; the lease for the Utah project was issued in June 2007* **(issued by Allred June 28, 2006 & effective by OSEC July 1, 2007).** *As discussed in Section 2.3.2, activities on the 160-acre RD&D leases are on going and are considered as part of the baseline under Alternative A, the no action alternative, for oil shale. (Section 1.4.1, pg. 1-9,10)*

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Section 21 of the MLA authorizes the Secretary of the Interior to lease deposits of oil shale and the surface of public lands containing the deposits, or lands adjacent thereto, as may be required for the extraction and reduction of the lease minerals. Under the MLA, the lease ***may not exceed 5,120 acres*** *and may be of an indeterminate period. The Secretary of the Interior may impose conditions on the lease, including convents {should be covenants} relative to methods of mining, prevention of waste, and productive development. (Section 2.2.1, pg. 2-2)*

52650-032

The MLA was changed August 8, 2005 as a result of the EPA2005 raising the maximum individual lease area to 5760 acres or 9 sections for the entire US. All leases combined for an individual or organizations was increased from 5120 acres (8 sections) to 50,000 acres per state. Since RDS applied for 3 leases apparently for 5760 acres (9 sections) each (see RDS plans of operations) why did they only receive 3 tracts of 8 sections each—why not 9 sections? What is this number of 5120 acres doing is this reference to the current MLA?

Congress declared that oil shale and tar sands (and other unconventional fuels) are strategically important domestic energy resources that should be developed to reduce the nation's growing dependence on oil from politically and economically unstable foreign sources. (Section ES.1, pg. ES-1)

Why did the DOI/BLM give away to Royal Dutch Shell (a foreign oil company with headquarters in the Hague, Netherlands) control of 24 sections of land with an estimated 24 billion barrels of oil—plus gas—worth in terms of refinery feedstock some $2.4 trillion dollars—for a mere $6000 in application fess via the BLM RDD oil shale leasing program? Why were they given 3 separate leases? If the position of the DOI/BLM is that the EPA2005 (signed August 8, 2005) trumps the Federal Register Notice on the BLM's RDD Program (published June 9, 2005) including the Minerals Leasing Act in force on 6/9/2005 then why weren't the other 17 applicants notified?

52650-033

Summary of my credentials—background, education, experience and oil shale development goals. When it comes to the development of oil shale I am not operating from a position of ignorance. I am the developer of the proprietary above ground Black Box Oil Shale Pyrolysis Process I and the underground Process II—claim lowest shale oil/gas production costs, highest energy efficiency, best energy self sufficiency, highest net resource recovery, and lowest environmental impact. I was one of 18 applicants for the BLM's Oil Shale RDD program. I was Exxon USA's Lead Senior Staff Mechanical Engineer on the Colony Oil Shale Project (a $6 billion dollar effort) TOSCO Pyrolysis Unit, and have a Sc.D. from MIT with over 45 years of Experience/Education in Energy/Process Industries and Water Conservation/Utilization. I have been retired for almost 8 years—6 of which have been spent on resurrecting work done 30 years ago for optimizing dry cooling towers for electric generation power plants to save water, and the development of my proprietary Black Box Oil Shale Pyrolysis Processes. I have two goals for oil shale: (1) beat out the competition on the basis of the merits of my process; and (2) participate as a stakeholder in the development of oil shale to insure this national

treasure is developed on a sound basis with: (a) minimum environmental impact, (b) maximum resource recovery in the form of liquid and gaseous fuels; (c) maximum energy efficiency; (d) maximum energy self sufficiency; (e) highest economic benefit and profitability; and (f) minimum water usage.

Chronology of Important Oil Shale Development Activities

.March 2004, DOE's Office of Naval Petroleum and Oil Shale Reserves issues, a 2 volume report dealing with the "Strategic Significance of America's Oil Shale Resource—Volume 1 Strategic Issues, Volume 2 Technology and Economics".

December 2004 DOE's Office of Naval Petroleum and Oil Shale Reserves issues a second report "America's Oil Shale—A Roadmap for Federal Decision Making—Sustainable Development of the Oil Shale Resources of the United States".

November 22, 2004 Federal Register Notice. BLM seeks public input on terms to be included in RDD leases—no other announcement or advertisement left many in the dark.

December 22, 2004 Deadline for comments on terms of RDD leases.

April 12, 2005 U.S. Senate Energy and Natural Resources Committee, Oil Shale and Oil Sands Resources Hearing wherein Royal Dutch Shell Testifies.

June 9, 2005 Federal Register Notice, BLM solicits nominations for RDD lease tracts. In the notice the BLM kills the idea of a research park for oil shale development where small entrepreneurs and small business could share certain costs and obtain access to adequate oil shale to conduct development work.

June 9, 2005 Royal Dutch Shell (RDS) tables 2 separate RDD lease applications with BLM. How did RDS know what the 15 application requirements were, and why did RDS make two different applications, rather than one as required by the Minerals Leasing Act in force on 6/8/2005?

June 23, 2005 U.S. House of Representatives Committee on Resources, Subcommittee on Energy and Mineral Resources, Hearing Related to Potential Development of U.S. Oil Shale Resources wherein Oil Tech, and Royal Dutch Shell Testify.

July 21, 2005 BLM requests RDD applicants to request time extension beyond September 9, 2005 deadline.

August 8, 2005 Pres. Bush signs Energy Policy Act of 2005—this changed the allowable lease acreage from 8 sections to 78.125 acres per state for Utah, Wyoming, & Colorado. There was no announcement that this changed the rules for the BLM RDD program.

August 22, 2005 BLM denies RDD application time extension.

September 2, 2005 Royal Dutch Shell tables a third BLM RDD lease application.

September 7. 2005 Deadline for BLM RDD program nomination applications.

December 13, 2005 BLM issues Federal Register Notice announcing intent to prepare Programmatic Environmental Impact Statement (PEIS) and conduct public scoping meetings and receive comments.

In the latter part of 2005 the Rand Corporation issued a third report for the DOE's National Energy Technology Laboratory, "Oil Shale Development in the United States—Prospects and Policy Issues" .

January 13, 2006 BLM announces 6 remaining BLM RDD applicants and 8 tracts (1 each for Chevron/Texaco (CVX), EGL, Exxon/Mobil (XOM), Oil Shale Exploration Company (OSEC), and Oil Tech and 3 for RDS). 12 other applicants and related 12 tracts were rejected.

January 10-20, 2005 BLM conducts PEIS public scoping and input meetings.

February 8, 2006 Energy Policy Act of 2005 authorizes RDD leases. Redundant and out of sync with BLM RDD program. Subsequently BLM takes the position that there will be no new RDD leases beyond the 4 successful applicants—RDS, CVX, EGL, and OSEC.

February 8, 2006 Energy Policy Act of 2005 requires Task Force to Produce Initial Report on America's Strategic Unconventional Fuels Resources on this date

February 15, 2006 Royal Dutch Shell tables Plan of Operations for 3 separate RDD leases at BLM Meeker field office.

February 15, 2006 Chevron/Texaco tables Plan of Operations for RDD lease at BLM Meeker field office

February 15, 2006 (assumed same date as CVX and RDS) EGL tables Plan of Operations for RDD lease at BLM Meeker field office

March 13, 2006 BLM announces Colorado RDD tract Public Open House Information Meetings for four applicants, CVX, EGL, RDS, and Exxon/Mobil (XOM), and 6 tracts.

March 24, 2006 BLM announces Colorado RDD tract Public Open House Information Meetings for only 3 applicants (RDS,CVX, & EGL) and 5 tracts.

March 24, 2006, BLM rejects Exxon/Mobil and Oil Tech RDD applications leaving 4 applicants and 6 tracts combined for Utah and Colorado. No BLM public announcement is made about this BLM action taken at this time.

March 28-April 6, 2006 BLM conducts Colorado RDD tract Open House Information Meetings.

March 30, 2006 Gale Norton, Sec. Dept. of Interior Resigns

April 25, 2006 BLM announces Utah RDD tract Public Open House Meeting for Oil Shale Exploration Company (OSEC).

May 17, 2006 BLM conducts Utah RDD tract Open House Information Meeting in Vernal, Utah for OSEC.

May 26, 2006 Dirk Kempthorne confirmed DOI Secretary by Senate.

June 1, 2006 U.S. Senate Energy and Natural Resources Full Committee Hearing, Grand Junction, Colorado wherein Royal Dutch Shell and Oil Tech's joint venture partner Baard Energy Testify. Committee Chairman Domenici states that Royal Dutch Shell is a **Very Powerful American Company**.

July 27, 2006 BLM issues notice for comments on EGL EA

August 15, 2006 BLM issues notice for comments on CVX EA

August 15, 2006 BLM issues notice for comments on RDS EA—one EA for three separate tracts.

August 25, 2006 Federal Register Notice, BLM solicits comments/suggestions to assist in writing of a proposed rule to establish a commercial leasing program for oil shale--ANPR.

September 1, 2006 Comment deadline for EGL EA

September 18, 2006 Comment deadline for CVX and RDS EAs

September 18, 2006 BLM issues notice for comments on Oil Shale Exploration (OSEC) EA

September 21, 2006 Tar Sand Conference at University of Utah Heavy Oil Center

September 25, 2006. Comment deadline for rule on commercial oil shale leasing, ANPR.

September 26, 2006 BLM issues Federal Register Notice extending ANPR comments deadline until October 25, 2006.

September 29, 2006 BLM's assistant Director, Tom Lonnie, promoted to BLM's Alaska State Director.

September, 2006 Energy Policy Act of 2005 Task Force Produces Initial Report on America's Strategic Unconventional Fuels Resources—8 months late

October 16-20, 2006 Oil Shale Symposium at Colorado School of Mines revived after termination for 11 years. Field trip to RDS private test site, Utah U-A tract White River Mine Site, and various oil shale geologic sites.

October 18, 2006 Comment deadline for OSEC EA

October 25, 2006 Extended comment deadline for rule on commercial oil shale leasing, ANPR.

November 5, 2006 U.S. elections. Pombo loses election, House Resource Committee Chairmanship goes to Democrat, Nick Rahall. Republican Senator Pete Domenici loses Senate Energy Committee Chairmanship to Democrat Senator Jeff Bingaman.

November 13, 2006 Allred, Asst. Sec. , Department of Interior signs Decisions of Records for Environmental Assessments for Royal Dutch Shell, Chevron/Texaco, and EGL

December, 2006 BLM changes scope and deliverable of PEIS and its relation to commercial leasing.

December 15, 2006 Allred, Asst. Sec. , Department of Interior signs 5 RDD leases for Royal Dutch Shell (3), Chevron/Texaco (1), and EGL(1).

December 28, 2006 Kempthorne, Sec. of Deparment of Interior, announces Kathleen Clarke's resignation as BLM Director.

December 28, 2006 Former Secretary of Interior, Gale Norton, joins Royal Dutch Shell as General Counsel over oil shale development.

January 29, 2006. U.S. State Department announced likely review of **Royal Dutch Shell's deal to develop Iran's largest natural gas field**.

February 5, 2007 Press article stating Royal Dutch Shell has recently appointed Cam Toohey, perceived enemy of the green lobby to work in Alaska. Mr. Toohey previously worked for Norton in the Interior Department. It also stated that Royal Dutch Shell has taken on Elizabeth Stolpe, a Bush environmental adviser and former oil industry lobbyist. Also at Royal Dutch Shell are Brain Malnak who also worked at Interior, and Kevin O'Donavan a former domestic policy adviser to Cheney responsible for Cheney's climate change and energy policy.

February 8, 2007 PEIS issue deadline per Energy Policy Act of 2005—deadline passed, PEIS not even out for public comment which is required before final release.

February 8, 2007 Energy Policy Act of 2005 requires Task Force to Produce Annual Report on America's Strategic Unconventional Fuels Resources on this date

August 3, 2007 James Caswell confirmed BLM Director by Senate.

August 24, 2007 Final regulations on commercial oil shale leasing deadline per Energy Policy Act of 2005 which was to be based on the PEIS.

September, 2007 Heavy Oil Program University of Utah issues Report "A Technical, Economic, and Legal Assessment of North American Heavy Oil, Oil Sands, and Oil Shale Resources" in response to EPA2005.

October 15-17, 2007 Oil Shale Symposium at Colorado School of Mines..

December 20, 2007 BLM Director Jim Caswell announces publication of the "Draft Programmatic Environmental Impact Statement (PEIS)" and 90 day comment period.

December 21, 2007 Michael Nedd, BLM, Assistant Director Minerals, Realty, and Resource Protection provides transmittal letter incorporated in the "Draft Oil Shale and Tar Sands Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS)".

February 8, 2008 Energy Policy Act of 2005 requires Task Force to Produce second Annual Report on America's Strategic Unconventional Fuels Resources on this date.

February 11-28, 2008 BLM conducts open houses on Draft

February 22, 2008 The 2008 Western U.S. Oil Sands Technology Transfer Meeting, University of Utah Heavy Oil Center

February 24, 2008 DOI Secretary required to meet with Governors and begin commercial oil shale leasing per Energy Policy Act of 2005

February, 2008 BLM awards RDS 275 lease blocks in Alaska containing 15 billion barrels of oil and 77 trillion cubic feet of gas with a market value of 2.3 $trillion.

March 20, 2008 public comment period on Draft ends.

March 21---until when? Final Draft?, Commercial Leasing? Mandates of Energy Policy Act Met?

If there are questions, or clarification is needed, please contact me via the above telephone or address.

Brent C. Fryer, Sc.D.

Responses for Document 52650

52650-001: As the comment points out, the scope of the PEIS differs from that originally envisioned as described in the December 2005 NOI. As stated in the Energy Policy Act, the development of oil shale, tar sands, and other strategic unconventional fuels for research and commercial development should be conducted in an environmentally sound manner, using practices that minimize impacts. The BLM believes that analyzing an allocation decision provides the opportunity to build on scientific, governmental, or industry research in order to analyze, in a general way, the possible impacts of commercial development on these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale exploration and development, further analysis will be carried out and documented in accordance with NEPA, to support any decisions in this regard. That NEPA analysis will evaluate the environmental impacts of the oil shale exploration and development, and develop specific mitigation measures to mitigate or eliminate the identified impacts. The BLM believes that such an approach will ensure that commercial oil shale development programs meet the intent of Congress and take advantage of the best available practices to minimize impacts and to offer opportunities for states, local communities, and the public to participate in the process.

52650-002: The BLM disagrees with the comment that there is an inconsistency between the conclusions in the RD&D EAs that these actions could proceed without significant environmental impact, but commercial leasing on a broader scale could not be supported with the information at hand. The six RD&D projects were specific proposed activities with a known location and specific plan for technological deployment. Although there were certain unknowns associated with these projects, impacts could be bounded by the facility size, site-specific information about resources on the site, and anticipated impacting factors such as water and energy use.

In developing the PEIS, the BLM has actively sought input from cooperating agencies, the states, local governments, Tribes, and interested parties. Some of these interactions occurred as part of the scoping process and public meetings on the Draft PEIS. Commenting on the Draft PEIS is one way to provide that input. Although information and input from these entities was used in making the decision to change the proposed action from a leasing decision to a land allocation decision, that decision was ultimately BLM's. A 20-year time frame for evaluation was used because it represents a reasonable time frame over which current development and population projections can be applied without undue speculation.

52650-003: The BLM believes there is considerable uncertainty regarding the impacts of a commercial oil shale and tar sands program, including the number of projects, location of projects, technologies to be deployed, resources within project areas,

and impacts associated with different technologies. One of the functions of the RD&D program is to provide information on impacts and allow refinements in the technologies. An attempt to prepare a PEIS on a commercial leasing program would have been based on too much uncertainty and too much speculation to serve as a basis for reasonable decision-making.

52650-004: The RD&D program was designed to determine the possibility of successfully recovering shale oil and the environmental effects associated with the various processes. The impacts that you have stated are as yet unknown and still to be determined. All of the processes being tested still are required to comply with the Clean Water Act and the state regulations implementing that Act.

52650-005: See response to Comment 52650-003.

52650-006: The BLM disagrees with the commentor's assertion that the overall oil shale and tar sands program is flawed. The program follows BLM requirements for NEPA and regulation development.

52650-007: The BLM implemented an open process for accepting and reviewing applications for RD&D leases. This process was announced and described in the *Federal Register* on July 9, 2005 (70 FR 33753).

52650-008: Section 2.3.2 of the PEIS has been revised to correctly characterize the no-action alternative (Alternative A) consistent with the comment.

52650-009: Thank you for your comments. The BLM is not basing land allocation decisions in the PEIS on the resource numbers identified. The numbers in question were calculated for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The numbers were developed with the understanding that the numbers underestimate the actual in-place resource. The numbers were developed using the values that described the minimum quality and thickness that was deemed to be economic. Those values are a minimum 25 ft thickness, and a minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming, the values used were 15 ft thick and 15 gallons per ton. These values coupled with the acreage in each of the alternatives generated the numbers in question. It is true that using more exact isopachs and quality data, if available, would have provided much higher values for each of the alternatives, but the alternatives would remain comparable.

The actual recovery numbers are yet to be determined, and they are contingent on the type of recovery method. This is also true for any recovery numbers that are proposed by in situ methods. The purpose of the PEIS is to identify lands to be opened or closed to oil shale development not to compare technologies.

52650-010: This PEIS evaluates the potential environmental impacts of a land allocation decision. While your comment addresses the development of an oil shale and tar

sands program, evaluation of the process of program development is beyond the scope of this PEIS. The impact evaluation in this PEIS, however, allows for the future development and implementation of alternative oil shale and tar sands extraction technologies that may result in reduced impacts.

52650-011: The full understanding or consequences of the impacts associated with the proposed technologies are yet to be determined. It is highly speculative and not reasonable to compare undetermined impacts at this time. The purpose of the PEIS is to identify lands to be opened or closed to oil shale development, not to compare technologies.

52650-012: All of the impacts associated with the proposed technologies are yet to be determined and comparisons of undetermined impacts is not possible at this time. The impacts of technologies that were known were included in the analysis. The purpose of the PEIS is to identify lands to be opened or closed to oil shale development, not to compare technologies.

52650-013: Consultations among affected parties were conducted as part of the RD&D leasing process. No other oil shale leases have been issued. Although future commercial oil shale development projects may use the technologies being considered in the RD&D program, the BLM expects that knowledge gained during the RD&D program will result in a refinement of those technologies and ultimately, a reduction in impacts that cannot be estimated at this time. Furthermore, to proceed with a full analysis that supports leasing would require a projected development scenario that BLM considers too speculative.

Note that the treatment of PRLAs in the PEIS has been revised to be consistent with the comment.

Comparisons of the impacts of various technologies are presented and discussed in Chapters 4 and 5 in the discussion of impacts to each resource.

52650-014: The cooperating agencies' review of a preliminary Draft PEIS led to the BLM's decision regarding the proposed action to be evaluated in the PEIS. All discussions pertaining to revising the proposed action were internal to the BLM. In developing the PEIS, the BLM used the best information available on different technologies. It is expected that as the RD&D program matures, new information will emerge that will be valuable for development of the project-specific evaluations that will be needed at leasing and development stages.

52650-015: Reasonable assumptions concerning the type of technologies were made based on the current technologies and associated impacts. The purpose of the PEIS is to identify lands to be opened or closed to oil shale development, not to compare technologies.

52650-016: The purpose of the RD&D leases is to collect information on the technologies and associated environmental consequences. Currently, there is insufficient information in the public domain to analyze water and air impacts of commercial oil shale extraction to make an informed decision on offering for lease lands for oil shale development. Although it is true that the ATP process has been tested in Australia, the RD&D program is working with a different type of shale with different characteristics.

52650-017: The assumptions concerning the processes for developing oil shale are based on currently known and available information on the technologies. However, the BLM recognizes the merits of an RD&D program to ensure that oil shale technologies are perfected to operate at economic and environmentally acceptable levels. The BLM believes this effort will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures.

52650-018: The scope of the PEIS, in consultation with the cooperating agencies, was changed from a leasing decision to an allocation decision. Consequently, new NEPA analysis will be required prior to offering for lease parcels of land for commercial oil shale exploration and development. This NEPA analysis will evaluate environmental impacts of the operation(s), and develop specific mitigation measures to mitigate or eliminate those impacts.

52650-019: See response to Comment 52650-002.

52650-020: An overview comparison of oil shale technologies is provided in Appendix A of the PEIS. In developing the PEIS, the BLM used the best information available to the agency on existing oil shale extraction technologies. Information was gathered by subject matter experts though the entire PEIS preparation period. There was an opportunity for specific public input during the scoping process and review of the Draft PEIS. The BLM expects that as the RD&D program matures, new information will emerge that will be valuable for development of the project-specific evaluations that will be needed at leasing and development stages.

52650-021: The purpose of the RD&D leases is to collect information on the technologies and associated environmental consequences. Currently, there is insufficient information in the public domain to analyze water and air impacts of commercial oil shale extraction to make an informed decision on offering for lease lands for oil shale development.

52650-022: The text in Section 4.3.1.1 has been modified to clarify the disturbed land relative to a given technology and production rate. Figures and relevant assumptions for in-situ processes are discussed in Table 4.1.3-1.

52650-023: Although the itemization requested by the commentor is not presented in Table 2.6-1, concerns about groundwater contamination due to the ICP process are addressed in Section 4.13.1.4 and in greater detail in Appendix A, Section A.3.2.2. Additionally, the potential for groundwater contamination from RD&D ICP processes is discussed in Section 6.1.1.4. The operators are seeking to minimize groundwater contamination through control of fracturing to minimize contact between productive zones. Monitoring of groundwater impacts from the RD&D sites will be conducted. Furthermore, leasing and commercial-scale production from the RD&D facilities will not be allowed until an evaluation pursuant to the National Environmental Policy Act concludes that commercial scale operations of the applicant's technology does not pose unacceptable environmental risks (including risk of groundwater contamination).

Section A.3.3 speaks to subsequent processing of crude shale oil for removal of sulfur contaminants, including hydrogen sulfide.

52650-024: Groundwater contamination from in situ retorting is a key concern identified in the Draft PEIS. Section 4.5.1.3 of the report contains a discussion of the organic and inorganic contaminants that are possible from in situ processes and mining. It is expected that groundwater monitoring at the RD&D sites will provide information at a pilot scale on the degree of impact from in situ technologies, and that this information would be used to determine mitigation measures and also decisions regarding possible future developments.

52650-025: Potential benefits of using connate water, which is considered to be of poor quality for oil shale and/or tar sands development, are considered speculative and are not addressed in the PEIS. The technologies to be used are selected by developers. Eventually, the successful technologies would be those that can be commercialized and are environmentally acceptable. They would be presented in project-specific plans of development and would be evaluated in the subsequent NEPA documents prior to leasing.

52650-026: The PEIS provides a wealth of information to the public and decision makers on the resources that could potentially be affected by the different extraction technologies. This information is used to make an informed decision on which lands should be opened or closed to future commercial oil shale leasing. This decision will form the foundation for subsequent NEPA analysis at the lease sales and plan of development stage.

52650-027: As discussed in Section 2.3.2, activities on the 160-acre RD&D leases are ongoing and are considered as part of the baseline under Alternative A, the no action alternative. The RD&D tracts were leased pursuant to the Notice in the *Federal Register* dated June 9, 2005 (Volume 70, Number 110) calling for nominations for RD&D proposals.

52650-028: The numbers in question were calculated for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The numbers were developed with the understanding that the number underestimates the actual in-place resource. The numbers were developed using the values that described the minimum quality and thickness that was deemed to be economic. Those values are a minimum 25 ft thickness and a minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming, the values used were 15 ft thick and 15 gallons per ton. These values coupled with the acreage in each of the alternatives generated the numbers in question. It is true that using more exact isopachs and quality data, if available, would have provided much higher values for each of the alternatives, but the alternatives would remain comparable.

52650-029: The current six RD&D leases were approved pursuant to the notice in the *Federal Register* dated June 9, 2005 (Volume 70, Number 110) calling for nominations for RD&D proposals. The current land use plans will be amended by the PEIS. Under the terms of the RD&D program, the federal government has a commitment to grant the RD&D companies leases for commercial development within the preference right lease areas, provided that all conditions of the program are met (see Section 1.4.1). As a result, all lands within the preference right lease areas would be available for issuance of commercial leases to the RD&D companies under Alternative C, if they meet all conditions of the program. If the RD&D leases are relinquished, for commercial oil shale development to occur on lands excluded by Alternative C, the specific land use plans would need to be amended to consider the excluded area for potential leasing.

52650-030: The commentor's interest in maximizing recovery of the resource is consistent with the direction of Congress to proceed to develop unconventional fuels in an environmentally sound manner. With current technologies undergoing development it is not yet clear what rates of recovery are feasible or what might pass the test of being fiscally and environmentally sound.

Appendix A of the PEIS discusses room and pillar mining of oil shale and makes the important point that the percentage of resource removed will be dependent on the structural integrity of the formation (an assessment that can only be made on a project-specific basis) and further establishes that a maximum resource removal percentage of 75% can be expected while still guaranteeing a safe mine development strategy. In Section 4.1.2, assumptions regarding room and pillar mining conservatively estimated a 60% resource volume removal for the purpose of establishing a reference condition against which to identify and evaluate potential environmental impacts. Congress has directed that future oil shale development be done in an environmentally responsible manner. The BLM interprets that to mean than successful lease applications will propose the maximum amount of resource that can be safely removed with the minimum amount of environmental impacts and will review future lease applications from that perspective.

Estimates of recovery rates of mined shale are presented based on traditional room and pillar mining techniques for coal. How that would compare to other technologies would be a valuable piece of information that will eventually become available.

52650-031: The commentor's interest appears to be in the process used to award the existing RD&D leases, which is beyond the scope of the PEIS.

52650-032: RD&D leases were issued consistent with the provisions described in *Federal Register* of June 9, 2005 (Volume 70, Number 110), which specified the acreage that would be available for lease. The establishment of the preference right lease acreage was done prior to the enactment of the Energy Policy Act on August 8, 2005.

52650-033: The successful applicants were selected based on their submittals responding to the Call for Nominations announced in the *Federal Register* dated June 9, 2005 (Volume 70, Number 110). Section 1.4.1 of the PEIS contains a brief description of the process.

Thank you for your comment, Byron McDonald.

The comment tracking number that has been assigned to your comment is OSTSD52651.

Comment Date: March 14, 2008 16:07:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD52651

First Name: Byron
Middle Initial: A
Last Name: McDonald
Organization:
Address: 13741 Annandale Dr. 19-I
Address 2:
Address 3:
City: Seal Beach
State: CA
Zip: 90740
Country: USA
Email: poppabum@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Let's get on with this program. This is our chance to break free from the enemy. It seems that all other opportunities are stimead by the factions. Please show us some progress. | 52651-001

Response for Document 52651

52651-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52652.

Comment Date: March 14, 2008 16:50:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD52652

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

My wife and i are all for the developement of the tar sands and oil shale areas. As long as reasonble reclamation / restoration procedures are followed after mining. The U.S. needs to develope all energy resources, fosil fuels and renewables, ASAP to become more energy independent.

52652-001

Response for Document 52652

52652-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Frederick Linton.

The comment tracking number that has been assigned to your comment is OSTSD52653.

Comment Date: March 14, 2008 17:02:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD52653

First Name: Frederick
Middle Initial: W
Last Name: Linton
Organization: OCTA
Address: 405 Wilkes Drive
Address 2:
Address 3:
City: Green River
State: WY
Zip: 82935
Country: USA
Email: flinton@wyoming.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We need to protect enough with this energy stuff .The following is just some of the reasons this vast 620,000-acre undeveloped expanse of sagebrush habitat is home to five areas of critical environmental concern, six wilderness study areas, some of the most intact segments of the Oregon, California, Mormon and Pony Express pioneer trails, and numerous significant historical, archeological, paleontological, and native traditional cultural places. It is tremendously important habitat for large herds of mule deer, pronghorn and elk, and thus is a popular hunting area, and it is a stronghold for the sage-grouse.I strongly protest to any development in this area

52653-001

52653-002

Responses for Document 52653

52653-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

52653-002: Please see response to Comment 52653-001.

Thank you for your comment, Sandra Goldberg.

The comment tracking number that has been assigned to your comment is OSTSD52654.

Comment Date: March 14, 2008 17:29:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52654

First Name: Sandra
Middle Initial:
Last Name: Goldberg
Organization: California Attorney General's Office
Address: 1515 Clay Street, 20th Floor
Address 2:
Address 3:
City: Oakland
State: CA
Zip: 94612
Country: USA
Email: sandra.goldberg@doj.ca.gov
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

3/14/2008

I am writing to request an extension of the deadline for submitting public comments on the Oil Shale and Tar Sands Draft Programmatic Environmental Impact Statement (PEIS). We only learned about the Draft PEIS recently. We request a 30-day extension of the comment period, to provide time for us to review the lengthy document and prepare comments on this very large-scale, long-term program. Thank you for your consideration of this request. Please contact me at: Sandra Goldberg, Deputy Attorney General (510)622-2145 sandra.goldberg@doj.ca.gov

52654-001

Response for Document 52654

52654-001: The comment period was extended for an additional period from March 20th until April 21st, 2008.

Thank you for your comment, James Catlin.

The comment tracking number that has been assigned to your comment is OSTSD52655.

Comment Date: March 14, 2008 17:42:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52655

First Name: James
Middle Initial:
Last Name: Catlin
Organization: Wild Utah Project
Address: 68 S. Main Street
Address 2: Suite 400
Address 3:
City: Salt Lake City
State: UT
Zip: 84101
Country: USA
Email: jim@wildutahproject.org
Privacy Preference: Don't withhold name or address from public record
Attachment: HOW_Executive_Summary.pdf

Comment Submitted:

Since 2003, A number of partners including the BLM have been aware of and interested in using the Heart of the West Conservation Plan in making land use decisions in parts of Utah, Wyoming, Colorado, and Idaho. Some of the tar sands and oil shale areas fall within the lands covered in this plan. We ask that all the documents on the submitted CD be considered as comments on this PEIS.

For some reason, even though we are listed with BLM as an interested party on all RMP activities, we were not served notice that this PEIS was underway. For this reason, we were not able to participate until now in this process. In this letter, we formally ask that you consider analyzing the Heart of the West conservation plan proposal as an alternative in this PEIS.

At the recent public hearing in Salt Lake, we presented you with a copy of the CD that includes this conservation plan. Included on this CD are GIS data that should be used as an alternative in making decisions for this PEIS. The GIS information is in the form of a coverage that presents a wildlands network of habitat needed in order to maintain the ecological health of ecoregion. Some lands that are identified in the Conservation Plan are recommended to be managed as core area or linkages. Attached is an executive summary (which is also found on the CD) that has a map (figure 3.13 on page 9) that shows which specific lands are recommended to managed as core areas and which other lands as linkages. Note that most of the lands in this region are not either core areas or linkages and thus remain available for more impacting land uses such as mineral extraction under appropriate land use stipulations. 52655-001

We request that you consider analyzing an alternative for the relevant RMPs that makes the following recommended RMP amendment decisions based on the wildlands network described by the GIS data that we provided. For core areas, this alternative would recommend no leasing or surface occupancy for oil shale and tar sands. For connectivity areas, land uses are allows that do not change the ability of that linkage to function for the key species identified as using this link.

For example, for aquatic connections, land use needs to ensure that native fish breeding grounds and travel between populations remains intact. For example new dams such as that proposed for the White River in a linkage, would not be consistent with this management recommendation. For linkages that support sage grouse, for example, surface disturbances would follow a set of criteria developed for sage grouse habitat. Details on wildlife habitat needs can be found on the CD.

These management recommendations for shale and tar sands are different from those that would be applied to oil and gas development. For example, in core areas, we recommend no new roads or drill pads but allow leasing and drilling from existing active pads. Because oil shale and most tar sand activities in the Heart of the West region involve large scale surface disturbances, we recommend management that gives priority to wildlife habitat protection that we described earlier in these comments.

52655-001 (cont.)

Cultural resources are also at risk. Here is one example that demonstrates flaws in this process that affect most of the west. In Nine Mile Canyon, Utah, this PEIS proposes to approve for development under world class cultural sites. For example, at a place called Warrior Ridge there exists a huge rock art panel that is perhaps the only place that captures what might be a battle between two native American factions in presettlement times. Should development occur, this panel would be lost as tar sands are removed. This PEIS should recommend no leasing or development of lands that contain significant cultural sites such as these.

52655-002

Please keep us informed by email of the status of this project. We would like to comment on the final EIS when this is available. Thank you for considering these comments.

James Catlin

On behalf of the Wild Utah Project and Western Wildlife Conservancy. See Attachment.

Heart of the West Conservation Plan

Cedar Mountain Erik Molvar

Executive Summary

The Heart of the West region embraces the Rocky Mountain backbone between Montana and Colorado. This conservation plan applies conservation science while describing the development and implementation of a wildlands network that will guide land managers and users to act in deference to the needs of the land. This plan identifies areas where habitat is critical for the continued viability of key species and communities. In these areas, we call for the management of human activities in a way that ensures the recovery and maintenance of habitat for key focal species. Equally important, this plan also identifies areas where responsible development can occur with a lower risk to the health of ecosystems.

Executive Summary

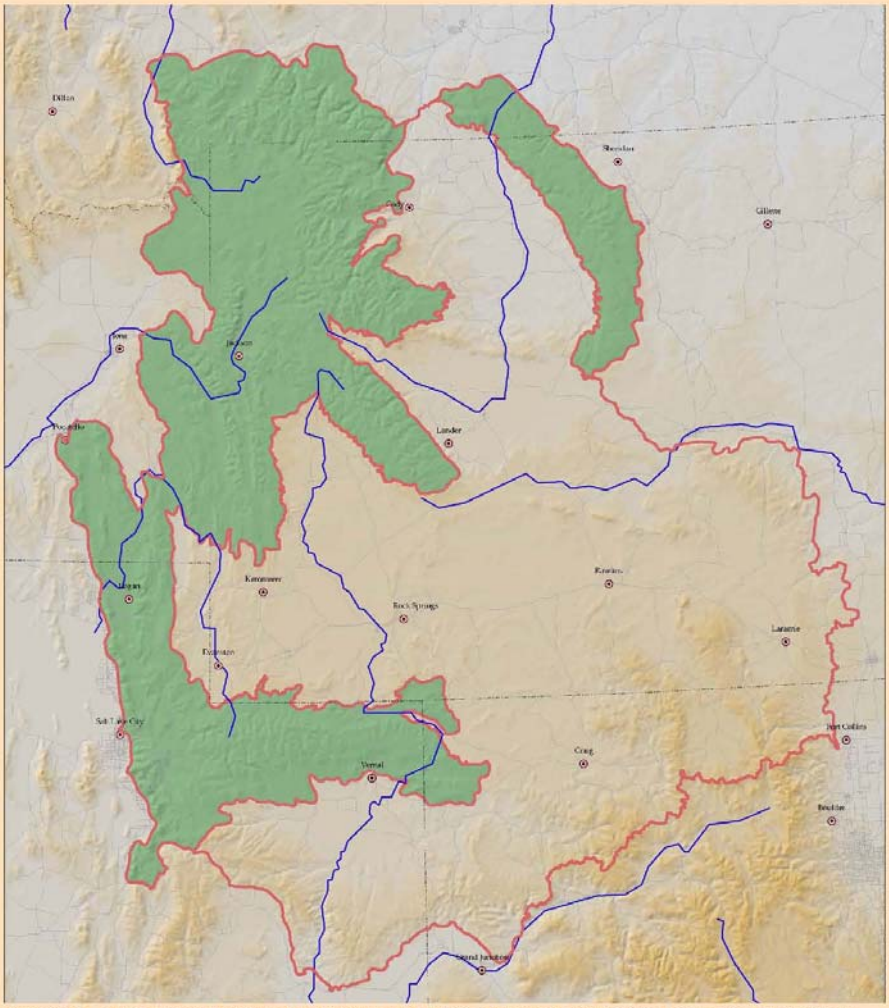

Figure 2.1 - The Greater Heart of the West Study Area. The Utah-Wyoming Mountain Ecoregion is shown in green. The remainder of the study area, called the "Lowland Study Area" consists chiefly of the Wyoming Basins Ecoregion.

Due to bureaucratic constraints, funding and personnel shortages, land managers are rarely able to effectively analyze and plan for ecosystems on a large scale. For this reason, concepts such as island biogeography, ecological integrity, wildlife linkages, the role of carnivores in ecosystem regulation, resilience, indicator species and other ecosystem principles have not been comprehensively incorporated into land management. This plan presents a scientifically based, proactive way to

Executive Summary

incorporate these biological principles at a landscape scale in order to meet land managers' requirement to restore and maintain the health of ecosystems.

Widely known as one of the wildest remaining regions of the West, the Heart of the West region faces rapid change. This region is the center for America's new push for large-scale fossil fuel development. Tens of thousands of wells are now being planned for large parts of Wyoming, Utah and Colorado. This conservation plan will help guide energy development in a way that benefits the long-term health of the land and those communities that depend on it.

This plan is the culmination of three years of work by numerous organizations and scientists seeking to produce a blueprint for effective land conservation across the central Rockies. When implemented, this wildlands network will meet land management goals and ensure ecological integrity and landscape health in 65 million acres of northeast Utah, southeast Idaho, western Wyoming and northwest Colorado.

Introduction to the Heart of the West Region (Chapter 1)

The Heart of the West includes both the Wyoming Basins Ecoregion and the Utah-Wyoming Mountains Ecoregion, as well as some adjoining connections with the adjacent Southern Rocky Mountains Ecoregion (Figure 2.1). It includes pieces of Idaho, Montana, Colorado, Wyoming and Utah. The vast majority of the lands in the Heart of the West are public lands, including National Parks, National Forests, Wilderness Areas, National Wildlife Refuges, plus a large amount of Bureau of Land Management (BLM), State and Native American sovereign lands.

Cold desert basins form the heart of the region and include more than 35 million acres of sagebrush steppe. This includes most of western Wyoming including the Bighorn Basin, the Wind River Basin, the Green River Basin, and the Great Divide Basin, and even extends into the upper North Platte watershed along the Sweetwater, North Platte, and Laramie rivers. To the south, the Piceance Basin, Uinta Basin and Bear Lake and its associated drainage basin form the southern boundary of the Heart of the West lowlands.

The mountains of the Heart of the West are anchored by the 26.8 million acres of the high elevation Greater Yellowstone Ecosystem, including the Absarokas, Wind River, and Wyoming mountain ranges. Moving away from the Yellowstone area to the east and south, the Heart of the West encompasses the Bighorn Mountains, the Commissary and Salt River ranges of southwest Wyoming and southeast Idaho, the Wasatch Range and Uintas of northern Utah, and a portion of the southern Rockies, including the Medicine Bow National Forest.

Primarily a high elevation system, more than 90% of the region lies between 5,900 and 7,800 ft. (1,800-2,400 m). For this reason, and with a northern latitude of 40-45°, the climate is harsh. Yet vegetation is extraordinarily diverse within the Heart of the West, in part because the region spans numerous life zones.

This region retains much of the wild character of the original West. The world's largest herds of pronghorn travel across the huge upland range. Elk, deer, black bear, wolverine, lynx, grizzly bear, bighorn

Executive Summary

sheep, ferruginous hawks, coyotes, burrowing owls, prairie dogs, cutthroat trout, snowshoe hares, pygmy rabbits, and sage grouse are but a taste of the diverse wild heritage still found in this region.

A number of important species are now in decline or face serious threats to their continued viability. Just as the canary served as an indicator of danger to miners, species at risk are clear indicators of largescale ecosystem perturbations. For example, the decline of sage grouse populations indicates loss of habitat function and productivity. These at-risk species and populations in the Heart of the West include several federally listed fish, many species of rare rangeland birds, one the world's only desert elk herd, and some of the most charismatic mammals found in the continental U.S., including federally listed grizzly bears, lynx and gray wolves.

Today, the human communities in Heart of the West are few and small in size, yet their continued existence is largely dependent on maintaining the health of surrounding wildlands. In recent decades, oil and gas exploration and development with their accompanying roads have likely been the biggest threat to the region and have permeated the Heart of the West basins, from the Bighorn to the Uinta. Ranching continues to benefit many in rural communities, often at a high ecological price. Logging and recreation are other important industries in the Heart of the West, but each take a toll on quality, productivity, and quantity of wildlife habitat. Habitat is becoming increasingly fragmented; it would surprise many to learn that very few large roadless areas remain in this region.

It is the importance of this region and the future that it faces that led us to initiate this planning effort for the Heart of the West. This conservation plan provides management prescriptions to implement a visionary wildlands network. We have identified those lands that are predominately healthy and which are the highest priority for immediate protection. Next, we give priority to restoring the health and productivity of those lands which are critical to the wildlands network but that are currently degraded. There are many causes of degradation (mostly human related) that have led to the decline of native species, loss and degradation of ecosystems, fragmentation of habitat, and the loss of natural processes. This plan presents the required tools to restore and maintain the health and function of the lands within the wildlands network.

Wolf Howie Garber

Executive Summary

Methods for Creating a Wildlands Network (Chapter 2)

Two different science teams worked on two different parts of the Heart of the West region. Conservation Science, Inc. on behalf of The Nature Conservancy (TNC), assembled a conservation planning effort for the Utah-Wyoming Mountains, which encompasses most of the mountainous regions within the greater Heart of the West (Noss et al. 2002). The Heart of the West coalition conducted a study, similar in many ways to that of Noss et al., for mid and low elevation range and forests in the remainder of the Heart of the West region. The focus of this conservation plan is primarily on this "lowland study area." Details of the reserve design effort for the (Utah-Wyoming) mountainous part of the region are included in Appendix A.

In this conservation planning effort for the Heart of the West, we apply the widely accepted core/corridor model. In order to determine the location and size of these components, we integrate three basic planning approaches that scientists have adopted over the last several decades to identify areas for protection:

1. Representation of all regional habitats, or vegetative community types, within a network of core areas
2. Identification and protection of special elements, such as rare species occurrences, biodiversity "hotspots," intact riparian zones, etc.
3. Identification and protection of key habitat of (focal) species that serve critical ecosystem roles and/or whose presence is indicative of healthy, functioning systems

Together, these three elements comprise a comprehensive approach to conservation planning. Each of these approaches is designed to address ecological issues of composition, structure, processes, resilience, evolution, and continued species viability. Representation of all regional habitats within the wildlands network design is an example of a coarse filter approach to biological conservation. Identification and conservation of special elements in a region is an example of a fine filter approach to conservation planning. In our case, rare species occurrences are mapped and used to help delineate core areas. The fine filter approach complements the coarse filter approach. Approaching the design of a wildlands network in this way offers greater likelihood that key habitat factors are included in the final design.

Ferris Mountains George Wuerthner

Representation of a species or a habitat type in a wildlands network by itself will not necessarily ensure that species will persist in a region. For this reason we add a third element in our conservation planning approach: focal species analyses. Focal species are organisms that can be used in planning and managing reserves because their requirements for survival represent factors important to maintaining the natural state of the entire region. Our focal species approach is tailored to the specific landscape level issues at play in the Heart of the West. Although there are many different types of focal species

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typically used in reserve design approaches to landscape conservation (i.e. flagship, umbrella, wilderness indicator species, etc.), we use only three broad types of focal species in our planning process: habitat quality indicators, keystone species, and foundation species.

To best achieve our goals for this reserve design effort, we use a core/corridor/compatible use model. Core areas are defined as wilderness, or wilderness-like areas, managed so as to maintain ecological processes and biodiversity within them. Cores serve as the "backbone" of a wildlands network, and are designated to protect those landscape features that are either under-represented elsewhere, critical for focal species viability, or are nearly irreplaceable in terms of their rare and important biota. Linkages, or corridors, are necessary to overcome the effects of habitat fragmentation in a region. They serve to link core areas so wildlife can move between them, while also allowing for evolutionary and ecological processes (i.e. fire, succession, predation, etc.) to function properly across the landscape. Compatible use areas flesh out the rest of the matrix in a wildlands network. These compatible use areas are usually subjected to low-intensity uses such as recreation, hunting, low-intensity livestock grazing, selective logging, and limited oil and gas development.

Both the higher elevation and low elevation study areas in the Heart of the West used a computer modeling program called SITES to spatially analyze complex ecological data for the region. This program is widely used by the Wildlands Project and TNC. SITES uses a algorithm that relates many ecological values in a grid of planning units to determine the most efficient wildlands network that meets the ecological goals set by the planning team. In both the mountainous and lowlands analyses for the Heart of the West, goals were set to capture rare species occurrences, and ensure necessary habitat and connectivity to meet the needs of focal species.

The variables entered into our SITES model for the lowland study area included roadless areas; Natural Heritage Program (NHP) occurrence data for rare, threatened and endangered species; conservation populations of cutthroat trout; representation values for different land cover types; and the best habitat for two of our key focal species: sage grouse and gray wolf. SITES then selected a best set of planning units to meet all of our goals for these targets, constructing a draft wildlands network that clumped planning units into cores and linkages.

For the lowlands portion of the region, we conducted further validation analysis on the draft network proposed by the SITES model. This included retrospective analyses on whether cores included adequate habitat for the rest of our focal species, adequate representation of aquatic systems, and adequate representation of Nature Conservancy portfolio sites. We also considered the size and shape of cores from the perspective of critical ecological and evolutionary processes. Next we overlaid various anthropogenic layers, such as major roads and road density, land ownership, and existing oil and gas wells to determine which cores and linkages might be compromised. Our validation analysis also assessed future development such as upcoming oil and gas projects within the draft wildlands network. This allowed us to identify compatible use lands, and instances where certain linkages seemed particularly unrealistic or misplaced,

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considering obstacles such as major roads. Lastly, we used both the human use data, and the biological values of core areas to conduct an irreplaceability and vulnerability analysis on key core areas within the lowlands wildlands network.

We utilized many forms of expert assessment in the design of the wildlands network. This included workshops with regional conservationists and environmental activists, TNC regional science staff, NHP employees, BLM employees, and other regional scientists. All focal species accounts, focal species GIS models, draft maps and the text of this report were peer reviewed by regional scientists and other experts from universities, government agencies, and conservation science research groups.

Results (Chapters 3 and 4)

Chapters 3 and 4 discuss the results of our analysis for the lowland portion of the Heart of the West region. Our draft wildlands network met almost all of our ecological targets,and in some cases were well above their specified target levels. Overall, our goals were closely met or exceeded for all of our 211 ecological targets (including all the individual focal species, NHP species, and land cover types). Our proposed set of cores and linkages for the lowland study area captured 67.2 % of all perennial streams in the lowland study area, 62.9% of all TNC portfolio sites that exist within the lowland region, and generally incorporated suitable habitat for terrestrial focal species at the level of 50% or greater.

After incorporating expert input, the final set of core areas and linkages (Figure 3.6) for the lowland wildlands network features 28 "mega cores" that range from 32,500 to 1,367,680 hectares in size. By taking into account the various targets met if these cores are protected, along with present and future threats to these areas, we ranked (by conservation priority) all of these key core areas using an analysis of irreplaceability and vulnerability. Some core areas that ranked particularly high for NHP species and other targets, while also suffering form human-induced threats, received high scores in this analysis, implying that these cores deserve the highest priority for protection.

The final lowlands wildlands network includes approximately 8,066,000 ha of cores (including core restoration areas) and linkages, or about 45 % of the total lowland study area. When our lowland wildlands network is connected to Noss et al.'s conservation assessment for the Utah-Wyoming Mountains Ecoregion (2002), we see that over 53% of the entire Heart of the West region would be managed for an emphasis on ecological health if both plans were implemented (Figure 3.13).

Our proposed wildlands network for the Heart of the West, if implemented in part or in full, is the best strategy science now offers to attain the original set of ecological goals we set for this region. In short, these goals include representing a solid balance of all kinds of ecosystems in protected areas, maintaining viable populations of native species, maintaining ecological and evolutionary processes, and providing for resilience in the face of long-term environmental change.

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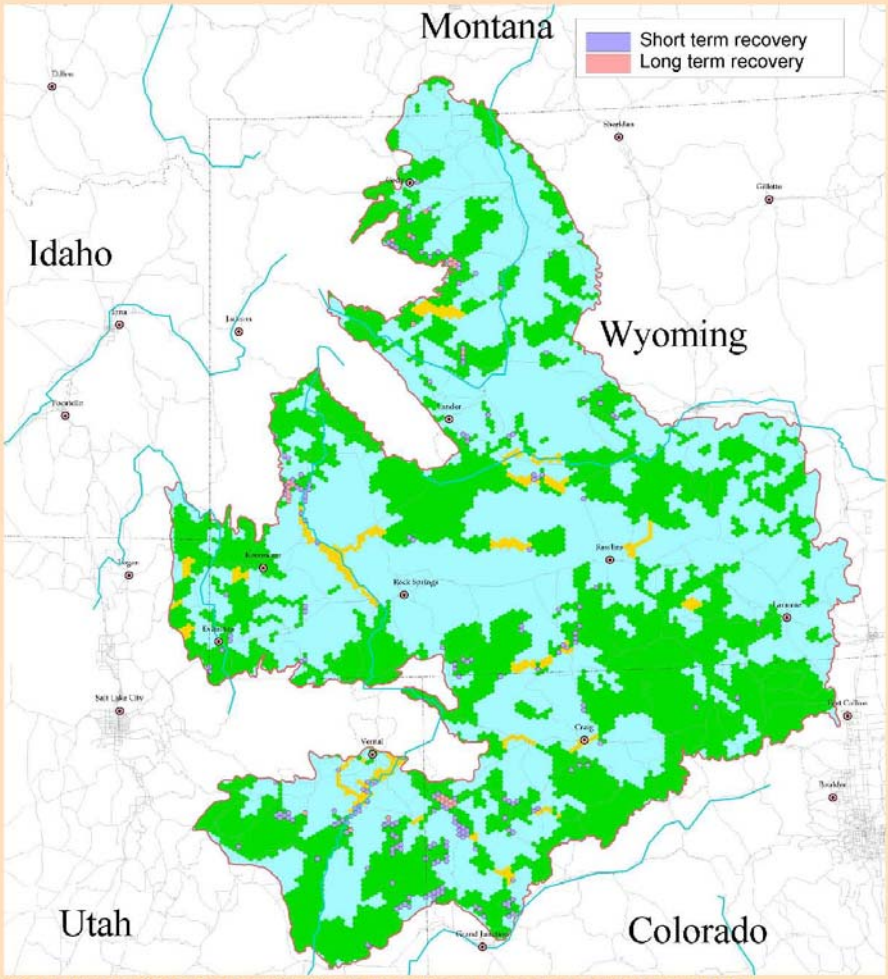

3.6 Lowlands wildlands network with short and long-term core recovery areas added

- Core
- Linkage
- Compatible Use
- Short term recovery
- Long term recovery

Executive Summary

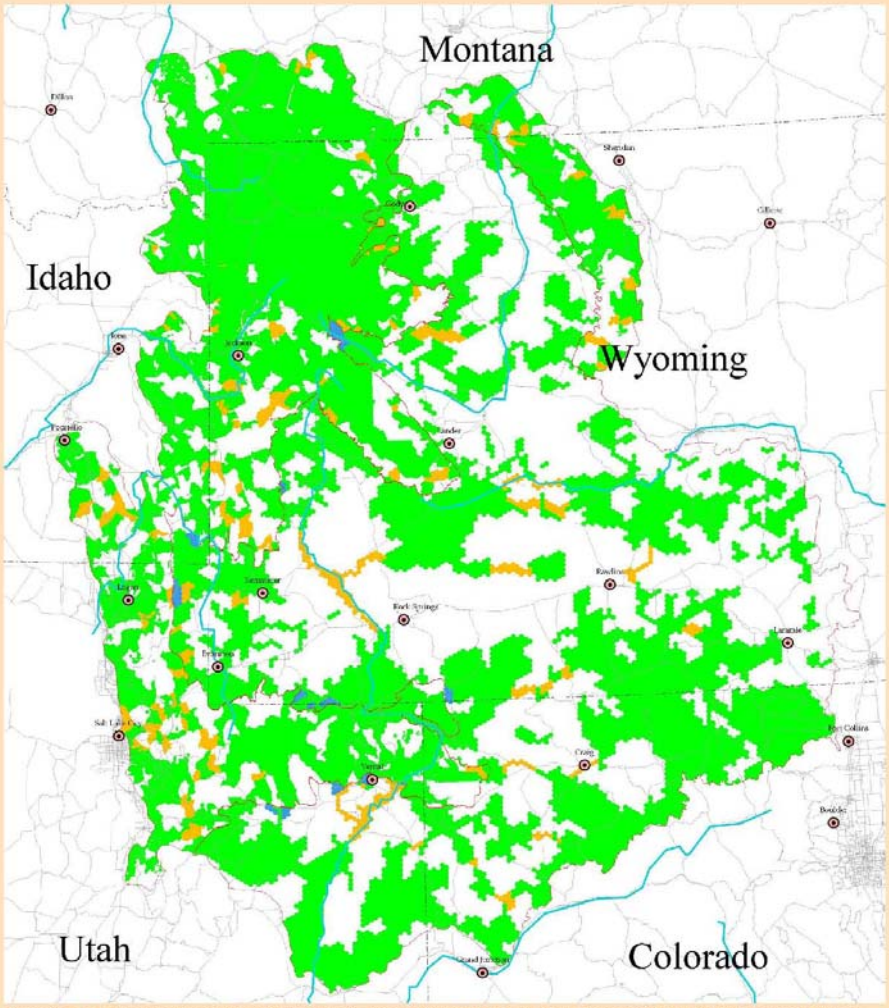

Figure 3.13 Lowlands wildlands network alongside SITES solution for TNC's Utah-Wyoming Mountains Ecoregional Plan (Noss et al. 2002) with Transition Study Areas shown in blue.

Implementation (Chapter 5)

In this chapter, we describe the management and land use prescriptions that relate to the wildlands network. These prescriptions are designed to implement management necessary to restore and maintain the required habitat for focal species in the network. Prescriptions are organized by human activity for core areas (including core recovery areas), linkages, and compatible use areas.

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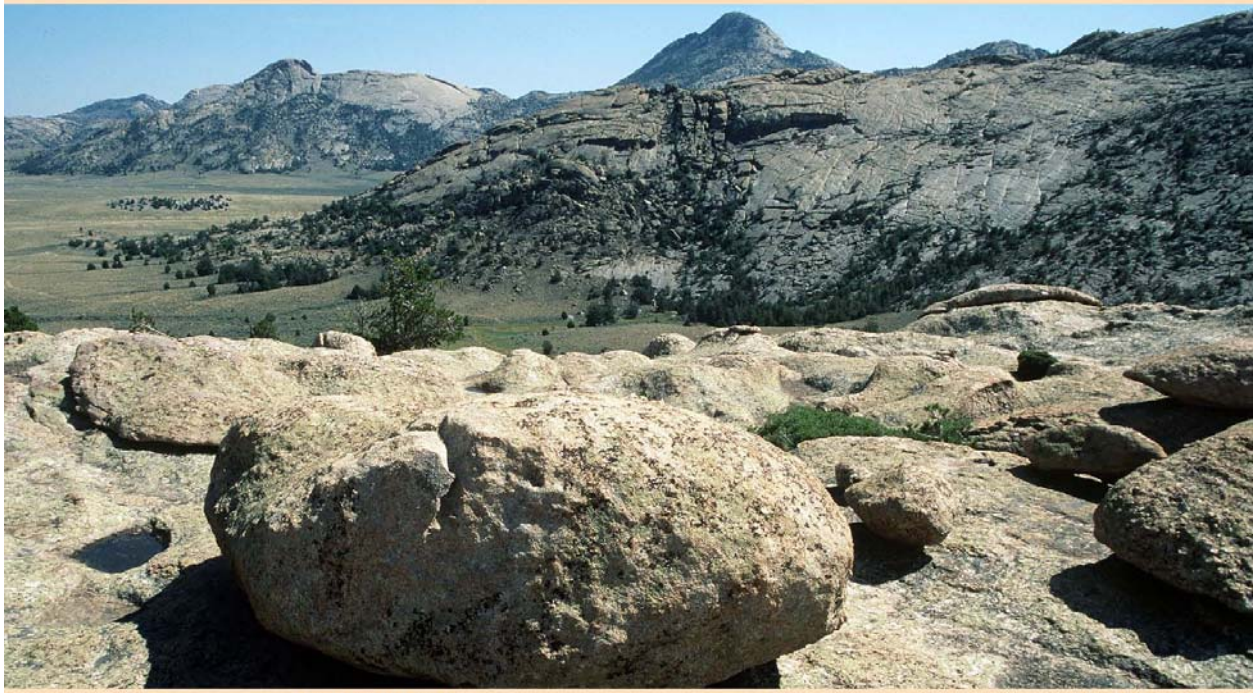
Implementation of the conservation plan follows a flow chart we developed to link the focal species habitat management prescriptions to management activities in the Heart of the West region. Upcoming land use decisions such as management plan revisions are compared to the prescriptions in the conservation plan. Recommendations are then developed to guide the land use decision to be consistent with the conservation plan. Subsequent monitoring evaluates whether the land management activity is in line with the conservation plan's goals, and where it isn't, further changes in land use are then recommended.

Our implementation model applies to all lands in the Heart of the West without regard to ownership. For private lands, this plan serves as a resource to guide private landowners who wish to practice ecological stewardship. For federal and state lands, our conservation plan fills a void and provides a tool for comprehensive ecosystem analysis (which is usually required by land management agencies, but is rarely done). In addition, our implementation model makes management recommendations for those lands outside of cores and linkages.

Implementation requires a collective effort that requires cooperation among those who own and use the land, those who have regulatory responsibility, and other affected parties. This conservation plan offers a biological framework for this socio-political process.



Sweetwater Rocks Erik Molvar

Executive Summary

Devil's Playground, Flaming Gorge — Erik Molvar

Conclusion and Recommendations (Chapter 6)

Nowhere in the lower 48 states do we face such rapid energy development in a landscape that is still largely wild. Land managers have recognized that "the land itself is in jeopardy, and the variety of products and values that this land has produced may not be sustained for future generations of American unless ecosystems are healthy and productive. . . . Only when ecosystems are functioning properly can the consumptive, economic, political, and spiritual needs of man be attained in a sustainable way" (U.S. Dept. of Interior, Rangeland Health, 1997).

Up to this time, land mangers have not had the proper tools to link biologically-based landscape analysis to land management decisions. The Heart of the West Conservation Plan uses a science-based planning framework to provide this critical tool to land managers, while establishing implementation priorities for this region (for both managers and conservationists). This plan also defines the kind of human activity that can occur compatibly in the wildlands network, and identifies areas where these uses can occur.

Our study indicates that the ecological health of the Heart of the West can be restored and maintained by a conservation plan that integrates a broader set of conservation criteria than those considered in current management plans. The primary product of our conservation assessment is a prescribed set of core areas and linkages, based on the best available, current data, and meets our ecological goals for the Heart of the West. A combination of players will need to engage a diverse combination of actions for this conservation plan to be successful - from on the ground protection of specific cores to multiple core/compatible use area strategies to abate pervasive threats to communities and ecoregions across the Heart of the West.

Responses for Document 52655

52655-001: Thank you for your comments. The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case. The scope of the PEIS was changed to only identify public lands to be opened or closed to application for commercial oil shale and tar sands leasing (see Section 1.1, Purpose and Need). Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. The BLM anticipates that oil shale development would proceed in a three-step decision-making process. The PEIS deals with the first stage, identifying lands that would be open to application for commercial leasing. The second stage would be a leasing decision where additional NEPA analysis will be required to analyze the environmental consequences associated with offering parcels of land for lease. The environmental analysis would consider alternatives, stipulations, or other measures, which would mitigate or eliminate adverse impacts to sensitive resources or special land classifications. The final stage would be approval of a plan of development on a lease which would also be subject to NEPA analysis, including development of mitigation measures. Consideration of the applicability of the conservation plan's site-specific recommendations would be more appropriate at the leasing stage.

52655-002: Thank you for your comment. The BLM agrees that cultural resources are potentially at risk with any development project, and certain sites, such as the rock art panel mentioned in the comment, could be particularly vulnerable if development were to occur. However, the proposed action analyzed in this PEIS is amending land use plans to allow the BLM to receive applications for leasing and plans of development and to evaluate those actions in future NEPA documents. The land allocation decision evaluated in this PEIS does not commit any resources or grant any lease rights; therefore, no leasing or development of lands that contain cultural sites is recommended in this document.

It should be noted that there are many areas of significant cultural resources that have not yet been identified, recorded, or formally evaluated for National Register eligibility. The only areas with cultural and historic values that are excluded from both Alternatives B and C for tar sands are designated ACECs and National Historic and Scenic Trails. These areas are excluded for multiple resource values, not strictly cultural resources. For oil shale, only ACECs withdrawn from mineral entry are excluded from Alternative B, while all ACECs are excluded from Alternative C. National Historic and Scenic Trails are excluded from consideration for leasing in both Alternatives B and C for oil shale.

Under all alternatives, the BLM would comply with all applicable requirements for cultural and historical preservation. It is the BLM's policy to fully protect cultural resources. Protection is accomplished largely through avoiding disturbing sites, which is the BLM's preferred method of mitigation. Any potential surface-

disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation.

Thank you for your comment, Dale DeLong.

The comment tracking number that has been assigned to your comment is OSTSD52656.

Comment Date: March 14, 2008 18:18:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD52656

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Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Mining Utah's Gold Turning Black To Gold Yes, really. We know how to mine the tar sand oil We have lab data to support our claim Utah's Recoverable Tar Sands Oil Three Reservoirs contain most of the 23 billion bbl estimate. The resource has remained dormant since discovery.

Some outcrops were used for rock asphalt road surfacing.

Again, we have lab data to support our claim and China, India and Western Europe will become more intense competitors for the world's oil. OPEC, Middle East and Far East countries can not be trusted while roiling in an ocean of Religious and Political unrest. Mexico and Canada are our only reliable sources. It is time to produce the oil. The 72 billion barrel resource: The United States Department of Energy estimates72 billion barrels of tar sand oil exist in the lower 48. The seventy-two billion barrel resource would last the United States twelve years based on current consumption if it were easily available. It is not. It will take technical smarts and money. The Lower 48 currently produces 4.5 million barrels of oil per day which is not being replaced by new reserves. Imports now total 10.99 million barrels of oil per day giving imports 68.78 percent of domestic consumption. 52656-001

The Comprehensive National Energy Strategy is to reduce our dependence on foreign sources and to increase recovery from abandoned, bypassed, mature and heavy oil and tar sand reservoirs. The CNES strategy success will not satisfy our need. The ubiquitous hydrocarbon is required for agriculture, health and medica plastics, chemicals and all other lifestyle conveniences to which we have become accustomed.

The Utah Prize: 23 billion barrels The state of Utah hosts twenty-three billion barrels of recoverable, tar in surface to 1500' depth reservoirs according to The University of Utah at Salt Lake City.

Our advanced technology makes the tar in place recoverable. Our technology will give life to these idle resources lying fallow for decades because of lack of applied technology. The system is simple, effective, efficient, environmentally sound and can be executed quickly to produce remarkable results.

The Recovery Plan Improved technology

The tar in place is immobile which adheres to the wall of the reservoir pore and cannot be moved by conventional means including Steam and CO2. Our proprietary advanced injection system will reduce oil viscosity, free the oil from entrapment by neutralizing the forces holding the oil captive. A water drive will place a pressure bank between the polymer front and the formula slug to move the now mobile tar to the production well. The tar becomes produced oil.

The ten acre seven spot inverted pattern The targeted reservoir will be exploited using multiple ten acre seven spot inverted miscible flood patterns which will allow the reservoir to be depleted quickly by operating several floods at once. The seven spot inverted flood will keep reservoir pressure high enough to allow the producing wells to flow throughout the project life. This will assure a broad swept area of the ten acres and eliminate the need for artificial lift equipment.

Net profits, after payback, from the first ten acre success will be immediately dedicated to an additional project in the same reservoir in the same field or different reservoirs in the same field. Multiple ten acre floods can be operated in multiple reservoirs in different fields concurrently.

Acreage + Technology = Money CREDENTIALS Member

Society of Petroleum Engineers

American Association of Petroleum Geologists

American Chemical Society

Hands-on experience

Our experts know how to produce the oil cited in the accompanying paper with straightforward no-nonsense geology, engineering , math and chemistry

Our experts have drilled one hundred deep, hot, high pressure exploratory wells wells where we reduced rig time to TD by fifty-percent and reduced mud costs by fifty-percent - some wells to 21,000 ft. with 21 ppg. mud..

Our experts have years of experience producing the discovered reservoirs. They allowed the reservoir oil to produce with natural water drive and gas drive forces.

When the natural forces depleted, our experts designed systems to produce the oil artificially with secondary forces as water floods, polymer floods, miscible floods, micellar floods and gas/frac floods.

Our experts pumped the oil by pipeline to the designated refinery. This is not a simple task. Many chemical and physical forces must be employed to keep the oil free-flowing.

These credentials coupled with three years reservoir research give us the edge to do it quickly and to do it right - the first time - profitably and be a friend of nature.

Professional Links:

The Bureau of Economic Geology www.beg.utexas.edu Society of Petroleum Engineers

52656-001 (cont.)

http://www.spe.org

American Chemical Society www.acs.org

American Association of Petroleum Geologists

http://www.aapg.org

DeLong Associates Petroleum Consultants 6335 Modesto Dr Houston, Texas, 77083

Telephone: (281) 460-3824

d_delong@sbcglobal.net

Response for Document 52656

52656-001: Thank you for information on your technology.

Thank you for your comment, Dwayne Rowland.

The comment tracking number that has been assigned to your comment is OSTSD52657.

Comment Date: March 14, 2008 20:48:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD52657

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Country: USA
Email: Dwayne@AtvAmerica.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support Oil Shale and Tar Sands development on public lands to fulfill the multiple uses of our public lands as set by law many years ago. Best management and technologies should be used to lessen any impacts to the backcountry character of these remote areas. I believe outdoor recreation and these developments can co-exist in a meaningful way. Thank You

52657-001

Response for Document 52657

52657-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Christopher Lish.

The comment tracking number that has been assigned to your comment is OSTSD52658.

Comment Date: March 14, 2008 21:13:14PM
Oil Shale and Tar Sands
Comment ID: OSTSD52658

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Attachment:

Comment Submitted:

Dear Bureau of Land Management staff,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I strongly urge you to protect our public lands from dirty fuels production. I am concerned that the Bureau of Land Management (BLM) is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, the BLM should wait until more is known about just how this program would be carried out before completing a PEIS. 52658-001

Congress wasted taxpayer dollars when it set arbitrary deadlines for the creation of government documents before the relevant information was even available. As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. Both oil shale and tar sands development will have massive impacts on the environment and local communities and the cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming. However, these impacts are not fully assessed in your Draft Programmatic Environmental Impact Statement and are not yet fully known due to the early stage of research on the development of these resources. In short, this document inadequately presents foreseeable cumulative impacts. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 52658-002

We know from tar sands production in Canada that dirty fuels operations destroy vast expanses of wildlands, displace wildlife, create toxic waste sites that go on for miles, produce three times the amount of greenhouse gasses per barrel produced as conventional fuel, and use enormous amounts of clean water -- a priceless resource in the arid West. The draft PEIS's preferred alternative forecasts production of one million barrels of oil shale per day. Producing one million barrels of oil shale per day is expected to require the energy equivalent of roughly ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. Oil shale and tar sands development could release dangerous toxic elements such as arsenic, selenium, and boron into the Colorado River watershed -- a vital source of drinking water for local communities. Yet the draft PEIS does not analyze potential impacts on air and water quality, global warming or human health, and concluded that dirty fuels should be the primary use of public land in order to benefit private companies. Beyond the environmental issues, the technology used to develop oil shale and tar sands is unproven and of questionable economic value. 52658-003

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than two million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 52658-004

There are many potentially negative impacts of commercial-scale oil shale and tar sands development. These include:

1) Water impacts Oil shale development is projected to have a dramatic effect on the West's water supplies and potentially its water quality. There is simply not enough water in Colorado to support this industry. Surface mining and retorting of oil shale could use up to five barrels of water for each barrel of oil produced. In 1996, the BLM found that oil shale development would result in a reduction in the annual flow of the White River of up to 8.2 percent. These low flows could concentrate dissolved solids, increase salinity, and devastate fisheries. In the same 1996 study, the BLM warned that a large-scale shale oil industry "would result in the permanent loss or severe degradation of nearly 50% of BLM stream fisheries" and that surface disturbance, base flow reductions, and long-term aquifer disruption would result in the loss of 35% of Colorado River cutthroat trout fisheries. 52658-005

Oil shale development also poses a potentially serious threat to water quality. The process of transforming the kerogen in shale into oil leaves behind salts and numerous toxic, water-soluble chemicals that could leach into the groundwater that is the source of much of the region's surface water during the critical time when flow is lowest. The technical feasibility of isolating and treating contaminated groundwater has not yet been demonstrated. 52658-006

Furthermore, predicted changes in climate in the upper Colorado River Basin were not accounted for in the BLM's analysis. Although the Draft PEIS acknowledges the potential for future changes, the analysis estimates water availability based on historical averages that do not account for expected effects climate change will have on the region's snowpack runoff. As Secretary Kempthorne explained in a July 2007 speech, "Here in the West, for example, runoff in five of the seven Colorado River basin states is projected to decline by more than 15 percent during the 21st century. If the basin warms and evaporation increases, we could face a situation in which the amount of precipitation we are receiving today produces significantly less runoff in the future." 52658-007

2) Air impacts The proposed surface and underground production technologies now being developed by Shell, Chevron, and EGL Resources will create major new demands on the energy grid. Our existing power plants are nearing their full production rates. To meet this demand, oil 52658-008

shale and tar sands development will require the construction of new power plants capable of producing electricity all day, every day. The most readily available fuels for new plants are coal and natural gas. The relatively low cost of coal makes this dirtiest of fossil fuels the more economically attractive choice for powering oil shale and tar sands development.

To support the million barrel-per-day industry forecast in the Draft PEIS, ten giant new power plants and five giant new coal mines will be required. These could emit 105 million tons of carbon dioxide every year—but you won't find that in the document. That's 80% more than was released by all existing electric utility generating units in Colorado, Utah, and Wyoming in 2005. Sulfur dioxide and nitrogen dioxide emissions, the major culprits in acid rain, could increase by over 35,000 tons per year each. This will greatly impair air quality in a region that's already seeing spikes in air pollution from the natural gas boom. 52658-008 (cont.)

3) Impacts to wildlife and landscapes The Draft PEIS states, "There is a potential for commercial oil shale development projects to adversely affect most of the threatened, endangered, and sensitive species that occur in the counties where development could occur." BLM has estimated that large-scale oil shale development would result in the permanent loss of 35% of Colorado River cutthroat trout fisheries. Oil shale would also adversely impact Colorado's largest elk herd by severing migration corridors and destroying the winter range of all big game species. 52658-009

Other likely impacts the BLM identifies: 1. Habitat loss, alteration, fragmentation, and resulting changes in habitat use 2. Disbursement and displacement – habitat modification, noise, fire, lights, etc. 3. Mortality – collisions with structures and vehicles, changes in predator populations 4. Toxicity from herbicides, hydrocarbons, or other contaminants 5. Increased accessibility – human infiltration of previously remote habitat 52658-010

According to the Draft PEIS, impacts of commercial oil shale development to our landscape will include: industrial noise across the landscape, visual transformation of the landscape, increased traffic, new roads, increased access to currently remote areas, industrialization of agricultural and undeveloped landscapes, sprawl, loss of available land for other new industries, decreased property values for adjacent landowners, and degradation or loss of cultural sites.

The environmental impacts of commercial tar sands mining are devastating. Tar sands mining usually utilizes strip mining or open pit techniques, completely ruining the environment during production, and possibly permanently destroying the wildlife and landscapes that are impacted. The BLM admits that a commercial tar sands industry would have substantial social and economic effects for Utah's communities, as quality of life and property values will decrease significantly. Tar sands mining produces three times as much global warming pollution as conventional oil, greatly threatening air quality in the places it is developed. 52658-011

Tar sands mining in Alberta, Canada, provides an example of the devastation wrought by this unconventional energy source—yet the Draft PEIS does not refer to the Canadian experience with tar sands development. The development of Canada's tar sands requires clear-cutting thousands of square miles of some of the most important habitat on Earth—boreal forest. Left behind are toxic landscapes that may never be capable of reclamation; not one acre has so far been fully rehabilitated, despite attempts by the responsible companies. If that were not enough, tar sands production in Canada is rapidly increasing the country's greenhouse gas emissions and air pollution, sucking dry the water sources that local communities depend on, and producing large amounts of toxic waste that poses serious health concerns. 52658-012

There is no good reason for the BLM to be preparing for commercial oil shale and tar sands leasing. Oil shale developers admit they are not ready to produce on a commercial scale now, and won't be for many years. Technologies are still in the research and development phase, and 52658-013

industry leaders believe commercial development is more than a decade away. The BLM should monitor companies' research and development to see whether it is technically and economically viable before taking steps towards commercial leasing. Furthermore, we know from preliminary research, as well as lessons learned from tar sands development in Canada, that the environmental impacts of tar sands leasing will likely be enormous, but the BLM's Draft PEIS doesn't provide sufficient detail on foreseeable cumulative impacts. The public must be able to judge for themselves whether the technology results in unacceptable impacts on the environment or communities.

52658-013 (cont.)

52658-014

Safer and more cost-effective solutions are already available, such as energy efficiency and alternative energy technologies. We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. The Bureau of Land Management should not be advancing a plan that would turn millions of acres of western wildlands into dirty industrial wastelands. Instead I urge you to protect these sensitive areas for future generations and shift your efforts to promoting cleaner sources of energy. I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information.

52658-015

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely, Christopher Lish

Responses for Document 52658

52658-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale and tar sands have a tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52658-002: The PEIS cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS, i.e., amending land use plans to allow certain lands to be considered for future leasing. A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

This PEIS does include in the cumulative impacts analysis a discussion of the possibility of land disturbance and other impacts from planned power lines, both those required for oil shale/tar sands facilities and those planned for other purposes (e.g., the transmission and pipeline rights-of-way are included in the total acreage estimate of 14,000 acres for an oil shale facility [Table 6.1.5-9 of the PEIS], and the potential impacts from other energy corridors are also acknowledged in Section 6.1.5.3.1). The impacts of greenhouse gas emissions from oil shale, tar sands, and ancillary facilities are not assessed at this time, because of the lack of scientific tools designed to predict climate change on regional or local scales limits the ability to quantify potential future impacts (see Sections 4.6.1 and 5.6.1).

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, it is justifiable that the evaluation of specific occurrences of resources and supporting facilities, analyses of the environmental consequences of oil shale or tar sands development, and the

assessment of the cumulative effects of oil shale and tar sands development together with the other factors mentioned in the comment be included in subsequent project- or site-specific NEPA documents rather than in the PEIS.

52658-003: The proposed action of this PEIS is a land allocation decision and does not authorize or require the BLM to undertake any action that would result in direct environmental impacts. Any subsequent oil shale or tar sands leasing and development would require additional NEPA evaluations, and those evaluations would assess the potential environmental impacts resulting from these actions, along with appropriate mitigation measures to reduce or minimize those impacts. These evaluations would include the cumulative impacts of other actions, including other oil shale or tar sands development projects, on the affected resources. The impact evaluation in this PEIS also allows for the future development and implementation of alternative oil shale and tar sands extraction technologies that may result in reduced impacts.

52658-004: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

52658-005: In this PEIS, the BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on aquatic resources.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development; it makes them available for potential future leasing. Subsequent project- or site-specific NEPA documents will be prepared to evaluate specific occurrences of species of concern, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis, if fish species of concern are present, may include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts on sensitive resources. Conservation measures to protect sensitive species (including Colorado River cutthroat trout) under the preferred alternative are identified in Appendix F of the PEIS.

The 1996 analysis that the commentor refers to was conducted for the 1996/1997 White River RMP and appropriately identified that large-scale oil shale development could result in substantial negative impacts on aquatic habitats and the organisms they support. Although the amount of specific fisheries that could be affected are not quantified in the PEIS, the potential for substantial negative impacts on aquatic resources from water depletions and water quality degradation associated with leasing and development of oil shale and tar sands areas are recognized and discussed in the PEIS. The specific streams and the amount of those streams that occur within or adjacent to BLM lands that would be considered for potential leasing applications under the various alternatives are quantified in the PEIS (Sections 6.1.1.7.1, 6.1.2.7.1, 6.1.3.7.1, 6.2.1.7.1, 6.2.2.7.1, and 6.2.3.7.1) and comparisons among those alternatives are presented in Sections 6.1.4.7.1 (oil shale alternatives) and 6.2.4.7.1 (tar sands alternatives). In addition, the PEIS identifies potential mitigation measures that could be applied to protect aquatic resources, including sensitive aquatic species such as native fish species (including Colorado River cutthroat trout) if future leasing and development is allowed.

52658-006: Groundwater contamination from in situ retorting is a key concern identified in the Draft PEIS. Section 4.5.1.2 includes a discussion of changes in permeability and leaching potential, and Section 4.5.1.3 contains a discussion of the organic contaminants that are possible from in situ processes based on field and lab studies. It is expected that groundwater monitoring at the RD&D sites will provide information at a pilot scale on the degree of impact from in situ technologies, and that this information would be used to determine mitigation measures and also decisions regarding possible future developments.

52658-007: Projection of future climate change relies on modeling which in turn use assumptions and mathematic algorithms. These vary among models. Different model results have been reported and sometimes are contradictory. To avoid such uncertainty, long-term hydrologic data were used in the evaluation presented in the PEIS. The data covers periods of both dry and wet years.

52658-008: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

The quantity and source of electrical power that might be needed for potential development would require making many speculative assumptions and, therefore, is premature at this stage of the process.

52658-009: Because the number and specific characteristics of potential projects are not known at this time, the PEIS evaluates potential impacts in a relatively generic fashion. The information presented in the PEIS for the state and federally listed species and for the BLM sensitive species is of sufficient detail for the purposes

of the PEIS. The PEIS provides a brief discussion for each of the federally listed species that identifies the listing status, basic life history and population information, existing threats, and the potential for the species to be affected by commercial oil shale and tar sands development. The PEIS identifies all oil shale basins and STSAs that occur in the watersheds where the Colorado River endangered fishes are found and acknowledges the potential for direct and indirect impacts to these species resulting from development within the watershed. Table E-1 presents the counties and habitats in which the endangered species are found. Appendix F presents proposed conservation measures for the preferred alternative, including measures to protect federally listed species and Colorado River cutthroat trout.

52658-010: The impact analyses provided in the PEIS qualitatively indicate the types of impacts that could occur to wildlife, including interference with migration and loss of important habitats such as winter ranges, based on the BLM's experience with other types of mineral development.

Quantitative analyses of potential impacts to Colorado's elk herd would be conducted for any proposed project located in the state. Policies and BMPs that would be implemented at the project-specific level are expected to avoid migration corridors and crucial seasonal habitats or, where not possible, minimize and mitigate impacts to them to the extent practicable. The need for mitigation measures would be determined on a project-by-project basis in conjunction with input from federal, state, and local agencies, and interested stakeholders.

52658-011: See response to Comment 52658-003.

52658-012: See response to Comment 52658-001.

The PEIS cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS, i.e., amending land use plans to allow certain lands to be considered for future leasing. A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available. The impacts of greenhouse gas emissions from oil shale, tar sands, and ancillary facilities are not assessed at this time, because of the lack of scientific tools designed to predict climate change on regional or local scales limits the ability to quantify potential future impacts (see Sections 4.6.1 and 5.6.1).

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, it is justifiable that the evaluation of specific occurrences of resources and supporting facilities, analyses of the environmental consequences of oil shale or tar sands development, and the assessment of the cumulative effects of oil shale and tar sands development

together with the other factors mentioned in the comment be included in subsequent project- or site-specific NEPA documents rather than in the PEIS.

52658-013: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures that the commercial oil shale program meets the intent of Congress while taking advantage of the best available information and practices to minimize impacts and offer opportunities for the states, local communities, and the public to participate in the process. The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases, or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts, will be applied as a result of site-specific NEPA evaluations. The BLM will involve the state, local communities, and the public throughout the subsequent NEPA processes.

52658-014: The cumulative analysis in the PEIS is consistent with the requirements of NEPA and does not disregard Congress's intent, nor does it preclude the eventual issuance of commercial leases once additional site-specific NEPA analysis is performed. A cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS, i.e., amending land use plans to allow certain lands to be considered for future leasing. A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

The cumulative impacts analysis in the PEIS summarizes the past, present, and reasonably foreseeable other activities (for example, oil and gas development, coal mining, minerals development) for the study area, and presents a preliminary qualitative assessment of the incremental impacts of those activities considered in conjunction with oil shale and tar sands development. At this preliminary stage, when the specifics of the extent of future oil shale and tar sands development are unknown, the discussion of the potential impacts of oil shale development are based on the BLM's experience with comparable surface-disturbing activities from other types of mineral development. In order that the decision maker might have sufficient information to make a reasoned choice among the alternatives, the BLM has developed a general analysis of the potential incremental impacts from all past, present, and reasonably foreseeable actions, in conjunction with a single hypothetical oil shale or tar sands facility, with the understanding that there might be more than one, or even many oil shale/tar sands facilities developed in the future. For the purpose of this analysis, parameters for consideration such as land disturbed, water use, and jobs created were developed where possible. For some parameters (such as air emissions) no estimates with respect to possible

development could be made because the data would depend entirely on technology-specific inputs.

Prior to leasing (when site-specific and technology-specific data will be available), or approval of a plan of development (when accurate information on water use, air emissions, employment, etc. will be available), additional environmental analysis will be performed including a cumulative analysis, as appropriate.

Note that oil sands in Canada are different chemically than the Utah tar sands, and the technologies used to process the oil sands also may differ substantially from what would be used for the Utah tar sands. Therefore, although some information from the Canadian operations may be useful for future analyses, site- and process-specific information will be used in future environmental analyses.

52658-015: See response to Comment 52658-001.

Thank you for your comment, Stephen Schultz.

The comment tracking number that has been assigned to your comment is OSTSD52659.

Comment Date: March 14, 2008 21:48:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD52659

First Name: Stephen
Middle Initial: r
Last Name: Schultz
Organization:
Address: Po box 96
Address 2:
Address 3:
City: La Sal
State: UT
Zip: 84530
Country: USA
Email: srschultz@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I would like to express my opinion. This Is NOT a desirable action to take. The Impacts on water, land and the envoroment are too high. Please reconsidewr and do not go forward with this propsal. | 52659-001

Response for Document 52659

52659-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Lydia Garvey.

The comment tracking number that has been assigned to your comment is OSTSD52660.

Comment Date: March 14, 2008 23:05:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD52660

First Name: Lydia
Middle Initial:
Last Name: Garvey
Organization:
Address: 429 S 24th
Address 2:
Address 3:
City: Clinton
State: OK
Zip: 73601
Country: USA
Email: wolfhowlmama@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Nix oil/shale/tar sands extraction! It's highly inappropriate to destroy wilderness areas, they are Not sacrifice areas! Do your job!-Protect Our Public lands, waters & wildlife. Discusted! | 52660-001

Response for Document 52660

52660-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Nancy LaPlaca.

The comment tracking number that has been assigned to your comment is OSTSD52661.

Comment Date: March 14, 2008 23:24:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52661

First Name: Nancy
Middle Initial:
Last Name: LaPlaca
Organization:
Address: 4801 W. Yale Ave
Address 2:
Address 3:
City: Denver
State: CO
Zip: 80219
Country: USA
Email: nancylaplaca@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Developing tar sands and oil shale is unbelievably stupid.

It will pollute our most precious resource, water, and use lots and lots and LOTS AND LOTS OF ENERGY.

Are we really that dumb? Our we going to fry our planet -- exacerbate global warming, use valuable energy and use up our water for Shell Oil Company?

We are a sad and sick society.

52661-001

Response for Document 52661

52661-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, O. Polly Wright.

The comment tracking number that has been assigned to your comment is OSTSD52662.

Comment Date: March 14, 2008 23:40:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52662

First Name: O. Polly
Middle Initial:
Last Name: Wright
Organization:
Address: 19600 Golden Rock CR
Address 2:
Address 3:
City: Groveland
State: CA
Zip: 95321
Country: USA
Email: 2wrights2@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Why is this taking so long? Canada is already doing it, I first heard about the reserves in the U.S. back when oil was $50 a barrel. I'm tired of foreign oil strangling us - Ethonol is more of an enviromental problem than oil ever thought about being. We have Cuba drilling off of the cost of Florida, Russia taking over the seas. We need to get off of the stick now! Develop what we have in Alaska and in the rest of the USA. We're all tired of the government throwing up roadblocks for the wishes of the greated majority of Americans. Get off the dime NOW!

52662-001

Response for Document 52662

52662-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Melissa Johnson.

The comment tracking number that has been assigned to your comment is OSTSD52663.

Comment Date: March 15, 2008 03:05:34AM
Oil Shale and Tar Sands
Comment ID: OSTSD52663

First Name: Melissa
Middle Initial:
Last Name: Johnson
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I strongly oppose the opening up of Utah, Colorado and Wyoming BLM land for use by oil shale companies. Not only are methods of extraction environmentally harmful, these activities would limit and possibly permanently destroy these areas for more sustainable activities and public enjoyment. The impact of these companies reaches far beyond the extraction, and on site impact and will affect the air and water quality far beyond the site. Roads and rural congestion and many other potential problems may arise. Extensive Environmental Impact Statements need to be made before any moves are made to industrialize our public lands. Thank you for your consideration. 52663-001

Response for Document 52663

52663-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Neal Furgurson.

The comment tracking number that has been assigned to your comment is OSTSD52664.

Comment Date: March 15, 2008 07:27:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD52664

First Name: Neal
Middle Initial: R
Last Name: Furgurson
Organization:
Address: 1034 German School Rd
Address 2:
Address 3:
City: Richmond
State: VA
Zip: 23225
Country: USA
Email: nfurgurson@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I really think this kind of development money and time would be better used in finding NON polluting forms of energy. The very fact that it may take years of "cooking" the earth to extract this resource should be a major clue that this is not meant to be. This is just a very large waste of taxpayer money in my opinion. 52664-001

Thanks.

Response for Document 52664

52664-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Rita Carey.

The comment tracking number that has been assigned to your comment is OSTSD52665.

Comment Date: March 15, 2008 10:56:19AM
Oil Shale and Tar Sands
Comment ID: OSTSD52665

First Name: Rita
Middle Initial:
Last Name: Carey
Organization:
Address: 705 W Canyon Dr
Address 2:
Address 3:
City: Prescott
State: AZ
Zip: 86303
Country: USA
Email: carey.rita@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Planning leases to extract fuels from shale and sand in Utah, Colorado and Wyoming is irresponsible and shortsighted. There is no evidence to support this technology now. Instead, there is ample evidence that removing oil from shale and tar from sand is one of the most environmentally and socially destructive extraction techniques. Communities suffer - as in Colorado when the extraction company shut down and left town overnight - and property values plummet. In past EIS statements, the BLM has said that these industries will be devastating on water quantity and quality, reducing or eliminating the flow in 50% of surface waterways! Add to this the tremendous amount of fossil fuels that need to be burned to extract oil and tar from rock and sand and all the other impacts on air quality, wildlife and global warming and you should realize this is the stupidest approach to energy development ever imagined or tried. This has to stop. The BLM has to get out of bed with the Bush administration and oil industries and do its job for once.

52665-001

Response for Document 52665

52665-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, David Coyte.

The comment tracking number that has been assigned to your comment is OSTSD52666.

Comment Date: March 15, 2008 12:16:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52666

First Name: David
Middle Initial:
Last Name: Coyte
Organization: Soft Energy Associates
Address: 1813 Frankfort Ave., #3
Address 2:
Address 3:
City: Louisville
State: KY
Zip: 40206
Country: USA
Email: dcoyte@juno.com
Privacy Preference: Don't withhold name or address from public record
Attachment: Comments on the BLM Oil Shale and Tar Sands Draft Programmatic EIS.doc

Comment Submitted:

See Attachment.

March 14, 2008

Comments on the BLM Oil Shale and Tar Sands Draft Programmatic EIS.

Please acknowledge receipt of these comments and enter them into the Record on this project.

I am an electric power producer and energy resource analyst working in Kentucky. In considering the various alternatives presented in this DPEIS I continually return to the consulting agencies' concerns about the lack of information on technologies or their environmental, economic, or social impacts. Too often, as with the ethanol rush, we have embraced energy alternatives without a comprehensive consideration of impacts.

I appreciate the BLM's decision not to issue leases on the basis of the PEIS. However, I must disagree that the chosen alternative would not impact the agency's ability to ensure a quality plan. The predisposition of BLM towards approval of technologies and future development is reflected by their support of Alternative B. Alternative B anticipates acceptable development proposals, and thereby biases BLM in favor of approving proposals. The additional anticipation and momentum created by Plan B, from both inside and outside the agency, negatively impacts the BLM's ability to clearly review proposals and technologies. We have suffered the results of such politically charged predispositions before and we should not set ourselves up for further policy failures. 52666-001

Tar sand extraction in Canada has had significant negative environmental impact and a questionable energy return. Oil shale extraction technology has not shown significant progress in 30 years. The environmental considerations for water, air quality, CO2 emissions, and energy consumption are huge. Given that other energy development strategies, including conservation, are just beginning to demonstrate their potential, it seems unwise to encourage developments so loaded with negative potential until those negatives can be thoroughly addressed. 52666-002

Alternative A allows for the continued R&D on extraction and mitigation technologies for these resources. There are also significant private land resources available for both R&D and future development. I fully support the continued research at this level. Further action at this time is both unnecessary and possibly counterproductive to good policy. 52666-003

Please keep me informed of future actions on this proposal.

Sincerely,

David Coyte
Soft Energy Associates
1813 Frankfort Ave.
Louisville, KY 40206
Dcoyte@juno.com

Responses for Document 52666

52666-001: It should be noted that the BLM does not support a particular alternative. The Record of Decision associated with the PEIS will provide a concise public record of its decision, which will include the rationale for that decision.

52666-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52666-003: The BLM acknowledges the commentor’s preference for Alternative A.

Thank you for your comment, Andy Mueller.

The comment tracking number that has been assigned to your comment is OSTSD52667.

Comment Date: March 16, 2008 02:52:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD52667

First Name: Andy
Middle Initial:
Last Name: Mueller
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (Draft PEIS) for commercial oil shale and tar sands development. I am concerned that BLM is prepared to sacrifice large tracts of the public lands without being able to provide adequate information to determine the true environmental and social risks of this program. Excavation of tar sands resources is known to have been environmentally devastating in Canada, and industry is still years away from completing research and development of commercial oil shale technologies. Given the irreversible, large-scale environmental damage that is likely to be caused to our wild public lands in Colorado, Utah, and Wyoming by a commercial leasing program, BLM should wait until more is known about just how this program would be carried out before completing a programmatic EIS. 52667-001

As you are aware, a PEIS is expected to provide a complete and comprehensive analysis of the potential cumulative impacts of oil shale and tar sands development. The cumulative impact of this massive development will negatively affect air, water, wildlife and communities in Colorado, Utah, and Wyoming - however, this document inadequately presents foreseeable cumulative impacts. The preferred alternative forecasts production of one million barrels of oil shale per day - that would require the energy equivalent of ten giant new power plants and five giant new coal mines, and enough water to supply up to 365,000 families of four for one entire year. We need to know more to protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. 52667-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. 52667-003

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. 52667-004

Responses for Document 52667

52667-001: In consultation with our cooperating agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52667-002: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

52667-003: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

52667-004: The BLM is managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and inter-disciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

Thank you for your comment, Kurt Schwarz.

The comment tracking number that has been assigned to your comment is OSTSD52668.

Comment Date: March 16, 2008 13:38:59PM
Oil Shale and Tar Sands
Comment ID: OSTSD52668

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Attachment: HCBCOilShaleMar2008.1.doc

Comment Submitted:

See Attachment.

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March 14, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne, IL 60439

To the Bureau of Land Management:

The Howard County Bird Club appreciates the opportunity to submit the following comments on the draft programmatic environmental impact statement for oil shale and tar sands (OSTS) development in Colorado, Utah and Wyoming. Members of the Howard County Bird Club have visited this region of the country, as it contains many areas of important habitat for birds and other forms of wildlife.

The Howard County Bird Club is an organization with 250 members in Howard County, Maryland. We are a chapter of the Maryland Ornithological Society, a nonprofit, statewide organization of people who are interested in birds and nature. Our purposes include promoting the study and enjoyment of birds, promoting knowledge about our natural resources, and fostering their appreciation and conservation. We offer field trips, bird counts, and conservation projects. The club has raised and donated more than $60,000 for wildlife habitat preservation during the past 28 years. Our members travel all over the United States to visit federal lands on birding and nature-watching vacations. We spend dollars on food, lodging, guide services, books and souvenirs to support the local economy wherever we go. Birding is one of the fastest-growing outdoor sports.

Wildlife Values
The region affected by this proposal has many areas of high wildlife values. The canyons of the Colorado Plateau are a migration route for many species of birds. The green ribbon of riparian habitat in the canyons is essential for migrants crossing the arid region. Cliffs are essential habitat for bighorn sheep and several species of raptors. Uplands in this region are crucial habitat for elk, pronghorn antelope and many other species, including critical winter range and calving/lambing areas.

52668-001

In any OSTS project, wildlife values must be protected by steering development away from lands essential to wildlife. This must include riparian zones, wintering and calving/lambing areas for large mammals, and migration corridors for both birds and mammals. Connections between large blocks of habitat must be kept intact. The focus must be broader than the species that have protection under the Endangered Species Act, embracing all native species of flora and fauna.

Alternatives
The draft EIS analyzes three alternatives in for oil shale and three for tar sands (Table ES-1). With respect to oil shale, Alternative A is the no-action alternative, keeping the existing six research and development projects – five in Colorado and one in Utah.

Alternative B makes 1.9 million acres available for commercial OS development in Colorado, Utah and Wyoming. Alternative C makes 800,000 acres available for OS development in the same three states.

With respect to tar sands (entirely in Utah), Alternative A is the no-action alternative, under which no development would take place. Alternative B makes 400,000 acres available for commercial TS development, while Alternative C makes 229,000 acres available.

The Howard County Bird Club urges BLM to reject Alternatives B and C as premature in both the oil shale and tar sands cases. Regarding oil shale, the wisest course is to proceed with pilot R&D programs under Alternative A to learn whether the extraction technologies are economically feasible and find out more about their environmental impacts and their requirements of energy and water. 52668-002

The commercial leasing proposed in Alternatives B and C in both oil shale and tar sands cases clearly would impose major environmental impacts, irreversibly degrading many public values in the immediate areas of operation and throughout the three-state region. The impacts affect air, water, and land over a wide area.

Excluded Lands

Alternatives B and C for both oil shale and tar sands exclude certain categories of lands from leasing: wilderness areas, wilderness study areas (WSA), other units of the National Landscape Conservation System, areas of critical environmental concern (if now closed to mineral development) and river segments determined eligible under the Wild and Scenic Rivers Act.

Those exclusions are not adequate because they do not protect millions of acres BLM has found to have wilderness characteristics outside of WSAs and lands of critical value for wildlife such as migration routes, winter range, calving grounds, and connectivity corridors. The failure to exclude these areas jeopardizes nationally known areas such as the Roan Plateau in Colorado, the San Rafael Swell in Utah, and Adobe Town and Kinney Rim in Wyoming.

The final EIS should include an alternative that excludes more nationally valuable categories of land. Such areas are clearly identified in BLM land use plans, a result of large investments of BLM time and budget over several years. Our club has participated in several Resource Management Plan efforts in which these areas were documented by BLM. 52668-003

Wilderness characteristics: Areas with wilderness characteristics can be found listed and mapped in RMPs such as Little Snake (Colorado) and Vernal, Moab, Price and Richfield (Utah). For example:

- In the Price Draft RMP Supplement (Map 3-27, Table 3-19), BLM lists 27 units totaling 937,440 acres as "non-WSA lands with wilderness characteristics." These include nationally known areas in the San Rafael Swell.
- In the Vernal Draft RMP Supplement (Map at Figure 20e, Table 3.22.1), BLM lists 25 units totaling 277,596 acres as "non-WSA lands with wilderness characteristics." These include lands adjoining Dinosaur National Monument.

- In the Richfield Draft RMP (Map 3-9, Table 3-20) BLM lists 29 units totaling 682,600 acres as "non-WSA lands with wilderness characteristics."

Wildlife habitat: Exclusions should include areas of high value for wildlife. BLM RMPs typically contain maps indicating large-mammal winter range and calving/lambing grounds and habitat for species protected under the Endangered Species Act. For example:

- Moab Draft RMP, Map 2-26-B, C and D – Desert bighorn lambing, rutting and migration habitat
- Moab Draft RMP, Map 2-25 – Pronghorn habitat
- Moab Draft RMP, Map 2-18 – Mexican Spotted Owl habitat

52668-003 (cont.)

Wildlife habitat exclusions should also include areas identified as essential habitat by bird and wildlife organizations and state wildlife agencies in Colorado, Utah and Wyoming.

Riparian habitat: Canyons containing riparian habitat should be excluded from OSTS leasing. There is no substitute for these crucial migration routes for birds. Riparian habitat may be identified on maps in recent draft RMPs.

Proposed Conservation Measures

Appendix F of the draft EIS contains "Proposed Conservation Measures for the Preferred Alternative," consisting of measures recommended by the US Fish & Wildlife Service for species that have protection under the Endangered Species Act. We would like to see the final EIS contain similar measures for non-ESA species.

BLM has long experience with wildlife conservation measures in the oil and gas leasing program. Leases commonly contain stipulations requiring buffer zones, seasonal closures and other measures to reduce the impacts of oil and gas exploration against wildlife such as pronghorn antelope and Sage-grouse. The final EIS should include such measures to protect all native wildlife.

52668-004

Conclusion

The Howard County Bird Club urges BLM to limit the OSTS program to existing R&D efforts for the present. If it goes forward, there should be more exclusions and more conservation measures, as described above, to protect crucial wildlife habitat.

Thank you for considering our views.

Sincerely,

Kurt R. Schwarz
Conservation Chair

Responses for Document 52668

52668-001: The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and they provide an effective analytical foundation for subsequent project-specific NEPA documents. There is sufficient information pertaining to habitat impacts on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, the specific number and locations of projects cannot be identified within the PEIS. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. Specific detailed descriptions of big game populations and habitats and analyses of impacts on big game habitats will be included in these documents. The project-specific NEPA documents will include an evaluation of the specific occurrences of key wildlife habitats, analyses of the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects (including those of other existing or reasonably foreseeable future oil shale and tar sands leases), reasonable alternatives, and mitigation measures to protect wildlife habitats, as well as what level of development may be anticipated. Project-specific NEPA analyses would also include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important wildlife habitats. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders.

52668-002: The BLM acknowledges the commentor's preference for Alternative A.

52668-003: The scope of the PEIS is to identify public lands that would be available or would not be available for application for the potential leasing of oil shale or tar sands in the future. This scope is consistent with the instruction of Congress in the Energy Policy Act of 2005 for the BLM to develop oil shale and tar sands resources in an environmentally sound manner. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development.

The PEIS does address the potential impacts of future oil shale and tar sands leasing and development in Chapters 4 and 5 to disclose the possible types of impacts that would have to be evaluated in future site-specific NEPA analyses, if leases are applied for and plans of development are submitted. It is premature at this stage to completely deny access to particular lands without sufficiently knowing the technologies to be applied or the specific physical area of potential effect. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct impacts, watershed impacts, indirect impacts, and

cumulative effects; additional reasonable alternatives; and potential mitigation measures.

52668-004: Appendix F includes conservation measures that were developed in consultation between the BLM and USFWS specifically for the oil shale and tar sands PEIS. This appendix is not meant to provide a comprehensive list of mitigation measures that would be applied to the leasing and development phases of particular projects. Sections 4.8.2 and 5.8.2 present a sample of potential mitigation measures to protect aquatic resources, plant communities, wildlife resources, and threatened and endangered species. In these sections, reference is also made to existing BLM mitigation policies and accepted practices. The mitigations described in the PEIS are not intended to be the only measures for consideration. Project-specific measures will be developed prior to leasing and development and in consultation with the USFWS and the state.

Thank you for your comment, Dr. Catherine Keske.

The comment tracking number that has been assigned to your comment is OSTSD52669.

Comment Date: March 16, 2008 14:29:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD52669

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Attachment: Catherine Keske Oil Shale Submission to BLM 3-17-08.doc

Comment Submitted:

In this text box I have provided an Executive Summary. I have attached a 38-page document that provides more thorough comments to this PEIS. Thank you for the opportunity to provide input and comments.

Executive Summary The Bureau of Land Management (BLM) conducted a thoughtful study on economic issues that may result from oil shale and tar sand development. After carefully considering their analysis, I respectfully offer suggestions in the following areas that would benefit from more in-depth analysis.

Incomplete Use of IMPLAN Modeling Program: While the BLM has utilized a well-respected input-output model (Minnesota IMPLAN Group, Inc. 2007) to estimate the impact from a loss of recreational opportunities due to oil shale and tar sands development, I do not believe that the agency has properly used the IMPLAN model to fully disclose the estimated regional effects of oil and tar sands development, and the impact on other sectors such as recreation or agriculture. Specifically, the BLM's analysis should include county-level analysis for areas within and outside of the ROI, particularly where the loss of water for agriculture may affect counties outside of the ROI. 52669-001

Economic Costs to Recreation, Agricultural Production, and Agri-Tourism: The BLM has correctly noted that two economic sectors that will be most affected by oil shale and tar sands development will be recreation and agriculture. However, further investigation into the costs sustained by these industries as a result of oil shale and tar sands development—particularly the agricultural and agri-tourism industry—needs to be further quantified. Visitor use data on public and private lands also must be better documented by the agency. 52669-002

Non-Market Values: By its own admission, the BLM notes that, "The cumulative impacts of greatest concern to ecological resources in the study area include loss or degradation of habitat 52669-003

and habitat fragmentation related to land disturbance; loss of individuals in populations (especially those of rare species); and changes in the amount, availability, and quality of surface water resources." (Volume II, Page 6-156). Given the potentially widespread and irreversible impact on these ecological resources, further measurement must be made to quantify the value that individuals, community residents, and citizens of the state place on these resources. Contingent valuation methodology has been used in notable cases to determine environmental damages, such as the Exxon Valdez oil spill. Given the enormity of the project and well-documented potential damages to environmental and natural resources, I believe that the prudent scientific decision is to conduct a non-market valuation study.

52669-003 (cont.)

Comments on the Socio-Economic Section: It is noteworthy that the BLM's projections presented in the Socio-Economic Impact Analysis are based primarily upon vintage data that cover the potential impacts of large energy resource development projects. Many of the projections are based upon a volatile industry where forecasting is notoriously difficult to perform. Furthermore, the social impact analysis methodology is unclear and likely to be biased. This is of great concern because this layer of analysis is not routinely conducted as part of a NEPA-level assessment.

52669-004

Dynamics of a Mineral Economy: The BLM has modeled potential gains to the economy that may directly result from extraction, and the agency states that it has conducted a qualitative study on the potential sociological effects of a volatile, mineral-based economy. However, the agency has not modeled the potential economic factors that could contribute to sustained, structural economic problems that are common to mineral-based economies with heavy exporting sectors and an undiversified economic base. While the BLM has articulated positive economic benefits from oil development, their report lacks a discussion about factors that can contribute to a boom-bust economic cycle and the negative costs to the regional economy. This analysis should also include mitigating measures that lead to the development of a diversified economy and retention of economic profits within the region.

52669-005

Market-Based Incentives to Mitigate Loss of Ecosystem Services: It has become increasingly common to conduct partnerships with private landowners to coordinate ecosystem management across public and private lands. Programs have also been instituted across the nation to offset losses of ecosystem services, including wildlife habitat. It is suggested that a market-based incentive like the species recovery credit system instituted between the Department of Defense and private landowners, be examined to offset loss of wildlife habitat in the ROI and surrounding regions. These market-based systems also provide the means for maintaining a diversified regional economy that can mitigate potentially harmful economic impacts. See Attachment.

52669-006

Colorado State University
Knowledge to Go Places

March 17, 2008

Bureau of Land Management
Ms. Sherri Thompson, Project Manager
Colorado State Office
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EVS/900
Lakewood, CO 80215

Bureau of Land Management
Mr. Mitchell Leverette
Oil Shale and Tar Sands PEIS
Argonne National Laboratory
9700 S. Cass Avenue
Argonne, IL 60439

RE: Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (BLM-WO-GI-08-005-3900; DOI No. DES 07-60) released on December 19, 2007

Dear Ms. Thompson:
I am a natural resource and agricultural economist with training and experience in mineral economics, as well as an assistant professor at Colorado State University and an adjunct professor at Denver University's Sturm College of Law. I am providing written input regarding socio-economic issues within the BLM's Draft Programmatic Environmental Impact Statement. My comments follow on the next few pages.
Thank you for the opportunity to respond to your report. I am appreciative of your consideration of my comments. Should you request further information, please do not hesitate to contact me using the information listed below:

Colorado State University
Dr. Catherine M. Keske
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Email: Catherine.Keske@colostate.edu Phone: 970-372-7966

I hope my comments will assist you. Thank you for giving me the opportunity to review this document.

Sincerely,

Catherine M. Keske, Ph.D.

Comments on Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (BLM-WO-GI-08-005-3900; DOI No. DES 07-60) released on December 19, 2007

Executive Summary

The Bureau of Land Management (BLM) conducted a thoughtful study on economic issues that may result from oil shale and tar sand development. After carefully considering their analysis, I respectfully offer suggestions in the following areas that would benefit from more in-depth analysis.

Incomplete Use of IMPLAN Modeling Program: While the BLM has utilized a well-respected input-output model (Minnesota IMPLAN Group, Inc. 2007) to estimate the impact from a loss of recreational opportunities due to oil shale and tar sands development, I do not believe that the agency has properly used the IMPLAN model to fully disclose the estimated regional effects of oil and tar sands development, and the impact on other sectors such as recreation or agriculture. Specifically, the BLM's analysis should include county-level analysis for areas within and outside of the ROI, particularly where the loss of water for agriculture may affect counties outside of the ROI. 52669-007

Economic Costs to Recreation, Agricultural Production, and Agri-Tourism: The BLM has correctly noted that two economic sectors that will be most affected by oil shale and tar sands development will be recreation and agriculture. However, further investigation into the costs sustained by these industries as a result of oil shale and tar sands development—particularly the agricultural and agri-tourism industry—needs to be further quantified. Visitor use data on public and private lands also must be better documented by the agency. 52669-008

Non-Market Values: By its own admission, the BLM notes that, "The cumulative impacts of greatest concern to ecological resources in the study area include loss or 52669-009

degradation of habitat and habitat fragmentation related to land disturbance; loss of individuals in populations (especially those of rare species); and changes in the amount, availability, and quality of surface water resources." (Volume II, Page 6-156). Given the potentially widespread and irreversible impact on these ecological resources, further measurement must be made to quantify the value that individuals, community residents, and citizens of the state place on these resources. Contingent valuation methodology has been used in notable cases to determine environmental damages, such as the Exxon Valdez oil spill. Given the enormity of the project and well-documented potential damages to environmental and natural resources, I believe that the prudent scientific decision is to conduct a non-market valuation study.

52669-009 (cont.)

Comments on the Socio-Economic Section: It is noteworthy that the BLM's projections presented in the Socio-Economic Impact Analysis are based primarily upon vintage data that cover the potential impacts of large energy resource development projects. Many of the projections are based upon a volatile industry where forecasting is notoriously difficult to perform. Furthermore, the social impact analysis methodology is unclear and likely to be biased. This is of great concern because this layer of analysis is not routinely conducted as part of a NEPA-level assessment.

52669-010

Dynamics of a Mineral Economy: The BLM has modeled potential gains to the economy that may directly result from extraction, and the agency states that it has conducted a qualitative study on the potential sociological effects of a volatile, mineral-based economy. However, the agency has not modeled the potential *economic* factors that could contribute to sustained, structural economic problems that are common to mineral-based economies with heavy exporting sectors and an undiversified economic base. While the BLM has articulated positive economic benefits from oil development, their report lacks a discussion about factors that can contribute to a boom-bust economic cycle and the negative costs to the regional economy. This analysis should also include mitigating measures that lead to the development of a diversified economy and retention of economic profits within the region.

52669-011

Market-Based Incentives to Mitigate Loss of Ecosystem Services: It has become increasingly common to conduct partnerships with private landowners to coordinate ecosystem management across public and private lands. Programs have also been instituted across the nation to offset losses of ecosystem services, including wildlife habitat. It is suggested that a market-based incentive like the species recovery credit system instituted between the Department of Defense and private landowners, be examined to offset loss of wildlife habitat in the ROI and surrounding regions. These market-based systems also provide the means for maintaining a diversified regional economy that can mitigate potentially harmful economic impacts.

52669-012

Comments

The Bureau of Land Management's (BLM's) PEIS encompasses a broad array of impacts that may be related to the development of oil shale and tar sand in Colorado, Wyoming and Utah. Much of the focus in the PEIS is to summarize and to forecast the costs and the benefits of oil shale and tar sands development. While the PEIS provides in-depth analysis in some places, in other areas, the benefits and costs are either incomplete or speculative. In the sprit of assuring that the costs associated with oil shale and tar sands development are not overlooked, I have identified the following areas where I believe that the BLM analysis requires further investigation.

Incomplete Use of IMPLAN Modeling Program: The comments in this section pertain to problems with the implementation and analysis of the IMPLAN regional economic model (Volume I, Pages 3-211 through 3-233; Volume II, Pages 4-134 through 4-147; Volume III, G-6, Page 360). While the BLM has utilized a well-respected input-output model (Minnesota IMPLAN Group, Inc. 2007) to estimate the impact from a loss of recreational opportunities due to oil shale and tar sands development, I do not believe that the agency has properly used the IMPLAN model to fully disclose the estimated regional effects of oil and tar sands development, and the impact on other sectors such as recreation or agriculture. 52669-013

IMPLAN is an input-output model that is based upon secondary data. It uses national production technology and information about counties and states to allow the user to construct an input-output model for any county, group of counties, or states in the U.S. While the BLM's regional analysis of selected counties aggregated into a "Region of Influence" or "ROI" in each state is one type of IMPLAN analysis, details are not provided in terms about the economic affect on the counties that have been excluded from identified "ROI" that may feel the economic impacts of such development. Furthermore and perhaps more

importantly, *specific county-level detail has not been provided about each of the counties listed within the ROI*. In other words, aggregating the counties into a region may mask county-level effects. There have been numerous studies that have used this model to evaluate potential county-level economic losses that may result from destruction or loss of an environmental or natural resource amenity (Keske and Loomis, 2008; Wiersma, Morris, Robertson, 2004; Prato and Hey, 2006). Hence, economic growth from oil and gas sectors—or the losses from displaced recreational and agricultural industries—should be specifically analyzed at the county level for all counties in the ROI, as well as counties near the ROI. To be clear, for the sake of completeness and full disclosure, BLM should run the IMPLAN model at three levels (county, regional, and state) for Colorado, Utah, and Wyoming.

52669-013 (cont.)

In addition to providing employment analysis, IMPLAN can also provide an in-depth estimate of projected sales/income, employee compensation, and tax revenues. However, one shortcoming of this analysis is that IMPLAN has not been used to estimate the impact of the oil and gas development on tax revenues. This is a critical omission for a number of reasons:

- First, the data are relatively easy to generate through an IMPLAN model, so providing a complete analysis of this project on tax revenues should be a routine process to complete.
- Second, the BLM has noted (Volume II, Pages 4-142 and 4-143) that local communities will be required to generate the necessary tax base required to develop and maintain the infrastructure to support oil and gas development (roads, utilities, etc.), and that the resources "might come from a number of sources". However, there is no model that projects the economic effect from different potential sources of tax revenues on the economy or other economic sectors. The models may be different for property tax increases, a locally distributed severance tax, or an environmental-related tax on energy producers.
- Third, raising state revenues to support infrastructure projects like roads (or public goods like education) is difficult with the current restrictions presented by the

52669-014

Colorado Tabor amendment, which limits revenue growth for state and local governments. Counting on the distribution of state revenues to a local project area will come at the expense of other state funded goods such as higher education and law enforcement, and is likely not feasible. 52669-014 (cont.)

Another problem with the manner in which the BLM has run the IMPLAN model is that estimates of the impact of oil and gas development have only been published on a select few of the 528 business sectors. As discussed in the report, IMPLAN can be used to estimate the effect of a change in one economic sector (such as oil and gas) on the effects of another sector, like recreation, agriculture, construction, manufacturing (Volume III G.1.3). For example, the BLM has developed scenarios to project the impact of oil and gas development on the recreation industry (Volume II Page 4-145) and the construction industry (Volume II, 4-142). However, no IMPLAN model was run on the agricultural sector, one of the classic business sectors available in IMPLAN. This is despite the fact that concerns regarding the economic impact on agriculture—particularly with regards to the loss of water available for agriculture—have been made clear throughout the report. This noteworthy oversight is further discussed later in my written comments. However, without a clear data output summary, such as an IMPLAN table, statements such as, "The impact of losses in revenues and income from a reduction in agriculture likely would be more than offset by increases in revenues coming from oil shale development but would likely change the character of community life in each ROI" (Volume II, Page 4-144), are unfounded and speculative. 52669-015

On a final note, while the report (Volume III, G.1.3) states that economic multipliers have been calculated for the ROI in each of the three states to "capture the indirect effects of construction and operation of oil shale and tar sands facilities and associated power plants and housing developments", the economic multipliers have not been explicitly stated for the ROI, the specific counties, or the three states. Again, this is a basic output function of IMPLAN, and this report is important when it comes to retention of local wages to infuse the economy. The relevancy of retaining local wages in the economy is further discussed in the "Dynamics of a Mineral Economy" later in my response. 52669-016

Economic Costs to Recreation, Agricultural Production, and Agri-Tourism

The BLM has correctly noted that two economic sectors that will be most affected by oil shale and tar sands development will be recreation and agriculture. However, further investigation into the costs sustained by these industries as a result of oil shale and tar sands development—particularly the agricultural and agri-tourism industry—needs to be further quantified. Visitor use data on public and private lands also must be better documented by the agency.

For example, with respect to impacts to the recreation and tourism industry, the BLM has provided a limited IMPLAN analysis (please refer to comments in the previous section) of the anticipated impact to recreation industry in the ROI. As a starting point, the agency has projected a decrease in visitor use at a 10% and a 20% level, but admits that these are only an estimate of the potential impact, because visitor use data are incomplete, "…and may underestimate the value of these resources… Since no data are available on how recreational resources on public lands in the oil shale and tar sands ROIs are valued by potential users, estimates of the economic impact of recreational activities on employment and income in each ROI are presented." (Volume I, Page 3-232)

52669-017

Visitor data and related expenditures have been used extensively by public agencies, where it is routine to maintain databases of net economic values of recreation and environmental quality to systematize such transfers (Bergstrom and DeCivita, 1999; Rosenberger and Loomis, 2002; Environment Canada, 1998). Therefore, it is negligent of the BLM to not obtain a more precise estimate of recreational use data. Data could be obtained either through the agency's secondary database or by conducting a primary data collection study of visitor use in the ROI. While it is well-established that visitor data on public lands can be difficult to obtain, public lands agencies have well-established protocols for generating this information (English et al., 2002). In fact, the BLM itself notes that this is a weakness of the PEIS: "…although general visitation statistics are usually collected by the various agencies administering federal and state land, the number of visitors using public lands for recreational activities in each ROI is either not collected,

available, or reported separately in federal and state agency statistics." (Volume I, Page 3-232)

52669-017 (cont.)

With regards to the agricultural sector, while the BLM correctly identifies that economic revenues and cultural heritage will be lost with changes in the agricultural sector, the agency fails to conduct an in-depth analysis to quantify these losses. Hence, the statement that "the impact of losses in revenues and income from a reduction in agriculture likely would be more than offset by increases in revenues coming from oil shale development but would likely change the character of community life in each ROI" (Volume II, Page 4-144), is unfounded and speculative. Furthermore, this statement implies that agricultural production alone is the primary source of income for agricultural producers. In fact, the trend in Colorado is for agricultural producers to earn an increasing portion of their income from agri-tourim, which includes hunting and fishing, hiking, and other farm/ranch-related experiences, including culinary experiences such as food and wine tastings and Western heritage experiences. The State Demographer's Office estimates that in 2005, tourism jobs accounted for 13% of all employment in basic industries (industries that bring dollars into Colorado's local and regional economies and are thus responsible for economic growth or decline), and 7.4% of total employment. Much of this income comes from out-of-state visitors, as well as in-state day-trippers (Sullins and Thilmany, 2007). Hence, loss of the agricultural sector will directly affect recreation and tourism revenues.

52669-018

Recent studies by Sullins and Thilmany (2007), and Thilmany, Sullins, and Ansteth (2007) report agri-tourism as a major economic contributor to the economy in the Intermountain West in their online survey of more than 1,000 agri-tourists from January 27 to Feb 1, 2007. Findings by these researchers reveal a number of relevant details that affect the BLM's ROI:

- There is interconnectivity between recreation and agri-tourism for future economic growth, and much of this potential remains untapped. Thilmany and Sullins identified that 25% of visitors to Colorado's West Slope region identified additional activities they would have participated in to extend their stays (such as

hiking, four-wheeling, mountain biking and visiting heritage sites), had their known more about such activities. Hence, the implication is that there is future growth in both the agri-tourism and recreational sector if they work together to grow this market.

- On-farm wildlife and nature activities were the most popularly cited of all listed activities, which include culinary experiences, farmers markets, and historical museums and sites. Hence, the natural experiences sought by area visitors extend beyond public lands.
- Agri-tourism activities attract "repeat customers", implying that attracting new agri-tourism visitors could potentially impact the economy significantly because of multiple visits. Nearly 1/5 of all respondents in the study participated in ag-related activities on their trips more than 3 times a year. 246 reported that agri-tourism was a primary or secondary reason for their trip to Colorado.
- Agri-tourism activities also provide much-needed off-season income, which counterbalances the Colorado winter ski season and summer outdoor recreation activities. Many of the agri-tourism visits took place during the fall, filling an "underutilized capacity in the lodging and service industries that occurs following the busy summer and winter travel seasons".

The Thilmany and Sullins research on the value of agriculture and agri-tourism to the state of Colorado is corroborated by other sources. The Colorado Division of Wildlife (2008) reports that hunting, angling and wildlife viewing alone contribute more than $2 billion annually to the economy of the State of Colorado, which results in a total of more than 30,000 manufacturing, retail sales, and wildlife related service jobs in the state. Furthermore, the Colorado Division of Wildlife also found that hunting and fishing alone contributed $26 million to the Moffat County, Colorado economy in 2002—again amplifying the need to conduct a county-level IMPLAN analysis. Other economic studies for have concluded that recreation is providing an increasing economic contribution to Western economies, and its economic contribution outweighs that of extraction. For example, Utah reports that 2007 net economic employment gain was

considerably greater for leisure/recreation jobs than for mineral development (Utah Economic Summary 2008), and a recent Wyoming economic report indicates that more people are employed in recreation and tourism than mineral development. Furthermore, agricultural production revenues far exceed the revenues produced by energy and mineral development (Bittner, 2007). Clearly, recreation, agriculture, and agri-tourism provide an economic anchor to these three western states, and the momentum being generated from this economic sector will clearly be disrupted by a large scale energy development project.

On a final note, in many places in the report, the BLM acknowledges that difficulty securing water rights from the agricultural sector will have widespread consequences on the ROI. However, the agency does not estimate the effects on agricultural communities outside the ROI, where presumably, many owners of senior water rights live downstream. This once again reiterates the importance of conducting the IMPLAN analysis on a county-level, and outside of the ROI. Furthermore, as noted in Volume II, Page 4-41, "Whether enough water is available for the development depends on the results of negotiations between various parties, including water rights owners, state and federal agencies, and municipal water providers, as well as developers." However, there is no projection of the legal costs necessary to attain the great amount of water necessary to conduct these operations. Given the complexity of wrestling water rights away from senior water right owners from over the state, it is very likely that legal costs associated with acquiring the water rights will be an expensive process. These costs should also be considered in the models. 52669-019

Non-Market Values: The BLM should be commended for a thorough summary and identification of the potential impact and disturbances to wildlife in the potentially affected regions. Indeed, Table 4.8.1-*3 Potential Effects on State-Listed Threatened and Endangered Species and Species of Special Concern, Federal Candidates for Listing, and BLM-Designated Sensitive Species* addresses this very issue and spans over fifteen pages. However, of concern is the fact that even though the BLM identifies potentially 52669-020

threatened natural areas, there does not appear to be a specific valuation study of the non-market benefits that are provided to this three-state area from these natural areas, including the value of threatened and endangered species. By its own admission, the BLM notes that, "The cumulative impacts of greatest concern to ecological resources in the study area include loss or degradation of habitat and habitat fragmentation related to land disturbance; loss of individuals in populations (especially those of rare species); and changes in the amount, availability, and quality of surface water resources." (Volume II, 6-156). However, given the potentially widespread and irreversible impact on these ecological resources, further measurement should be made to quantify the value that individuals, community residents, and citizens of the state place on these resources.

52669-020 (cont.)

There are several social science models that can be employed, and one frequently used economic model is the contingent valuation method—one of several "non-market valuation" techniques. Non-market valuation studies can be used to assign a value on natural resource or environmental amenities that traditionally do not have a "market price tag", and contingent valuation methodology, in particular, has been used in notable cases to determine environmental damages, such as the Exxon Valdez oil spill (Carson et al., 1992). The literature on contingent valuation methodology is voluminous, and the use of this technique to evaluate impact of federal projects is well-documented. For example, contingent valuation methodology has been utilized to value natural resource amenities such as the value of improvements in visibility in the Grand Canyon (Schulze and Brookshire, 1983) the value of protecting an endangered species (Boyle and Bishop, 1987), and wilderness areas (Loomis and Koontz, 2005).

Non-market valuation study data can specifically measure the value of the benefits that natural areas provide to residents and visitors alike, and the technique should be considered for any benefit-cost analysis study of a large natural resource project. To be clear, non-market valuation data can be used to justify the benefits of the current natural areas or the costs incurred from the destruction from oil shale and tar sands development. Conducting a non-market valuation study has the potential to reduce much of the BLM's speculation about the cultural and economic changes that may take place as a result of

changes in the landscape, and particularly with respect to loss of wildlife, agriculture, recreational opportunities and open space. Non-market valuation may also be used to identify the willingness of a tax base to support an infrastructure development project (such as road development) or a habitat protection center.

As stated above, numerous state and federal projects have incorporated non-market valuation techniques to estimate both positive and negative impacts of a project. Typically, a survey is distributed to a stratified group of respondents (such as area visitors or residents) to minimize the sample bias. As far as the oil shale/tar sands project goes, it would be prudent to conduct a survey with both residents and visitors in order to determine the separate values that each group places on the natural area. A survey question similar to that below is typically asked, and the subject can be changed either represent a "good" to protect or a "bad" to prevent (such as pollution). The method of payment may be modified, as well. For example, the question may be modified to ask whether the respondent would support an increase in taxes to fund a specific good.

Dichotomous Choice Contingent Valuation Question Example

As you know, some of the costs of travel such as gasoline, campgrounds, and hotels often increase. If the total cost of this most recent trip to the natural area where you were contacted had been $X higher, would you have made this trip to this area? Circle one:

YES *NO*

The $X bid amount contains a range of values, typically ranging from $2 to $950.

In order to analyze the data, economists use a simulated market survey design combined with statistical analysis to estimate the consumer surplus for natural resources. The dependent variable is then regressed on the bid value, to determine the "consumer surplus" or total value that the population places on natural good. In contrast to consumer expenditures (which can be modeled through software such as IMPLAN, the most common way in which to assess the "non-market value" for an item is a measure called *"consumer surplus"*. While the techniques may not be "perfect", the process of determining a consumer surplus clearly provides insight into the value of the natural resource, when there is not a traditional market for the good, which is true in the case of endangered species, wildlife, and cultural values.

As stated above, the use of a contingent valuation study can be used to specifically understand the county-level, ROI, or state values of the rural agricultural culture in the western part of Colorado—an issue that the BLM notes that is of importance and which is threatened by oil shale and tar sand development (Volume II, Pages 6-63): "The number of new residents from outside the producing regions and the pace of population growth associated with the commercial development of oil shale resources, including large-scale production facilities and ancillary power plants, coal mines, and housing developments, would likely lead to substantial demographic and social change in small rural communities. These communities would likely be required to adapt to a different quality of life, with a transition away from a more traditional lifestyle in small, isolated, close-knit, homogenous communities with a strong orientation toward personal and family relationships, toward a more urban lifestyle, with increasing cultural and ethnic diversity and increasing dependence on formal social relationships within the community."

52669-020 (cont.)

Given the enormity of the project, the potentially irreversible damages to environmental and natural resources (as well as cultural changes), and the widespread acceptance of non-market valuation techniques to document the benefits and costs of large-scale federal projects, I believe that the prudent scientific decision is to conduct a non-market valuation study with residents of this three state region in order to quantify the values presented by the wilderness, natural areas, and cultural values in the proposed project areas.

Dynamics of a Mineral Economy: The BLM correctly characterized energy and mineral based economies, even at a regional or local level, as being prone to periods of boom or bust economic cycles (Volume II, Pages 4-137 through 4-144). Furthermore, the PEIS also describes the Colony Project boom and bust period in great detail (Volume I, Pages 3-207 through 3-210. Economic cycles similar to the Colony Project are driven by a number of natural resource-specific issues, including fluctuations in prices and spending leakages outside of the project area that result from high rates of exportation of

52669-021

the commodity outside of the region. The BLM has modeled potential upside gains to the economy that may directly result from extraction (Volume III, Appendix G), and the agency states that it has conducted a qualitative study on the potential sociological effects of a volatile, mineral-based economy. However, the agency has not *modeled* the potential *economic* factors that could contribute to a sustained, regional Dutch Disease and a "resource curse" —jargon for two structural economic problems that are common to mineral-based economies with heavy exporting sectors without a diversified economic base. Furthermore, with the exception of projections on the recreation sector, the downside economic losses have not been fully modeled.

52669-021 (cont.)

In order to facilitate a healthy regional economy that can be sustained into the future, it is of great importance that the agency characterizes the economic factors that can contribute to a diversified economy in order to prevent the county, regional, and state economy from falling victim to either of these problems. Specifically, the agency must develop an economic mitigation measure to facilitate the retention of such revenues into the local economy to ensure a diverse economic base and to ensure that there is not a repeat of the Colony Project boom-bust phenomenon.

To further elaborate, "Dutch Disease" refers to an economic structure that is heavily export-based (consistent with an energy or natural resource-based economy), which may cause underdevelopment of other sectors within the economy (such as recreation or agriculture). It is well-established that energy and mineral-based economies often export goods, and temporary workers often brought in to work in the region often do not generate sustained internal spending multipliers that other economic structures (such as agrarian economies) can maintain. As a result, volatile pricing fluctuations that are inherent to energy and mineral commodities can cause leave a mineral-based economy in a dire situation, due to lack of economic diversity. In a similar vein, the "resource curse" typically occurs when the present value economic gains of a large project (typically the driving source of income to a region) are offset by the present value of the negative effects, which are often long-term and environmental in nature. To

summarize the Dutch Disease and the resource curse, an economy that becomes overly dependent on extraction is susceptible to economic depression that may result from a global structural economic change that affects the demand for that particular commodity. In essence, a heavily extraction-based economy that is not diversified may not be able to adapt to changing economic forces.

In contrast to the statement made in Volume II, Page 4-144, "The review of the literature assessing the relationship between social disruption and the rapid development of various energy projects in small rural communities suggests that there is insufficient evidence to predict the extent to which specific communities are likely to experience social disruption, which population groups within each community are likely to be most affected, and the extent to which social disruption is likely to persist beyond the end of the boom period…" we can in fact minimize the likelihood that region succumbs to the resource curse or the Dutch Disease. Davis (1995), Davis and Tilton (2005) and Iimi (2007) point out that the Dutch Disease and resource curse are not inevitable, and the extraction-based economies can utilize extraction in order to leverage economic growth. Indeed, many successful national and regional economies have utilized economic profits from extraction to diversify an economy's base and promote sustainable economic development. The danger lies in not recognizing economic diversity or destroying natural resources that can provide a diversified economy. It is my concern that without a mitigating measure that will accommodate wildlife and recreation, these regional economies may rely too heavily on extraction, leaving the economy at the mercy of external economic forces and unable to react to structural economic changes. While the BLM has articulated positive economic benefits of the oil development in numerous places in the report, identification of factors that can contribute to a boom-bust economic cycle and the negative costs to the regional economy should be identified. Ultimately, this analysis should also include mitigating measures that will lead to the development of a diversified economy and retention of economic profits within the region. Furthermore, the PEIS should include a model and analysis of the anticipated tax revenues that can

52669-022

be used to develop and support public services—which can also be jeopardized with an undiversified economy. 52669-022 (cont.)

Direct Comments on Socio-Economic Impact Analysis: The PEIS describes past oil shale development projects and provides an in-depth commentary about the past history of the Colony Basin project in the 1970's through the 1980's (Volume I, Pages 3-207 through 3-210). Many of my comments are discussed earlier in this paper, and I have presented specific comments about the Colony Basin project in the previous section, "Dynamics of a Mineral Economy". However, it is noteworthy that the BLM's projections presented in the Socio-Economic Impact Analysis are based primarily upon vintage data that cover the potential impacts of large energy resource development projects (DOI 1973b; BLM 1980; 1983a,b; 1984; DOE 1982a; all listed in Volume II, page 4-137). Moreover, the BLM also states that the effort was heavily subsidized (Volume I, Pages 3-207), which clearly leads to market distortion and failure of an economy to develop economic diversity. It also presents a paucity of revenues available for infrastructure development, and tremendous financial pressures onto a community. For these two reasons, at least one county in the ROI concedes that they have transitioned their economy into recreation and tourism and agriculture, to provide a more sustainable economic base (Volume I, Page 3-218 through 3-223). A return to an extraction-based economy may also undo the self-described 20-year economic recovery process. 52669-023

Also of concern is the fact that the Socio-Economic Impact analysis is heavily based upon assumptions, and its projections of peak construction development are in year 2022 for an in situ facility and 2027 for a surface and underground mine (the first year of assumed production). This is an Achilles Heal of the analysis, because accurate pricing and economic forecasts this far into the future are notoriously difficult to project, particularly in the volatile energy industry (Dahl, 2005), which can present wild variations in supply and demand (and subsequently prices). This volatility affects other economic indicators, such as employment. Hence, a more accurate forecast of economic change would be to include a range, rather than a point value forecast, and 52669-024

understandably, the range would be broad. The PEIS also acknowledges volatility and the difficulty in forecasting accurate energy returns to a project. This is summarized in a description of forecasts in the Colony Basin project, where Exxon, "… envisaged production of 600,000 bbl/day by 1990, 1 million by 1995 and 8 million bbl/day by 2010" (Volume I, Page 3-208), but, "after spending more than $1 billion, Exxon announced on May 2, 1982, that it was closing the project and laying off 2,200 workers. No shale oil was ever produced commercially." (Volume III, Page A-16) Simply put, socioeconomic data in the PEIS relies too heavily on too many key assumptions, which are summarized on Volume II, Pages 4-134, with little acknowledgement of technical efficiencies to the extraction process that have been made in the past several decades, which may lead to less employment potential.

52669-024 (cont.)

I articulated my concerns about recreation and agricultural economic impacts earlier in the paper, but it is worth mentioning that the interviews conducted in the scoping phase and presented in Volume III Appendix H do not indicate that there was a representative sample of agricultural producers, agri-tourism stakeholders, or representatives from the recreation industry. Furthermore, no mention is made of the qualitative research interview structure that was used to conduct this phase of the research study. Thus, the research design of this phase of the study is rather mysterious, and it very likely that there was interview bias, and an improperly stratified data technique. This is of great concern, because as described in Volume I Page 3-228, "Social impacts are not considered in any detail in the various NEPA-related assessments that have been made since the early 1970s of the potential impacts of shale/tar sands projects and other relevant large-scale energy resource developments. Consequently, there is little indication from these documents of the extent to which proposed oil shale and tar sands developments would produce social disruption in local communities located near these facilities." Without systematic research of the social impacts of this project being performed ahead of time, it appears unlikely that these will be considered during the NEPA-assessment process, which may prove to be a critical mistake.

52669-025

Market-Based Incentives to Mitigate Loss of Ecosystem Services: As the BLM has acknowledged several times throughout the PEIS, it will be imperative to work with private landowners in order to offset changes in the ecosystem that may result from oil shale and tar sands development. However, it is of concern that there is not disclosure of potential strategies, particularly market based methods that can be used to facilitate this process. It has become increasingly common to conduct partnerships with private landowners to coordinate ecosystem management across public and private lands (Loomis, 2002). As an extension of this concept, programs have also been instituted across the nation to offset losses of ecosystem services, including wildlife habitat. It is suggested that a market-based incentive like the species recovery credit system instituted between the Department of Defense and private landowners, be used to offset loss of wildlife habitat. These market-based systems also provide the means for maintaining a diversified regional economy. 52669-026

In the example of the recovery credit system, habitat for the Golden cheeked warbler (an endangered species) has been made available on private lands in order to offset land required for the Ft. Hood military base installation. As a result, private landowners enter into a conservation lease with the Department of Defense to provide habitat for the warbler. This economic contract facilitates the agricultural economy and military installation, while accommodating the endangered species. This is an example of a measure that can facilitate a diversified economic base, and the potentially displaced agricultural producers, and it is suggested that the BLM consider market based incentives as a mitigating measure.

Summary

In summary, while the BLM's efforts to summarize the environmental impacts of the oil shale project have been considerable, I believe that analysis of the regional economic effects of the project falls short of its goal. It is my belief that the

IMPLAN analysis has been incomplete and speculative, particularly in summarizing the economic benefits of the agricultural and agri-tourism industry. Additional analysis of economic impacts must be made at the county-level for counties within the ROI, as well as counties outside of the ROI, particularly due to the impact of a loss of water rights in areas outside of the identified ROI. Furthermore, accurate data must be obtained for recreational visitor use and the non-market values provided by the natural and cultural features of the region.

It is my recommendation that the BLM pursue further investigation of the regional economic impacts of this project in order to provide full disclosure before the agency undertakes NEPA efforts or modifies land management plans. Specifically, I also encourage the agency to create an alternative that address several of the economic concerns, including economic diversification and private land partnerships as part of its mitigating measures, in order to temper a boom-bust mineral economy. Clearly, these natural areas provide the foundation of economic base in these three states, and the consequences of shifting from a natural amenity/service based economy to an industrial /mining economy are irreversible. Hence, full disclosure and analysis of the impact of an oil shale/tar sands development project is critical to the long-term economic well-being of the Intermountain West.

52669-027

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Responses for Document 52669

52669-001: Although it is recognized that potential restrictions on water use by existing users, including agriculture, and the transfer of water rights to oil shale and tar sands developers, may be significant with the development of oil shale and tar sands resources in most counties in each ROI, the location, technology, and magnitude of oil shale and tar sands development, and consequently, the extent to which existing regional surface and groundwater sources or water transferred into each oil shale and tar sands resource area will be utilized, cannot be determined at this time. Consequently, the PEIS assesses potential impacts qualitatively at the ROI level, to provide a general determination as to the magnitude of potential impacts of reductions in agriculture on the economy of each ROI. If oil shale and tar sands facility development occurs, additional NEPA analyses would be undertaken, where project locations, production levels, and water demand, and any transfers from other uses would be known, allowing a detailed analysis of the impact on agriculture at the county level. If it is determined that additional impacts to agriculture with changes in water use may occur in other counties outside each ROI, these counties would be included in any future site-specific assessment.

52669-002: Although it is recognized that potential restrictions on water use by existing users, including agriculture, and the transfer of water rights to oil shale and tar sands developers, may be significant with the development of oil shale and tar sands resources in each ROI, the location, technology, and magnitude of oil shale and tar sands development, and consequently, the extent to which existing regional surface and groundwater sources, and the interregional transfer of water into each oil shale and tar sands resource area, and the associated legal costs, cannot be determined at this time. Consequently, the PEIS assesses potential impacts qualitatively, to provide a general determination as to the magnitude of potential impacts of reductions in agriculture on the economy of each ROI. If oil shale and tar sands facility development occurs, additional NEPA analyses would be undertaken, where project locations, production levels and water demand, and any transfers from other uses would be known, where a more detailed analysis of the impact on agriculture would be undertaken.

52669-003: Text has been added to Section 3.10.3 covering non-market valuation of recreational and cultural resources. If commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken to analyze in detail the extent of regional economic impacts, including impacts on recreation. While no nonmarket valuation study will be done at this stage of the evaluation, these studies may be included in subsequent NEPA reviews of individual lease applications.

52669-004: As the technologies and scale of development associated with oil shale and tar sands resource and ancillary development are not known, in order to proceed, the analysis described in the PEIS was based on assumptions regarding production levels and timeline for each resource and technology, despite potential volatility

in energy markets, as the commentor notes. Assumptions were also made regarding direct project employment, direct and indirect population (workers and their families) in-migration rates, the provision and location of direct and indirect worker housing, and local public services and infrastructure during both construction and operations phases. These assumptions, described in Section 4.11 of the PEIS, were based on publicly available NEPA reviews, past BLM experience with oil shale and tar sands and other energy-related projects, and industry data on power generation and coal mining. These assumptions were based on the most recent data available, or on historical data that are unlikely to have changed significantly. The assumptions are considered reasonable for a programmatic review of potential socioeconomic impacts.

The methodology used to perform the social impact analysis in the PEIS is described in Appendix G, and is based on the BLM's Guidelines for Social Impact Assessment.

The methodology is routinely used by the BLM to perform assessments of social impacts of a range of development projects and land use changes on public land, and is not therefore, as the commentor suggests, a layer of analysis not routinely conducted as part of a NEPA-level assessment. The methodology used to select interview respondents and the interview structure that was used are described in Appendix H of the PEIS. As is indicated in the text in the PEIS, the sampling strategy used to select interview respondents and the open-ended nature of the questions is likely to have introduced potential bias in the responses. Despite these problems, the interviews add text and verbatim quotations that summarize viewpoints, perceptions, and attitudes towards large-scale energy developments. Additional surveys of residents and other individuals could be performed as part of future NEPA reviews for individual oil shale and tar sands developments.

Socioeconomic analyses are routinely conducted as a part of NEPA assessments, particularly Environmental Impact Statements, and would be included in future NEPA analyses for leasing and/or plans of development.

52669-005: Many of the social and economic impacts of the "bust" after the "boom" of the Colony Project are described in Sections 3.10.1 and 3.10.2.2.1 of the PEIS, and the impacts that have occurred as a result of the loss of energy projects in general in Section 3.10.2.2.5. Experience and perceptions of the long-term economic impacts of continued reliance on energy development and the impacts on attempts to diversify local and regional economies to avoid "boom" and "bust" economic development in the future are described in Section 3.10.2.2.1 of the PEIS.

Text has been added to the PEIS to indicate that while it may be the case that community development programs, with participation from energy resource developers, local, state, and federal governments, will be implemented in each ROI at various stages of the oil shale and tar sands development process, the nature, extent, level of participation, and timing of these programs is not known at

this time. As a result, the analysis undertaken for the PEIS provides information on impacts in each ROI in the absence of these measures. A series of potential mitigation measures related to the provision of direct and indirect employee housing and related services, and to the development of socioeconomic monitoring, vocational training, and outreach programs are provided, in order to reduce the initial impact of construction and operations activities in each ROI, particularly with regard to the impact on housing markets, local public services and infrastructure, social disruption, and wholesale and retail price inflation.

Text has been added to the PEIS to indicate that additional impact mitigation strategies could be designed and implemented at the local and state level, notably market-based mitigation strategies to coordinate ecosystem management practices, and rotational schedules for direct workers, once the location, timing, and magnitude of impacts of specific projects are known. The role of tax revenues in attempts to diversify local economies and reduce dependency on natural resource extraction industries, thereby reducing the susceptibility of local communities to the boom-and-bust economic cycle associated with energy development in rural areas, could also be considered.

52669-006: There are no impacts, other than possible impacts on property values, associated with the proposed action of this PEIS (i.e., amending land use plans to identify lands eligible for application for leasing). Preliminary analysis of potential impacts of future development is provided, to identify data gaps and potential mitigation measures. While it may be the case that community development programs, with participation from energy resource developers, local, state, and federal governments, could be implemented in each ROI at various stages of the oil shale and tar sands development process, the nature, extent, level of participation, and timing of these programs are not known at this time. As a result, the analysis undertaken for the PEIS provides information on impacts in each ROI in the absence of these measures. A series of mitigation measures related to the provision of direct and indirect employee housing and related services, and to the development of socioeconomic monitoring, vocational training, and outreach programs are provided, in order to reduce the initial impact of construction and operations activities in each ROI, particularly with regard the impact on housing markets, local public services and infrastructure, social disruption, and wholesale and retail price inflation.

Additional impact mitigation strategies could be designed and implemented at the local and state levels, notably market-based mitigation strategies to coordinate ecosystem management practices, and rotational schedules for direct workers once the location, timing, and magnitude of impacts of specific projects are known. The role of tax revenues in attempts to diversify local economies and reduce dependency on natural resource extraction industries, thereby reducing the susceptibility of local communities to the boom-and-bust economic cycle associated with energy development in rural areas, could also be considered.

52669-007: Please see response to Comment 52669-001.

52669-008: As public land in the three state ROIs is used primarily for hunting and other forms of dispersed outdoor activities, the numbers of visitors using these lands for these recreational activities are not available from all administering agencies. As described in the PEIS, in addition to visitation rates, the economic valuation of certain natural resources can also be assessed in terms of the potential recreational destination for current and future users, their nonmarket value. Text has been added to Section 3.10.3 of the PEIS to provide a review of the literature on nonmarket valuation of recreational resources. Another valuation method, and the one used in the PEIS, is to estimate the economic impact of the various recreational activities supported by natural resources on public land in the vicinity of land proposed for oil shale and tar sands development.

52669-009: Please see response to Comment 52669-003.

52669-010: Please see response to Comment 52669-004.

52669-011: Many of the social and economic impacts of the "bust" after the "boom" of the Colony Project are described in Sections 3.10.1 and 3.10.2.2.1 of the PEIS, and the impacts that have occurred as a result of the loss of energy projects in general in Section 3.10.2.2.5. Experience and perceptions of the long-term economic impacts of continued reliance on energy development and the impacts on attempts to diversify local and regional economies to avoid "boom" and "bust" economic development in the future are described in Section 3.10.2.2.1 of the PEIS.

While it may be the case that community development programs, with participation from energy resource developers, local, state, and federal governments, will be implemented in each ROI at various stages of the oil shale and tar sands development process, the nature, extent, level of participation and timing of these programs is not known at this time. As a result, the analysis undertaken for the PEIS provides information on impacts in each ROI in the absence of these measures. A series of mitigation measures related to the provision of direct and indirect employee housing and related services, and to the development of socioeconomic monitoring, vocational training, and outreach programs are provided, in order to reduce the initial impact of construction and operations activities in each ROI, particularly with regard the impact on housing markets, local public services and infrastructure, social disruption, and wholesale and retail price inflation.

Additional impact mitigation strategies could be designed and implemented at the local and state levels, notably market-based mitigation strategies to coordinate ecosystem management practices, and rotational schedules for direct workers once the location, timing, and magnitude of impacts of specific projects are known. The role of tax revenues in attempts to diversify local economies and reduce dependency on natural resource extraction industries, thereby reducing the

susceptibility of local communities to the boom-and-bust economic cycle associated with energy development in rural areas, could also be considered.

52669-012: See response to Comment 52669-006.

52669-013: Please see response to Comment 52669-001.

52669-014: The historical and projected contributions of oil and gas development to local county and state tax revenues are presented as part of the description of the economic baseline in each state ROI in Section 3.10 of the PEIS, and in the projections presented in Section 6.1.1.10.1. Although the past and current impacts of oil and gas development provide some insight into the type of impacts expected with oil shale and tar sands development, analysis of the employment and fiscal impacts of oil and gas using IMPLAN are not presented in greater detail as they are not the main focus of the PEIS. More detail on the current and projected impacts of oil and gas development part of the Colorado ROI can be found in "Northwest Colorado Socioeconomic Analysis and Forecasts," produced for the Associated Governments of Northwest Colorado.

If commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken, where project locations, employment levels, and the number of in-migrating workers in each phase of development would be known, enabling a detailed analysis of impacts on local tax revenues.

52669-015: Text has been added to Sections 3.10 and 4.11.1.4 of the PEIS to include information provided in the comments. Although it is recognized that potential restrictions on water use by existing users, including agriculture, and the transfer of water rights to oil shale and tar sands developers, may be significant with the development of oil shale and tar sands resources in each ROI, the location, technology, and magnitude of oil shale and tar sands development, and consequently, the extent to which existing regional surface and groundwater sources, and the interregional transfer of water into each oil shale and tar sands resource area cannot be determined at this time. Consequently, in the absence of these data, the PEIS does not attempt to estimate the potential impacts of water restrictions to agriculture in each ROI using IMPLAN, but assesses potential impacts qualitatively, to provide a general determination as to the magnitude of potential impacts of reductions resulting from agriculture water restrictions on the economy of each ROI. If oil shale and tar sands facility development occurs, additional NEPA analyses would be undertaken, where project locations, production levels, and water demand, and any transfers from other uses would be known, where a more detailed analysis of the impact on agriculture would be undertaken.

52669-016: Text has been added to Appendix G of the PEIS providing more information on the IMPLAN multipliers used in the analysis of impacts of oil shale and tar sands developments at the ROI level.

The results of the analysis in the PEIS using IMPLAN to estimate the direct and indirect employment effects of oil shale and tar sands developments at the ROI level reflect the programmatic scope of the analysis. Although IMPLAN data are available at the county and state levels, the analysis presents data at the ROI level in order to capture the overall scale of the impacts of each oil shale and tar sands technology and ancillary facilities. When commercial-scale oil shale and tar sands development occurs, additional NEPA analyses would determine the impacts of oil shale and tar sands facilities on employment and income for the counties most likely impacted.

The extent to which wages and salaries associated with oil shale and tar sands and ancillary facility and housing development would be retained in each ROI was introduced as an assumption into the socioeconomic impact assessment described in Section 4.11 of the PEIS. Additional NEPA analyses would analyze in detail the extent of regional wage and salary retention, based on actual worker residential locations by county, wage and salary spending, and equipment material and service procurement patterns in each county.

52669-017: Please see response to Comment 52669-002.

52669-018: Text has been added to Section 4.11.1.4 of the PEIS to include mention of agri-tourism.

52669-019: Please see response to Comment 52669-015.

52669-020: Please see response to Comment 52669-003.

52669-021: See response to Comment 52669-006.

52669-022: See response to Comment 52669-006. Many of the social and economic impacts of the "bust" after the "boom" of the Colony Project are described in Sections 3.10.1 and 3.10.2.2.1 of the PEIS, and the impacts that have occurred as a result of the loss of energy projects in general in Section 3.10.2.2.5. Experience and perceptions of the long-term economic impacts of continued reliance on energy development and the impacts on attempts to diversify local and regional economies to avoid "boom" and "bust" economic development in the future are described in Section 3.10.2.2.1 of the PEIS.

52669-023: Assumptions used in the analysis with regard to direct employment, in-migration, and regional spending of wages and procurement expenditures, described in Section 4.11 of the PEIS, were based on publicly available NEPA reviews, past experience with oil shale and tar sands and other energy-related projects, and

industry data on power generation and coal mining. These assumptions are reasonable for a programmatic review of potential socioeconomic impacts.

If commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken, where project locations, employment levels, and the number of in-migrating workers in each phase of development would be known, enabling a detailed analysis of oil shale and tar sands and ancillary facility impacts on local tax revenues. The role of tax revenues in attempts to diversify local economies and reduce dependency on natural resource extraction industries, thereby reducing the susceptibility of local communities to the boom-and-bust economic cycle associated with energy development in rural areas, could also be considered.

52669-024: As the technologies, scale of development, and project locations associated with oil shale and tar sands resource and ancillary development are not known, the analysis described in the PEIS was based on a series of assumptions regarding project production levels and timeline for each resource and technology during both construction and operations phases. In the absence of any data from industry indicating oil shale and tar sands resource development timelines in any of the ROIs or employment levels for particular technologies, assumptions were made in order to perform the analysis. These assumptions, described in Section 4.11 of the PEIS, were based on publicly available NEPA reviews, current BLM experience with oil shale and tar sands and other energy-related projects, and industry data on power generation and coal mining. These assumptions are reasonable for a programmatic review of potential socioeconomic impacts.

52669-025: The methodology used to select interview respondents and interview structure are described in Appendix H of the PEIS. The interviews were not intended to be a representative sample of all the various stakeholder groups that might have relevant information on the potential impacts of oil shale and tar sands developments, rather, they were intended only to add anecdotal information to the PEIS.

As is stated in Appendix H of the PEIS, the interviews covered various aspects of the experience in each ROI with “boom and bust” energy developments, recent oil and gas development, and the prospects for oil shale and tar sands. Interviews were open-ended, and were merely intended to capture the viewpoints, perceptions, and attitudes of respondents to these aspects of large-scale energy development.

As is suggested in the review of the literature on social disruption presented in Section 3.10.2.2.5, because of the absence of longitudinal studies of the social impacts of energy development projects in communities of varying population size, socio-cultural background, and economic and social history, there is little evidence that can be used to conclusively predict the extent to which social

disruption will occur in any given community, and precisely how social disruption would manifest itself.

If commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses could be undertaken to analyze in detail the extent of regional and community social impacts, including impacts on population, housing, crime, and social disruption.

52669-026: The ideas expressed in the comment may have applicability if oil shale and tar sands development become established, but at this time, it is premature to discuss mitigation strategies. It would be very useful to know the size of likely commercial operations, their sequences of development, likely production rates, sources of water, and power, etc. Once those are defined it will be possible to develop a clear idea of what level of impact may develop and then strategies to mitigate it could be developed and applied across the landscape.

52669-027: The rationale explained in the PEIS to not attempt to issue commercial leases from this document is directly related to the points raised in the comment. There currently is not enough information on the technologies, their size, employment, water requirements, air emissions, etc. to make the judgements being suggested. It is also for this reason the BLM is conducting a phased decision-making process—proceeding from land use planning, to leasing, to operational permitting. The land use planning or allocation decision does nothing more than to remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases. The BLM has initiated the research, development, and demonstration leasing process to provide important information that can be used as the BLM works with communities, states, and other federal agencies to develop strategies for managing any environmental and socioeconomic effects of the technologies.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52670.

Comment Date: March 16, 2008 15:37:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD52670

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands. The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a full range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 52670-001 52670-002 52670-003

The Bureau of Land Management's controversial proposal would fuel an outdated, fossil-fuel-intensive energy infrastructure and comes at a time when we need to be rapidly transitioning away from fossil fuels-based energy production. If "business as usual" greenhouse gas emissions continue, over one third of the world's plants and animals will be committed to extinction by the middle of this century or before. 52670-002 (cont.)

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to all of the plants and animals that will be affected.

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 52670-001 (cont.)

Sincerely,

Responses for Document 52670

52670-001: The BLM acknowledges the commentor's preference for Alternative A.

52670-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52670-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

52670-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment, Al Leedahl.

The comment tracking number that has been assigned to your comment is OSTSD52671.

Comment Date: March 16, 2008 16:21:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD52671

First Name: Al
Middle Initial:
Last Name: Leedahl
Organization:
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Address 2:
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City: Benson
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Country: USA
Email: aleedahl@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is completely reprehensible that we in the USA are importing a significant amount of the crude oil we consume while we are sitting on up to two times as much petroleum in the form of oil shale (in the green river formation in Colorado, Utah and Wyoming) as there is crude oil in all of the world! On top of that much of the crude oil we are importing is from countries that are not necessarily friendly to the USA.

I placed a brief summary of the Oil Shale situation on my web site at:
http://www.friendlyinnovators.com/mn/20080320.htm

The development of oil shale and tar sands in the USA is a national security issue as well as an economic issue. We need to take aggressive action to develop these resources now!!

52671-001

Response for Document 52671

52671-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Carrie Covington.

The comment tracking number that has been assigned to your comment is OSTSD52672.

Comment Date: March 16, 2008 18:52:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD52672

First Name: Carrie
Middle Initial: E
Last Name: Covington
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment: CovingtonComment.doc

Comment Submitted:

See Attachment.

Carrie Covington
1841 Pine St. #3
Boulder, CO 80302
carriecov@gmail.com

March 15, 2008

Sherri Thompson
Oil Shale and Tar Sands Leasing Programmatic EIS
Bureau of Land Management
Colorado State Office
2850 Youngfield Street
Lakewood, CO 80215
ostseiswebmaster@anl.gov

Dear Reviewers,

Thank you for the opportunity to contribute to the oil shale conversation. I appreciate the information you have made easily accessible on the Oil Shale EIS website, and I hope that you will continue to engage the public as the EIS process continues. As a citizen of Colorado and frequent visitor to the tri-state oil shale region, I much appreciate your committed and hard work.

I offer four broad suggestions to BLM as they continue this history-making Programmatic Environmental Impact Statement (PEIS) process. First, I hope that you will follow the mandate of the Energy Policy Act of 2005 and your new tradition of openness and substantively involve the public, local communities, and governments in innovative ways throughout the NEPA process. Second, I implore BLM to respond to the unprecedented nature of oil shale technology and the unprecedented size of this NEPA analysis with a correspondingly comprehensive PEIS and site-specific EISs that incorporate lessons learned in previous NEPA mineral operations and account for loopholes within the leasing scheme. Third, I remind BLM of the many treasured natural places and important local communities, human and animal, that are in and around the Green River Formation and stand to be significantly impacted alongside the landscape involved in the OSTS PEIS. Fourth, I request that BLM require far more research, data-gathering, and disclosure about the technology and its demands on this area's limited resources before any commercial leases are issued.

I will begin by commenting on the legislative and regulatory scheme into which the Oil Shale and Tar Sands ("OSTS") PEIS fits and highlighting the mandates that BLM must meet. This PEIS is governed by the Energy Policy Act of 2005, the Mineral Leasing Act, FOOLGRA, and NEPA, and there are particular provisions and charges that the OSTS PEIS can benefit from as a multi-basin and policy-driven document produced by an agency well-seasoned in environmental impact analysis. In the second half of my comment, I will address five crucial aspects of NEPA compliance to which I hope BLM will be particularly attuned: the scope and process of this PEIS, cumulative impacts, inadequate and unavailable information, water, and public participation.

I. Regulatory scheme, generally

Because of its rather sweeping scope, the PEIS may of necessity have to include some vague information. Accepting this, however, BLM has the heightened responsibility to require as complete information as possible from the RD&D companies and gather as much current

information on impacts as possible. I here highlight some of the key points of law and regulation that I see as mandates for BLM to follow in the OSTS PEIS process. Most of my comments in this section pertain directly to the PEIS or the policy that will form this PEIS. Although some of my comments may seem to be outside of the regulatory discretion of the PEIS, I would ask that BLM consider them in light of the expansive policy directive that OSTS PEIS contemplates and forward them along to the administrative committee that will be charged with establishing lease procedures once the PEIS is finalized.

A. Energy Policy Act

Section 369(b) of the Energy Policy Act states as the three primary goals of OSTS development: reduction of our dependence on foreign oil, environmental soundness and minimization of impacts, and sustainability with regard to affected states and communities. 42 U.S.C. § 15927(b). BLM must keep all three goals in mind as the OSTS development process proceeds, and maintain a commitment to balancing those goals rather than allowing one to subordinate the others. Under Section 369(c), the only lands that should be made available by the Secretary of the Interior ("Secretary") within the first phase of availability are those for research and development (RD&D) leasing. 42 U.S.C. § 15927(c). Yet, the five companies that have received RD&D leases have also received the option to expand their operations to 5,120 acres. Because these expanded operations would still be considered RD&D leases, these parcels could escape NEPA's hard look if the PEIS is not yet completed and BLM extends its FONSI to these expanded leases. It would strain reason to believe that developing oil shale on a parcel of 5,120 acres would not have a significant impact, and so it is imperative that BLM include these parcels within the PEIS process. 52672-001

Section 369(e) of the Energy Policy Act requires that the Secretary consult with governors, local government representatives, tribes, and interested members of the public within 180 days of publishing the PEIS to determine whether there is "sufficient support" for a lease sale. 42 U.S.C. § 15927(e). Although this meeting is technically outside of the purview of the PEIS, I would ask that BLM read this provision as evidence of congress' intention to work closely with and engage local and state interests. To that end, and in keeping with BLM's proactive involvement of the public thus far, I would suggest that BLM continue to substantively involve the governors' offices, local governments, tribes and the public throughout the EIS process rather than after the PEIS is produced. 52672-002 The cost-sharing provision of Section 369(l) of the Energy Policy Act raises the possibility that private companies may be benefiting from federal assistance (in the form of waived royalty payments and rental fees or tax incentives) and so further supports the idea that the public is a significant stakeholder in this process. 42 U.S.C. § 15927(l).

B. Mineral Leasing Act

The Energy Policy Act amended a few of the provisions of the Mineral Leasing Act that pertain to oil shale. Section 241(a)(4), as amended, gives discretionary power to the Secretary to waive "payment of any royalty and rental during the first five years of any lease." 30 U.S.C. § 241(a)(4). The broadness of this waiver is concerning 52672-003 not so much for the current RD&D leases, but for possible future leases developed at a time when the technology has already been developed and so no RD&D period is necessary. This seems an unnecessarily broad incentive and an unnecessary subsidy by the federal government if the company is using an already proven technology. More generally, oil companies simply do not need any more subsidies: allowing the

market to determine if and when oil shale development is necessary will allow more time to get a meaningful regulatory regime in place and encourage development of alternate sources of energy. 52672-003 (cont.)

Section 241([second subsection]c) allows the Secretary to issue one offsite lease of up to 6,400 acres in association with each oil shale lease. 30 U.S.C. § 241([second subsection]c). These offsite leases are defined as those "additional lands necessary for the disposal of oil shale wastes and the materials removed from mined lands, and for the building of plants, reduction works, and other facilities connected with oil shale operations." *Id.* Under Section 241(c)(3), "[a]n offsite lease shall remain subject to leasing…where such leasing would not be incompatible with the offsite lease." 30 U.S.C. § 241(c)(3). Importantly, the Secretary may only issue an offsite lease after considering the "impacts on the environment and other resource values" and "seek[ing] the recommendation of the Governor of the State[.]" 30 U.S.C. § 241(d)(2)(B); 30 U.S.C. § (d)(3). These offsite lease provisions have important consequences for the PEIS: BLM must be sure to factor in this potential additional affected acreage, consider the potential environmental impacts on these offsite parcels that will house spent shale and other industrial mine wastes, and be sure that any potential offsite mine locations are governed by the PEIS. 52672-004

C. FOOGLRA

Under the Federal Onshore Oil and Gas Leasing Reform Act of 1987 (FOOGLRA) and cases construing, no property right in the minerals accrues until the lease is issued, companies have no choice but to abide by any stipulations contained in the lease, and all new leases must be offered in competitive bidding. 30 U.S.C. § 226; *Wyoming Outdoor Council v. Bosworth*, 284 F.Supp.2d 81 (D.D.C. 2003). Although the lease procedure is established, oil shale is a unique mineral undergoing a highly experimental RD&D phase. If the property right in oil shale accrues at the time of the lease, then environmental impact analysis must be rigorous and complete before any leases are committed—if not including the initial RD&D leases, then certainly including the possible 5,120 acre RD&D expansion leases. The PEIS must be thorough in order to clearly define wildlife corridors or other mitigation efforts that should be included on individual leases. 52672-005

D. NEPA

The development of one of the world's largest deposits of oil shale is no doubt a major federal action that will significantly affect the quality of the human environment. The OSTS development area is extensive: the four main geologic basins—Piceance, Washakie, Green River, and Uinta—comprise over 8.5 million acres of the Upper Colorado Plateau. Although this region is sparsely populated, the region is home to 100,000 people and counting, thanks to recent oil, gas and coal bed methane booms. The OSTS PEIS must certainly be one of the largest EIS documents ever undertaken by a federal agency. Because of its somewhat sweeping scope and national importance, BLM has the opportunity to produce a document groundbreaking in its comprehensive policy approach and widely inclusive of large-scale ecological management. The PEIS's broad sweep should not be an excuse to overlook important details at all levels or to think about the variations of on-the-ground implementation. A strong PEIS can enable effective implementation by defining specific boundaries into which site-specific EISs can fit. Because of the truly unknowable nature of oil shale development right now, the BLM should prepare a rigorous PEIS that anticipates no less rigorous site-specific EISs. The PEIS should clearly define 52672-006

the requirements of the site-specific EISs in order to prevent companies and local agency offices from over-depending on the tiering allowed by 40 CFR § 1502.20. 52672-006 (cont.)

The PEIS must anticipate all of the different processes involved in the development of oil shale including pit-mining (in the surface retort process), oil/gas well drilling, and the heretofore largely untested large-scale in-situ retorting. At minimum, BLM should incorporate lessons already learned about environmental impact avoidance and mitigation from hardrock pit mines and conventional oil and gas drilling. Although oil shale was removed from the General Mining Law's purview along with oil, gas, and coal under the Mineral Leasing Act of 1920, it would be a mistake to ignore pertinent lessons from the hardrock mining industry's successes and challenges in complying with NEPA. At least one company—Utah's Oil Shale Exploration Company—is moving ahead with surface retort development which means all of the potential environmental impacts that accompany room-and-pillar mines, above-ground retorting, and spent-shale and overburden waste deposits. Although most other companies are focusing on in-situ technologies and thus don't have comparable above-ground environmental impacts, hardrock mines' problems with subsidence and groundwater leaching at hardrock mines are certainly relevant. Another lesson to be learned from the Mining Law is that the estimated commercial value of the mineral should take into consideration all of the costs of remediation as well as mitigation, and should be factored without accounting for federal subsidies. BLM should also consider establishing a remediation fund, on top of the 12.5% royalty rate, as an insurance policy for a landscape already hard-hit by mining and now threatened with the additional and unpredictable strain of OSTS development. 52672-007

There are a few other considerations that fall under the general category of NEPA before moving into a few areas of special concern. The first is a problem of practical application: how will the various Regional Management Plans be changed or modified to align with this new, more sweeping programmatic plan? Is it clear which plan or office takes precedence? The second concern is the amount of CO_2 that could be produced and whether enough attention has been paid in the research process to its management. Along similar lines, the BLM should require that each company disclosing the estimated amount of energy it will use, where that energy will come from, and the perceived environmental affects of that energy production (just saying it comes from elsewhere is not enough—the recent RAND study suggests that each oil shale production site might need a new coal-fired power plant). 52672-008

II. Cumulative Impacts

"'Cumulative impact' is the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." 40 CFR § 1508.7. As of November 5, 2007, the Colorado Oil and Gas Conservation Commission (COGCC) had issued over 2,000 drilling permits within Garfield County and as of that same week, there were 4,316 active wells and 120 drilling rigs running in that county.[1] In addition to conventional oil and gas drilling in the Piceance, Green River, and Uinta basins, BLM would be remiss in ignoring the coalbed methane ("CBM") boom. Based on the relative ease with which CBM can be extracted and the low costs required to produce it (thanks to existing infrastructure and minimal refining), CBM development is more than a reasonably foreseeable future action—there are over fifty CBM wells to date in the Piceance basin. In addition to the ever-increasing 52672-009

[1] The statistics, which are updated frequently, are found on the COGCC's website, http://www.oil-gas.state.co.us/ under the "News/Media" heading (then go to "Colorado Weekly and Monthly Information").

cumulative impact potential for oil and gas drilling and CBM development in the Piceance, there are other mining operations that should be considered in the PEIS. One other type of mining that should be addressed in the PEIS is nahcolite: there is one operation on the ground, though it has been suspended, and most of the companies researching oil shale mining are looking into marketing nahcolite also.[2]

The RAND Report has estimated that the extent of the Green River oil shale Formation could produce from 800 billion to 1.8 trillion barrels of oil. Because so many aspects of the technology to extract this potential resource are experimental, we lack any meaningful information about how much energy the extraction process will require and how extensively the process will use and contaminate the area's water resources. Even given all of the uncertainties, we can be sure that production of oil from the Green River Formation will require a massive amount of energy and—as it must heat the earth to over 700° F and then cool that rock—and have a significant impact on the land, air and water of a vast are of the American West. Oil shale development means new power plants whose emissions could affect the viewsheds the many special natural places that surround the Green River Formation, including Dinosaur National Monument, Colorado National Monument, Arches and Canyonlands National Parks, the Flaming Gorge, and Roan Plateau. It means putting additional strain on the famously beleaguered Colorado River by ultimately reducing the amount of water in the river while adding pollutants. It means extensive alteration of the landscape through some open mine operations and the resultant spent shale piles, some underground rock-boiling operations and the requisite roads to install and monitor their multi-year process, processing plant infrastructure, and the potential for subsidence or geologic shifting as man endeavors to hurry mother nature along in her production of oil. Oil shale development stands to alter the upper Colorado Plateau on a massive and unprecedented scale. Thus, the OSTS PEIS must be comprehensive on an unprecedented scale because of the extensive impacts on the human (from the boom-impacted communities of Rifle to public lands tourists) environment (from humpback chub habitat to crucial wildlife corridors) that oil shale development portends.

52672-009 (cont.)

The current conversation about drilling on the Roan Plateau has demonstrated, above all else, that the citizens and leadership of Colorado are committed to a cautious approach to mineral development in western Colorado. As the OSTS PEIS process moves forward, I hope BLM will heed the many lessons already on the ground in western Colorado. On the Roan Plateau, innovative solutions like directional drilling from existing well pads are coupled with a collective conservation ethic that is unwilling to subordinate the scenic, recreational, and habitat resources on top of the Plateau to the cause of mineral development. The larger Colorado community is beginning to understand the wariness of locals whose lives are scarred by the emotional and economic impacts of a century marked by waves of hope, then frenzy, then tumbleweeds. Even now, Rifle and Parachute (and Grand Junction and Glenwood Springs) are weary from the

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[2] One example is American Soda, which began commercial mining operations in 2000 for nahcolite, naturally-occurring sodium bicarbonate deposits that are intermingled with lower-quality oil-shale deposits just below the Mahogany Zone. Although its mining operations cover a relatively small amount of acreage and were put on hold in fall of 2004, this is yet another mining operation that has impacted the Piceance Basin environment and has the potential to contribute to environmental impacts in the future (the wellfield included 26 wellheads, a processing facility, access roads, and a pipeline). Additionally, extraction of nahcolite involves injecting steam heated to 350°-420°F: this mine's impacts on water quantity, quality, energy usage, and geologic stability should be considered as part of the OSTS PEIS's cumulative impacts analysis.

52672-009 (cont.)

onslaught of this latest boom: their schools and hospitals and law enforcement need time and funds to catch up.

To consider the development of oil shale in the Piceance Basin as separate from all current and proposed oil and gas, CBM, nahcolite, and any other mining operations would be viciously inaccurate and deeply inadequate. Cumulative impacts must consider oil shale together with oil and gas. Additionally, the five EA/FONSIs downplay the percentage of land affected by talking about surface disturbance rather than openly dealing with the underground mining/retorting process as necessarily part of the environment/landscape, which it most certainly is. BLM must take a more honest (and harder) look at the amount of land that will be affected by oil shale development in the PEIS and not play the percentage game of the EAs. There simply can be no shortage of cumulative impacts when BLM proposes to extract massive quantities of oil out of nearly 8.7 million acres of rock through an energy-intensive process that may require a number of new coal-fired power plants. For this reason, the PEIS must also consider oil shale development's contributions to climate change.[3] All current and proposed mining operations are having and will continue to have "collectively significant" impact on the air quality, water quantity and quality, and socioeconomic health of the local communities. 52672-010

III. Lack of Adequate Information on Potential Environmental Impacts

The experimental technologies involved with oil shale mean that the information contained in the PEIS will necessarily be incomplete. Before companies are allowed to go forward with commercial development, the OSTS NEPA process should require disclosure of any data that would cause environmental impacts—including data considered proprietary—and allow for an additional public comment period. Under NEPA, agencies are required to include information about impact that "is essential to a reasoned choice among alternatives and the overall coasts of obtaining it are not exorbitant[.]" 40 CFR § 1502.22(a). Commercial development should not be allowed to go forward until companies have gathered adequate data about significant impacts. Once they have that data, the PEIS should require disclosure, because only exorbitant costs—not proprietary concerns—are considered legitimately prohibitive under NEPA. Additionally, because public involvement is so fundamental to the process and because of the continued inadequacy and unavailability of the information, the PEIS should contain a provision for additional public comment once companies can more accurately estimate their potential impacts. Companies pursuing OSTS development are currently engaged in an intense research process that necessarily encompasses potential environmental impacts. Because of this, it is reasonable for BLM to expect those companies to produce potential impact data at the same time that the company determines that it is ready to go forward with development. The leasing process is the best way to police this compliance. While freeze wall technologies may certainly be worthy of confidentiality, the amounts of water that may be either required for this technology to work or that may leak into the groundwater supply, should as certainly be made publicly available. 52672-011

[3] Climate change litigation is an important new thread in environmental protection, as *Massachusetts v. EPA*, 127 S.Ct. 1438 (2007), demonstrated. Lower federal courts are picking up this baton by requiring specific climate change impacts to be included in NEPA analyses. *See, eg., Center for Biological Diversity v. National Highway Traffic Safety Administration*, 2007 WL 3378240 at 32 (9th Cir. November 15, 2007) (finding the EA's cumulative impacts analysis inadequate for failure to evaluate the "incremental impact" and the actual effects of emissions and holding that "[t]he impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct.")

Companies may assert that they were unable to collect all data pertaining to environmental impact. Again, BLM should make every effort to prevent commercial development until companies produce these data, to include some sort of proprietary confidentiality protections if need be. If, after all of these protections, there is still some incomplete or unavailable information, then the PEIS must account for section 1502.22(b) by requiring companies to rigorously detail the information they are missing and all scientific and theoretical studies that shed light on that information in a format accessible to the agency and the public. 40 CFR § 1502.22(b)(1-4). 52672-011 (cont.)

Although estimates vary, commercial development of OSTS is still a number of years out (as Shell's having pulled its application demonstrates). In producing the PEIS, BLM should gather all available data on OSTS research and development from foreign nations like Estonia and Canada who are actively pursuing commercial operations. Additionally, thanks to the buzz of the oil crisis, vastly improved technologies, and the internet, there is a wealth of new studies that continues to grow in size and availability so that BLM need not rely solely on data and reports produced at the time of the 1970s oil shale boom. A process slated to begin sometime after 2010 and conceivably lasting until 2030 should not rely on information from the 1970s or gathered from a remediation research site using technology from the 1960s.[4] 52672-012

The 800 pound gorilla in determining the potential environmental impact of oil shale development is the fundamental practical unpredictability of the theoretical or small-scale-tested technologies. While the companies are involved in rigorous RD&D programs, they are private entities motivated by profit and it is unlikely that they will engage in an adequate analysis on their own of the environmental impacts. The BLM's role in this case must be to protect the public interest, including the environment. The fact that Shell withdrew its Plan of Operations this summer suggests, at a minimum, that their freeze wall technology (and others?) was not close to practical application. If Shell needs to slow down, we could all probably afford to. After all, the in-situ process proposes to heat large swathes of the earth up to 700° F for a period of years if not decades: do we really know what that may do to the arid soil, fragile plant life, and delicate wildlife communities? Do we know what will happen on the surface as a result of the in-situ process, and what impacts the steam and other gaseous chemicals could have on surface and sub-surface ecosystems? 52672-013

The companies have also admitted that oil shale's physical structure changes when it is heated within a confined or compressed location: it has a very different porosity and permeability and there is an increased incidence of unpredictable fracture lines. These alterations have been amply recorded at the microscopic research level on core samples, but there is no way to know what all of these properties will mean when large deposits of oil shale are heated: once the core samples expand, their size cannot be reduced back to the original, their increased porosity has necessary implications for how gases, liquid chemicals and water will travel through the deposits, and a large collection of unpredictable fractures is similarly unpredictable. When speaking about these problems at this year's oil shale conference, the Exxon representative had

[4] Rock Springs Oil Shale Retort Test Site, west of Rock Springs, Wyoming, functioned from 1965-1979, and then was reopened in 1996 to test groundwater remediation processes. The in-situ retort site has produced some data about the movement of contaminants: most notably that because they are gases they move up the fractures rather than down to the groundwater and that existing and enhanced underground factures make the remediation process particularly unpredictable. That said, the site is relatively small, the shale deposit was fairly close to the surface, and the retorting process relied on technology from the 1960s. This is not a strong enough hook upon which a large-scale 21st century oil shale operation should hang its hat.

very few answers. While I appreciate the company's candor in identifying these concerns, the PEIS should contain some internal controls that require companies to find out what porosity, permeability, and fracturing mean in a large-scale operation. Where companies are at least talking about the properties of reacted oil shale, there was very little discussion of excess CO_2 from the process. Given the current (warming) climate, no PEIS would be complete without a comprehensive evaluation of CO_2 production (during the retorting process but also resulting from any new power pants required for the heating process) and management.

52672-013 (cont.)

52672-014

IV. Continued Public Involvement and Access to Information

Estimates of the percentage of oil that can be extracted from the shale are wildly optimistic. I'd like to believe that we are past the Cold War era of allowing the military-industrial complex to determine our country's priorities by scaring us with the specter of peak oil and hamstringing us by haphazardly developing our last oil reserves (through a process that tries to artificially accelerate geologic processes that would ordinarily take millennia). The public deserves good science, clearly presented. With the power of technology, the ever-growing body of scientific knowledge, and the climate of federal agency openness with its public, complex evaluations of environmental impacts can and should be presented effectively to the public. Agencies must continue to make the science of potential environmental impacts available to the public in a way that is neither oversimplified nor overly-technical. In the continuing efforts to be open with the public, this is a crucial piece. It bears repeating that it is impossible to engage the public in the process if the companies or agencies do not make information available or accessible. It also bears repeating that information should not be considered proprietary if a company is using any federal funds to complete its research or development. It is clear that we are in a new era of federal openness with the public, and NEPA's public information mandate should not be subordinated to the interests of private companies (who may well be receiving federal subsidies through tax incentives and royalty waivers). The OSTS PEIS process is a federally-funded program being implemented on public lands: there is no clearer way to articulate the very public nature of this process.

52672-015

Because of the enormous scale and numerous unique aspects of the OSTS PEIS, BLM should take this opportunity to introduce a more iterative process of public comment and involvement. As it currently stands, comments were solicited during the scoping process and will be accepted again after the Draft EIS is released. Although there may be an additional chance for involvement under Section (e) of the Energy Policy Act of 2005's requirement to consult with interested public and affected states' governors, two official opportunities for public comment simply is not enough. 4737 individual comments were submitted during the scoping process, all of which took place before the Piceance Basin became the media darling of oil and gas development. Oil shale commercial development is an entirely new endeavor that is will significantly alter the landscape of western Colorado, southwestern Wyoming, and northeastern Utah for at least this first quarter of a century. Two opportunities to allow the citizens of the region, states—world—to weigh in on such a massive endeavor is simply not enough. BLM should take this unique opportunity to enhance its public involvement process by adding an additional comment period after releasing the PEIS (so that the PEIS is more like a second draft), ensuring that at least two comment periods are opened an each and every site-specific EIS, and considering the possibility of entirely new ways of public involvement. Continue the new tradition of public meetings! Consider creating a citizen board or oversight committee as a part of the PEIS! Take seriously the mandates to *consult* with the public and *respond* to public

52672-016

comments—4737 commentors and counting care deeply about oil shale development AND moderation, mitigation, meaningful consideration. 52672-016 (cont.)

V. Water Quantity and Quality

Although the RD&D companies tout their new in-situ technologies or, in OSEC's case, the improved efficiency of the Canadian surface-retort process, introducing an enormous resource extraction operation into an expansive, arid landscape must carefully consider that operation's affects on water quantity and quality. These are dry areas whose water supply is increasingly constrained by population demands along the entire Colorado River drainage. Oil shale development on the proposed scale will bring large numbers of new people to these areas, significantly increase industrial water demand, and necessarily affect the groundwater supply as it induces intense geologic change. With the best-available information, estimates are 2-5 barrels of water used for each barrel of shale oil produced which means that a 1-million bbl/day industry would consume .8-1.8 bbl/year or 100,000 to 240,000 acre ft./yr. One recent report estimates that, given the recent trend in Colorado River flows, there will be 209,000 surplus acre ft./yr in 2010 and only 109,000 surplus acre ft./yr. by 2020.[5] This report goes on to list the variety of water uses of an industrial oil shale development: "water will still be needed for drilling and extraction, post-extraction cooling, product upgrading and refining, environmental control systems, and power production."[6] Perhaps an even more important warning to note here is that "[r]eliable estimates of water requirements for Shell's process will not be available until the technology reaches the scale-up and confirmation stage."[7] No commercial leasing should happen until the RD&D process produces accurate data about water usage and impacts. 52672-017

BLM must not accept anything less than full disclosure about how much water these operations (including numbers of workers and their families) will use. Many companies have maintained water rights from the first oil shale boom, and others have purchased senior rights within the last decade. Companies should have to demonstrate that they have maintained the diligence requirements on these rights before being allowed to lease. This is the easiest part of the water quantity discussion, however, because profit-driven companies are easily motivated to be sure of their water rights. Actual water rights are a very different animal than paper water rights in the arid West, and the PEIS process should incorporate checks within the permitting process to determine if and when water will be available for companies. Even if there is technically enough water in the stream for a company to take, BLM may need to limit a company's diversion because endangered species or the public trust require a minimum amount of instream flow. The harder questions are the ones that BLM must ask during the PEIS process lest they never be asked. 52672-018

The BLM must also consider the geologic structure of the groundwater aquifers in all of the basins at issue. The groundwater aquifer that people draw water from in the Piceance basin is a shallow one and its water is generally considered as part of the surface water system. There is a deeper aquifer, under the Mahogany Zone, but the water quality goes down significantly there because of salt and nahcolite. If the shallower aquifer is in fact considered as part of the Colorado River surface allocation, then companies should not be allowed to rely on this store 52672-019

[5] John Duda, et. al., *Emerging Issues for Fossil Energy and Water: Investigation of Water Issues Related to Coal Mining, Coal to Liquids, Oil Shale, and Carbon Capture and Sequestration* at p. 36 (June 2006) DOE/NETL-2006/1233, available at http://www.netl.doe.gov/technologies/oil-gas/publications/AP/IssuesforFEandWater.pdf.
[6] *Id.* at 35.
[7] *Id.*

either for their own proposed purposes or as an answer to their increased use of surface water in the area. BLM may want to require that companies seeking additional sources of water only use water from the deeper aquifer because of its water's poor quality. An accurate accounting of water rights and proposed groundwater usage is imperative before any commercial operations go forward.

52672-019 (cont.)

I do not believe that all or even most of the citizens of Colorado, Utah, and Wyoming are willing to allow water protected by the public trust doctrine go to the development of oil shale at the expense of instream flows and the four endangered fish species in the Colorado River. Beyond the public trust, the BLM must seriously consider instream flows and endangered fish species as part of its public interest responsibility. If companies are challenged on their diligence requirements, should we allow them to buy agricultural water rights out from under other possible municipal or recreational users? Why can't we require CBM and oil shale companies to work together to put good use to CBM's produced water for oil shale cooling purposes? Shouldn't BLM take a cue from SMCRA and require that oil shale companies replace private water supplies that they harm even if the damage is inadvertent? These are questions that will not be answered in the free-market frenzy to develop oil shale. But they are crucial questions that go to the heart of oil shale's environmental impact. The OSTS PEIS is the best, if not only, place for them.

52672-020

Water quality is no less important a consideration than water availability. BLM should take advantage of the scientific advances in this area as well as learn from thirty years of NEPA and Clean Water Act regulation in evaluating the potential water quality impacts of OSTS development. A professor at the Colorado School of the Mines holds out seasonal cycles and the importance of accurate baselines as two of the most important developments in water quality science in the last thirty years.[8] A recent study that compared predicted and actual water quality at 25 hardrock mines recommends that "EISs for new mines should include comprehensive baseline water quality, hydrologic, and geochemical valuations and careful and supportable identification of mitigation measures, including an evaluation of potential mitigation failures."[9] A report that looked specifically at oil shale development has suggested that "[t]he largest uncertainty exists for excess mine drainage, which is highly site dependent. This may be a particular concern for in-situ operations as they are likely to be sited in the rich center of the Piceance Basin, which has significant groundwater."[10]

52672-021

Water quality concerns are plagued by lack of available information. What we do know, however, should be reason enough for BLM to require clear information from the RD&D process and available studies of the impacted areas before any commercial leases are assigned (and, arguably, the expanded RD&D leases). What little do we know? Leaching from the in-situ sites is a large enough concern for companies that they are developing freeze walls. Freeze wall technology is experimental at best and at least one company (Shell) has had to go back to the drawing board. Maintaining freeze walls to prevent contamination of groundwater for decades will be a significant drain on energy resources and will have a significant (if heretofore

[8] *See* Wendy Harrison, *Addressing Water Quality impacts of Oil Shale Development – Modern Approaches for an Old Problem*, conference speech given at Colorado School of the Mines 27th Oil Shale Symposium (October 15-19, 2007).

[9] Kuipers, J.R., Maest, A.S., MacHardy, K.A., and Lawson, G., *Comparison of Predicted and Actual Water Quality at Hardrock Mines: The reliability of predictions in Environmental Impact Statements* at p. 15 (2006) Kuipers & Associates & Buka Environmental, *available at* http://www.earthworksaction.org/pubs/ComparisonsReportFinal.pdf.

[10] Duda, et. al., *Emerging Issues for Fossil Energy and Water* at p. 38.

unknown) impact on below and likely above-ground ecosystems. Ph and other chemicals fluctuate significantly within a snowmelt cycle. Adequate remediation efforts are nearly impossible without accurate baselines completed comprehensively and recently. Before water and chemicals are used to cool the super-heated oil shale, the deposit will have expanded, become more porous, and fractured. What little we know is that we do not yet know enough. 52672-021 (cont.)

VI. Conclusion

BLM should take advantage of the existing regulatory scheme, the lessons of a century of oil and gas leasing, and its ever-increasing NEPA sophistication in producing an OSTS PEIS that substantively and rigorously addresses the broad policy concerns indicated by such a vast resource. The PEIS should take a holistic view of the entire area to be developed: it is a brittle landscape already straining under the oil and gas boom and its attendant socioeconomic impacts. In order to begin to pursue a holistic view of the area, the PEIS should produce a map that traces the whole extent of current human footprint to include oil and gas wells, mines, municipalities, and historic and sacred sites. Maps are crucial policy-making tools, and can speak with brevity and immediacy to the question of impacts. The PEIS must also include maps that zoom out and in on wildlife corridors: rights-of-way through existing well pads and proposed leasing areas must be derived from a comprehensive eagle's-eye view of a tri-state mineral development that involves boiling large swathes of the earth.

BLM must seek to achieve full disclosure about the extent of the proposed impacts of oil shale development to the local communities, spare landscape, and larger ecological world in which the Green River Formation is situated. Please continue to engage the public and local governments and tribes at every opportunity, and consider establishing a more iterative process to account for gaps in companies' available data. Please hold companies accountable by requiring accurate information about environmental impact, limiting royalty waivers and other subsidies, and establishing firm mitigation requirements from the outset. Please do not overlook or underestimate the vast extent of this PEIS: it will deeply affect Colorado, Wyoming, and Utah's energy, water, tourism and wildlife resources. In order to achieve a sustainable and reasonable approach to American oil shale development, please take the time to gather sufficient baseline data, lessons from other mineral development and foreign efforts to develop oil shale and tar sands, and public input.

Thank you very much for devoting this time and consideration to public participation. The OSTS PEIS will be history-making, not least because BLM has the opportunity to produce a PEIS in line with 21st century values of biodiversity protection, landscape preservation, community engagement, and prudent management of our finite resources.

Sincerely,

/s/
Carrie Covington

Responses for Document 52672

52672-001: For the purposes of the PEIS, the RD&D leases are prior existing rights and the PEIS is reflecting that they will be administered under the terms of the existing leases which include, but are not limited to BLM's determination, following analysis pursuant to NEPA, that commercial-scale operations can be conducted subject to mitigation measures to be specified in stipulations or regulations, without unacceptable environmental consequences.

Comments offered on the administration of the RD&D leases are outside the scope of the PEIS.

52672-002: Thank you for your comment.

In addition to the requirements in the Energy Policy Act of 2005, the BLM's land use planning process provides multiple opportunities for state and local governments and the public to participate in the process. In the next step of the planning process, the governors of the three states will be given a formal 60-day review period to determine the consistency of the Proposed RMP Amendments with state plans prior to the ROD being completed. As the commentor mentioned, subsequent consultation with the governors will be undertaken regarding the interest within each state to pursue commercial leasing.

52672-003: Thank you for your comment, but congressional direction regarding royalty matters is beyond the scope of the PEIS.

52672-004: 30 U.S.C. §241 only authorizes the Secretary to issue an off-site lease to the holder of the federal oil shale lease known as Federal Prototype Tract C-a. The Federal Prototype Tract C-a was relinquished on October 14, 1998.

52672-005: It is correct that until a lease is issued a property right is not granted. The PEIS analyzes an allocation decision and not a leasing decision. This allocation decision does nothing more than to remove an administrative barrier preventing the BLM from accepting applications. The amendment of the land use plans does not authorize any ground-disturbing activities and is not an irreversible or irretrievable commitment of resources under NEPA. Moreover, the amendment does not constitute the granting of any property right. As such, subsequent NEPA analysis will be required prior to the issuance of any lease, which will analyze the environmental consequences of the proposed action on affected resources and develop stipulations and mitigation measures to eliminate or mitigate impacts.

52672-006: As stated in the Energy Policy Act, the development of oil shale, tar sands, and other strategic unconventional fuels for research and commercial development should be conducted in an environmentally sound manner, using practices that minimize impacts. The BLM believes that analyzing an allocation decision as is being done in the PEIS provides the opportunity to build on scientific,

governmental, or industry research in order to analyze, in a general way, the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale exploration and development, further analysis will be carried out and documented in accordance with NEPA, to support any decisions in this regard. That NEPA analysis will evaluate the environmental impacts of oil shale or tar sands exploration and development, and develop specific mitigation measures to mitigate or eliminate identified impacts. The BLM believes that such a phased approach will ensure that commercial oil shale development programs both meet the intent of Congress and take advantage of the best available practices to minimize impacts and to offer opportunities for states, local communities, and the public to participate in the process. While uncertainty is an inherent part of planning in accordance with FLPMA's multiple-use mandate, and delays are possible in bringing any new resource into commercial development, the BLM is committed to managing the public lands in compliance with the Federal Land Management Policy Act's principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

52672-007: Thank you for your comments. The technical concerns mentioned are all discussed in Appendix A. The BLM will critically review future lease applications and plans of development to ensure that lessons learned will be applied where applicable.

52672-008: All decisions related to land use planning decisions for oil shale and tar sands resources in the ongoing RMPs will be made in the ROD for the PEIS. The ROD will amend the existing plans (MFP or RMP or ongoing RMP if completed first) by making land use planning decisions on whether or not lands will be available for application for future leasing and development of oil shale or tar sands on public lands for those areas where the resources are present. Additional site-specific NEPA analysis will be completed on any future lease application before any leases would be issued. If, as part of this pre-leasing NEPA analysis, the BLM determines that leasing and subsequent development of the oil shale or tar sands resources would cause significant impacts, the BLM can require the applicant to: 1) Mitigate the impact so that it is no longer significant, 2) Move the proposed lease location, or if neither of these options resolves the anticipated conflicts, 3) BLM can decide that development of the oil shale or tar sands resources outweighs protection of the on-site resources and approve the application. This preleasing NEPA analysis would include opportunities for public involvement and comment that are part of the PEIS process and every other planning and NEPA process the BLM undertakes.

Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions including CO_2 would result from the alternatives examined for making BLM-

administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

The amount and source(s) of power are one of the items of major interest regarding commercial development of oil shale. The need for this information has been identified in the PEIS, and depending upon what kind of technology is proposed in a future development, it is likely this information would be reviewed as part of the NEPA process.

52672-009: This PEIS is a programmatic-level document analyzing land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and provide an effective analytical foundation for subsequent project-specific NEPA documents. The BLM believes there currently is sufficient information at the programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing.

The PEIS presents, for the purposes of analysis, a cumulative analysis based on the nature and scope of the proposed action and on available nonspeculative information. It provides a summary of the extensive ongoing activities in the Piceance Basin and elsewhere in the study area, and considers these in its overview of potential cumulative impacts (see Sections 6.1.5 and 6.2.5). For example, Table 6.1.5-4 shows that over 30,000 oil and natural gas wells are planned for installation over the 20-year study period in the affected field offices. Potential development of other minerals, including nahcolite, is also summarized in Tables 6.1.5-4 through 6.1.5-6.

The approximate land disturbance for well installations, as well as from other activities, was used to estimate total cumulative land disturbance from other activities in the study area over the next 20 years. The potential cumulative impacts from oil shale and tar sands development are also identified in the PEIS. For example, Section 6.1.5.3.10 acknowledges that income in the recreation sector may be lost due to oil shale and tar sands development, and Sections 6.1.5.3.4 and 6.1.5.3.7 identify the potentially substantial effects of oil shale development on water use and the aquatic organisms in the habitats supplied by that water, including endangered fishes in the Upper Colorado River basin. Also, Sections 6.1.5.3.4 and 6.1.5.3.5 note that depending on the type and level of development, regional water and air impacts may limit oil shale and tar sands development.

The BLM anticipates that oil shale development would proceed in a three-step decision-making process similar to that used for federal onshore oil and gas: land use planning (i.e., amending RMPs); leasing; and approval of a drilling permit or a plan of operations. In the present experimental stage of the oil shale and tar sands industries, however, the BLM believes that the stages of NEPA compliance will be different from those used in oil and gas.

As a result of the maturity of the oil and gas industry, the BLM is usually able to include sufficient site-specific analysis in its NEPA documentation for amendments to RMPs so that an additional NEPA document is not required prior to issuing an oil and gas lease in conformance with the RMP. Nonetheless, the BLM does prepare a NEPA analysis before approving a plan of operation or a drilling permit that would authorize significant disturbance of the leased area. The NEPA analysis for both decision levels includes cumulative effects analysis. Analysis of each oil and gas decision is based on technical information associated with the particular proposed action, as well as information about other reasonably foreseeable future actions in and near the area of the proposal.

In contrast, the present experimental state of the oil shale and tar sands industries does not allow this PEIS for land use allocation to include sufficient site-specific information or cumulative impact analysis to support issuance of a lease. Accordingly, unlike in oil and gas leasing, prior to oil shale leasing, additional NEPA analysis will be required. That NEPA analysis could result in decisions not to lease in specific areas, or to lease particular areas with stipulations, such as a stipulation precluding disturbance of the land surface.

As with oil and gas leases, although the lease would grant the lessee the right to explore and develop the oil shale and tar sands resources, the lease would not authorize surface disturbance. Before disturbing the surface, the operator would have to obtain the BLM's approval of a plan of development through a project-level NEPA analysis. NEPA analysis at the leasing and at the development approval stage of oil shale and tar sands decision making would be based on reasonably available technical information associated with the proposed action, and on information about other reasonably foreseeable future actions in and near the area of the proposal.

The BLM believes that cumulative impacts would be adequately assessed at the leasing stage. As required under NEPA, all subsequent NEPA documents will also analyze the cumulative effects from other reasonably foreseeable future actions. The scope and nature of the specific proposed action will drive the type of NEPA analysis the BLM performs. The cumulative effects analysis would consider the present effects of past actions, to the extent that they are relevant, and present any reasonably foreseeable (not highly speculative) federal and nonfederal actions, taking into account the relationship between the proposed action and these reasonably foreseeable actions.

As described in the proposed action in the PEIS, the BLM is committed to performing NEPA analyses prior to leasing and development. However, until the scope of the potential leasing and/or development is known we cannot commit to the scope of the NEPA analysis (regional, planning area, or local) that will be required. The proposed action will drive what analysis must be done to comply with the requirements of NEPA.

52672-010: The PEIS presents, for the purposes of analysis, a cumulative analysis based on the nature and scope of the proposed action and on available non-speculative information. It provides a summary of the extensive ongoing activities in the Piceance Basin and elsewhere in the study area, and considers these in its overview of potential cumulative impacts (see Sections 6.1.5 and 6.2.5. For example, Table 6.1.5-4 shows that over 30,000 oil and natural gas wells are planned for installation over the 20-year study period in the affected field offices. The approximate land disturbance for these well installations, as well as from other activities, was used to estimate total cumulative land disturbance from other activities in the study area over the next 20 years.

The potential land disturbance and other impacts from planned power lines, both those required for oil shale/tar sands facilities and those planned for other purposes, are discussed in the cumulative impacts analysis (e.g., the transmission and pipeline rights-of-way are included in the total acreage estimate of 14,000 acres for an oil shale facility [Table 6.1.5-9 of the PEIS], and the potential impacts from other energy corridors are also acknowledged in Section 6.1.5.3.1. The PEIS also considers potential effects of underground operations on various aspects of the environment, including geology and water resources.

With respect to power requirements for oil shale/tar sands development, the cumulative impacts are too speculative for analysis at this time. The impacts of power requirements are very speculative because the amount of power required varies with technology to be implemented, and also because the source of the power (and therefore the impacts) is unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. Refinery requirements are also highly speculative at this time; however, the PEIS does include a preliminary assessment of these requirements, concluding that, even if significant oil shale/tar sands development occurs over the next 20 years, new national refining facilities are unlikely to be needed (see Sections 4.1.7 and 5.1.6). Additional and more detailed cumulative impact analysis for transmission corridors, power generation (including greenhouse gas emissions), and refining needs will be conducted at two subsequent stages of development: for NEPA analysis of any leasing decisions, and for NEPA analysis for sites with specific plans of development being evaluated.

52672-011: Please see the response to Comment 52837-016 for a discussion of the requirements of 40 CFR 1502.22. In addition, the BLM has identified numerous issues in the PEIS for which companies interested in future commercial leasing will need to provide information as part of the lease application and future NEPA processes.

52672-012: In developing the PEIS, the BLM used the best available information regarding existing oil shale and tar sands technologies, and environmental resource characteristics in the most geologically prospective portions of oil shale basins and Special Tar Sand Areas. It is expected that the existing RD&D program will

provide additional information on the impacts of different technologies, the effectiveness of different mitigation strategies, as well as the information needed to improve extraction and refinement processes. A full evaluation of future development impacts will be conducted on a project-specific basis using, among other things, the information gained in the RD&D program.

52672-013: The PEIS has explored in a many of the issues raised in the comment regarding the potential impacts of development on aquifers and ground water including potential contamination issues. See Sections 3.4, 4.5, 5.5, and Chapter 6.

52672-014: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52672-015: NEPA processes are designed to be open and inclusive and to actively seek public input to decision processes. The issue of “proprietary information” is one that must be dealt with in the specific instance where it arises and as such, is outside the scope of this PEIS where no proprietary information issues exist.

52672-016: Thank you for your comments. The BLM has worked closely with the cooperating agencies throughout the PEIS process. There also have been numerous opportunities for public comment, including the 30-day extension of the original 90-day comment period for the Draft PEIS. An informative project Web site has also been maintained throughout the PEIS process. Because of the limited scope of the decisions in the PEIS, the suggestion regarding an oversight committee has not been included in the PEIS, however, creating such a group is within the existing authority of the states and the Secretary of the Interior.

52672-017: The PEIS is a programmatic-level document that analyzes land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies plans and programs and they provide an effective analytical foundation for subsequent project-specific NEPA documents.

The specific amount of water needed for oil shale development depends on many factors, including scale of development, technologies used in the development, and the locations and hydrologic conditions of project sites. Therefore, the PEIS describes a range of estimates of water needs for oil shale and/or tar sands development. The BLM has initiated a phased or staged approach to oil shale development. The first phase is an RD&D leasing program that the BLM believes will significantly enhance the collective knowledge regarding commercial technologies and associated impacts. This provides an opportunity for a subsequent level of NEPA analysis of specific parcels that may be offered for lease.

The amount of water needed for oil shale development in Table 4.5.2-1 is inclusive, from drilling, mining, in situ processing, cooling, and upgrading. It should be noted that the technologies used for oil shale development are evolving. The water needs for the development also change with time. This is demonstrated by the oil sands development in Canada. Future NEPA analyses would use the best available data to assess water needs and impacts.

52672-018: Water rights, including surface and groundwater usage, will be important factors in planning for any commercial oil shale and tar sands development operation. The water rights issues for any proposed development would be addressed in subsequent project-specific NEPA documents when these factors can be better defined. Depending on the type and level of development, regional water impacts may limit oil shale and tar sands development (See Section 6.1.5.3.4 of the PEIS).

52672-019: The reviewer is correct that water rights, including groundwater usage, would be important factors in planning for any commercial operations. The water rights issue for any proposed development would be handled at the state level with site-specific information on groundwater quality and availability.

52672-020: Please see the response to Comment 00154-015 regarding the demand and consumptive uses of water.

The PEIS discloses the fact that the BLM will consider new information, such as that emerging from the RD&D leases, during subsequent NEPA analysis performed as the basis for making any leasing decisions. As part of the site-specific NEPA analysis, specific mitigation measures will be developed to mitigate impacts to water resources and use. The proposed action in the PEIS is a land use allocation and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the threatened or endangered species.

52672-021: The comments are concerned with key issues of water quality, including gathering sufficient baseline data and assessing in situ technology, leaching, freeze wall tests, and changes in porosity and permeability. The comments note that mine drainage is site-dependent. Baseline conditions, as well as potential impacts such as those noted, are also site-specific. The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Project- or site-specific NEPA documents will be prepared to analyze the baseline conditions and environmental consequences of leasing and future exploration and development, including considerations of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect water resources.

Thank you for your comment, John Hoffmann.

The comment tracking number that has been assigned to your comment is OSTSD52673.

Comment Date: March 16, 2008 21:11:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD52673

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Comment Submitted:

The level of environmental degradation that is necessary to produce oil from oil shale formation, which has the Btu content of a potato is reprehensible and should not even be considered until all conservation tactics have been employed. Do not allow this atrocity to occur on our federal commons. Thank You for your attention, John Hoffmann

52673-001

Response for Document 52673

52673-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, steve bell.

The comment tracking number that has been assigned to your comment is OSTSD52674.

Comment Date: March 16, 2008 21:13:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD52674

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Comment Submitted:

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information. | 52674-001

Response for Document 52674

52674-001: In consultation with our cooperating agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

Thank you for your comment, clare white.

The comment tracking number that has been assigned to your comment is OSTSD52675.

Comment Date: March 16, 2008 21:14:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD52675

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Comment Submitted:

We should not sacrifice our public lands for commercial oil shale and tar sands leasing until industry can prove that development of these unconventional energies can be done without causing unacceptable harm to our air, water, landscapes, wildlife, and health. Therefore, I strongly urge the agency to delay completing its PEIS process until the agency can provide less speculative information.	52675-001

Response for Document 52675

52675-001: In consultation with our cooperating agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

Thank you for your comment, Chelsea Brundige.

The comment tracking number that has been assigned to your comment is OSTSD52676.

Comment Date: March 16, 2008 22:58:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52676

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Comment Submitted:

Unlike the way the BLM has fast tracked oil and gas leasing in Western Colorado, the BLM needs to TAKE GREAT CARE in evaluating proposals for oil shale development.

The impacts from oil and gas leasing will be with us for a long time, all so that we have a few additional days of fossil fuel in America. It is a SHAME how a public agency has sacrificed the multiple values of precious public lands for the greed of a few . PLEASE not take this approach to oil shale. 52676-001

Oil Shale development will take priority over all other uses on public land.Oil shale development would affect nearly 320,000 acres in western Colorado, with an added 50,000 acres of split estate acreage. Much of this land already feeling the strain of the natural gas boom. The unproven new technologies for extraction (in-situ) will include 100% surface disturbance for these 5,000 acres. 52676-002

The energy values in oil shale are pathetic and require HUGE amounts of energy to extract. Does that make sense ? For every oil shale in-situ facility, we would need two new coal fired power plants the size of the one in Craig, Colorado. We do not need 10 or more new coal fired power plants in western Colorado. The number of new coal-fired power plants that would be necessary to power the oil shale industry is staggering. It is irresponsible to consider so much coal-produced energy just as Colorado is trying to become a leader on curbing global climate change. 52676-003

I have studied and worked professionally on water resource issues. There is simply not enough water in Colorado to support this industry.You know this... you manage public resources! 52676-004

The plan would allow oil shale development to impact some of our most sensitive areas in Colorado including wilderness, wildlife refuges, and roadless areas.

As a citizen owner of public lands, I BEG you, the responsible agency to be responsible, not a pansy for energy interests. This is my Colorado you are threatening. 52676-001 (cont.)

Responses for Document 52676

52676-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52676-002: The BLM is managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

52676-003: The PEIS provides a general discussion of the impacts associated with water and power requirements associated with potential future oil shale and tar sands development. At present, water and power requirements are very speculative due to the variation in technology currently available, and because the source of the water and power (and, therefore, the impacts) is unknown. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power and water requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52676-004: The PEIS is a programmatic-level document that analyzes allocation decisions and their consequences but does not commit any resources or grant any lease rights. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Water requirements for oil shale development depend on many factors, including project sites, technologies to be used, and various activities involved in the development. The depletion issue would be handled at the project levels when these factors are better defined Its impacts on water resources would be addressed in subsequent project-specific NEPA documents.

Thank you for your comment, Donald Schramm.

The comment tracking number that has been assigned to your comment is OSTSD52678.

Comment Date: March 17, 2008 09:44:03AM
Oil Shale and Tar Sands
Comment ID: OSTSD52678

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Comment Submitted:

The price of oil has influenced the interest in Wyoming Oil Shale on Kinney Rim, east of Rock Springs. These formations are within the Checkerboard Land Pattern, with alternate sections of private and federal mineral estate and surface. This EIS must address specific situations where private oil shale development can occur with understanding that adjacent and intermingled federal oil shale will be available for lease. This situation is totally different than where majority of the formation is federal ownership, and incentive to develop is at the discretion of the federal managers.	52678-001

Response for Document 52678

52678-001: BLM-administered public lands in portions of the checkerboard are identified in both Alternative B and C as available for application for leasing. Joint development on a combination of private and federal minerals is possible but would likely be viewed as more complicated because of additional requirements for operation on public lands compared to private lands. Under both Alternative B and C, land use plans would be amended to specify that the BLM will consider and give priority to the use of land exchanges to facilitate commercial oil shale development pursuant to Section 369(n) of the Energy Policy Act of 2005 (see Section 1.1.1 of the PEIS). Use of land exchanges, although potentially complex in themselves, could simplify the administrative land pattern to make blocks of land more available for oil shale development. Based on current understanding of oil shale technology, however, most interest is currently directed at what are considered to be higher value deposits in Colorado and Utah. Coupled with what is perceived as lower value deposits, the checkerboard in Wyoming likely complicates the consideration for development in the near future.

Thank you for your comment, Naomi Kisen.

The comment tracking number that has been assigned to your comment is OSTSD52679.

Comment Date: March 17, 2008 12:25:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD52679

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Comment Submitted:

Thank you for the opportunity to comment on the Draft PEIS concerning commercial oil shale and tar sands development in the western US. Although I understand this exploration of resource potential is mandated by the Energy Policy Act, I am concerned that large areas of public lands which hold increasingly significant environmental and societal value will be put at risk by being made available for leasing. Areas such as the Roan Plateau and the San Rafael swell have emerged in the last few decades as vital areas of public recreation, due in part to their wild and relatively undisturbed nature. The marginalization of these areas is tantamount to a breach of public trust. Although we cannot know the future impact of the yet to be developed extraction techniques, the impact of current excavation of tar sands and old shale has public health (air quality) and resource implications (water usage and water quality) that resonate far outside public lands. The BLM's preferred alternative does not adequately take these factors into consideration. Until more is known about just how this program would be carried out, the EIS should be postponed. 52679-001 52679-002 52679-003

Allowing these areas to be made available for oil shale and tar sand extraction, would be creating a pandora's box of unknowns with the likely potential to destroy much of the inter mtn. west's remaining natural beauty. Please take longer to consider these implications before proceeding with the EIS. 52679-001 (cont.)

Responses for Document 52679

52679-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52679-002: The BLM is managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

52679-003: The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease of public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale or tar sands technology and any anticipated environmental consequences including offsite impacts regarding air and water resources. New information on technologies may be a consequence of research on the RD&D leases or result of research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA process.

Thank you for your comment, Philip Ratcliff.

The comment tracking number that has been assigned to your comment is OSTSD52680.

Comment Date: March 17, 2008 14:19:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD52680

First Name: Philip
Middle Initial:
Last Name: Ratcliff
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City: Cloverdale
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Email: skazz999W@netscape.net
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Attachment:

Comment Submitted:

The Bush administration has the worst, by far, environmental record of any. The ravaging of public lands for oil and gas extraction epitomizes this. This nation desperately needs to invest in non-polluting, renewable, energy sources.	52680-001

Response for Document 52680

52680-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Sean DeHaven.

The comment tracking number that has been assigned to your comment is OSTSD52681.

Comment Date: March 17, 2008 14:21:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD52681

First Name: Sean
Middle Initial:
Last Name: DeHaven
Organization:
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Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

This is an exellent opportuntity for our country to become more independent with regard to oil/energy, thus decreasing our need to interact with a part of the world that thrives on conflict.

Its our governments duty to help america become more self sufficient in our daily lifes. Although environmental impact should be considered, it should not hinder our national security.

52681-001

Response for Document 52681

52681-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52682.

Comment Date: March 17, 2008 14:28:44PM
Oil Shale and Tar Sands
Comment ID: OSTSD52682

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

We need to open up our country's natural resources to lessen depence on foriegn oil. because of this depence and our unwillingness to harvest our own resources it has caused the country to be involved with the Middle East, which has historically caused war, bloodshed, and terror. Open up the site for the good of national security and continue to find alternate resources for power. Do our best to lessen the environmental impact but it must be done!

52682-001

Response for Document 52682

52682-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Jan Garton.

The comment tracking number that has been assigned to your comment is OSTSD52683.

Comment Date: March 17, 2008 14:43:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD52683

First Name: Jan
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Last Name: Garton
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Attachment:

Comment Submitted:

While the BLM finds no environmental impact on the mere amendment of existing land use plans to allow future consideration of granting leases for oil shale or tar sands development, the agency acknowledges that the preferred Alternative B is intended to facilitate the establishment of a long-term program of commercial leasing. 52683-001

There can be no denial that any attempt to develop either oil shale or tar sands resources will severely damage both on-site and off-site environments. The tar sands projects in Alberta, Canada use enormous amounts of water – up to five barrels of water to produce one barrel of crude oil – from an area of low rainfall. Furthermore, the water used to process the tar sands is so contaminated it cannot be readily cleaned, so in Canada it is confined in gigantic tailings ponds which can overflow, leach into groundwater, and poison thousands of migratory birds who mistake the ponds for clean water. 52683-002

Converting tar sands to crude oil is extremely energy intensive. Canadian operations require nearly two-and-a-half tons of raw sands to produce a single barrel of oil! For vertical well technology that claims to create less surface damage than open mining, as much as 1,000 cubic feet of natural gas is required to produce one barrel of crude. And at a time when drastic reductions of CO2 are necessary, up to 275 pounds of CO2 will be released in producing a barrel of oil from tar sands compared to 64 pounds of CO2 in conventional oil production. This is a trade-off that cannot be supported morally, economically or ecologically. 52683-003

While Alternative B claims to put wilderness and other ecologically sensitive lands off limits, air and water quality will be affected despite assurances of protective measures. "Oops" is not an acceptable remedy.

So while simply amending land use plans may have no environmental impact, the implications of such amendments make that finding disingenuous at best. The BLM has an obligation to the public interest and the public trust in meeting the agency's mission. That's why I strongly oppose the preferred Alternative B, and urge the BLM to adopt Alternative A, recommending no action. 52683-001 (cont.)

Responses for Document 52683

52683-001: The BLM acknowledges the commentor's preference for Alternative A.

52683-002: Thank you for your comment. The landscape of water use in oil sands projects in Alberta, Canada, continues to evolve with time. Currently, new insitu technologies have demonstrated that water uses in oil sands development in Canada could be substantially reduced through extensive water recycling. Potential impacts on water resources by contaminated water are described in Section 5.5 of this PEIS. The impacts could be mitigated or minimized through careful planning and management. Project-specific issues such as this would be evaluated during future NEPA analyses when additional information is available about the particulars of the site, project, and technologies to be used.

52683-003: Thank you for your comment.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52684.

Comment Date: March 17, 2008 14:58:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52684

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Address 2:
Address 3:
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State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM Oil Shale Plan

March 17, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

While in an ideal world America could satisfy its energy demands by neither importing foreign energy nor developing its own energy resources, the fact remains that American energy must be developed in order to stem American dependence on foreign energy sources and satisfy its energy demands. BLM has taken a major step towards that end in the draft PEIS for oil shale and tar sands.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52684-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

52684-001 (cont.)

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security. As the greatest nation in the world, we should not be totally dependent on other countries for something so crucial as oil. We need to be independent from other counties.

Sincerely,

Response for Document 52684

52684-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Megan Williams.

The comment tracking number that has been assigned to your comment is OSTSD52685.

Comment Date: March 17, 2008 15:21:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD52685

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Attachment: PEIS air quality comments 03-17-08.pdf

Comment Submitted:

See Attachment.

March 17, 2008

Bureau of Land Management
Oil Shale and Tar Sands PEIS
Argonne National Laboratory
EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

RE: Comments on the Air Quality Analysis for the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement

Dear Oil Shale and Tar Sands PEIS Project Manager:

I am writing to submit comments on the December 21, 2007 Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS). My comments pertain to the air quality portions of the PEIS. These comments were developed under contract to The Wilderness Society.

The PEIS does not analyze the air quality impacts that could occur as a result of the actions authorized under the Resource Management Plan (RMP) amendments, therefore, failing to comply with the National Environmental Policy Act (NEPA) and the Federal Land Policy Management Act (FLPMA). The BLM is proposing to put off any air quality analysis until specific oil shale and tar sands development projects are proposed. At such time, the BLM indicates that it will conduct air quality analyses as part of the project-specific NEPA evaluations. This future commitment is not an acceptable replacement for a comprehensive quantitative assessment – during the PEIS process - of the environmental and public health impacts resulting from considerable increases in air pollution in areas already heavily impacted by the adverse effects of increasing development. Without such an analysis, the BLM cannot say what the impacts of the activities authorized in the PEIS will be on air quality and human health or whether the BLM will prevent significant deterioration of air quality, as required by the Clean Air Act (CAA). 52685-001

The BLM has put forth three alternatives as part of this PEIS. The preferred alternative (B) does not satisfy the BLM's responsibility to ensure no significant environmental impacts and to provide for compliance with the Clean Air Act. Even alternative A (the no action alternative), which is the most protective of the environment, is not adequate because it does not fully disclose the adverse air quality impacts from the six oil shale Research, Development and Demonstration (RD&D) projects in Colorado and Utah. The BLM must put forth an alternative that ensures no significant impacts and full compliance with the Clean Air Act. This would include one that fully assesses the 52685-002

impacts on visibility in the affected Class I areas, prevents significant deterioration of air quality in the proposed development areas and affected Class I areas and ensures no violations of the National Ambient Air Quality Standards (NAAQS). Attached are more detailed comments on the important elements of air quality protection, which this PEIS is lacking.

52685-002 (cont.)

I have over 10 years of experience working on air quality issues. My curricula vitae is enclosed for further information on my expertise. Thank you for consideration of these comments. Please include me on the mailing list for any future actions on the Draft Oil Shale and Tar Sands RMP Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and PEIS.

Sincerely,

Megan M Williams

Megan M. Williams
megan@sevenfivesix.org
756 Cottage Lane
Boulder, CO 80304

Attachments

ATTACHEMENT

Detailed Air Quality Comments on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement

1. The BLM Must Conduct a Comprehensive Quantitative Analysis of Air Quality Impacts in Order to Satisfy NEPA Requirements and to Accurately Evaluate and Address the Potential Impacts of Air Pollution From Commercial-Scale Oil Shale and Tar Sands Development on Human Health and the Environment

52685-003

As mentioned in my cover letter, the BLM did not conduct any analysis of air quality impacts for the draft Oil Shale and Tar Sands RMP Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and PEIS. The BLM does not provide specific analyses of near-field, far-field or cumulative air quality impacts as required by NEPA for resource management plan amendments and environmental impact statements. A future commitment, such as the one on page 4-46 of the draft PEIS, to predict site-specific air quality impacts when "actual oil shale projects are proposed and designed" as part of a project-specific NEPA evaluation and "through consultations with the BLM prior to actual development" does not satisfy the BLM's obligation to fully assess the potential effects on human health and the environment (e.g., visibility, acidification of lakes, etc.) from air pollution that will result from activities authorized in the RMP amendments and PEIS.

Under NEPA, the BLM has obligations to assess and report the cumulative impacts of expected emissions in the various development areas on the National Ambient Air Quality Standards (NAAQS), prevention of significant deterioration (PSD) increments, and air quality related values (AQRVs) and to identify alternatives or other mitigation measures sufficient to prevent expected violations of NAAQS, PSD increments and adverse impacts on AQRVs (e.g., visibility impairment). NEPA mandates that the preparation of an environmental impact statement be done with "scientific integrity" and requires that information be collected as needed unless the costs would be exorbitant or the means to do so are unknown. See 40 CFR §1502.24. The Federal Land Policy and Management Act (FLPMA) mandates that, "[i]n the development and revision of land use plans, the Secretary shall . . . (8) provide for compliance with applicable pollution control laws, including State and Federal air, water, noise, or other pollution standards or implementation plans…" at 43 U.S.C. § 1712(c)(8). See also 43 CFR § 2920.7(b)(3) (requiring the same for land use authorizations). Without completing a comprehensive assessment of the cumulative air quality impacts of emissions from all sources, the BLM cannot satisfy its obligation under NEPA to determine whether emissions from the commercial-scale development program will have a "significant impact on the human environment", where "significant" means that the impact "threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment." See 40 CFR § 1508.27(b)(10).

Furthermore, the language in NEPA requires that the federal government "(C) include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on – (i) the environmental impact of the proposed action, … " (42 U.S.C. § 4332). To provide further details for this requirement, the BLM's planning regulations mandate that the analysis of the effects of alternatives "will estimate and display the physical, biological, economic, and social effects of implementing each alternative considered in detail." Although the regulation later concedes that, "[t]he estimate may be stated in terms of probable ranges where effects cannot be precisely determined,"[1] the BLM has not even attempted to meet the requirements of the regulation on this level. Based on several key factors: (1) the known requirements for economically and technically feasible development of oil shale and tar sands resources; (2) the specifics of the viable development locations in Colorado, Wyoming and Utah; (3) the proposed scale of development as defined in the various alternatives; and (4) the detailed process information provided to the BLM for the oil shale research, development and demonstration (RD&D) projects, the BLM most certainly has the ability to assess the air quality impacts of the various alternatives in the PEIS and therefore *must* do so.

Providing even more detail, the BLM's own Land Use Planning Handbook explains that the analysis of alternatives in the draft EIS/RMP must

> "… provide adequate information to evaluate the direct, indirect, and cumulative impacts of each alternative in order to determine the best mix of potential planning decisions to achieve the identified goals and objectives (the analysis should also specifically address the attainment, or non-attainment, of Land Health Standards expressed as goals). The assumptions and timeframes used for analysis purposes (such as reasonably foreseeable development scenarios) should be documented."[2]

The BLM has not evaluated the air quality impacts in the development areas as described in the Land Use Planning Handbook because it did not evaluate the direct, indirect and cumulative impacts from the proposed alternatives. Without a full-scale quantitative evaluation the public cannot know the predicted air pollutant concentrations throughout the affected areas and, therefore, cannot be assured that there will be no significant impacts to human health and the environment from any level of commercial-scale oil shale and tar sands development. Delaying this type of critical assessment until after the BLM has made the overarching programmatic decision to allow for commercial leases to develop oil shale and tar sands resources and then performing the assessments on a project-specific basis will make it difficult, to say the least, to establish comprehensive and effective mitigation measures that will collectively ensure air quality protection throughout the affected areas. According to the BLM, the proposed PEIS decision is "policy-setting, because it will establish oil shale or tar sands development as an

[1] 43 CFR 1610.4-6
[2] BLM, "Land Use Planning Handbook," H-1601-1, March 11, 2005, 22.

appropriate use of the designated BLM-administered lands".[3] However, the BLM cannot be sure that this type of use is appropriate if it does not fully evaluate the potentially significant impacts to air quality. The PEIS should include a comprehensive evaluation of predicted concentrations in order to determine compliance with all CAA requirements. This is the only way in which the BLM can provide for compliance with air quality standards as specified by FLPMA in 43 U.S.C. § 1712(c)(8).

The BLM completed modeling analyses for the six RD&D EAs and has completed full-scale modeling analyses for other draft RMPs, including, for example, the Farmington, New Mexico; Vernal, Utah; Pinedale Anticline, Wyoming; and Roan Plateau, Colorado resource management plans. While there were serious flaws in all of these analyses, the fact that air quality dispersion modeling analyses were performed prior to project-specific development sets a precedent for the inclusion of comprehensive quantitative analyses in broad planning EISs such as this programmatic EIS. In fact, the EPA is insisting that the BLM go back and perform an air quality dispersion modeling analysis in the Vermillion Basin in Colorado for the Little Snake draft RMP, very near the oil shale development area in Colorado.[4]

The BLM must conduct a comprehensive quantitative analysis of air quality impacts because – in addition to being necessary for the BLM to know if it is complying with a myriad of federal laws and regulations – such an analysis is necessary for the BLM to understand and evaluate potential significant impacts of the various development scenarios under the PEIS on human health and the environment. Without preparing a comprehensive quantitative analysis of air quality impacts the BLM simply cannot adequately predict the emission levels of these various pollutants and the affect they will have on human health and visibility. Certainly, without a full understanding of the background and predicted increased concentrations in the area, the public cannot know whether air quality will, at the very least, remain below the levels established by the EPA as protective of human health (i.e., below the NAAQS) *before* the BLM proceeds with a commercial leasing program.

2. The BLM Must Acknowledge and Address the Existing Air Quality Concerns in the Study Area in the PEIS

The BLM must acknowledge the existing air quality concerns in the proposed oil shale and tar sands development areas and recognize that high background levels of air pollutants can mean that *any* increases in those pollutants could result in significant detrimental effects on human health and on visibility. Currently, there are serious concerns with NAAQS compliance, visibility impairment, increment consumption and sulfur and nitrogen deposition in the study area.

52685-004

[3] See BLM's answer to "What is a Programmatic EIS?" at http://ostseis.anl.gov/faq/index.cfm.
[4] See letter from EPA to BLM, "Little Snake Resource Management Plan Draft EIS, Craig, Colorado, CEQ # 2007004," August 16, 2007.

The PEIS includes the following statement about current air quality:

> "The existing air quality of the study area is in attainment with all ambient air quality standards, as demonstrated by the relatively low concentration levels presented in Table 3.5.3-2." PEIS at 3-101.

I would not characterize the ambient concentrations of fine particles ($PM_{2.5}$) or ozone in the study area as at "relatively low concentration levels", as suggested. In these areas of Colorado, Wyoming and Utah background concentrations of both fine particles and ozone are likely already at or near the NAAQS and leave little room for additional growth in emissions. For the BLM to present alternatives for the PEIS that include development scenarios that will result in significant growth in the emissions that contribute to these existing air quality concerns without an up-front comprehensive quantitative assessment is extremely shortsighted when one considers the impacts of these air pollutants to human health and the environment. These issues must be dealt with in this PEIS by ensuring overall air quality compliance throughout the affected areas. Specifically, the BLM must acknowledge and address the areas of concern described in more detail below.

52685-004 (cont.)

Particulate Matter Concentrations in the Study Area are High

Starting with Colorado, the $PM_{2.5}$ background concentration of 18μg/m^3 presented in Table 3.5.3-2 from Grand Junction, Colorado is already over 50% of the 24-hour $PM_{2.5}$ NAAQS of 35 μg/m^3. PEIS at 3-104. A review of the most recent data from the State and Local Air Monitoring Station (SLAMS) in Grand Junction shows $PM_{2.5}$ 24-hour average concentrations as high as 31 μg/m^3 in 2007 (and a 98th percentile 24-hour average concentration of 24 μg/m^3 for that same year).[5] These recently-observed concentrations indicate that background levels of $PM_{2.5}$ in the area are, at times, almost 90% of the 24-hour NAAQS.

These same $PM_{2.5}$ data from Grand Junction, Colorado are used as background concentrations for the Utah study area as well. See Table 3.5.3-2 of the PEIS at 3-104. However, there are more recent data available from the State-operated monitor in Vernal, Utah, which would certainly be more representative of background concentrations in the Utah development areas. The Vernal monitor, which operated from December 2006 through mid-December 2007 recorded several very high values of $PM_{2.5}$, including six exceedances of the 24-hour $PM_{2.5}$ NAAQS. The maximum 24-hour average concentration at the Vernal monitor in 2007 was 63.3 μg/m^3 based on a one-in-three day sampling frequency. This observed 24-hour average concentration is 180% of the NAAQS. Keeping in mind that the concentration to be used as reflective of background should be determined by also evaluating "the meteorological conditions accompanying the concentrations of concern" (see 40 CFR Part 51, Appendix W, § 9.2.2), use of the

[5] EPA AirData, http://www.epa.gov/air/data/index.html, last accessed 01/29/08.

maximum 24-hour average concentration from the Vernal monitor (63.3 $\mu g/m^3$) as the representative $PM_{2.5}$ background concentration is the best way to ensure public health protection. These observed concentrations in Vernal, where even the high sixth high concentration exceeds the NAAQS, indicate that the BLM must find a way to *reduce* $PM_{2.5}$ emissions in the area in order to avoid violating the short-term $PM_{2.5}$ NAAQS. Continuing to approve more development - in this case commercial-scale development of oil shale and tar sands with the potential to add significant amounts of fine particle emissions to the basin - will further threaten the area's attainment of the NAAQS. The oil shale RD&D site in Utah is an underground mining operation with surface retort and includes potentially significant fugitive dust emissions sources. The PEIS preferred alternative allows the possibility of surface mining with surface retort in Utah and Wyoming, which would essentially allow for the highest potential $PM_{2.5}$ impacts to these areas (as compared to in-situ processes and underground mining with surface retort). Surface mine operations at a tar sands deposit can produce significant fugitive dust emissions from the mine pit, storage and from crushing operations. Fine particle emissions will also be emitted as a product of combustion from the mining equipment.

In Wyoming, as in Utah, the background levels of $PM_{2.5}$ are already at levels that exceed the 24-hour NAAQS. See Table 3.5.3-2 of the PEIS at 3-104. The $PM_{2.5}$ data presented from Lander, Wyoming show that $PM_{2.5}$ concentrations are 120% of the short-term $PM_{2.5}$ NAAQS of 35 $\mu g/m^3$. Yet there is no discussion in the PEIS about these recorded exceedances and how the proposed massive increase in PM emissions from a commercial leasing program for oil shale will affect future compliance with the NAAQS.

The EPA recently lowered the short-term $PM_{2.5}$ standard from 65 $\mu g/m^3$ to 35 $\mu g/m^3$ because scientific information showed that the pollutant is a health concern at levels lower than what the previous standard allowed.[6] Fine particles with an aerodynamic diameter of 2.5 microns or less ($PM_{2.5}$) can become lodged deep in the lungs or can enter the blood stream, worsening the health of asthmatics and even causing premature death in people with heart and lung disease. Fine particles are also a major contributor to visibility impairment. See the EPA's staff paper on particulate matter (EPA-452/R-05-005a, December 2005) as well as the EPA's Air Quality Criteria Document for Particulate Matter (EPA/600/P-99/002aF and EPA/600/P-99/002bF, October 2004) for more detailed information on the health effects of fine particles. Even $PM_{2.5}$ concentrations lower than the current NAAQS are a concern for human health. In fact, the Clean Air Scientific Advisory Committee (CASAC), in their recommendations to the EPA on the revised $PM_{2.5}$ standard, unanimously recommended that the 24-hr $PM_{2.5}$ standard be lowered from 65 $\mu g/m^3$ to 30-35 $\mu g/m^3$ and that the annual standard be lowered from 15 $\mu g/m^3$ to 13-14 $\mu g/m^3$.[7] EPA set the standard on the high end of the CASAC recommended range for the short-term standard and chose not to lower the annual standard at all. In response, CASAC made it clear in their September 29, 2006

[6] 71 FR 61144, effective December 18, 2006

[7] EPA-CASAC-LTR-06-003, Clean Air Scientific Advisory Committee Recommendations Concerning the Final National Ambient Air Quality Standards for Particulate Matter, September 29, 2006, http://www.epa.gov/sab/panels/casacpmpanel.html

recommendation letter to the EPA that their recommendations were based on "clear and convincing scientific evidence" and that the EPA's decision not to lower the annual standard does not provide for "an adequate margin of safety … requisite to protect the public health" as required by the CAA and, furthermore, that their recommendations were "consistent with the mainstream scientific advice that EPA received from virtually every major medical association and public health organization that provided their input to the Agency". The BLM has an obligation, under NEPA, to evaluate all potential health effects from exposure to increased pollution under the various alternatives of this PEIS. The fact that the EPA has set the $PM_{2.5}$ standards at levels that some would claim are not adequate to protect human health should not limit the BLM to using only EPA's standards. The BLM must assure adequate protection of human health from exposure to fine particles in the area and could certainly use the CASAC recommendations as a guide for achieving this protection.

Since all of the proposed development areas have already experienced ambient concentrations that exceed, or are close to exceeding, the level of the short-term $PM_{2.5}$ NAAQS it is imperative that the BLM not allow for growth in the study area that will result in significant fine particle emissions without a demonstration that these emissions will not cause or contribute to violations of the NAAQS. Major sources of fine particles from oil shale development will include products of combustion (e.g., from coal-fired power plants used to generate electricity for in-situ oil shale development as well as on-site drilling engines, boilers, diesel generators, heaters and compressors used during oil shale extraction and retort) and fugitive dust from travel on unpaved roads and from construction activities as well as fugitive dust emissions from (underground and surface) mining activities associated with non in-situ oil shale development. Major sources of fine particles from tar sands development include products of combustion (e.g., from mining equipment, in-situ steam injection and combustion processes, etc.), surface retort, spent tar sands from solvent extraction plants, and fugitive dust emissions from mining operations (e.g., the mine pit, storage piles, crushing operations, etc.). All of the development areas could see significant growth in fine particle emissions from these sources if the BLM finalizes its proposal to allow for commercial leases to develop oil shale and tar sands resources in these areas.

The amount of growth allowed under any of the alternatives (even the No Action alternative which includes the 6 oil shale RD&D test sites) is cause for great concern with respect to the health effects and visibility impacts of an increase in PM levels in the study area unless the BLM can assure the public that there will be adequate mitigation of particulate matter emissions from oil shale and tar sands development and other PM sources in the area. The BLM's preferred alternative (B) proposes to allow almost 2 million acres of land for use in developing oil shale resources and over 400,000 acres of land for tar sands development. PEIS at 2-17 and 2-40. Current $PM_{2.5}$ levels in the study area are already close to or exceeding the NAAQS. The amount of growth in oil shale and tar sands development being proposed in the PEIS warrants a close look at the potential health impacts from this scale of development. Even the No Action alternative, which

includes the 960 acres leased for six RD&D sites, is predicted to result in significant PM and visibility impacts. In fact, the final EAs for these RD&D sites showed project-specific *violations of the 24-hour $PM_{2.5}$ NAAQS and cumulative impacts on visibility in the Flat Tops Wilderness Area.*[8] The only way to know for sure if there is the potential for further NAAQS exceedances and potential NAAQS violations in the study area is for the BLM to conduct a comprehensive modeling analysis of the proposed increases in emissions and assess their impacts on ambient air concentrations in the proposed development areas. The BLM must establish enforceable mitigation measures, based on the results of the modeling analysis that will assure compliance with the PM NAAQS. Only then can the public be assured that the mitigation measures will be adequate to protect human health.

Ozone Concentrations in the Study Area are High

Along with data at Mesa Verde National Park showing high ozone concentrations, other areas in the region are also experiencing elevated ozone concentrations, sometimes in excess of the ozone NAAQS, including Rocky Mountain National Park, Canyonlands National Park, and the Green River Basin in Wyoming.[9] Thus, ozone concentrations must be a concern to be evaluated for the PEIS. It is extremely important that the impact of the proposed commercial-scale development on ozone concentrations along with all other existing and expected growth of ozone precursor emissions in the region be evaluated. Considering the recent studies on the ozone potential of oil and gas development emissions, the elevated ozone concentrations in the region, and the health and environmental impacts that can occur, it is imperative that the PEIS disclose to the public the impacts that could occur due to ozone formation from the oil shale and tar sands development.[10]

The importance of protecting the air quality for those people who live in the study area, most importantly for sensitive populations, including children, the elderly and those with respiratory conditions is huge. Exposure to ozone is a serious concern as it can cause or exacerbate respiratory health problems, including shortness of breath, asthma, chest pain

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[8] Shell Oil Shale Research, Development and Demonstration Projects Environmental Assessment (CO-110-2006-117-EA), August 2006 at 18 and 150.

[9] See "4 Corners Air Quality Task Force Existing Monitoring Summary", May 2006. Also see "Restore Clean Air to Rocky Mountain National Park", Petition Submitted to the U.S. Department of the Interior by Environmental Defense and Colorado Trout Unlimited, September 1, 2004. Also see data compiled by the National Park Service at http://www.airquality.utah.gov/Public-Interest/Current-Issues/Oil_and_Gas/Uintah_Basin/comparison.pdf. Also see EPA air monitoring data for Sublette County, Wyoming at http://www.epa.gov/air/data/reports.html.

[10] See *Smog Underestimated in Southwestern U.S.* at http://www.pnas.org/misc/archive100603.html#HL1. See also "Extensive regional atmospheric hydrocarbon pollution in the southwestern United States" by Aaron S. Katzenstein, Lambert A. Doezema, Isobel J. Simpson, Donald R. Blake, and F. Sherwood Rowland, available at the URL listed above.

and coughing, decreased lung function and even long-term lung damage.[11] The EPA is currently in the process of revising the 8-hour ozone standard and, as with the revised PM standards, the CASAC has recommended substantially lowering the 8-hour standard. Specifically, the CASAC has put forth a unanimous recommendation to lower the 8-hour standard from 80 parts per billion (ppb) to somewhere between 60-70 ppb.[12] The committee concluded that there is no scientific justification for retaining the current 8-hour standard and that the EPA needs to substantially reduce the primary 8-hour standard to protect human health, especially in sensitive populations. So, even ozone concentrations at levels as low as 60 ppb can be considered harmful to human health and the BLM must consider this when evaluating the air impacts in the PEIS.

Ozone pollution can cause adverse effects to the physical environment as well.[13] Ozone pollution is absorbed by plants and can cause leaf discoloration, reduced photosynthesis, and reduced growth as well as make plants more susceptible to disease, pests and environmental stresses. Ozone effects on trees are thought to accumulate over time such that whole forests or ecosystems can be affected. Many plant species have been identified by the Federal Land Managers as being sensitive to ozone pollution, include subalpine fir, trembling aspen, and huckleberry in the Flat Tops Wilderness Area. See Appendix 3A of FLAG.

The background concentrations for ozone presented in the PEIS are all near the level of the 8-hour NAAQS. PEIS Table 3.5.3-2 at 3-104 and 3-105. In fact, the BLM indicates that "[a]lthough no O3 violations have been documented, some measurements are near the 8-hour O3 standard of 157 µg/m3." PEIS at 3-101. Data from the Mesa Verde National Monument ozone monitor indicate that regional ozone levels are virtually at the level of the current 8-hour NAAQS (i.e., 8-hour concentrations of 78 ppb compared with the 80 ppb standard) and well above the range of concentrations recommended by CASAC for the revised standard.[14] The monitor located in Vernal, Utah for most of 2007 also confirms that ozone concentrations in the area already threaten human health.[15] And recent data from Sublette County, Wyoming also show levels of ozone near the NAAQS.[16] This leaves virtually no room for growth in emissions that contribute to ozone formation - namely, nitrogen oxides (NO_x) and volatile organic compounds (VOCs). And yet, no analysis of ozone impacts was conducted for this PEIS. The BLM is proposing to allow NO_x emissions and VOC emissions in the study area to significantly increase from the addition of almost 2 million acres of land for use in developing oil shale resources

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[11] See EPA's National Ambient Air Quality Standards for Particulates and Ozone, 62 FR 38,856 (July 18, 1997).

[12] EPA-CASAC-LTR-07-001, Clean Air Scientific Advisory Committee's (CASAC) Peer Review of the Agengy's 2nd Draft Ozone Staff Paper, October 24, 2006

[13] As discussed in U.S. National Park Service, Air Quality in Our National Parks, 2002, Chapter 2.

[14] See Table 3.2 of the Moab RMP, September 2007.

[15] The 4th highest maximum 8-hour average concentration in 2007 was 68 ppb, see www.airquality.utah.gov/Air-Quality-Board/Packets//2008/January/january.htm

[16] The 4th highest maximum 8-hour average concentration in 2006 at the Sublette County monitor (560350100) was 74 ppb. Source: EPA AirData.

and over 400,000 acres of land for tar sands development. PEIS at 2-17 and 2-40. Oil shale and tar sands development include numerous sources of NO_x and VOC emissions (e.g., from coal-fired power plants that supply electricity for in-situ processes, from drilling engines, compressor engines, diesel generators, heaters, boilers, mining equipment and from solvent extraction plants as well as from flares, storage tanks and retort processes, etc.). Even considering the fact that we don't know the resultant impacts that could occur as a result of this increase in emissions without completing a dispersion modeling analysis, *any* increase in emissions of ozone precursors will certainly exacerbate the negative health effects of ozone in the region and is almost certain to threaten the region's compliance with the current and future ozone standard. The BLM must establish strict and enforceable mitigation measures that essentially do not allow for growth in NO_x and VOC emissions in the area in order to protect human health and to avoid violations of the ozone NAAQS. In order to protect human health and to fulfill its responsibility to provide for compliance with the ozone standard in this PEIS, the BLM must ensure that ozone concentrations in the region do not increase further and instead make a plan within this PEIS to keep ozone below harmful levels. The BLM should fully consider the CASAC recommendations when evaluating the human health impacts from ozone concentrations in the region.

Visibility in Several Class I Areas in the Region is Already Being Impacted by Growth in the Development Areas

Several recent modeling analyses performed by the BLM for project-specific EISs, Environmental Assessments (EA) and RMPs in the study area indicate that visibility in several Class I areas is threatened by ongoing development.

In the final EAs for the five oil shale RD&D test sites in Colorado the BLM showed that there *will be significant adverse effects on visibility at the Flat Tops Wilderness Area Class I area* when considering all oil shale research projects along with the ExxonMobile Piceance Development Project activities. Specifically, the BLM's analysis predicted there would be greater than a 1.0 deciview change in visibility on 13-20 days.[17] Thus, the potential air quality impacts of the oil shale RD&D sites are already quite significant with respect to visibility in the Flat Tops Wilderness Area in Colorado.

Several recent RMPs in Utah have identified concerns about visibility impacts from oil and gas development in several Class I areas including Canyonlands National Park and Capitol Reef National Park. For example, in the September 2007 draft Price RMP the BLM reported that if compressors associated with the oil and gas development in the Price planning area are fueled by natural gas, the standard visual range could be reduced by more than 10% for 11 days at Capitol Reef National Park and 2 days at Canyonlands National Park and the standard visual range reduction could range from 5% to 10% for 47 days at Capitol Reef National Park and 16 days at Canyonlands National Park.[18] The

[17] See, for example, Shell Oil Shale Research, Development and Demonstration Projects Environmental Assessment (CO-110-2006-117-EA), August 2006 at 150.

[18] Final Air Quality Baseline and Analysis Report for the Price Resource Management Plan, p. 39.

BLM makes a statement in the Price RMP that "the potential for cumulative visibility impacts (increased regional haze) is a concern" in the area.[19] Similarly, in the October 2007 draft Richfield RMP the BLM says it is particularly concerned with the reduced visibility resulting from increased recreational activities in the area. However, neither of these draft RMPs (for Price and for Richfield) specify the extent of the visibility issues nor do they analyze the effects of reasonably foreseeable development in the planning areas on visibility in affected Class I areas.

In Wyoming there are serious concerns that visibility in the Bridger Wilderness Area and other nearby Class I areas is already being impacted by oil and gas development in the Pinedale Anticline and Jonah Fields. The December 2006 draft Pinedale Anticline supplemental EIS baseline modeling (i.e., not including the proposed development) showed 45 days above a 1.0 deciview (dv) change in visibility impairment at the Bridger Wilderness Class I area. The modeling also predicted five additional days of impairment above 1.0 dv at the Fitzpatrick Wilderness Class I area, and one additional day above 1.0 dv at Grand Teton National Park Class I area. That same analysis showed that there were 87 additional days above 0.5 dv predicted for the Bridger Wilderness Area, along with at least several additional days above 0.5 dv at all other nearby Class I areas with the exception of North Absaroka Wilderness Area.[20] Similarly, the early project development modeling for the Jonah Infill Development Project draft EIS showed that the Jonah Infill sources – even before full development - would adversely impact visibility in the Bridger and Fitzpatrick wilderness areas by causing changes in visibility of more than 0.5 dv on several days.[21] The Jonah Infill modeling also showed that, cumulatively, extensive degradation of visibility would occur at all western Wyoming Class I areas and the BLM's emission inventory makes clear that this degradation is largely the result of emissions associated with oil and gas development in the region.[22]

In all of these cases the visibility impacts predicted by the BLM were likely underestimated due to deficiencies in the emissions inventories as well as assumptions used in the modeling analyses.[23] And while the BLM has used a change of 1.0 dv to

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[19] Final Air Quality Baseline and Analysis Report for the Price Resource Management Plan, p. 25.

[20] Draft Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, December 2006, Volume 2, Appendix I, Table 1.9 and Air Quality Impact Analysis Technical Support Document, December 2006, Volume 1, Table E.12.1.

[21] Jonah Infill Drilling Project Draft Air Quality Technical Support Document Supplement, August 2005, Appendix E: Early Project Development Stage Modeling Results, Table E.8.3.

[22] Jonah Infill Drilling Project Draft Air Quality Technical Support Document Supplement, August 2005, Appendix E: Early Project Development Stage Modeling Results, Table E.8.4.

[23] See August 30, 2006 Comments on Environmental Assessment for EGL Resources, Inc., Oil Shale Research, Development and Demonstration Proposal Tract CO-110-2006-118-EA Regarding Air Quality Impacts (V. Stamper and M. Williams), September 15, 2006 Comments on Environmental Assessment for the Chevron Oil Shale Research, Development and Demonstration Proposal Tract, CO-110-2006-120-EA, Regarding Air Quality Impacts (V. Stamper and M. Williams), September 15, 2006 Comments on Environmental Assessment for the Shell Oil Shale Research, Development and Demonstration Projects, CO-110-2006-117-EA, Regarding Air Quality Impacts (V. Stamper and M. Williams), March 26, 2007 Comments on the Air Quality Analyses for the Pinedale Anticline Oil and Gas Exploration and

denote visibility impairment in these EISs, a threshold of 0.5 dv is much more protective of visibility in Class I areas. All of the Federal Land Managers (i.e., those agencies with an affirmative responsibility under the Clean Air Act for protecting the air quality related values of mandatory Class I areas) including the U.S. Forest Service consider a 0.5 dv change to be a Limit of Acceptable Change threshold.[24] Thus the potential impacts to visibility from the ongoing development in the areas covered by this PEIS are likely even more than those briefly summarized above. This PEIS must fully consider these existing visibility concerns along with the impacts of the massive increases in air pollutants that contribute to visibility impairment (e.g., sulfates, nitrates, dust, etc.) that will come from oil shale and tar sands development under the various proposed alternatives.

The Amount of Increment Already Consumed in Some Development Areas is Cause for Concern

The near-field modeling performed for the draft EGL oil shale RD&D EA showed that the EGL project alone would directly cause violations of the 24-hour average Class II PM_{10} and SO_2 increments.[25] For the final EA the BLM revised the emissions inventory and modeling such that there are no longer predicted violations of these PSD increments. However, the modeling done for the final RD&D EAs still shows that the EGL project consumes nearly all of the 24-hour Class II PM_{10} and SO_2 increment *and that the Chevron RD&D site also consumes nearly all of the available Class II 24-hour PM_{10} increment.*[26]

Almost all of the scenarios modeled for the December 2006 Pinedale Anticline draft SEIS in the green river basin indicate that Pinedale Anticline project sources will cause "direct predicted impacts" greater than the PSD Class II increment for NO_2 of 25 $\mu g/m^3$ (annual average).[27] In 2005, the Wyoming Department of Environmental Quality (WYDEQ) released a report on NO_2 increment consumption in Sublette County, Wyoming.[28] This analysis indicated that a maximum of anywhere from 11.16 $\mu g/m^3$ to 12.23 $\mu g/m^3$ of NO_2 increment was already consumed in Sublette County (Table SR-12 of WYDEQ NO_2 Increment Report). Considering this analysis, along with the additional increment consumption resulting from the increased development already underway in

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Development Project Draft Supplemental Environmental Impact Statement (M. Williams and C. Copeland) and October 5, 2005 Comments on the Air Quality Analyses for the Jonah Infill Development Project EIS Pinedale (V. Stamper).

[24] See Federal Land Manager's Air Quality Related Values Workgroup Phase I Report, December 2000 (FLAG guidance) at 26-7.

[25] EGL Resources Inc. Oil Shale research, Development and Demonstration Tracts Environmental Assessment (CO-110-2006-118-EA), July 2006 at 21.

[26] Modeled 24-hour PM_{10} direct concentrations from operation are 28.6 $\mu g/m^3$ compared with the Class II 24-hour PM10 increment of 30 $\mu g/m^3$. See final EA (CO-110-2006-118-EA, November 2006) at 23. Modeled 24-hour PM_{10} direct concentrations from operations are 25.86 $\mu g/m^3$. See final EA (CO-110-2006-120-EA, November 2006) at 28.

[27] See Appendix M of the December 2006 draft Pinedale Anticline SEIS.

[28] Summary Report, Southwest Wyoming NO_2 PSD Increment Consumption Modeling: Results for Sublette County, September 15, 2005 (WYDEQ NO_2 Increment Report)

the Jonah Infill and the predicted impacts from the proposed Pinedale Anticline project, the NO_2 increment in Sublette County would be more than consumed under most of the proposed development scenarios.[29] The BLM did not include emissions from drilling rigs in its increment analysis for Pinedale because they considered drilling to be a temporary emissions source that, therefore, does not consume PSD increment. On the contrary, this significant NO_x source will not be temporary; this drilling will go on for several years, well in excess of the two years typically considered by EPA as temporary, (see, e.g., 43 FR 28394, June 29, 1978). Large numbers of wells will be drilled from a single well pad, meaning drill rigs will remain in a fixed area for extended periods of time. Therefore, even more of the NO_2 increment is likely to be consumed. The Class II PSD increments for PM_{10} (both the annual and the 24-hour) would likely also be violated under most of the modeled scenarios for the December 2006 Pinedale Anticline draft SEIS.[30]

Based on a National Park Service modeling analysis there are existing violations of the Class I SO_2 increment occurring in Capitol Reef National Park. During the permit review process for the proposed Unit 3 of the Intermountain Power Plant located in Delta, Utah, the National Park Service conducted a Class I SO_2 PSD increment consumption analysis and determined that existing sources in Utah are causing violations of the 3-hour average Class I SO_2 increment in Capitol Reef National Park. Specifically, on March 25, 2004, the National Park Service submitted a letter to the Utah Division of Air Quality that provided, among other things, the National Park Service's formal findings that the 3-hour average SO_2 increment was being violated by existing sources in Utah at Capitol Reef National Park.[31] In May of 2003, the Assistant Secretary for Fish and Wildlife and Parks submitted a letter and accompanying Technical Support Document that reiterated the NPS claim that existing sources are causing violations of the 3-hour average SO_2 increment at Capitol Reef National Park.[32]

The amount of increment consumed in the Class II development areas in Utah is largely unknown. The recent updates to the RMPs in the Vernal, Moab, Price, Richfield and Monticello planning areas did not include any assessment of the impacts from the areas' proposed development on Class I or Class II PSD increment consumption. As with southwest Wyoming, it is certainly plausible that the air quality in these heavily developed areas of Utah has degraded enough to cause concern with regard to compliance with certain PSD increments.

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[29] See March 26, 2007 Comments on the Air Quality Analyses for the Pinedale Anticline Oil and Gas Exploration and Development Project Draft Supplemental Environmental Impact Statement (M. Williams and C. Copeland).

[30] See Appendix M of the December 2006 draft Pinedale Anticline SEIS.

[31] National Park Service Comments on the Intermountain Power Agency Prevention of Significant Deterioration Permit Application for the Addition of Unit 3 at its Intermountain Power Plant, March 2004, attached to its March 25, 2004 letter to Rick Sprott, Utah Division of Air Quality, at 5.

[32] National Park Service Supplemental Technical Comments on the Intermountain Power Agency Prevention of Significant Deterioration Permit Application for the Addition of Unit 3 at its Intermountain Power Plant, May 2004, attached to its May 2004 letter from the Assistant Secretary for Fish and Wildlife and Parks to Rick Sprott, Utah Division of Air Quality, at 8-9.

Impacts From Current Development on Air Quality Related Values (e.g., Sulfur and Nitrogen Deposition) in Nearby Class I areas are a Concern

It is possible that there will be significant impacts on sulfur or nitrogen deposition at the Flat Tops Wilderness Area from the cumulative impacts of the five Colorado oil shale RD&D sites and the ExxonMobile Piceance Development Project activities, depending on the significance criteria used. In the final EAs for the RD&D test sites the BLM used a significance threshold that is much higher than the Class I FLMs "Deposition Analysis Thresholds" used in reviewing air permits under the Clean Air Act.[33] Under the Deposition Analysis Thresholds, the BLM's predicted cumulative impacts on both sulfur and nitrogen deposition would be significant.

In 2006, the Air Quality Task Group for the Pinedale Anticline Working Group produced a report on air quality monitoring. This report identified increasing nitrate levels at all sampled lakes in the Bridger and Fitzpatrick Wilderness Areas and concluded that the increases are probably in part due to regional sources. Hobbs Lake, in the Bridger Wilderness Area, is showing a decrease in acid neutralizing capacity (ANC) and acidification is starting to occur. The report also states that the USFS is very concerned about Black Joe Lake, also in the Bridger Wilderness Area, because ANC is decreasing, while nitrate and sulfate levels are increasing in parts of the lake. These results mean that nitrification of the lake is occurring, with this being the first step towards eutrophication.[34]

All of these existing air quality concerns in the study area must be acknowledged and addressed in this PEIS. The BLM cannot proceed with a commercial-scale leasing program for oil shale and tar sands development without ensuring the public that such a program would not further exacerbate the NAAQS exceedances, the consumed increment and the visibility impairment and other AQRV impacts in the study area.

3. The BLM Must Acknowledge and Address the Potential Enormous Impacts that Would Result from the Electricity Requirements of Commercial Scale In-Situ Oil Shale Development

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In the PEIS the BLM assumes the electricity requirements for in-situ oil shale development would come from coal-fired power plants. Specifically, the BLM states that:

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[33] The maximum total nitrogen deposition at Flat Tops Wilderness Area was predicted to be 0.265 kg/ha-yr and the maximum total sulfur deposition was predicted to be 0.033 kb/ha-yr. The BLM claims these impacts are insignificant based on an acceptability threshold of 3 kg/ha-yr. Final Shell EA at 150. Indeed, these impacts *are* significant when compared to the National Park Service's Class I area "Deposition Analysis Thresholds" of 0.005 kg/ha-yr for both nitrogen and sulfur deposition.

[34] Air Quality Task Group, Pinedale Anticline Working Group, "2005 Air Quality Monitoring Report," May 12, 2006.

> "Oil shale projects utilizing in situ processes are expected to have electric power requirements that would necessitate construction of new power plants to supply the required electricity. It is expected that the new power plants would be conventional 1,500-MW coal-fired plants." PEIS at 4-123.

To meet the additional electrical power needs for in-situ oil shale production, the BLM is assuming that a combination of construction of new power plants and expansion of existing power plants would occur. PEIS at 4-14. The BLM is assuming that future in-situ projects would require 2,400 megawatts (MW) of additional electricity generation capacity when commercial production levels of 200,000 barrels of oil shale per day are reached.[35] According to the BLM, this 2,400 MW of additional electrical generating capacity would be provided by conventional coal-fired power plants. PEIS at 4-14.

The electricity needs to support an in-situ oil shale production level of 200,000 barrels/day are equivalent to over half of the total amount of electricity produced by all types of Colorado electricity sources in 2005.[36] Twenty four hundred MWs is also equivalent to the electricity needed to power 24 million 100-watt light bulbs simultaneously. The power requirements for commercial scale oil shale production as described by the BLM in the PEIS are considerable and the potential impacts on air quality in the region as a result would be significant.

While power plants authorized for construction today have better pollution controls and more strict emission requirements for some pollutants (although not currently for carbon dioxide (CO_2)), even new coal-fired power plants with state-of-the-art pollution controls could have adverse impacts on air quality.

For example, the proposed 1,500 MW Desert Rock coal-fired power plant to be located on Navajo Nation land about 25 miles southwest of Farmington, New Mexico, is slated by its owner (Sithe Global Power) to have the lowest air emissions permitted to date. Yet, this facility's impact will be far from benign. The computer modeling prepared under National Park Service guidelines for the Desert Rock permit predicted maximum reductions in visibility of 10-17% at Mesa Verde National Park, which is roughly 80 kilometers from the proposed power plant (a similar distance as the Flat Tops Wilderness Area is from the Piceance Basin).[37] A reduction in visibility by 10% or more can be considered to be adverse by the National Park Service and is considered to be a

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[35] "This estimate is based in part on published information indicating that the Shell in situ technologies being evaluated as part of the oil shale RD&D program require about 1,200 MW of power for every 100,000 bbl of shale oil produced (Bartis et al. 2005)." PEIS at 4-14.

[36] Generation data obtained from "Net Generation By State By Type of Producer by Energy Source" Excel spreadsheet available at http://www.eia.doe.gov/cneaf/electricity/epa/epat1p1.html. (Electric Power Monthly).
35,570,135 MWh from Total Electric Power Industry * (1yr/8760hr) = 4,060 MW
2,400MW / 4,060MW = 59%

[37] January 2006 DREF Class I Area Modeling Update at 4-13 (Table 4-5, Method 2 results).

noticeable change in visibility. Further, the facility's predicted maximum sulfur deposition at Mesa Verde was 0.029 kilograms per hectare per year (kg/ha/yr) and the maximum predicted nitrogen deposition was 0.012 kg/ha/yr. These predicted impacts are greater than the National Park Service's thresholds of 0.005 kg/ha/yr for both sulfur and nitrogen deposition used in determining whether an adverse environmental impact may occur due to sulfur or nitrogen deposition. Too much sulfur or nitrogen deposition in an area could affect soil fertility and nutrient cycling and could result in acidification of bodies of water. A subsequent PSD increment consumption modeling analysis prepared by AMI Environmental indicates that the Desert Rock power plant will also contribute to violations of the 3-hour and 24-hour average Class I SO_2 increments at Mesa Verde National Park.[38]

Yet, the proposed Desert Rock power plant reflects only 63% of the total electricity needed to support a 200,000 barrel/day oil production rate from the in-situ retort processing of oil shale. It would take almost two coal-fired power plants of the Desert Rock size to meet those electricity needs. While such facilities will not likely be co-located, it is possible that the facilities will be located nearby to the areas of oil shale development (i.e., within the states of Colorado, Wyoming and Utah). Just one conventional coal-fired power plant the size of the proposed Desert Rock power plant located in western Colorado would likely adversely impact visibility and exceed PSD increments in some of the numerous Class I areas in the intermountain West, based on the computer modeling done for the Desert Rock power plant. Two power plants of roughly that size would have even more significant impacts.

In Table 6.5.1-3 of the PEIS the BLM presents assumed emission rates for coal-fired power plants and states that "power plants are assumed to operate at a 60% efficiency" (see footnote a). The BLM does not indicate what type of efficiency this represents (i.e., gross thermal efficiency, net thermal efficiency or something else entirely) but it cannot possibly represent either gross or net thermal efficiency of the assumed plant - modern IGCC (Integrated Gasification Combined Cycle) and supercritical pulverized coal units can only achieve net thermal efficiencies in the high 30s to low 40 percent range.[39] The Desert Rock power plant is designed to operate supercritical units with a *gross* thermal efficiency of just 38%. Based on R&D activities for IGCC technology it is possible that overall plant thermal efficiencies could reach levels of 50 to 60 percent but not until 2020 and only with "considerable improvements in IGCC performance levels".[40]

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[38] "Cumulative SO2 Modeling Analyses of Desert Rock Energy Facility and Other Sources at PSD Class I Areas," by Khanh Tran of AMI Environmental, November 9, 2006. Included as an attachment to the public comment letter #23 (John Smith, WCEC, November 13, 2006) for the Desert Rock PSD Permit at http://www.epa.gov/region09/air/permit/desertrock/#pub-comments

[39] EPA-430/R-06/006, July2006 Final Report on Environmental Footprints and Costs of Coal-Based Integrated Gasification Combined Cycle and Pulverized Coal Technologies.

[40] EPA-430/R-06/006, July2006 Final Report on Environmental Footprints and Costs of Coal-Based Integrated Gasification Combined Cycle and Pulverized Coal Technologies, p. 2-4.

Even assuming the 2,400 MW of additional power will come from plants with not-yet-seen-today efficiencies of 60% the emissions from these plants, based on the BLM's assumed emission rates in Table 6.5.1-3, will be huge. Specifically, the BLM assumes SO_2 and NO_x emissions rates for a 1,500 MW coal-fired plant of 0.6 lb/mmBTU heat input. At these emission rates, almost 22,500 tons per year each of SO_2 and NO_x would be emitted to the atmosphere. Scaling the emission up to the 2,400 MW of electrical power needed to support a 200,000 barrel a day in-situ commercial oil shale production would result in 36,000 tons per year each of SO_2 and NO_x.[41] The BLM assumes a PM_{10} emission rate of 0.03 lb/mmBTU heat input. At this rate, almost 1,800 tons per year of PM_{10} emissions would be emitted in producing 2,400 MW of electrical power.[42] Assuming a more reasonable gross thermal efficiency of 40%, SO_2 and NO_x emissions would each be almost 54,000 tons per year and PM_{10} emissions would be almost 2,700 tons per year.

An increase in SO_2 emissions of this magnitude in the region would represent almost a doubling of SO_2 emissions from all electric generating units (EGUs) in Colorado.[43] The additional NO_x emissions represent an 80% increase in NO_x emissions from all EGUs in Colorado.[44] The additional PM_{10} emissions represent a 10% increase in all point-source emissions of PM_{10} in Colorado.[45]

Admittedly, the BLM's assumed emission rates are not at all consistent with recently permitted emission rates for coal-fired power plants in the west. For example, the Desert Rock power plant's proposed permit limits for SO_2 and NO_x emissions are 0.06 lb/mmBTU heat input, which is 10 times lower than what is assumed by the BLM in the PEIS. It is important to note, though, that even at these lower emission rates the additional SO_2 and NO_x emissions (approx. 5,400 TPY each) that will come from generating an additional 2,400 MW of electrical power in the region are still significant as indicated by the projected impacts to nearby Class I areas from the proposed Desert Rock power plant, which only represents 1,500 MW of power production.

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[41] Emissions calculation for SO_2 (NO_x is the same):
1,500 MW_{out} / (0.60) = 2,500 MW_{in}
2,500,000 kW_{in} * (0.003421 mmBTU/kWh) = 8,550 mmBTU/hr heat input
0.6 lb_{SO2}/mmBTU * 8,550 mmBTU/hr = 5,130 lb_{SO2}/hr
5,130 lb_{SO2}/hr * (8760 hr/yr) / (2000 lb/ton) = 22,500 TPY SO_2
22,500 TPY * (2,400 MW / 1,500 MW) = **36,000 TPY SO_2**

[42] Emissions calculation for PM_{10}:
1,500 MW_{out} / (0.60) = 2,500 MW_{in}
2,500,000 kW_{in} * (0.003421 mmBTU/kWh) = 8,550 mmBTU/hr heat input
0.03 lb_{PM10}/mmBTU * 8,550 mmBTU/hr = 257 lb_{PM10}/hr
257 lb_{PM10}/hr * (8760 hr/yr) / (2000 lb/ton) = 1,120 TPY PM_{10}
1,120 TPY * (2,400 MW / 1,500 MW) = **1,800 TPY PM_{10}**

[43] 2005 EPA Clean Air Markets Division data for Colorado EGUs, SO_2 emissions = 59,337 TPY

[44] 2005 EPA Clean Air Markets Division data for Colorado EGUs, NO_x emissions = 67,635 TPY

[45] The latest available data on EPA's AirData website are from 2001 (based on NEI data)
PM_{10} point source emissions statewide (Colorado) = 27,446 TPY
http://www.epa.gov/air/data/

It is also worthwhile to note that the BLM's commercial-scale production estimate of 200,000 barrels of oil shale per day is likely the lowest possible production rate one could expect from in-situ development. The RAND Corporation's 2005 analysis of oil shale development assumed that *initial* commercial operations would have a production capacity of 200,000 barrels a day but that the same amount of production capacity could be added each year such that 1 million barrels a day could be produced in just seven years time.[46] At this million barrel a day production rate, in-situ oil shale development would require 12,000 MW of electrical power which, based on the BLM's assumptions for emissions from coal-fired power plants, could add 180,000 tons per year each of SO_2 and NO_x emissions to the region.[47] An increase in SO_2 emissions of this magnitude in the region would represent almost a doubling of SO_2 emissions (and an 80% increase in NO_x emissions) from all EGUs in Colorado, Wyoming and Utah combined.[48]

Along with these pollutant impacts would be the associated mammoth increase in greenhouse gas emissions that would be associated with the electricity production needed to support a 200,000 barrel per day oil shale industry. The carbon dioxide emissions increase would be quite significant at potentially 19 million tons per year.[49] This increase in CO_2 emissions from electricity generated solely to support an oil shale industry reflects a 40% increase in the amount of CO_2 emitted by all existing electric utility generating units in 2005 in Colorado (or a 15% increase in CO_2 emitted by all existing utility generating units in 2005 in Colorado, Wyoming and Utah combined).[50]

For surface and underground mining projects, the BLM has assumed that power needs would be met through the expansion of existing power plants. As many of the existing plants in the region are poorly controlled sources of air pollution, increases in plant capacities at these high emitting sources to support the proposed 50,000 barrel per day surface mining and 50,000 barrel per day underground mining projects could result in significant impacts to air quality in the region. The BLM must assess these potential impacts.

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[46] Bartis J.T., LaTourrette T., Dixon L., Peterson D.J., Cecchine G., "Oil Shale Development in the United States: Prospects and Policy Issues", The RAND Corporation, 2005, p. 45.

[47] Emissions calculation for SO_2 (NO_x is the same):

$12{,}000\ MW_{out} / (0.60) = 20{,}000\ MW_{in}$

$20{,}000{,}000\ kW_{in} * (0.003421\ mmBTU/kWh) = 68{,}420\ mmBTU/hr$ heat input

$0.6\ lb_{SO2}/mmBTU * 68{,}420\ mmBTU/hr = 41{,}000\ lb_{SO2}/hr$

$41{,}000\ lb_{SO2}/hr * (8760\ hr/yr) / (2000\ lb/ton) =$ **180,000 TPY SO_2**

[48] 2005 data from EPA's Clean Air Markets Data and Maps website, http://cfpub.epa.gov/gdm/index.cfm

[49] Emissions calculation for CO_2 based on an emission rate for subbituminous coal of 212.7 lb/mmBTU from DOE (http://www.eia.doe.gov/oiaf/1605/coefficients.html):

$1{,}500\ MW_{out} / (0.40) = 3{,}750\ MW_{in}$

$3{,}750{,}000\ kW_{in} * (0.003421\ mmBTU/kWh) = 12{,}800\ mmBTU/hr$ heat input

$212.7\ lb_{CO2}/mmBTU * 12{,}800\ mmBTU/hr = 2{,}730{,}000\ lb_{CO2}/hr$

$2{,}730{,}000\ lb_{PM10}/hr * (8760\ hr/yr) / (2000\ lb/ton) = 12$ million TPY CO_2

12 million TPY * (2,400 MW / 1,500 MW) = **19 million TPY CO_2**

[50] 2005 data from EPA's Clean Air Markets Data and Maps website, http://cfpub.epa.gov/gdm/index.cfm

The BLM must acknowledge the massive amount of emissions that will be added to the region as a result of the increased need for electrical power generation to support commercial-scale in-situ oil shale production. The fact that the study area is already seeing impacts to air quality from ongoing development makes it quite possible that the region simply cannot withstand, without adverse effects, the huge increases in emissions that will come from increased power needs for in-situ oil shale development. Before considering a commercial leasing program the BLM must be up front with the public and fully disclose the potential impacts to human health and the environment from this significant source of SO_2, NO_x, PM, CO and CO_2 emissions. The BLM must include an assessment of the impact of the emissions from the power generation for commercial-scale in-situ oil shale development and provide an alternative in the PEIS that demonstrates compliance with all of the NAAQS (including SO_2, PM, NO_2 and ozone) and the PSD increments and one that prevents visibility degradation and acidification of lakes in affected areas.

4. The BLM Must Acknowledge and Address the Potential Air Quality Impacts that Would Result from the Increased Oil Refining Needs Associated with Commercial Scale Oil Shale and Tar Sands Development

There is no mention in the draft PEIS of the air quality impacts that would result from the additional oil refining capacity that will be required to process the oil from commercial-scale oil shale and tar sands development. If, in fact, current refinery capacity for crude oil in the region is inadequate, the potentially huge influx of supply from commercial-scale oil shale and tar sands development may require significant expansion of oil refining capacity in the West. This additional capacity, either in the form of new refineries or expansion at existing refineries will be a significant source of air pollution in the region and must be considered in the PEIS. The BLM must ensure that emissions from the associated increase in refinery utilization do not have adverse effects on air quality in the region.

52685-006

5. The BLM Must Determine Whether Commercial-Scale Oil Shale and Tar Sands Development Along With All Other Ongoing Development in the Study Area Will Cause Significant Deterioration of Air Quality or Impact Visibility

52685-007

The BLM has not analyzed whether the commercial oil shale and tar sands leasing program will prevent significant deterioration (PSD) of air quality, as required by the Clean Air Act. The BLM must complete an analysis to determine how much of the incremental amount of air pollution allowed in clean air areas (i.e., PSD increment) has already been consumed in the affected areas and how much additional increment consumption will occur due to the commercial leasing program. Without this analysis, the BLM is not ensuring that the air quality in the study area will not deteriorate more than allowed under the CAA. It does not appear that the BLM is even committed to completing such an analysis for future project-specific oil shale and tar sands NEPA

reviews. The BLM states on page 3-102 of the PEIS that "[a]ll NEPA analysis comparisons to the Prevention of Significant Deterioration (PSD) increments are intended to evaluate a threshold of concern and do not represent a regulatory PSD Increment Consumption Analysis". The BLM is required under NEPA to analyze and disclose all significant air quality impacts, regardless of whether another agency might address an adverse environmental impact in the future. The BLM must consider the PSD increments as important and legally binding Clean Air Act requirements and it must provide for compliance with these requirements in the PEIS. The PSD increments are separate ambient air quality standards not to be exceeded, as set out in §163 of the Clean Air Act, that apply *in addition to* the national ambient air quality standards in clean air areas. The BLM is required under FLPMA, 43 U.S.C. § 1712(c)(8), to "provide for compliance with" all Clean Air Act requirements, and thus the BLM cannot authorize an action that would allow the PSD increments to be exceeded. See also 43 CFR § 2920.7(b)(3) (requiring the same for land use authorizations).

In the past, the BLM has also indicated that predicted PSD increment violations in EIS documents should not be considered as real increment violations because they are modeled. However, since only emissions from major stationary sources which commenced construction or modification after the applicable "major source baseline date" and emissions increases from minor, area and mobile sources that occurred after the relevant "minor source baseline date" affect the allowable increment, an air quality monitor cannot distinguish between pollutant concentrations from sources that are part of the baseline and those from sources that consume increment.[51] Therefore, it is impossible to use monitoring data to establish compliance with the PSD increments; the only way to determine compliance is to complete a modeling analysis. As mentioned above, FLPMA and related regulations specify that all CAA requirements be met in the development of land use plans. The BLM is required to "provide for compliance with" all CAA requirements, and cannot authorize an action that would violate the PSD increments, which are a CAA requirement under Section 163.

Modeling of <u>all</u> emission sources is necessary to determine the affect the activities analyzed under the three scenarios of the PEIS will have on compliance with the PSD requirements of the Clean Air Act. The PSD increment inventory of all existing and reasonably foreseeable increment-consuming sources, once fully developed, also must be used to analyze whether the development allowed under the leasing program would cause or contribute to adverse impacts on visibility in any Class I area affected. While the visibility regulations do not provide for a visibility baseline date, as the goal of the program is to restore visibility to natural conditions, the Federal Land Managers typically require the modeling of all PSD increment consuming sources in a cumulative visibility

[51] The major source baseline dates are January 6, 1975 for SO_2 and PM_{10} and February 8, 1988 for NO_2. 40 CFR 52.21(b)(14)(i). The minor source baseline dates in Colorado, Utah and Wyoming differ by pollutant and were triggered on the date that a complete PSD permit application was received by the state or by the EPA in the case of sources locating in Indian Country. See definitions of "major source baseline date" and "minor source baseline date" in the Colorado, Utah and Wyoming state PSD rules and 40 CFR 52.21(b)(14)(i), 52.21(b)(14)(ii) and 52.21(b)(15).

analysis.[52]

Thus, in order for the BLM to properly analyze the cumulative impacts on visibility that could occur at Class I areas in the region and the cumulative impacts on any PSD increment, it must develop a separate emissions inventory than used in the NAAQS analysis that includes emissions from all new and modified sources added after the regulatory major and minor PSD baseline dates. The BLM is required to do this not only to comply with its obligations under the Clean Air Act and the Federal Land Policy and Management Act, but also to comply with its obligations under NEPA to consider the direct and indirect impacts of the action, and its cumulative impacts. See e.g., 40 C.F.R. §§ 1502.2(d), 1508.7, 1508.8.

6. The BLM Must Disclose the Magnitude of Emissions Authorized Under the Three Alternatives of the PEIS and Perform a Full-Scale Dispersion Modeling Analysis of the Alternatives to Evaluate the Potential Air Quality Impacts From a Commercial-Scale Oil Shale and Tar Sands Leasing Program

52685-008

The BLM must inventory all potential emissions from a commercial-scale oil shale and tar sands leasing program of the scale proposed under alternatives B and C of the PEIS. In particular, the inventory must include a comprehensive evaluation of fugitive and point source emissions from construction and operation activities and must include all sources of $PM_{2.5}$, PM_{10}, NO_x, SO_2, VOC and HAP emissions. Undoubtedly, a commercial-scale leasing program for oil shale and tar sands development is going to be *the* most significant source of air pollution in these areas and the associated impacts of the massive increase in emissions from these sources must be carefully evaluated and the results of that evaluation must be fully disclosed to the public *before* the BLM makes a decision to allow for such leases. As mentioned earlier, it is certainly possible for the BLM to determine projected emissions (based on the known requirements for economically and technically feasible development, the specifics of the viable development locations, the proposed scale of development, the detailed RD&D test site data, etc.) and, in fact, the BLM has done just that by including detailed figures and estimates for noise generation (see Section 4.7 of the PEIS at 4-50 to 4-61).

This PEIS does not identify the magnitude of overall emissions to be expected from a leasing program under alternatives B or C, nor does it provide any details of the anticipated source-specific emissions in the PEIS. However, we know that the magnitude of emissions that would result just from the electricity production for in-situ oil shale development are, alone, quite staggering and represent only one of many sources that make up oil shale and tar sands production operations. Appendix B provides some potential emissions estimates for the various tar sands development processes. Based on this information: (1) a 50,000 barrel per day surface mining and surface retort tar sands development project has the potential to emit over 9,000 tons per year of total suspended

[52] See Federal Land Managers' Air Quality Related Values Workgroup Report (FLAG) Phase I Report, December 2000, p. 26.

particulate (TSP); (2) a 50,000 barrel per day surface mining and solvent extraction tar sands development project has the potential to emit almost 40,000 tons per year of NO_X; and (3) a 50,000 barrel per day in-situ steam injection tar sands development project has the potential to emit almost 17,000 tons per year of SO_X.[53] To put this in perspective, these tar sands emissions are equivalent to over 60% of NO_x emissions and over 50% of SO_2 emissions from all EGUs in Utah in 2005. Assuming roughly half of the estimated TSP emissions fall in the PM_{10} size range these tar sands emissions are equivalent to approximately 25% of all PM_{10} point source emissions in Utah.[54] These emissions certainly have the potential to cause significant impacts to air quality considering the proposed tar sands development areas are located where significant development is already ongoing.

In addition to a comprehensive emissions inventory of the various oil shale and tar sands sources anticipated under alternatives B and C of the PEIS, the BLM must prepare an inventory of all other BLM-administered activities in the study area, all pollutants from all other air pollution sources in the study area as well as all sources expected to impact the same areas impacted by emissions from the study area. These sources include any State- and Federal-permitted sources in Colorado, Utah, Wyoming and Indian Country, any Colorado or Wyoming State Oil and Gas Commission or Utah Division of Oil, Gas and Mining permitted oil and gas wells as well as all reasonably foreseeable development (RFD) sources (e.g., other NEPA projects, proposed power plants, proposed coal mines, etc.).

The reasonably foreseeable development projects inventory should include all sources recently permitted or which have recently submitted complete PSD permit applications but which are not yet operating, that will have an impact on the same areas impacted by the study area. For example, several PSD permit applications have been submitted, and some permits have been issued, for coal-fired power plants to be located in areas that could impact the same area impacted by the oil shale and tar sands development areas. Coal-fired power plants can often have significant impacts on a Class I area even when located 200-300 km or more away from that area. Specifically, the following power plants were recently permitted or are proposed in the region:

- The 270 MW Sevier Power Company coal-fired power plant in Sigurd, Utah (recently permitted)
- The 950 MW Unit 3 Intermountain Power Project in the central part of Utah near Delta (permit issued)

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[53] See, Tables B-3, B-5, B-6 and B-7 in Appendix B of the draft PEIS.

[54] 2005 SO_2 and NO_x data are from EPA's Clean Air Markets Data and Maps website, http://cfpub.epa.gov/gdm/index.cfm
The latest available PM_{10} point source data on EPA's AirData website are from 2001 (based on NEI data)
PM_{10} point source emissions statewide (Utah) = 16,576 TPY
http://www.epa.gov/air/data/

- The 600 MW Unit 4 at the Hunter Power Plant (PacifiCorp) in central Utah (no permit issued yet)
- The 110 MW Unit 2 at the Bonanza Power Plant in Uintah County in northeast Utah (permit issued August 30, 2007)
- The 1,500 MW Desert Rock power plant in northwest New Mexico (no permit issued yet)
- The 300 MW Mustang power plant in northwest New Mexico (proposed)
- The proposed 500 MW expansion at the Jim Bridger Power Plant in southwest Wyoming
- The 385 MW Dry Fork power plant near Gillette, Wyoming (permit issued 10/07)
- The Wygen 2 and the recently permitted 100 MW Wygen 3 power plants near Gillette, Wyoming
- The permitted 280 MW Two Elk Unit 1 and 750 MW Two Elk Unit 2 power plant to be located in the Powder River Basin of Wyoming[55]
- The permitted 780 MW Roundup power plant in southeastern Montana
- The permitted 160 MW Hardin Generating Station, also in southeastern Montana
- The permitted 250 MW Highwood Generating Station near Great Falls, Montana

All of these power plants have the potential to impact the same Class I areas that are impacted by the study and, therefore, must be included in the BLM's RFD inventory. In addition to these power plants, the BLM must include in the regional inventory any other new or modified sources, other than power plants, proposed in the region.

The regional inventory must also include any emissions from NEPA projects in Colorado, Utah and Wyoming that could be impacting the same area as the study area. For example, there are a large number of resource management plans being revised in Utah all at the same time – the Monticello, Richfield, Price, Moab and Vernal plans, all of which are close to the Utah development areas. The BLM has also recently approved several project-specific oil and gas development projects in Utah (e.g., Enduring Resources' Saddletree Draw Leasing and Rock House Development project, Chapita-Wells Stagecoach Area Natural Gas Development project and the Greater Deadman Bench Oil and Gas Producing project). In addition, the BLM is proposing a RMP for the Canyons of the Ancients National Monument in southwest Colorado. The BLM must make sure that the projected growth in all of these areas, as a whole, will not have significant impacts on air quality in the region. There are also several NEPA-approved projects in the area with remaining emissions that should be included in the RFD inventory. These include Roan Plateau RMP sources in Colorado, projects in Moffat County, Colorado (Little Snake Field Office) such as the Vermillion Basin Project and the Powder River Basin coalbed methane sources in Montana. The remaining development in any NEPA-approved projects in the area must be included in the RFD inventory.

As previously mentioned, the BLM has not completed an air quality impacts analysis as

[55] Although the Two Elk permit expired due to lack of construction, it was reissued in May 2003

required by NEPA. The BLM must take the emissions inventory described above and perform a quantitative assessment of near-field, far-field and cumulative impacts as part of this PEIS. This analysis is necessary for the BLM, and the public, to understand the potential human health effects and environmental impacts (e.g., visibility) of the activities associated with a commercial-scale leasing program for oil shale and tar sands development and in order for the agency to comply with federal statutes and regulations. Instead, the BLM is leaving such an analysis for project-specific NEPA reviews.

Without a dispersion modeling analysis the BLM cannot know if a commercial-scale leasing program will exceed the NAAQS or consume more than the PSD increments allow. And, as previously mentioned, since air quality concentrations of $PM_{2.5}$ and ozone in the study area are high and compliance with the NAAQS for these pollutants is a already threatened, putting off any rigorous analysis until after a commercial leasing program is established is irresponsible. Based on the existing air quality concerns in the study area, a commercial-scale leasing program would likely have to include substantial mitigation measures to ensure compliance with all CAA requirements. It is only fair to the public and those with an interest in developing these resources that the BLM establish, up front, what levels of controls are going to be required in order to accommodate the level of increased development in the region being proposed under Alternatives B and C of the PEIS.

To accomplish this, the PEIS should include a full-scale analysis of the direct, indirect and cumulative impacts on air quality that could occur under all three alternatives of the PEIS. A comprehensive emission inventory of all air pollution sources (as previously described) should have been used in an air quality dispersion modeling analyses to fully assess the impacts on air quality in the region from the alternatives of the PEIS. In order to comply with 40 CFR §1502.24 (to ensure the professional and scientific integrity of the air quality analysis), the air quality analysis should include the following components:

1. A Near-Field Modeling Analysis to Assess Local Air Quality Impacts

A near-field modeling analysis of localized maximum ambient air impacts should be performed to assess whether the activities allowed under the PEIS alternatives would comply with the NAAQS and the PSD Class II increments. The inputs for this analysis should include all of the air pollution source categories allowed under the alternatives of the PEIS. The maximum emission rates from sources over the averaging times of the standard for which compliance is being assessed should be modeled. The modeling analysis should be based on at least one year of quality-assured, on-site, representative meteorological data or, if no on-site data is available, five years of meteorological data from the closest meteorological station representative of the area. See, e.g., Sections 9.3.a., 9.3.1.2., and 9.3.3.2. of EPA's Guidelines on Air Quality Models at 40 CFR Part 51, Appendix W. For the NAAQS analysis, appropriate background concentrations reflective of current air quality in the area should be added to the modeling results.

2. A Far-Field Modeling Analysis to Assess Air Quality Impacts on the Nearby Class I Areas

The BLM must perform a far-field modeling analysis to assess whether the activities allowed under the various alternatives of the PEIS would adversely impact air quality in nearby Class I areas. These Class I areas should include Flat Tops Wilderness Area, Mt. Zirkel Wilderness Area, Rocky Mountain National Park, Black Canyon of the Gunnison Wilderness Area, Maroon Bells-Snowmass Wilderness Area, the Rawah Wilderness Area, the West Elk Wilderness Area, La Garita Wilderness Area, Weminuche Wilderness Area, West Elk Wilderness Area and the Eagles Nest Wilderness Area in Colorado, Arches, Canyonlands and Capitol Reef National Parks in Utah as well as Yellowstone National Park, North Absaroka Wilderness Area, Washakie Wilderness Area, Teton Wilderness Area, Grand Teton National Park, Fitzpatrick Wilderness Area, and the Bridger Wilderness Area in Wyoming. In addition, the BLM should consider the impacts on the following sensitive federal Class II areas: High Uintas Wilderness Area, Flaming Gorge National Recreation Area and Ouray National Wildlife Refuge in northeast Utah and Dinosaur National Monument, Colorado National Monument, Raggeds Wilderness Area, Holy Cross Wilderness Area and Hunter-Frying Pan Wilderness Area in Colorado. The maximum emission rates from sources over the averaging times of the standard for which compliance is being assessed should be modeled. For visibility impacts, this requires modeling of the maximum 24-hour average emission rates. The modeling analysis should be based on three years of mesoscale meteorological data, pursuant to Section 9.3.1.2.d. of EPA's Guidelines on Air Quality Models at 40 CFR Part 51, Appendix W. The far-field analysis should assess the impacts of the alternatives of the PEIS on the Class I increments and on air quality related values, including visibility.

3. A Cumulative Air Quality Impacts Analysis

The BLM must perform a cumulative analysis of air quality impacts that could occur under the various alternatives of the PEIS, as follows. Specifically, both near-field and far-field analyses, with comprehensive emissions and meteorological data inputs as described above, should be completed to assess compliance with the NAAQS and Class II increments as well as to determine impacts on air quality related values and the Class I increments in all potentially affected Class I areas. The analysis must include all existing sources and reasonably foreseeable sources of air emissions that could impact the same area impacted by the study area. For the Class I and Class II PSD increment analyses, an evaluation of all increment consuming emissions from existing sources must be made, which would include all increases in emissions since the applicable minor source baseline date that have occurred at existing sources, as well as all new sources of emissions that came into existence after the applicable minor source baseline date and reasonably foreseeable sources not yet operating. Because only those emissions that are new after the applicable baseline date consume the available PSD increment, it is not acceptable or appropriate to use monitoring data as reflective of existing source emissions even if the monitoring data could be shown to be reflective of the maximum concentrations of all sources impacting the area. If the sources being modeled are not isolated, as is the case in this modeling assessment, then modeling of existing sources is necessary to determine the

potential contribution of background sources. See Section 9.2.1 of EPA's Guidelines on Air Quality Models at 40 CFR Part 51, Appendix W. A separate emissions inventory must be developed to reflect those emission changes since the applicable baseline date, and those emissions changes must be modeled to demonstrate compliance with the PSD increments and visibility requirements.

These impact analyses should be performed for the PEIS to provide the public with information on the air quality impacts of the alternatives proposed and so that state government officials would be aware of any conflicts that could occur with the objectives of Federal, State, and local laws regarding protection of air quality. Such analyses must also be performed so that appropriate mitigations can be developed and put into place to protect air quality in the region. The BLM failed to conduct this impact analysis for the alternatives in the PEIS and, as stated previously, is not fulfilling its obligations under NEPA.

In addition to the air impact analyses described above, the BLM must complete an analysis of impacts on ground level ozone concentrations. As previously stated, ozone precursor emissions (NO_x and VOC) could have a significant impact on the region's compliance with ambient ozone standards in the near future. Considering the already-high levels of ozone in all of the proposed development areas it is extremely important that the impact of a commercial leasing program on ozone concentrations along with all other existing and expected growth of ozone precursor emissions in the region be evaluated.

Finally, the BLM must also disclose the cumulative hazardous air pollutant (HAP) impacts to the exposed population. There is no mention of the impacts of HAP emissions, in conjunction with projected emissions from the BLM sources, on human health in the affected areas. The BLM's HAP assessment must be a cumulative one, not just an analysis of the incremental risk associated with the oil shale and tar sands development, which would be imposed on top of existing health risks in the area. It should, at a minimum, include an analysis of the health impacts of the following potential HAPs associated with oil shale and tar sands development: benzene, toluene, ethylbenzene, xylene, n-hexane and 1,3-butadiene,[56] formaldehyde and secondary formaldehyde[57] as well as diesel exhaust. In particular, the cancer risk associated with diesel exhaust emissions may be significant. EPA's health assessment for diesel exhaust found that long-term exposure to diesel exhaust poses lung cancer risks while short-term

[56] See EPA's *Locating and Estimating Air Toxic Emissions* documents at http://www.epa.gov/ttnchie1/le/ for more info on 1,3-butadiene and other HAPs listed here.

[57] This would include the contribution of other VOCs emitted from oil shale and tar sands development projects to the formation of secondary formaldehyde in the atmosphere downwind from the points of emission.

exposures can cause lung irritation and inflammation.[58] Diesel combustion will be required in many aspects of oil shale and tar sands development and operation. Each of these HAPs comes with its own suite of concerns to human health and it is imperative that these pollutants be considered in the air quality analysis for this PEIS.

7. The BLM Must Include Adequate Plans to Protect Air Quality in the Affected Areas as Part of The RMP Amendments and PEIS

The BLM has not evaluated the air quality impacts from the activities authorized under the PEIS (the proposed development) and has not proposed adequate enforceable mitigation measures to assure no adverse impacts on air quality are occurring or will occur in the affected area. The BLM passes this off by saying:

> "It is not possible to predict site-specific air quality impacts until actual oil shale projects are proposed and designed. Once such a proposal is presented, impacts on these resources would be further considered in project-specific NEPA evaluations and through consultations with the BLM prior to actual development." PEIS at 4-46.

52685-009

However, the BLM has an obligation under NEPA to include adequate plans to protect air quality in the area as part of this PEIS process. The BLM's mandate under NEPA to "provide for compliance" with the air quality standards gives the agency the authority to regulate sources on the land it leases in order to prevent violations of applicable air quality standards. Additionally, the BLM has sole authority to allow pollution sources to locate on its land—that is, the BLM has sole authority in the first instance to allow or disallow sources of emissions such as oil shale and tar sands development activities. At the basic level, this would allow the BLM to stop any additional projects from taking place if those projects would further degrade the environment at an unacceptable level. The BLM should recognize and implement this underlying authority, as necessary, so as to meet its statutory obligation to provide for compliance with the Clean Air Act and related laws and, more fundamentally, to ensure air quality is protected - and in some cases restored - throughout the study area and all other affected areas in the region.

[58] U.S. Environmental Protection Agency (U.S. EPA), *Health Assessment Document for Diesel Engine Exhaust*, May 2002, 1-3, available at http://www.epa.gov/ttn/atw/dieselfinal.pdf. See also, http://www.catf.us/projects/diesel/dieselhealth/ .

Responses for Document 52685

52685-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Sections 4.6, 5.6, 6.1.1.5, 6.1.2.5, 6.1.3.5, 6.1.4.5, 6.1.5.3.5, 6.1.6.1.4, 6.2.2.5, 6.2.3.5, 6.2.4.5, 6.2.5.3.5, and 6.2.6.1.4 in the PEIS all address potential impacts to air quality. However, no air pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

Computation of EROI is not within the scope of the PEIS.

52685-002: Potential air quality impacts were adequately analyzed under NEPA documents previously prepared for the existing oil shale RD&D projects. The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal or federal air quality laws, statutes, regulations, standards, or

implementation plans. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process.

52685-003: See response to Comment 52685-001 regarding impacts on air quality.

52685-004: Table 3.5.3-2 in Section 3.5.3 provides a detailed list of representative criteria air pollutant concentrations. All values are cleaner than the ambient air quality standards applicable when the analysis was prepared, although as indicated in Table 3.5.3-2, certain ozone and particulate matter values were greater than 50% of the applicable standard (up to 93% of the 8-hr ozone standard based on CASNET monitoring at the Mesa Verde, Canyonlands, and Gothic stations. The EPA has recently lowered the ambient ozone standards, and will make formal determinations as to whether or not the study area continues to achieve the applicable National Ambient Air Quality Standards. The BLM will not conduct or authorize activities which would not comply with applicable local, state, tribal or federal air quality laws, statutes, regulations, standards, or implementation plans.

52685-005: Section 3.5.1.2 in the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

The quantity and source of electrical power that might be needed for potential development would require making many speculative assumptions and, therefore, is premature at this stage of the process.

52685-006: The quantity and source of refinery capacity that might be needed for potential development is premature at this stage of the process.

See also response to Comment 52685-007.

52685-007: See response to Comment 52685-001 regarding the proposed action.

52685-008: See response to Comment 52685-007.

52685-009: The BLM will not conduct or authorize activities which would not comply with applicable local, state, Tribal or federal air quality laws, statutes, regulations, standards, or implementation plans. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process.

Thank you for your comment, Stewart Cowley.

The comment tracking number that has been assigned to your comment is OSTSD52686.

Comment Date: March 17, 2008 15:48:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD52686

First Name: Stewart
Middle Initial: M
Last Name: Cowley
Organization: Mountain West Energy
Address: 928 North 510 East
Address 2:
Address 3:
City: Orem
State: UT
Zip: 84097
Country: USA
Email: stewart@mtnwestenergy.com
Privacy Preference: Don't withhold name or address from public record
Attachment: PEIS Alternative B support letter.doc

Comment Submitted:

See Attachment.

March 17, 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

As a concerned American, I want to see our government take positive steps to effectively respond to the energy crisis currently facing our country and the world. We must take action to address issues such as the following:

- Gasoline prices are projected to be over $4.00 per gallon this summer, attributable to the fact that international oil production is not keeping pace with increasing consumption of oil worldwide.
- America is importing more than 60% of the oil that is used to make gasoline and diesel.
- America is paying over $1 billion a day for oil to countries like Saudi Arabia, Venezuela, and Iran.
- America is converting farm ground from food production to crops needed for ethanol production, which is driving up food prices.
- America has the ability, the technology, and the resources to develop domestic alternative oil resources, if government policies would allow it.

I urge the United States to take steps to strengthen our nation's energy security by expanding access to its domestic energy resources.

Domestic reserves of oil shale and tar sands are vital sources of domestic energy; after all, the federal government estimates that oil shale deposits on public lands hold the equivalent of at least 1.23 trillion barrels of oil. The time is now and it is critical for these resources to be developed in order to lower gas and diesel prices, increase American energy security, reduce our dependence on imported oil, and maintain the integrity of our nation's food supply. 52686-001

Given technological advances today, I am certain that an active oil shale and tar sands program can be responsibly developed in a balanced and environmentally sound manner. I strongly support Alternative B in the PEIS.

If BLM adopts Alternative A, the United States will be unwisely ignoring an important domestic energy source. This alternative would force us to continue to increase our dependence on imported oil. Likewise, Alternative C is not acceptable because it does not allow for full recovery of oil shale and tar sands resources and does not provide for sound or efficient management of the program.

I urge you to ensure that these important national energy resources can be developed in an environmentally sound manner in order to help reduce gasoline and diesel prices, as well as our dependence on foreign oil by adopting Alternative B in the PEIS.

Sincerely,

Stewart M. Cowley

928 North 510 East

Orem, Utah 84097

stewart@mtnwestenergy.com

Response for Document 52686

52686-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Janet Taylor.

The comment tracking number that has been assigned to your comment is OSTSD52687.

Comment Date: March 17, 2008 16:22:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD52687

First Name: Janet
Middle Initial: E
Last Name: Taylor
Organization:
Address: 8132 s 1715 e
Address 2:
Address 3:
City: sandy
State: UT
Zip: 84093
Country: USA
Email: jetaylor.creek@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

My family and I spend alot of time hiking and camping in the "swell". It is such a wild and beautiful area. There are many Indian artifacts and geologic features that would knock you socks off. Stand on the brink of the Wedge Overlook, go down by Horsehoe Canyon, or wander around Jackass Flats. This is not an area suited for oil development. It is too spectacular. 52687-001

Response for Document 52687

52687-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52688.

Comment Date: March 17, 2008 20:12:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52688

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please withhold my name and address from the public record.

Dear Sherry Thompson, BLM Project Manager:

Because of the unacceptable environmental impacts that cannot be adequately mitigated, I ask you to choose the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

The proposed development comes at a time when our public lands are already bearing the brunt of the current energy boom and significant population growth across the West and when we desperately need to be transitioning away from fossil fuels and reducing our greenhouse gas emissions. 52688-001

This proposal is not feasible environmentally or economically, and would result in unacceptable quantities of greenhouse gas and other pollutants. The Bureau of Land Management should scrap the proposed development completely, choose the No Action alternative, or, at the very least, develop and evaluate a wider range of reasonable alternatives, including alternatives based on energy conservation and efficiency. 52688-002 52688-003

The Bureau of Land Management must also adequately consider the cumulative impacts of the proposed development to affected plants, wildlife, and regional air and water quality. 52688-004

I urge the Bureau of Land Management to choose the No Action alternative and abandon plans to develop oil shale and tar sands on public lands in the Rockies. 52688-001 (cont.)

Response for Document 52688

52688-001: The BLM acknowledges the commentor's preference for Alternative A.

52688-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52688-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed

analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

52688-004: The PEIS, while not exhaustive in its identification of potential impacts of commercial development, discloses potential impacts of oil shale and tar sands development based primarily on BLM experiences with surface-disturbing activities from other types of mineral development (e.g., coal mining and oil and gas). We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those types of impacts may occur.

This PEIS fulfills three purposes: 1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale or tar sands leasing; 2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and 3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS, and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It puts operators on notice that development of oil shale and tar sands can occur only if it is done in an environmentally acceptable manner, and it reiterates the obvious requirements that any development must comply with existing laws and regulations regarding the protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species. The cumulative effects analysis is presented in Sections 6.1.5 and 6.2.5 of the PEIS for oil shale and tar sands, respectively. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1).

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52689.

Comment Date: March 17, 2008 22:49:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52689

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale aids America's attempt to increase domstic energy

March 17, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to declare independence once more: this time it is from our staggering dependence on foreign nations for our energy needs. I support efforts to increase domestic energy production, particularly oil shale and tar sands.

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

52689-001

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence.

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52689

52689-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Jane Robinett.

The comment tracking number that has been assigned to your comment is OSTSD52690.

Comment Date: March 18, 2008 08:51:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD52690

First Name: Jane
Middle Initial:
Last Name: Robinett
Organization:
Address: 2922 Capitol Avenue
Address 2:
Address 3:
City: Cheyenne
State: WY
Zip: 82001
Country: USA
Email: jane_robinett@bresnan.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I would like to voice my objection to expanding oil shale production especially in Wyoming. Please adopt the No Action alternative and do not move forward with commercial-scale oil shale leasing until results from the experimental Research and Development oil shale pilot projects become available. Wyoming's landscape is especially fragile and oil shale extraction is an environmentally expensive alternative for energy production. 52690-001

Thank you.

Response for Document 52690

52690-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52691.

Comment Date: March 18, 2008 08:58:15AM
Oil Shale and Tar Sands
Comment ID: OSTSD52691

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

It is critical that we develop oil shale. The resource is vast, oil prices are reaching critical limits, and oil shale will take two years to actually produce even after an agreement to develop. These lands have been and can be developed responsibly.	52691-001

Response for Document 52691

52691-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Roy Vawter.

The comment tracking number that has been assigned to your comment is OSTSD52692.

Comment Date: March 18, 2008 11:49:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD52692

First Name: Roy
Middle Initial: G
Last Name: Vawter
Organization: ATP Services, LLC
Address: 2700 Gilstrap Ct
Address 2: Suite 305
Address 3:
City: Glenwood Springs
State: CO
Zip: 81601
Country: USA
Email: atpv@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment: ATP Comments on Draft Oil Shale and Tar Sands PEIS 3.18.2008.doc

Comment Submitted:

Comments on Draft Oil Shale and Tar Sands PEIS ATP Services, LLC 2700 Gilstrap Ct, Suite 305 Glenwood Springs, CO 81601 atpv@comcast.net March 18, 20082008 Executive Summary General Comment The document is not clear about the status of the BLM R,D& D leases issued in Colorado and Utah in 2007 that state they may be expanded to 5,120 Acres (or perhaps 5, 760 acres) if certain stipulations and conditions in those leases are met. It needs to be clarified in the final EIS that those leases may proceed to commercial size irrespective of the final Alternative chosen by BLM. In addition the BLM Resource Management Plans for the effected BLM offices should also reflect the unique status of the BLM R,D& D Leases with respect to the lessee's right to exercise its preference rights per the executed R,D& D leases. Table ES-1 – Resource Estimates 52692-001

The potential shale oil resource presented appears to be understated by at least of factor of ten (10), particularly in Colorado where the resource under consideration is thicker and richer that the other two states. This is especially true for the center of the Piceance Basin where much of the BLM land is located. According to the 2005 Rand Report and the authors cited therein "Within the Piceance Basin, about a half trillion barrels of oil are contained in deposits yielding more than 25 gallons per ton (Dyni, 2003).… The potential yield per surface acre is enormous, with portions of the basin yielding 2.5 million barrels per acre." Others have conservatively estimated figures in the range of 0.5 to 1.5 million barrels per acre. If the most conservative of those estimates is applied to the acreages in Alternative B & C the following resource estimates result: Alternative B Alternative C Colorado, 359,798 acres Colorado, 40,325 acres Colorado, 180 Billion Barrels Colorado, 22 Billion Barrels 52692-002

The reason this understatement of the extent of the resource is important is because it misstates the value of the resource to the future energy and national security of the nation.

Table ES-1 – Exclusions cited in Alternative C

Excluding all ACECs seems unreasonable as would seem to preclude any development where development for oil and gas and other minerals is already occurring because of mitigation measures that can be taken or other provision made with BLM to accommodate responsible development of energy resources.	52692-003
2.3.2 – Alternative A, No Action Alternative This Alternative is unrealistic, but it is understood that BLM must consider such an Alternative. The Energy Security Act of 2005 contemplated the need for oil shale as a source of energy for the nation and this alternative would not meet that mandate. 2.3.3.1 – Alternative B for a Commercial Oil Shale Leasing Program This Alternative B seems reasonable as it offers enough acreage to provide significant shale oil production for the nation, and a diversity of resource settings that could support surface and insitu processes. It opens prime resource areas to oil shale leasing that were earlier closed because of the priority given to other minerals (e.g. saline minerals and oil and gas). Also this Alternative does not close ACECs closed in Alternative C. 2.3.3.2 Alternative C for a Commercial Oil Shale Leasing Program This is an unrealistic Alternative for Colorado for a number of reasons. It does not offer enough acreage to provide significant shale oil production for the nation, nor a diversity of resource settings that could support surface and insitu processes. With minor exceptions this alternative does not offer tracts big enough to support a commercial venture as the acreage of individual blocks are as small as 160 acres or less. Thank you for considering these comments in your deliberations. See Attachment.	52692-004

Comments on Draft Oil Shale and Tar Sands PEIS
ATP Services, LLC
2700 Gilstrap Ct, Suite 305
Glenwood Springs, CO 81601
atpv@comcast.net
March 18, 20082008

Executive Summary

General Comment

The document is not clear about the status of the BLM R,D& D leases issued in Colorado and Utah in 2007 that state they may be expanded to 5,120 Acres (or perhaps 5, 760 acres) if certain stipulations and conditions in those leases are met. It needs to be clarified in the final EIS that those leases may proceed to commercial size irrespective of the final Alternative chosen by BLM. In addition the BLM Resource Management Plans for the effected BLM offices should also reflect the unique status of the BLM R,D& D Leases with respect to the lessee's right to exercise its preference rights per the executed R,D& D leases.

Table ES-1 – Resource Estimates

The potential shale oil resource presented appears to be understated by at least of factor of ten (10), particularly in Colorado where the resource under consideration is thicker and richer that the other two states. This is especially true for the center of the Piceance Basin where much of the BLM land is located.

According to the 2005 Rand Report and the authors cited therein "Within the Piceance Basin, about a half trillion barrels of oil are contained in deposits yielding more than 25 gallons per ton (Dyni, 2003).... The potential yield per surface acre is enormous, with portions of the basin yielding 2.5 million barrels per acre." Others have conservatively estimated figures in the range of 0.5 to 1.5 million barrels per acre. If the most conservative of those estimates is applied to the acreages in Alternative B & C the following resource estimates result:

Alternative B	Alternative C
Colorado, 359,798 acres	Colorado, 40,325 acres
Colorado, 180 Billion Barrels	Colorado, 22 Billion Barrels

The reason this understatement of the extent of the resource is important is because it misstates the value of the resource to the future energy and national security of the nation.

Table ES-1 – Exclusions cited in Alternative C

Excluding all ACECs seems unreasonable as would seem to preclude any development where development for oil and gas and other minerals is already occurring because of mitigation measures that can be taken or other provision made with BLM to accommodate responsible development of energy resources.

2.3.2 – Alternative A, No Action Alternative

This Alternative is unrealistic, but it is understood that BLM must consider such an Alternative. The Energy Security Act of 2005 contemplated the need for oil shale as a source of energy for the nation and this alternative would not meet that mandate.

2.3.3.1 – Alternative B for a Commercial Oil Shale Leasing Program

This Alternative B seems reasonable as it offers enough acreage to provide significant shale oil production for the nation, and a diversity of resource settings that could support surface and insitu processes. It opens prime resource areas to oil shale leasing that were earlier closed because of the priority given to other minerals (e.g. saline minerals and oil and gas). Also this Alternative does not close ACECs closed in Alternative C.

2.3.3.2 Alternative C for a Commercial Oil Shale Leasing Program

This is an unrealistic Alternative for Colorado for a number of reasons. It does not offer enough acreage to provide significant shale oil production for the nation, nor a diversity of resource settings that could support surface and insitu processes. With minor exceptions this alternative does not offer tracts big enough to support a commercial venture as the acreage of individual blocks are as small as 160 acres or less.

Thank you for considering these comments in your deliberations.

Responses for Document 52692

52692-001: The status of the RD&D leases in the Final PEIS has been more fully described.

52692-002: The number in question was calculated for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The number was developed with the understanding that the number underestimates the actual in-place resource. The number was developed using the values that described the minimum quality and thickness that was deemed to be economic. Those values are a minimum 25 ft thickness and a minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming, the values used were 15 ft thick and 15 gallons per ton. These values, coupled with the acreage in each of the alternatives, generated the numbers in question. It is true that using more exact isopachs and quality data, if available, would have provided much higher values for each of the alternatives, but the alternatives would remain comparable.

52692-003: While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. It was determined that the three alternatives provided a reasonable range because the allocation decisions, as being proposed in the PEIS, had a very narrow and limited scope: to allow certain lands to be considered for future leasing. This approach is in full compliance with NEPA since the purpose and need of the PEIS serves as the basis to determine the reasonable range of alternatives in a NEPA document. Alternative B was structured to make the most geologically prospective lands available, and Alternative C was structured to apply existing land use plan decisions associated with the affected planning areas that concern the protection of sensitive resources, including those resource values found in ACECs. The analysis of the alternatives discloses the impact of opening or closing lands to oil shale application. This gives the decision maker the ability to fully compare the consequences of each alternative in relationship to energy development and the protection of sensitive resources.

The PEIS only amends the management prescriptions associated with oil shale and tar sands and does not affect the decision concerning other mineral resource development.

52692-004: The BLM acknowledges the commentor’s preference for Alternative B.

Thank you for your comment, Manuel Cypers.

The comment tracking number that has been assigned to your comment is OSTSD52693.

Comment Date: March 18, 2008 11:55:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD52693

First Name: Manuel
Middle Initial: M
Last Name: Cypers
Organization:
Address: 1295 E 5600 S
Address 2:
Address 3:
City: Ogden
State: UT
Zip: 84403
Country: USA
Email: mannycypers@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I Thought that the meeting in Salt Lake was very educational. I believe that something has to be done about the energy crisis. Oil Shale and Tar Sands are more than viable in my opinion. Pushing Ethanol and bio fuels is not a good idea because it causes the price of food to go up. Petroleum will always have a huge need because it is used for many many other things besides gasoline. No matter what automobiles run on in the future, there will ALWAYS be a need for petroleum. 52693-001

Response for Document 52693

52693-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52694.

Comment Date: March 18, 2008 12:25:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD52694

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Draft PEIS for Oil Shale and Tar Sands

March 18, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

From Americans for American Energy

When it comes to energy, America is at war. At war with those abroad who threaten our way of life, and control much of our oil. And, at war with those at home who want to keep us dependent on foreign sources of energy.

Becoming more energy independent is about preserving the American way of life. It's about creating jobs and economic opportunities in the United States. It's about preserving and bolstering our national security.

The Energy Policy Act of 2005 was a landmark bipartisan Congressional accomplishment and a major step towards winning this war. Years of work on both sides of the aisle produced a commitment to make our nation's abundance of domestic energy resources available to all Americans. Forward-thinking policy makers included provisions in the act that would open up federal lands in the Western United States to oil shale development. 52694-001

America's Western oil shale deposits are the largest untapped energy source on earth. It is estimated that more than two trillion barrels of oil are held in domestic oil shale reserves. That

represents more oil reserves than are contained in all the countries in the Middle East combined. The richest and most easily recoverable deposits are currently found in the Green River formation in Northeastern Utah, Northwestern Colorado, and Southwestern Wyoming. Estimates suggest Colorado's total resources alone approach one trillion barrels of oil, which is four times as much oil as Saudi Arabia's proven oil reserves. Today, the U.S. Department of the Interior owns more than 80 percent of this area. This resource base is believed to be capable of eventually producing 10 million barrels of oil a day for more than 100 years.

Some radical environmental groups want to halt development of oil shale and tar sands even before it begins. They have found strong allies in the U.S. Congress who will carry out their agenda and prevent the oil shale regulatory process from moving forward. Now is a critical time for our permitting this vital domestic energy resource to be developed. To reduce our reliance on foreign energy, we must develop our domestic resources and invest in advanced energy technologies that will bring increased energy efficiency and provide for reliable - and affordable - domestic sources of power, key for a strong economy and our security. We need smart policies that provide incentives for innovation and conservation.

52694-001

We need positive change in our energy policies. We don't want a strategy that results in our energy dollars flowing to nations openly hostile to the United States. That is why Americans for American Energy, our members and supporters from the West and across the country support the Draft Programmatic Impact Statement for Oil Shale and Tar Sands as a first step in opening up public lands from commercial oil shale leasing.

Without a commercial leasing program, private industry will remain hesitant to commit the capital necessary to tap this tremendous domestic energy resource. There is extraordinary new technology under development that holds much promise but only if the companies willing to invest millions of dollars in it have an economic light at the end of the tunnel. Publishing commercial lease regulations as soon as possible will help provide that support.

As BLM and the U.S. Department of Interior move forward on oil shale and tar sands, Americans for American Energy will remain committed to working cooperatively to promote these resources as key to our long-term domestic energy independence and security.

Sincerely,

Response for Document 52694

52694-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Kirk Robinson.

The comment tracking number that has been assigned to your comment is OSTSD52695.

Comment Date: March 18, 2008 12:46:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD52695

First Name: Kirk
Middle Initial: C
Last Name: Robinson
Organization: Western Wildlife Conservancy
Address: 68 S. Main St., Suite 4
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84105
Country: USA
Email: lynx@xmission.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Thank you for this opportunity to comment on the PEIS.

Western Wildlife Conservancy hereby formally endorses the comments submitted by Wild Utah Project (Jim Catlin, Director) and Utah Rock Art Research Association (URARA). 52695-001

The mission of Western Wildlife Conservancy it to protect both vital wildlife habitat and important archaeological sites, including ancient rock art.

We are particularly distressed at the fact that Warrior Ridge, in Nine Mile Canyon, is included within the project area. The pristine rock art panels atop the high ridge (a spur ridge on the Tavaputs Plateau jutting into Nine Mile Canyon) are some of the best in the state, depicting what appear to be epic battle scenes and other extremely interesting representations that cast light on the way of life of the ancient inhabitants of this area. 52695-002

Responses for Document 52695

52695-001: Thank you for your comments. The comments referenced have been considered as part of the BLM review. See responses to Documents 52655 and 52748 for Wild Utah Project and URARA comments, respectively.

52695-002: Thank you for your comment regarding Warrior Ridge. Although the area is included within the area open for application for leasing, additional site-specific NEPA analysis will be completed on any future lease application before any leases would be issued. If, as part of this preleasing NEPA analysis, the BLM determines that leasing and subsequent development of the oil shale or tar sands resources would cause significant impacts, the BLM can require the applicant to: 1) mitigate the impact so that it is no longer significant, 2) move the proposed lease location, or if neither of these options resolves the anticipated conflicts, 3) the BLM can decide that development of the oil shale or tar sands resources outweighs protection of the on-site resources and approve the application. This preleasing NEPA analysis would include opportunities for public involvement and comment that are part of the NEPA process.

Thank you for your comment, Glenn Vawter.

The comment tracking number that has been assigned to your comment is OSTSD52696.

Comment Date: March 18, 2008 12:48:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52696

First Name: Glenn
Middle Initial:
Last Name: Vawter
Organization: National Oil Shale Association
Address: P.O. Box 3080
Address 2:
Address 3:
City: Glenwood Springs
State: CO
Zip: 81602
Country: USA
Email: natosa@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment: NOSA Review of Oil Shale OSTS Draft PEIS 3.18.08.doc

Comment Submitted:

APPENDIX A – OIL SHALE DEVELOPMENT BACKGROUND AND TECHNOLOGY OVERVIE Section A.1 – Description of Geology – Footnote 1 – …"desorption" is not the proper term. Suggest …thermal cracking and distillation… The three products of the recovered organic fraction are crude shale oil, flammable gas [not hydrogen gas, but contains hydrogen, hydrocarbons and inert gases], and char [not recovered as such as a product but deposited on spent shale – some processes combust this char to provide process heat]. Although not a product as such water is also produced during retorting of oil shale and must be processed, disposed of or utilized appropriately. 2nd Paragraph The definition of oil shale to be considered viable in Utah and Colorado could well average less than 25 gallons per ton, but very likely much greater than 25 ft in thickness. For instance one developer in the Piceance Basin is considering a section of Illitic oil shale some 200 ft thick averaging between 20 and 25 gallons per ton as viable for development because of the potential for lesser ground water impacts. 3rd Paragraph Surface mining has been shown to be economic in other mineral extraction projects at stripping ratios of 1:1. That being the case, and considering the oil shale in the middle of the Piceance basin ranges up to some 1000 feet thick, surface mining could be considered where overburden is up to 1000 ft deep. The historical limitation on surface oil shale mining on public land has been the inability to provide surface area of disposal of overburden during the initial stages of development since leases were limited to 5,120 acres. With larger leases and/or the ability to lease/use private surface lands for disposal, surface mining may be viable with overburden thicknesses of 1000 ft. Figure A-1 Question: Are the "Most Geologically Prospective Oil Shale Resource" areas on public land only? It seems the outcrop areas in Colorado and Utah where underground/surface mining projects were considered in the past are outside of this designation (e.g. tributaries to Roan and Parachute Creeks in Colorado). Also Rifle and Rangely are not shown on the map. Table A-2 – note "a" 1 barrel of shale oil = 42 gallons [not oil shale] Section A.2.l Colorado Activities – The Exxon – TOSCO Colony Project In the 1960's [not 1970's], a prototype mine and plant ….. Section A.3.1.1 Direct Recovery

Mining Technologies The 1st line refers to room-and-pillar mining as (shaft) mining. The (shaft) insert is not necessarily correct as some room-and-pillar mines are accessed from horizontal adits, declines or a combination thereof. Also same comment as given earlier, deposits over 500 ft of overburden may be amenable to surface mining. Suggest use the generic term "surface mining" vs. "strip mining" as not all surface mining is strip mining, strictly speaking. Paragraph beginning "Ventilation is necessarily continuous… The last line should be corrected to say "Access to the mine is either by shaft, decline or adit or a combination thereof." Section A.3.1.2 Indirect or Insitu Recovery Techniques 1st Paragraph – It is a misnomer to say that kerogen is mobilized. Kerogen by definition is a solid and even though insitu techniques use lower temperatures over longer time periods, and at potentially higher pressure to pyrolize the kerogen, it is still a thermal decomposition process. It may be aided by pressure and catalytic processes, depending on the technology. 2nd Paragraph – Remove …"most often" by steam injection. Actually, the technologies proposed by two of the three firms with BLM R,D&D leases in Colorado involve indirect heating with no injection of steam or other materials into the formation. It would be more accurate to say that technologies currently under investigation involve indirect heating, fluid injection and alternate energy methods. Again, kerogen is not mobilized, but the products of pyrolysis of the kerogen are mobilized and recovered in wells at the surface.

High Pressure CO2 Flooding It seems unlikely that CO2 flooding would be used to follow the conventional mining of shale as is implied [unless mining in this context includes insitu processing]. Section A.3.2 Processing Oil Shale 3rd Paragraph …such as separation of water (e.g. formation water, as well as condensate that results when steam is used to heat the formation, and water resulting from the pyrolysis of kerogen)… 4th Paragraph … Same comment as earlier provided to correct "flammable hydrogen gases" to flammable hydrocarbon gases.. Section A.3.2.1 Above Ground Retorting Technologies 1st Paragraph – [after]… impinging directly on the oil shale undergoing retorting [add], or the char bearing spent shale resulting from retorting…. Section A.3.2.2 In Situ Retorting Same comment about "mobilizing kerogen" being inaccurate. 3rd Paragraph - Gases produced from insitu retorting that do not involve combustion or injection of inert gases are not inferior to the gases produced from AGR. Reduced recoveries from insitu retorting generally occur because more organic carbon is left on the spent shale than from AGR, which is also the reason that the hydrocarbon liquids are of a higher quality. Much of the thermal cracking (upgrading) performed on AGR produced oil above ground in a separate upgrading step is performed underground over longer retorting periods in insitu retorts. 4th Bullet about advantages for insitu retorting It is not clear that the efficiency of insitu processing is better than AGR. Paragraph that starts "Insitu retorting also has some potential disadvantages…. The current insitu processes that heat oil shale to temperatures in the range of 600 to 700 degrees F cause less CO2 decomposition that AGR processes that heat oil shale to temperatures of 900 degrees F and higher. Processes that keep temperatures below 1100 degrees F keep CO2 evolution to a minimum. Footnote 19 – page A-48 It would be more accurate to say that some of gaseous components produced during upgrading of shale oil and gases produced during the retorting of oil shale are in the boiling range that can be made into LPG (liquid petroleum gas). A.4. Spent Shale Management 2nd Paragraph Underground disposal of spent shale back into underground mines should not be discounted on its face just because of leaching of constituents from spent shale may occur. It predisposes that mitigating measures can be taken to overcome the problem and meet regulatory requirements. 3rd Paragraph Eliminate the term "Popcorn Effect" here and later in the text. Any solid material that is reduced in size as a result of crushing or grinding will create void space between particles, the density will decrease, and the volume of a given mass will increase. Even when spent shale is compacted the density cannot reach the original density that the rock had in its original solid condition. This is not an issue specific to spent shale and is a myth that should not be formally perpetuated. Footnote 22 The formula for pyridine is C5H5N. [The N was omitted from the text] Table A-6 What is the cited source of information for the Simulated In-Situ Retorts

column? The quantity and nature of leachates from insitu retorting will vary based upon the process employed, the retorting temperature, the efficiency of recovery of organics and whether or not combustion was involved in the processing. Section A.5 Ongoing and Expected Future Oil Shale Development Technologies

A.5.3 Future R&D Projects on BLM Administered Lands 2nd Paragraph – The Energy Security Act of 2005 authorizes expansion of the R,D&D leases to up to 5,760 acres, or 640 acres more than cited. ATTACHMENT A1 – ANTICIPATED REFINERY MARKET RESPONSE TO FUTURE OIL SHALE PRODUCTION 1 INTRODUCTION 8TH and Last Bullet – Pipelines do not drive refinery….. The nature of crude or raw shale oil is such that crude oil pipelines are reluctant to accept it because of its nitrogen content that would contaminate subsequent batches of conventional crude oil. If a pipeline were dedicated to raw shale only it would be acceptable. Otherwise upgrading of raw shale oil will be required prior to shipment in common carrier crude oil pipelines. 2 OVERVIEW OF THE CRITICAL PARAMETERS IN THE CRUDE OIL REFINERY PROCESS Decisions on the degree of mine site upgrading are influenced by the constituents in crude shale oil that are unique to the petroleum refining business. For instance the nitrogen and heavy metals content in crude shale oil are not discussed in the text. It is a factor that is important in the refining and pipelining of crude shale oil. Conventional crude oils generally contain very small amounts of nitrogen, whereas crude shale oil contains amounts ranging up to and in some cases over 1%, depending upon the retorting process and the distillation cut. Nitrogen deactivates some refining catalysts that are not formulated for it. Likewise elements like arsenic are found in crude shale oil that needs to be removed before refining. Past work by Unocal, Arco and others have demonstrated the processes and catalysts needed to remove these constituents. Figure 1 – Generic Refinery Configuration… This is a very good and simple depiction of the refining process. Where Asphalt is shown as the bottom of the barrel product it is partially correct as many crude oils will not produce suitable asphalt and instead the bottom of the barrel product will be bunker/heavy fuel oil or continued to be recycled to a coker. A mixture of the heavy ends of shale oil and conventional asphalt have shown to give paving asphalt superior properties. This was demonstrated by laboratory and later highway testing by Paraho, Marathon Oil Co., Western Research Institute and state highway departments. 5th Paragraph page – Page A-101 During the 1980's Unocal processed thousands of barrels of crude shale oil at its upgrading plant in Parachute, CO. The crude shale oil was produced from its Union B demonstration scale retort. This was a commercial level operation that demonstrated the processes and catalysts for successfully upgrading crude shale oil into a synthetic fuel suitable for refining in any US refinery. Upgrading to remove nitrogen, via hydrogenation, was found to be successful in reducing sulfur to very low levels in the syncrude. Some of the upgraded shale oil from Unocal and other sources was refined into products that were tested by the Department of Defense and found satisfactory for use in military aircraft, vehicles and ships. This comment also applies to discussions about market responses in Section 3. THANK YOU FOR CONSIDERING OUR COMMENTS. OVERALL THE PEIS DOCUMENT IS VERY WELL DONE, AND THE ABOVE COMMENTS ARE OFFERED ON AS A MEANS OF MAKING MINOR CHANGES AND IMPROVEMENTS. SOURCES OF INFORMATION FOR OUR COMMENTS COME FROM PERSONAL EXPERIENCE, NON-PROPRIETARY DOCUMENTS, AND INPUT FROM OUR MEMBERS. R. GLENN VAWTE EXECUTIVE DIRECTOR See Attachment.

NATIONAL OIL SHALE ASSOCIATION(NOSA)
Review of OSTS Draft PEIS - March 18, 2008
Appendix A – OIL SHALE DEVELOPMENT BACKGROUND AND TECHNOLOGY OVERVIEW

APPENDIX A – OIL SHALE DEVELOPMENT BACKGROUND AND TECHNOLOGY OVERVIEW

Section A.1 – Description of Geology –

Footnote 1 –

> …"desorption" is not the proper term. Suggest …thermal cracking and distillation…
>
> The three products of the recovered organic fraction are crude shale oil, flammable gas [not hydrogen gas, but contains hydrogen, hydrocarbons and inert gases], and char [not recovered as such as a product but deposited on spent shale – some processes combust this char to provide process heat]. Although not a product as such water is also produced during retorting of oil shale and must be processed, disposed of or utilized appropriately.

52696-001

2nd Paragraph

> The definition of oil shale to be considered viable in Utah and Colorado could well average less than 25 gallons per ton, but very likely much greater than 25 ft in thickness. For instance one developer in the Piceance Basin is considering a section of Illitic oil shale some 200 ft thick averaging between 20 and 25 gallons per ton as viable for development because of the potential for lesser ground water impacts.

52696-002

3rd Paragraph

> Surface mining has been shown to be economic in other mineral extraction projects at stripping ratios of 1:1. That being the case, and considering the oil shale in the middle of the Piceance basin ranges up to some 1000 feet thick, surface mining could be considered where overburden is up to 1000 ft deep. The historical limitation on surface oil shale mining on public land has been the inability to provide surface area of disposal of overburden during the initial stages of development since leases were limited to 5,120 acres. With larger leases and/or the ability to lease/use private surface lands for disposal, surface mining may be viable with overburden thicknesses of 1000 ft.

52696-003

Figure A-1

> Question: Are the "Most Geologically Prospective Oil Shale Resource" areas on public land only? It seems the outcrop areas in Colorado and Utah where underground/surface mining projects were considered in the past are outside of this designation (e.g. tributaries to Roan and Parachute Creeks in Colorado). Also Rifle and Rangely are not shown on the map.

52696-004

Table A-2 – note "a"

> 1 barrel of *shale oil* = 42 gallons [*not oil shale*]

52696-005

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NATIONAL OIL SHALE ASSOCIATION(NOSA)
Review of OSTS Draft PEIS - March 18, 2008
Appendix A – OIL SHALE DEVELOPMENT BACKGROUND AND TECHNOLOGY OVERVIEW

Section A.2.1 Colorado Activities –

The Exxon – TOSCO Colony Project 52696-006

In the *1960's* [not 1970's], a prototype mine and plant …..

Section A.3.1.1 Direct Recovery Mining Technologies

The 1st line refers to room-and-pillar mining as (shaft) mining. The (shaft) insert is not necessarily correct as some room-and-pillar mines are accessed from horizontal adits, declines or a combination thereof.

Also same comment as given earlier, deposits over 500 ft of overburden may be amenable to surface mining. 52696-007

Suggest use the generic term "surface mining" vs. "strip mining" as not all surface mining is strip mining, strictly speaking.

Paragraph beginning "Ventilation is necessarily continuous…

The last line should be corrected to say "Access to the mine is either by shaft, decline or adit or a combination thereof."

Section A.3.1.2 Indirect or Insitu Recovery Techniques

1st Paragraph –

It is a misnomer to say that kerogen is mobilized. Kerogen by definition is a solid and even though insitu techniques use lower temperatures over longer time periods, and at potentially higher pressure to pyrolize the kerogen, it is still a thermal decomposition process. It may be aided by pressure and catalytic processes, depending on the technology. 52696-008

2nd Paragraph –

Remove …"*most often"* by steam injection. Actually, the technologies proposed by two of the three firms with BLM R,D&D leases in Colorado involve indirect heating with no injection of steam or other materials into the formation. It would be more accurate to say that technologies currently under investigation involve indirect heating, fluid injection and alternate energy methods. Again, kerogen is not mobilized, but the products of pyrolysis of the kerogen are mobilized and recovered in wells at the surface. 52696-009

High Pressure CO_2 Flooding 52696-010

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NATIONAL OIL SHALE ASSOCIATION(NOSA)
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Appendix A – OIL SHALE DEVELOPMENT BACKGROUND AND TECHNOLOGY OVERVIEW

It seems unlikely that CO_2 flooding would be used to follow the conventional mining of shale as is implied [unless mining in this context includes insitu processing]. 52696-010 (cont.)

Section A.3.2 Processing Oil Shale

3rd Paragraph

…such as separation of water (e.g. formation water, ~~*as well as*~~ condensate that results when steam is used to heat the formation, *and water resulting from the pyrolysis of kerogen*)… 52696-011

4th Paragraph

… Same comment as earlier provided to correct "flammable hydrogen gases" to *flammable hydrocarbon gases*.. 52696-012

Section A.3.2.1 Above Ground Retorting Technologies

1st Paragraph –

[after]… impinging directly on the oil shale undergoing retorting [add], *or the char bearing spent shale resulting from retorting….* 52696-013

Section A.3.2.2 In Situ Retorting

Same comment about "*mobilizing kerogen*" being inaccurate. 52696-008 (cont.)

3rd Paragraph -

Gases produced from insitu retorting that do not involve combustion or injection of inert gases are not inferior to the gases produced from AGR. Reduced recoveries from insitu retorting generally occur because more organic carbon is left on the spent shale than from AGR, which is also the reason that the hydrocarbon liquids are of a higher quality. Much of the thermal cracking (upgrading) performed on AGR produced oil above ground in a separate upgrading step is performed underground over longer retorting periods in insitu retorts. 52696-014

4th Bullet about advantages for insitu retorting

It is not clear that the efficiency of insitu processing is better than AGR. 52696-015

Paragraph that starts "Insitu retorting also has some potential disadvantages….

The current insitu processes that heat oil shale to temperatures in the range of 600 to 700 degrees F cause less CO_2 decomposition that AGR processes that heat oil shale to temperatures of 900 degrees F and higher. Processes that keep temperatures below 1100 degrees F keep CO_2 evolution to a minimum. 52696-016

National Oil Shale Association, P.O. Box 3080, Glenwood Springs, CO 81602, natosa@comcast.net, www.oilshaleassoc.org, 970-389-0879, 970-945-5994 (Fax)

NATIONAL OIL SHALE ASSOCIATION(NOSA)
Review of OSTS Draft PEIS - March 18, 2008
Appendix A – OIL SHALE DEVELOPMENT BACKGROUND AND TECHNOLOGY OVERVIEW

Footnote 19 – page A-48

It would be more accurate to say that some of gaseous components produced during upgrading of shale oil and gases produced during the retorting of oil shale are in the boiling range that can be made into LPG (liquid petroleum gas). 52696-017

A.4. Spent Shale Management

2nd Paragraph

Underground disposal of spent shale back into underground mines should not be discounted on its face just because of leaching of constituents from spent shale may occur. It predisposes that mitigating measures can be taken to overcome the problem and meet regulatory requirements. 52696-018

3rd Paragraph

Eliminate the term "Popcorn Effect" here and later in the text. Any solid material that is reduced in size as a result of crushing or grinding will create void space between particles, the density will decrease, and the volume of a given mass will increase. Even when spent shale is compacted the density cannot reach the original density that the rock had in its original solid condition. This is not an issue specific to spent shale and is a myth that should not be formally perpetuated. 52696-019

Footnote 22

The formula for pyridine is C_5H_5N. [*The N was omitted from the text*] 52696-020

Table A-6

What is the cited source of information for the Simulated In-Situ Retorts column? The quantity and nature of leachates from insitu retorting will vary based upon the process employed, the retorting temperature, the efficiency of recovery of organics and whether or not combustion was involved in the processing. 52696-021

Section A.5 Ongoing and Expected Future Oil Shale Development Technologies

A.5.3 Future R&D Projects on BLM Administered Lands 52696-022

2nd Paragraph –

The Energy Security Act of 2005 authorizes expansion of the R,D&D leases to up to 5,760 acres, or 640 acres more than cited.

National Oil Shale Association, P.O. Box 3080, Glenwood Springs, CO 81602, natosa@comcast.net, www.oilshaleassoc.org, 970-389-0879, 970-945-5994 (Fax)

NATIONAL OIL SHALE ASSOCIATION(NOSA)
Review of OSTS Draft PEIS - March 18, 2008
Appendix A – OIL SHALE DEVELOPMENT BACKGROUND AND TECHNOLOGY OVERVIEW

ATTACHMENT A1 – ANTICIPATED REFINERY MARKET RESPONSE TO FUTURE OIL SHALE PRODUCTION

1 INTRODUCTION

8TH and Last Bullet – Pipelines do not drive refinery…..

52696-023

The nature of crude or raw shale oil is such that crude oil pipelines are reluctant to accept it because of its nitrogen content that would contaminate subsequent batches of conventional crude oil. If a pipeline were dedicated to raw shale only it would be acceptable. Otherwise upgrading of raw shale oil will be required prior to shipment in common carrier crude oil pipelines.

2 OVERVIEW OF THE CRITICAL PARAMETERS IN THE CRUDE OIL REFINERY PROCESS

Decisions on the degree of mine site upgrading are influenced by the constituents in crude shale oil that are unique to the petroleum refining business. For instance the nitrogen and heavy metals content in crude shale oil are not discussed in the text. It is a factor that is important in the refining and pipelining of crude shale oil. Conventional crude oils generally contain very small amounts of nitrogen, whereas crude shale oil contains amounts ranging up to and in some cases over 1%, depending upon the retorting process and the distillation cut. Nitrogen deactivates some refining catalysts that are not formulated for it. Likewise elements like arsenic are found in crude shale oil that needs to be removed before refining. Past work by Unocal, Arco and others have demonstrated the processes and catalysts needed to remove these constituents.

52696-024

Figure 1 – Generic Refinery Configuration…

This is a very good and simple depiction of the refining process. Where Asphalt is shown as the bottom of the barrel product it is partially correct as many crude oils will not produce suitable asphalt and instead the bottom of the barrel product will be bunker/heavy fuel oil or continued to be recycled to a coker. A mixture of the heavy ends of shale oil and conventional asphalt have shown to give paving asphalt superior properties. This was demonstrated by laboratory and later highway testing by Paraho, Marathon Oil Co., Western Research Institute and state highway departments.

52696-025

5th Paragraph page – Page A-101

During the 1980's Unocal processed thousands of barrels of crude shale oil at its upgrading plant in Parachute, CO. The crude shale oil was produced from its Union B demonstration scale retort. This was a commercial level operation that demonstrated the processes and catalysts for successfully upgrading crude shale oil into a synthetic fuel suitable for refining in any US

52696-026

NATIONAL OIL SHALE ASSOCIATION(NOSA)
Review of OSTS Draft PEIS - March 18, 2008
Appendix A – OIL SHALE DEVELOPMENT BACKGROUND AND TECHNOLOGY OVERVIEW

refinery. Upgrading to remove nitrogen, via hydrogenation, was found to be successful in reducing sulfur to very low levels in the syncrude.

Some of the upgraded shale oil from Unocal and other sources was refined into products that were tested by the Department of Defense and found satisfactory for use in military aircraft, vehicles and ships.

52696-026 (cont.)

This comment also applies to discussions about market responses in Section 3.

THANK YOU FOR CONSIDERING OUR COMMENTS. OVERALL THE PEIS DOCUMENT IS VERY WELL DONE, AND THE ABOVE COMMENTS ARE OFFERED ONLY AS A MEANS OF MAKING MINOR CHANGES AND IMPROVEMENTS.

SOURCES OF INFORMATION FOR OUR COMMENTS COME FROM PERSONAL EXPERIENCE, NON-PROPRIETARY DOCUMENTS, AND INPUT FROM OUR MEMBERS.

R. GLENN VAWTER, EXECUTIVE DIRECTOR

National Oil Shale Association, P.O. Box 3080, Glenwood Springs, CO 81602, natosa@comcast.net, www.oilshaleassoc.org, 970-389-0879, 970-945-5994 (Fax)

Responses for Document 52696

52696-001: Thank you for your comment. Clarifications have been made to the text.

52696-002: One of the goals of the PEIS is to identify the most geologically prospective area within the states of Colorado, Utah, and Wyoming. The area was delineated, based on the data cited in the Draft PEIS and is shown on numerous figures in the PEIS. It can be assumed that comparable procedures would be developed, as in the coal, oil, and gas program, etc., to explore the oil shale deposit in order to obtain geological, geophysical, environmental, and other pertinent data concerning the oil shale deposit, thereby gathering adequate information for subsequent stages of exploration and development.

52696-003: Federal leases currently are limited to 5,760 acres by Congress. It is possible that operations could use a combination of federal and private lands to increase the number of acres necessary for development. The decision to limit the analysis of potential surface mining to areas of 500 ft or less was based on factors such as projected economics and material rehandle and equipment capabilities.

52696-004: Although the Green River Formation underlies federal, private, state, and Tribal lands, the scope of the PEIS includes only those most geologically prospective areas that underlie public lands (federal surface and federal minerals) managed by the BLM within the Green River Formation boundary as delineated in Figure A-1. While there maybe areas outside the area defined as most geographically prospective that are viable for development, those areas were not included in the scope of the PEIS.

52696-005: Thank you for your comment. The text has been corrected.

52696-006: Thank you for your comment. The text has been corrected.

52696-007: Thank you for your comment. Clarifications have been made to the text to incorporate your comment.

52696-008: Available evidence as to whether the kerogen is mobilized before undergoing decomposition is lacking. Nevertheless, the comment is acknowledged and the text has been changed.

52696-009: The text has been modified to acknowledge that other materials beside steam are being investigated for injection into the shale oil formation.

52696-010: Clarifications have been made to the text to indicate that CO_2 flooding would occur only with in situ processing.

52696-011: Thank you for your comment. Appropriate clarifications have been made to the text.

52696-012: The text inadvertently used the term “hydrogen gases” when it should have read “hydrocarbon gases.” The text has been corrected.

52696-013: Thank you for your comment. Appropriate changes have been made to the text.

52696-014: Thank you for your comment.

52696-015: The text has been modified to introduce a degree of uncertainty as to the relative efficiencies of in situ processing over AGRs.

52696-016: The BLM concurs with the point made in the comment. However, the paragraph was intended to address the potential consequences of indiscriminate (i.e., uncontrolled) heating. In those instances, although the average temperature of the formation may still fall below the decomposition temperatures of most carbonates, uneven heating may cause some portions of the formation to be heated to temperatures above those decomposition temperatures. Some clarifications have been made to the text in response to this comment.

52696-017: The footnote in question has been modified to indicate that the gases produced are generally within the boiling range of commercial liquid petroleum gas (LPG).

52696-018: The text does not discount the disposal of spent shale back into the mine because of the potential for leaching of hazardous constituents, but instead acknowledges this potential on those occasions when in-mine disposal of spent shale is practiced. No change has been made to the text.

52696-019: The BLM agrees that the bulk density of oil shale will decrease upon crushing and sizing in preparation for retorting. However, there is also conflicting data in the open literature as to whether additional volume and density changes occur during retorting. Nevertheless, the text in Section A.4 has been modified to remove the term “popcorn effect.” From an environmental perspective, the volumetric increase, together with the accompanying reduction in bulk density, may increase the potential both for erosion and for leaching of hazardous constituents and thus is an important consideration in the design of disposal strategies for spent shale from technologies employing AGR.

52696-020: Thank you for your comment. This inadvertent error has been corrected.

52696-021: The source of the data was inadvertently omitted: *EPA, 1980, Monitoring Groundwater Quality: The Impact of In Situ Oil shale Retorting, Interagency Energy-Environment Research and Development Program Report*, EPA- 600/7-80-132, Environmental Monitoring Systems Laboratory, Las Vegas, Nev., June.

52696-022: The current six RD&D leases were approved pursuant to the notice in the *Federal Register* dated June 9, 2005 (Volume 70, Number 110) calling for nominations for RD&D proposals. This predated the passage of the Energy Policy Act of 2005,

which amended the Mineral Leasing Act to increase the potential lease acreage for subsequent leases.

52696-023: The contaminants present in raw shale oil can indeed affect their eligibility for transport in crude oil pipelines operated by common carriers. A footnote has been added to acknowledge this.

52696-024: Thank you for your comment. Discussions in Sections A.3.2 and A.3.3 appear to be consistent with the comment. No text changes are warranted.

52696-025: A footnote has been added to capture the essence of the comment.

52696-026: A footnote has been added to capture the essence of the comment.

Thank you for your comment, John Graves.

The comment tracking number that has been assigned to your comment is OSTSD52697.

Comment Date: March 18, 2008 13:07:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD52697

First Name: John
Middle Initial: F
Last Name: Graves
Organization:
Address: 2985 Lincoln Ave.
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State: UT
Zip: 84401
Country: USA
Email: www.johngraves2222@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

After reading the EPIS I found that it was detailed and well documented. The only oil shell process that would be able to mininize it's impact on the environment is Leon Smiths aka Snytec process. It's a proven process that minimizes water usage and contamination along with biproduct pollution while being extremely cost effective. Bigger is not usually better given my research into the large oil company's bizzare processes.	52697-001
Let us begin the process of utilizing our national resources to protect this countries security and economy!	52697-002

Responses for Document 52697

52697-001: Thank you for your comment. Although the BLM anticipates that commercial oil shale operations of the future are likely to involve one or more of the technologies being investigated in ongoing RD&D efforts, nothing in the PEIS would preempt the consideration of other technologies.

52697-002: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Raymond Ridge.

The comment tracking number that has been assigned to your comment is OSTSD52698.

Comment Date: March 18, 2008 14:09:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52698

First Name: Raymond
Middle Initial: L
Last Name: Ridge
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City: Salt Lake City
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Country: USA
Email: RayRidge@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment: BLM EIS Two.doc

Comment Submitted:

We support Alernative B, but subject to each applicant meeting the "Best Available Technology" standard for preventing harm to the environment. Our complete comment is set forth in an attachment hereto. See Attachment. | 52698-001

EXCALIBUR
INDUSTRIES INC

1366 Spring Lane E
Salt Lake City, UT 84117
(801) 274-1353

March 18, 2008

Via E-Mail
ostseis.anl.gov

BLM Oil Shale and Tar Sands Resources PEIS
Argonne National Laboratory
EVS/900
9700 Cass Avenue
Argonne, IL 60439

Re: **Supplemental EIS Comments**

Gentlepersons:

This letter of comment is submitted to supplement our earlier comments set forth in a letter dated March 5, 2008 together with attachments and samples, which is incorporated herein by this reference.

Alternative B Subject to "Best Available Technology"

Our letter of March 5, 2008 asserts that commercial leasing of BLM oil shale properties should be permitted to proceed uninhibited or otherwise burdened by any requirement(s) for future environmental impact statements for the "best available technology" ("BAT"). This letter is to clarify that we support strongly Alternative B in the PEIS, but only for those leasehold applicants capable of demonstrating commercial viability of their processes (especially important where the leases rely on royalty payment streams rather than large up-front payments) **and** the "best available technology" ("BAT") to prevent adverse environmental impacts.

52698-002

Any leasehold applicant unable to meet the most stringent environmental processes available as BAT, would be required to file an environmental impact statement for their process and the specific property involved to explain why such a project should be relieved from compliance with BAT.

Our technology eliminates all effluents and renders the spent shale environmentally inert using plasma gasification in combination with above-ground retorting. Any technology unable to achieve the same results should be required to file additional EIS statements to justify the impact of their processes on the environment.

Should you have any questions, please call.

Sincerely yours,

RAYMOND L. RIDGE

Responses for Document 52698

52698-001: The BLM acknowledges the commentor's preference for Alternative B.

52698-002: Issuance of commercial leases or approvals of plans of development are subject to requirements of existing laws and regulations, including the NEPA process.

Thank you for your comment, Roger Day.

The comment tracking number that has been assigned to your comment is OSTSD52699.

Comment Date: March 18, 2008 15:05:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD52699

First Name: Roger
Middle Initial:
Last Name: Day
Organization: E.G.L. Oil Shale, LLC
Address: 110 E. 3rd Street, Suite 210
Address 2: PO Box 1470
Address 3:
City: Rifle
State: CO
Zip: 81650
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment: EGL Comments on Oil Shale PEIS.pdf

Comment Submitted:

Please see the attached comment letter on behalf of E.G.L. Oil Shale, LLC. Please include these comments in the administrative record for the Oil Shale and Tar Sands Programmatic EIS. See Attachment.

EGL Oil Shale, LLC
110 E. 3RD Street, Suite 210, PO Box 1470, Rifle, CO 81650
970-625-4324 phone

March 18, 2008

BLM Oil Shale and Tar Sands Resources
Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Re: Comments on Draft Oil Shale and Tar Sands Resource Management Plan Amendments To Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic EIS, 72 Fed. Reg. 72751 (Dec. 21, 2007)

Dear Sir/Madam:

E.G.L. Oil Shale, LLC (EGL) submits these comments in response to the draft Programmatic Environmental Impact Statement (PEIS) prepared to support amendments to resource management plans concerning to oil shale development in Colorado, Utah, and Wyoming. EGL holds Lease COC 69169 in Colorado, an Oil Shale Research, Development and Demonstration (RD&D) lease that BLM issued in December 2006, and is interested in pursuing oil shale development on other lands within the area studied by the draft PEIS.

I. BLM's Discussion of the No Action Alternative Must Acknowledge EGL's Right to Develop the Preference Lease Area.

Under the National Environmental Policy Act (NEPA), an agency must consider a reasonable range of alternatives to the proposed action, including a no action alternative. The purpose of the no action alternative is to "compare the potential impacts of the proposed major federal action to the known impacts of maintaining the status quo." *Custer County Action Ass'n v. Garvey*, 256 F.3d 1024, 1040 (10th Cir. 2001). In the context of an EIS prepared to amend land management plans (such as the PEIS), the no action alternative means "'no change' from current management direction or level of management intensity." The Council on Environmental Quality's "Forty Questions Memorandum," Question and Answer No. 3, 46 *Fed. Reg.* 18026 (1981). 52699-001

Accordingly, for the lands covered by the RD&D leases in Colorado, the no action alternative must include the rights granted by the RD&D leases (which are part of the status quo), as well as the management direction in the current White River Resource Management Plan. The White River RMP issued in 1997

specifically addressed oil shale development and allowed issuance and development of RD&D leases like EGL's:

> At the discretion of the Secretary of the Interior, research scale lease tracts will be considered within lands available for oil shale leasing. Approval of research tracts will be based on the merits of the technology proposed. The Secretary of the Interior could also propose research tract development to further the goals of a federal energy policy. No definitive limits on research tract size will be set forth at this time. No commercial-scale operations will be permitted on a research tract lease. However, if the research tract technology successfully demonstrated an adequate reserve recovery, the Secretary of the Interior will have the discretion of expanding the research tract into a commercial mineral lease.

White River RMP at 2-6. Therefore, the current management direction for the area in which the Colorado RD&D leases are located authorized issuance of the leases and gave the Secretary of the Interior the discretion to expand the leases into commercial leases.

In the draft PEIS, however, BLM assumes that, for the no action alternative, development of RD&D leases will be limited to the initial 160 acre tract and no development will occur on the preference right lease areas. Draft PEIS at 2-16. This assumption is an incorrect description of the no action alternative. EGL has the contractual right to convert the lease to a commercial lease covering the preference lease area if it satisfies the provisions of Section 23 of the lease. Under Section 23, EGL is entitled to a commercial lease for the preference lease area if (1) it produces oil shale in commercial quantities; (2) it pays a bonus based on the fair market value of the lease; (3) it documents its consultation with state and local officials regarding a plan to mitigate socioeconomic impacts; (4) it provides an adequate reclamation bond; and (5) if BLM determines, following a NEPA analysis, that "commercial scale operations can be conducted, subject to mitigation measures to be specified in stipulations or regulations, without unacceptable environmental impacts." EGL's conversion right is entirely consistent with the existing management direction in the White River RMP. 52699-001 (cont.)

Accordingly, BLM should revise the discussion of the no action alternative to recognize the rights of RD&D lessees to convert leases to commercial leases and to develop the preference right areas identified in those leases. BLM should also note that its ability to deny development of the preference right lease area is limited to the terms of the leases, and BLM will be liable for damages if it breaches a lease. *See, e.g., Mobil Oil Exploration & Producing Southeast, Inc. v. United States*, 530 U.S. 604 (2000) (government

held liable for damages when it breached plaintiffs' oil and gas exploration and development lease contracts); *Sun Oil Co. v. United States*, 572 F.2d 786 (Ct. Cl. 1978) (oil and gas lessees entitled to damages for government's breach of oil and gas lease).

In this regard, the draft PEIS incorrectly suggests that BLM can deny conversion of an RD&D lease if commercial development would cause "*significant adverse environmental or social impacts.*" PEIS at 1-9 (emphasis added). EGL's lease actually states in Section 23 that BLM can deny development only if it determines that development would cause "*unacceptable* environmental consequences." (Emphasis added.) In describing BLM's authority under the leases to deny a conversion for a commercial development lease, the PEIS should employ the language that is used in the leases. Merely because an environmental impact might be "significant" (and thus warrant study in an EIS) does not mean the impact is "unacceptable" under Section 23 of the leases. 52699-001 (cont.)

II. The BLM Properly Identifies Alternative B as the Preferred Alternative.

EGL supports BLM's selection of Alternative B as the preferred alternative in the PEIS. As compared to the other alternatives, Alternative B strikes the proper balance between protection of the environment, by prohibiting oil shale development in wilderness areas and other special management areas, *id.* at 2-17 to 2-18, and Congress' directive in the Energy Policy Act to develop oil shale to reduce the nation's growing dependence on oil. *Id.* at 1-1. By contrast, Alternative C unnecessarily removes 1.2 million acres of significant oil shale resources from development. *Id.* at 2-27. Because an additional site-specific environmental analysis will be conducted before issuance of a commercial lease, BLM can decide on a case-by-case basis whether certain areas should be available to oil shale leasing and what measures could be taken to protect sensitive areas. *Id.* at 2-25. Therefore, BLM need not close vast areas to oil shale leasing at this early step in the process. 52699-002

Moreover, with minor exceptions, Alternative C does not allow oil shale development on tracts large enough to support the surface and in-situ processes required for a commercial venture, especially since the acreage of some individual parcels are as small as 160 acres or less. Alternative C also does not open to oil shale development sufficient acreage to provide significant shale oil production for the nation, as directed by the Energy Policy Act. The no action alternative (Alternative A) similarly does not comport with Congress' directive in the Act to develop oil shale. Because Alternatives A and C fail to satisfy Congressional intent, and because further environmental review will occur before individual leases are issued, BLM has properly identified Alternative B as the Preferred Alternative.

III. BLM Understates the Potential Recovery of Oil Shale.

The draft PEIS states that, under Alternative B, approximately 16 billion barrels of oil would be available from Colorado, 28 billion barrels from Utah, and 17 billion barrels from Wyoming. *Id.* at 2-22. Under Alternative C, the draft PEIS estimates that two billion barrels of oil would be available from Colorado, 21 billion barrels from Utah, and eight billion barrels from Wyoming. *Id.* at 2-27. These estimates of potential shale oil resource appear to be grossly understated, particularly in Colorado where the resource under consideration is thicker and richer that the other two states. This understatement of the extent of the resource should be corrected because it may affect the choice of alternatives, and because it provides an inaccurate picture of the value and importance of the oil shale resource to the nation's future energy and national security.

According to the 2005 Rand Report, "[w]ithin the Piceance Basin, about a half trillion barrels of oil are contained in deposits yielding more than 25 gallons per ton (Dyni, 2003). . . . The potential yield per surface acre is enormous, with portions of the basin yielding 2.5 million barrels per acre." Rand Corporation, Oil Shale Development in the United States, Prospects and Policy Issues, at 6 (2005). Others have conservatively estimated figures in the range of 0.5 to 1.5 million barrels per acre. *See, e.g.*, EGL EA at 5. Using the most conservative of those figures (0.5 million barrels per acre) results in the following estimate for oil shale resources in Colorado under Alternative B and C: 52699-003

	Number of Acres Open for Oil Shale Development[1]	Oil Shale Resource Estimate (in barrels)
Alternative B	359,798	180 Billion
Alternative C	40,325	22 Billion

Based on these calculations, the draft PEIS appears to underestimate the potential oil shale resources in Colorado by a factor of ten. BLM should revise the PEIS to provide a more accurate assessment of the oil shale resources.

IV. Technical Comments

Attached are technical comments on Appendix A of the draft PEIS, the Oil Shale Development Background and Technology Overview.

EGL appreciates the opportunity to submit comments on the draft Oil Shale and Tar Sands PEIS.

[1] *See* PEIS at 2-27 (Table 2.2.3-1); 2-32 (Table 2.3.3-2).

Sincerely,

Roger L Day

Roger Day
Vice President of Operations
E.G.L. Oil Shale, LLC

Enclosure

3837583_2.DOC

Technical Comments on Draft Oil Shale PEIS Appendix A – Oil Shale Development Background And Technology Overview

Section A.1 – Description of Geology

Statement in Draft PEIS: "Retorting and pyrolysis are key steps in oil shale processing. Retorting is a process that causes thermal desorption of organic fractions of the oil shale from the mineral fractions. The recovered organic fraction is then distilled, or pyrolyzed, to produce three products: crude shale oil, flammable hydrogen gas, and char." Draft PEIS at A-3 n.1.

Comment: BLM should replace the term "desorption" with "thermal cracking and distillation." The three products of the recovered organic fraction are crude shale oil, flammable gas [not hydrogen gas, but contains hydrogen, hydrocarbon, and other gases], and char [not recovered as such as a product but deposited on spent shale – some processes combust this char to provide process heat]. Although not a product as such, water is also produced during retorting of oil shale and must be processed and disposed of or utilized appropriately. 52699-004

Statement in Draft PEIS: "As discussed in Section 1.2 of the main text of the PEIS, in defining the scope of analysis for the PEIS, the BLM identified the most geologically prospective areas for oil shale development on the basis of the grade and thickness of the deposits. For the purposes of this PEIS, the most geologically prospective oil shale resources in Colorado and Utah are defined as those deposits that are expected to yield 25 gal of shale oil per ton of rock (gal/ton) and are 25 ft thick or greater." *Id.* at A-4.

Comment: The definition of oil shale to be considered viable in Utah and Colorado could well average less than 25 gallons per ton, but very likely much greater than 25 ft in thickness. For instance, EGL Oil Shale LLC (EGL) is considering a section of illitic oil shale some 200 ft thick averaging between 20 and 25 gallons per ton as viable for development because of the potential for lesser ground water impacts. 52699-005

Statement in Draft PEIS: "In addition to limiting the scope of analyses to the most geologically prospective resources, the BLM has determined that, for the purposes of establishing a commercial leasing program for oil shale development on public lands, oil shale resources that are covered by more than 500 ft of overburden would not be available for application for leasing using surface mining technologies under the scope of this PEIS. This limitation is based on the assumption that 500 ft is about the maximum amount of overburden where surface mining can occur economically, using today's technologies." *Id.*

Comment: Surface mining has been shown to be economic in other mineral extraction projects at stripping ratios of 1:1. That being the case, and considering the oil shale in the middle of the Piceance basin ranges up to some 1000 feet thick, surface mining could be considered where overburden is up to 1000 feet deep. The historical limitation on surface oil shale mining on public land has been the inability to provide surface area of disposal 52699-006

of overburden during the initial stages of development since leases were limited to 5,120 acres. With larger leases and/or the ability to lease/use private surface lands for disposal, surface mining may be viable with overburden thicknesses of 1000 feet. 52699-006 (cont.)

Statement in Draft PEIS: Figure A-1 purports to show the "Most Geologically Prospective Oil Shale Resources." *Id.* at A-5.

Comment: Are the most geologically prospective oil shale resource areas on public land only? It appears that the outcrop areas in Colorado and Utah where underground/surface mining projects were considered in the past are outside of this designation (e.g., tributaries to Roan and Parachute Creeks in Colorado). Why is this the case? Also Rifle and Rangely are not, but should be, shown on the map. 52699-007

Statement in Draft PEIS: Table A-2, note "a" states that 1 barrel oil shale = 42 gallons. *Id.* at A-10.

Comment: The reference to "oil shale" should be deleted. 52699-008

Section A.2.1 Colorado Activities

Statement in Draft PEIS: With respect to the Exxon-TOSCO Colony Project, "In the 1970s, a prototype mine and plant operation proved the viability of the underground mining plan with aboveground processing using the "TOSCO II" retort method. *Id.* at A-16.

Comment: The reference to "the 1970s" should be changed to "the 1960s." 52699-009

Section A.3.1.1 Direct Recovery Mining Technologies

Statement in Draft PEIS: "Surface mining techniques (e.g., strip mining and/or pit mining) as well as subsurface mining techniques (e.g., room-and-pillar (shaft) mining, longwall mining, and other derivatives) have been successfully employed in the recovery of oil shale. For oil shale deposits relatively close to the surface, conventional strip mining technologies could be employed to retrieve the oil shale." *Id.* at A-22.

Comment: The reference to room-and-pillar mining as shaft mining is not necessarily correct as some room-and-pillar mines are accessed from horizontal adits. Also, the generic term "surface mining" should be used rather than "strip mining" as not all surface mining is strip mining, strictly speaking. 52699-010

Statement in Draft PEIS: "The typical cycle of activities in room-and-pillar mining involves drilling, charging, blasting, wetting, crushing, loading, hauling, scaling, and roof bolting (DOE 1982)." *Id.* at A-24.

Comment: We are not aware of any oil shale project that crushed underground before loading and hauling. 52699-011

Statement in Draft PEIS: "Access to the mine is either by shaft, decline, or both." *Id.*

Comment: This statement should be corrected to say "Access to the mine is by shaft, decline, adit, or a combination thereof." 52699-012

Section A.3.1.2 Indirect or In Situ Recovery Techniques

Statement in Draft PEIS: "In its simplest manifestation, an indirect recovery technique increases the mobility of kerogen within the formation by heating it to lower its viscosity, allowing it to 'flow' through the formation for removal by conventional oil and gas recovery techniques." *Id.* at A-25.

Comment: It is a misnomer to say that kerogen is mobilized. Kerogen by definition is a solid and even though in situ techniques use lower temperatures over longer time periods, and at potentially higher pressure to pyrolize the kerogen, it is still a thermal decomposition process. It may be aided by pressure and catalytic processes, depending on the process. 52699-013

Statement in Draft PEIS: "Heat can then be introduced into the formation by a variety of mechanisms, most often by steam injected into either vertically or horizontally oriented boreholes or wells, but also by the application of alternative energy technologies such as microwave heating, radio frequency heating, or electric resistance heating." *Id.*

Comment: Remove the phrase "most often" before "steam injection." The technologies proposed by two of RD&D lessees in Colorado involve indirect heating with no injection of steam or other materials into the formation. It would be more accurate to say that technologies currently under investigation involve indirect heating, fluid injection and alternate energy methods. Again, kerogen is not mobilized, but the products of pyrolysis of the kerogen are mobilized and recovered at the surface via wells. 52699-014

Statement in Draft PEIS: "Enhanced oil recovery (EOR) technologies developed for the conventional crude oil and tar sands industries also have potential application to oil shale recovery. Both secondary and tertiary techniques have been developed. Secondary techniques essentially involve mechanical displacement of oil by the use of high-pressure immiscible gases or water. Waterflooding and high-pressure gas flooding are examples." *Id.* at A-26.

Comment: It seems unlikely that high-pressure gas flooding would be used to follow the conventional mining of shale as may be inferred from the term "conventional heating technologies". 52699-015

Statement in Draft PEIS: "Solvent flooding may involve the use of such materials as raw naphtha, a collection of light molecular weight aliphatic hydrocarbons, that is a principal feedstock for gasoline or other products of partial crude oil refining." *Id.* at A-26. 52699-016

Comment: Although the concept of solvent flooding is worth investigating, there are two key points to note. First, expensive solvents must be recaptured and recycled to make the process viable. Second, the chemicals left behind if used in situ can be an environmental challenge. 52699-016 (cont.)

Section A.3.2 Processing Oil Shale

Statement in Draft PEIS: "When the raw resource has been retrieved from its formation as a liquid through in situ formation heating or other in situ recovery technologies, crushing and sizing are obviously not required; however, other actions such as separation of water (e.g., formation water as well as the condensate that results when steam is used to heat the formation) and removal of entrained fine particulates are necessary prior to any retorting." *Id.* at A-31. 52699-017

Comment: This is not correct in several ways. Please consider the following: "When the resource is to be retrieved from its formation as a fluid through in situ formation heating or other in situ recovery technologies, crushing and sizing are obviously not required; however, other actions such as formation dewatering may be necessary prior to any retorting."

Statement in Draft PEIS: "When direct recovery methods are used (e.g., surface or subsurface mining), retorting the recovered oil shale causes thermal desorption of the organic fractions from the mineral fractions and their subsequent destructive distillation or pyrolysis, which produce three product streams: crude shale oil (a collection of condensable organic liquids); flammable hydrogen gases; and char, a solid fraction of organic material that typically remains adsorbed to the mineral fraction of the shale." *Id.* 52699-018

Comment: Change "destructive distillation or pyrolysis, which produce" should be "destructive distillation or pyrolysis of kerogen, which produces"

Section A.3.2.1 Above Ground Retorting Technologies

Statement in Draft PEIS: "In direct heat retorting, some of the oil shale is combusted to provide heat for pyrolysis of the remaining oil shale, or some other fuel is burned with the flame impinging directly on the oil shale undergoing retorting." 52699-019

Comment: This should read: "In direct heat retorting, some of the oil shale or char bearing spent shale or some other added fuel is burned within the chamber used to retort the kerogen"

Section A.3.2.2 In Situ Retorting

Statement in Draft PEIS: "Field experiences with the first generation in situ retorts indicate that the petroleum gases tend to be of lesser quality than gases recovered by AGRs." *Id.* at A-39. 52699-020

Comment: Gases produced from in situ retorting that does not involve combustion or injection of inert gases are not inferior to the gases produced from AGR. Reduced recoveries from in situ retorting generally occur because more organic carbon is left on the spent shale that from AGR, which is also the reason that the hydrocarbon liquids are of a higher quality. Much of the thermal cracking (upgrading) performed on AGR produced oil is performed underground over longer retorting periods in in situ retorts. 52699-020 (cont.)

Statement in Draft PEIS: "Overall energy efficiencies would increase over conventional retrieval and AGR methods". *Id.* at A-40.

Comment: It is not clear that the efficiency of in situ processing is better than AGR. 52699-021

Statement in Draft PEIS: "Indiscriminate formation heating can result in technological problems, as well as the thermal decomposition of mineral carbonates and the release of CO_2."

Comment: The current in situ processes that heat oil shale to temperatures in the range of 600 to 700 degrees F cause less CO_2 decomposition than AGR processes that heat oil shale to temperatures of 900 degrees F and higher. Processes that keep temperatures below 1100 degrees F keep CO_2 evolution to a minimum. 52699-022

Statement in Draft PEIS: "Butanes formed during upgrading of shale oil are typically mixtures of butane and butylenes. Although potentially saleable products, these mixtures are more typically used as fuel at the plant site." *Id.* at A-48 n.19.

Comment: It would be more accurate to say that some of gaseous components produced during upgrading of shale oil and gases produced during the retorting of oil shale are in the boiling range that can be made into LPG (liquid petroleum gas). 52699-023

A.4. Spent Shale Management

Statement in Draft PEIS: "While disposal of spent shale back into the underground oil shale mine or a preexisting mine appears initially attractive, various logistical issues may prevent or limit such disposals as well as potential problems unique to that disposal technique . . . Also, while the potential for leaching of toxic constituents from the spent shale as a result of precipitation or run-on surface water interactions is effectively eliminated, leaching as a result of interaction of groundwater can still be anticipated." *Id.* at A-48. 52699-024

Comment: Underground disposal of spent shale back into underground mines should not be discounted simply because of the leaching of constituents from spent shale may occur. It is possible that mitigating measures can be undertaken to deal with the issue and meet regulatory requirements.

Statement in Draft PEIS: "Regardless of the disposal option selected, a number of issues need to be addressed, including the structural integrity of emplaced spent shale, an 52699-025

increase in volume (and decrease in density) over raw shale during the retorting process (this has become known as "the popcorn effect"), and the character of leachates from spent shale." *Id.*

Comment: Eliminate the term "popcorn effect" here and later in the text. Any solid material that is reduced in size as a result of crushing or grinding will create void space between particles and the density will decrease, and the volume of a given mass will increase. Even when compacted, the density cannot reach the original density that the rock had in its original solid condition. This is not an issue specific to spent shale and is a myth that should not be formally perpetuated. 52699-025 (cont.)

Statement in Draft PEIS: "The parent compound, pyridine, is a cyclic polar hydrocarbon with the formula C5H5." *Id.* at A-50 n. 22.

Comment: The formula for pyridine is C_5H_5N. 52699-026

Statement in Draft PEIS: Table A-6 provides a summary of the range of leachate characteristics of simulated spent shale from in situ retorting and from three AGRs. *Id.* at A-51.

Comment: What is the cited source of information for the Simulated In-Situ Retorts column? The quantity and nature of leachates from in situ retorting will vary based upon the process employed, the retorting temperature, the efficiency of recovery of organics, and whether combustion was involved in the processing. 52699-027

Attachment A1 – Anticipated Refinery Market Response To Future Oil Shale Production

1 Introduction

Statement in Draft PEIS: "Pipelines do not drive refinery market investments; pipeline operators react to committed emerging markets and provide transportation linkage between the source and the refiner." *Id.* at A-98.

Comment:
Add the sentence, "Either shale oil upgrading or dedicated pipelines will be needed." 52699-028

2 Overview Of The Critical Parameters In The Crude Oil Refinery Process

Statement in Draft PEIS: "Empirical evidence suggests that, together with the intrinsic variability in the composition of the parent oil shale, the quality of recovered shale oil ultimately offered to the refinery market will be highly dependent on the extraction and retorting technologies selected and the nature and extent of mine site upgrading." *Id.* at A-101. 52699-029

Comment: Decisions on the degree of mine site upgrading are influenced by the constituents in crude shale oil that are unique to the petroleum refining business. For instance, the nitrogen and heavy metals content in crude shale oil, which is very important in the refining and pipelining of crude shale oil, are not discussed. Conventional crude oils generally contain very small amounts of nitrogen, whereas crude shale oil contains amounts ranging up to over 1%, depending upon the retorting process and the distillation cut. Nitrogen deactivates some refining catalysts that are not formulated for it. Likewise elements like arsenic found in crude shale oil need to be removed before refining. Past work by Unocal, Arco, and others have demonstrated the processes and catalysts needed to remove these constituents.

52699-029 (cont.)

Statement in Draft PEIS: Figure 1 shows a generic refinery configuration. *Id.* at A-100.

Comment: This is a very good and simple depiction of the refining process. However, showing asphalt as the bottom of the barrel product is only partially correct, as many crude oils will not produce suitable asphalt and instead the bottom of the barrel product will be bunker/heavy fuel oil or continued to be recycled to a coker.

52699-030

Statement in Draft PEIS: "That being said, there is very little experience related to commercial-scale shale oil development." *Id.* at A-101.

Comment: During the 1980s, Unocal processed thousands of barrels of crude shale oil at its upgrading plant in Parachute, CO. The crude shale oil was produced from its Union B demonstration scale retort. This was a commercial level operation that demonstrated the processes and catalysts for successfully upgrading crude shale oil into a synthetic fuel suitable for refining in any U.S. refinery. Upgrading to remove nitrogen, via hydrogenation, was found to be successful in reducing sulfur to very low levels in the syncrude. Some of the upgraded shale oil from Unocal and other sources was refined into products that were tested by the Department of Defense and found satisfactory for use in military aircraft, vehicles and ships. This comment also applies to discussions about market responses in Section 3.

52699-031

3838180_1.DOC

Responses for Document 52699

52699-001: In general, valid existing rights are considered administrative actions by the BLM and do not require a specific planning decision to implement. This is a planning criterion and, as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decisions are subject to valid existing rights. With respect to the federal government's commitment to issue commercial leases on the PRLAs to the RD&D lease holders, a lease will be issued only if the terms and conditions of the lease are met. This includes evaluation pursuant to the NEPA that concludes that commercial-scale operations of the applicant's technology at that site do not pose environmental or social risks unacceptable to the BLM. The discussion of the PRLAs, however, has been revised to reflect the language in the lease and clarify that this is a component of all of the PEIS oil shale alternatives.

52699-002: The BLM acknowledges the commentor's preference for Alternative B.

52699-003: The numbers in question were created for comparative purposes to illustrate the potential differences among Alternatives A, B, and C. The numbers were developed with the understanding that they underestimate the actual in-place resource. The numbers were developed using values that describe the minimum quality and thickness that were deemed to be economic. Those values are a minimum 25 ft thickness and a minimum quality value of 25 gal/ton for Utah and Colorado. In Wyoming, the values used were 15 ft thick and 15 gal/ton. These values, coupled with the acreage in each of the alternatives, created the numbers in question. It is true that using more exact isopachs and quality data, if available, would have provided much higher values for each of the alternatives, but the alternatives would remain comparable.

52699-004: Thank you for your comment. The document has been changed to reflect the information provided in the comment.

52699-005: We agree that there may be areas outside of the area defined as "most geologically prospective" that are in fact viable. The drawing of the boundaries was based on areas considered the most geologically prospective. Although other areas might be viable, it was determined that they were not the most geologically prospective.

52699-006: The decision to limit the analysis of potential surface mining to areas of 500 ft or less was not based solely on surface area needed to dispose of the waste material, but on other factors such as projected economics, material rehandling, and equipment capabilities. Development of a surface oil shale operation would most likely resemble an open-pit operation with far greater material handling and storage issues than a strip mine operation.

52699-007: Although the Green River Formation underlies federal, private, state, and Tribal lands within portions of three states, the scope of the PEIS includes public lands administered by the BLM within the most geologically prospective area delineated in Figure A-1 where 1) the federal government owns both the surface estate and the subsurface mineral rights, and 2) the federal government owns the subsurface mineral rights, but the surface estate is owned by Tribes, states, or private parties. See also response to Comment 52699-005.

52699-008: Thank you. The document has been corrected to reflect your comment.

52699-009: Thank you. A correction has been made to the text.

52699-010: Thank you for your comment. A clarification has been made to the text.

52699-011: Thank you for your comment. The statement referenced in the comment was intended to describe the typical sequence of room and pillar mining, not that mining technique as it has been applied to this point in the mining of oil shale. The fact that initial crushing in the mine site has not been practiced in oil shale mining to date does not eliminate that practice from future oil shale mining protocols. However, although it is altogether possible for future oil shale mining applications to propose initial crushing in the mine, the impact analysis in Chapter 4 was based on the presumption that all required crushing and grinding of mined oil shale would occur at surface facilities.

52699-012: Thank you for your comment. Corrections have been made to the document.

52699-013: Thank you for your comment. The text has been modified to indicate that kerogen thermal decomposition products, rather than kerogen, flow through the formation to recovery wells.

52699-014: Thank you for your comment. Irrespective of the technologies proposed for use in RD&D ventures, the statement is correct since steam has historically been used. Nevertheless, the text has been modified to accommodate the point made in the comment.

52699-015: Thank you for your comment. The BLM has no data available to it at this time that would discount the use of high-pressure gas flooding following in situ formation heating.

52699-016: Thank you for your comments. The BLM agrees with both of the points made. One of the principal concerns associated with in situ retorting at this time is the ability to recover the organic fractions that result from kerogen pyrolysis. While the addition of a solvent to enhance that recovery effort is an obvious advantage, the inability to recover all of the solvent may create additional potential for groundwater contamination. Any future lease applications proposing the use of solvent flushing must also include detailed plans of operation for recovery of the

solvent as well as protection of groundwater resources. The text has been changed in response to your comment.

52699-017: The alternative suggested in the comment is a correct statement; however, that was not the point of the original statement in the text. Indeed, most formation heating must be preceded by removal of formation water (and prevention of reentry of formation water into the retorting zone). However, the statement was not intended to address formation water that was removed prior to the start of formation heating, but rather, water that is recovered together with kerogen decomposition products. The original statement has been modified, however, to clarify that formation water is not expected to be present in significant quantities, but that water produced during kerogen pyrolysis will also be recovered.

52699-018: Thank you for your comment. Appropriate corrections have been made.

52699-019: Appropriate corrections have been made to the text.

52699-020: The statement is correct; as is the statement in the comment. First-generation in situ retorts used open flame combustion, and the gases recovered were of lesser quality than gases recovered from AGRs. However, gases recovered from in situ retorting that does not involve combustion can be of equivalent quality to gases recovered from AGRs. A footnote has been added to the text to reflect the point made in the comment.

52699-021: A text change has been made to indicate uncertainty with respect to overall efficiency.

52699-022: The text in question discussed indiscriminate or poorly controlled heating where portions of the formation could be heated to beyond carbonate decomposition temperatures. Text changes have been made for clarity.

52699-023: The footnote has been modified to incorporate the point presented in this comment.

52699-024: Thank you for your comment. In-mine disposal of spent shale is not being discounted. Instead, the text points out potential disadvantages of such disposal strategies.

52699-025: The document has been revised to reflect the information in your comment.

52699-026: Thank you for your comment. This inadvertent error has been corrected.

52699-027: The commentor is correct. The quantity and characteristics of the leachate produced will be dependent on the specific conditions maintained during retorting (including whether open flame combustion was involved). Likewise, organic compounds that resulted from kerogen pyrolysis but that were not removed from

the formation can be the source of groundwater contamination, especially if they have sufficient polar character to have reasonable water solubilities. The cited reference was inadvertently omitted. It is the following EPA report: *EPA, 1980, "Monitoring Groundwater Quality: the Impact of In Situ Oil Shale Retorting, Interagency Energy-Environment Research and Development Program Report,* EPA-600/7-80-132, Environmental Monitoring and Systems Laboratory, Las Vegas, Nev., June 1980." The text has been modified to include the reference.

52699-028: A footnote has been added to the text to capture the point of the comment.

52699-029: Thank you for your comment. The points made are consistent with the discussions in Section A.3.3, although the specifics of the upgrading steps (i.e., catalysts used) were not introduced since the character of raw shale oil cannot be precisely predicted. Those upgrading decisions would be made after analysis of the recovered raw shale oil and a consideration of the acceptance parameters of the refinery that will receive it.

52699-030: A footnote has been added to capture the point of the comment.

52699-031: A footnote has been added to introduce the points made.

Thank you for your comment, Lewis Cooper.

The comment tracking number that has been assigned to your comment is OSTSD52700.

Comment Date: March 18, 2008 17:13:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD52700

First Name: Lewis
Middle Initial: C
Last Name: Cooper
Organization:
Address: PO Box 121
Address 2:
Address 3:
City: Lapoint
State: UT
Zip: 84039
Country: USA
Email: bms@ubtanetwb.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am very happy that the Whiterocks Canyon deposit was not included in any proposal. Any attempts to develop the small and lean deposit in this canyon would cause irreversible damage to the pure fresh water aquifer and river that flow through this canyon. This water supply is the sole water supply for the Ute Indian tribal community of Whiterocks and hundreds of farmers and ranchers. 52700-001

I attended the Vernal Utah meeting and was very impressed with the knowledgeable persons I spoke with.

Keep up the good work.

Lewis Cooper

Response for Document 52700

52700-001: Thank you for your comment. As stated in the comment, no land disturbance in Whiterocks Canyon will occur as a result of this PEIS. Additionally, no other lands will be disturbed as a direct result of this PEIS, because the scope of the PEIS was changed from a leasing decision to an allocation decision (in consultation with cooperating agencies). The BLM's analysis in the PEIS provides information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. This PEIS uses the available information to analyze impacts from types of projects that might be proposed later for commercial operations. Future leasing decisions will be accompanied by a NEPA document that will analyze impacts using information then available.

Thank you for your comment, Todd Runck.

The comment tracking number that has been assigned to your comment is OSTSD52701.

Comment Date: March 18, 2008 18:09:48PM
Oil Shale and Tar Sands
Comment ID: OSTSD52701

First Name: Todd
Middle Initial:
Last Name: Runck
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose plan B & support plan A | 52701-001

Response for Document 52701

52701-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Kasandra Griffin.

The comment tracking number that has been assigned to your comment is OSTSD52702.

Comment Date: March 18, 2008 18:12:46PM
Oil Shale and Tar Sands
Comment ID: OSTSD52702

First Name: Kasandra
Middle Initial: M
Last Name: Griffin
Organization:
Address: 1718 SE 34th Avenue
Address 2:
Address 3:
City: Portland
State: OR
Zip: 97214
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I vehemently oppose Alternative B and support only the "No Action" Alternative A.

The only solution to the energy crisis is to reduce demand. There is not enough oil to be had in the desert southwest to justify destroying the priceless natural beauty of the area. 52702-001

Response for Document 52702

52702-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Denise Hudson.

The comment tracking number that has been assigned to your comment is OSTSD52704.

Comment Date: March 18, 2008 18:21:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52704

First Name: Denise
Middle Initial:
Last Name: Hudson
Organization:
Address:
Address 2:
Address 3:
City: Flagstaff
State: AZ
Zip: 86004
Country: USA
Email: djh@infomagic.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose "Preferred Alternative" B and support the "No Action" Alternative A. I believe our government should be pursuing alternative and sustainable energy sources. | 52704-001

Response for Document 52704

52704-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, dan & doris heffernan.

The comment tracking number that has been assigned to your comment is OSTSD52705.

Comment Date: March 18, 2008 18:24:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52705

First Name: dan & doris
Middle Initial:
Last Name: heffernan
Organization:
Address: 5329 W. Garden Dr.
Address 2:
Address 3:
City: glendale
State: AR
Zip: 85304
Country: USA
Email: azearthwalker@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

At a time when we need to be moving away from fossil fuels and the damage they cause, this proposal would continue our dependence on them. The PEIS fails to adequately address any of these issues, or to consider a reasonable range of alternatives, including the potential for increased energy conservation and efficiency. This is contrary to agency regulations and the law. 52705-001

Response for Document 52705

52705-001: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

The preparation of the PEIS is not contrary to agency regulations or laws. Preparation of the PEIS is in full compliance with the principles of the FLPMA of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals.

Thank you for your comment, John Buckley.

The comment tracking number that has been assigned to your comment is OSTSD52708.

Comment Date: March 18, 2008 18:37:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD52708

First Name: John
Middle Initial: M
Last Name: Buckley
Organization:
Address: 2932 New Mexico Avenue, NW
Address 2:
Address 3:
City: Washington
State: DC
Zip: 20016
Country: USA
Email: Johnbuckley100@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The BLM's Preferred Alternative B in regard to Oil Shale Extraction should absolutely NOT be implemented. I am a Republican who voted twice for George W. Bush, the son of an oil company employee, and I know that the nation needs to develop new sources of fossil fuel. But this would lead to ecological devastation throughout the West. Do not go forward with this plan. John Buckley

52708-001

Response for Document 52708

52708-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, John Finazzo.

The comment tracking number that has been assigned to your comment is OSTSD52709.

Comment Date: March 18, 2008 18:59:07PM
Oil Shale and Tar Sands
Comment ID: OSTSD52709

First Name: John
Middle Initial: A
Last Name: Finazzo
Organization:
Address: 2415 Atkinson st
Address 2:
Address 3:
City: Detroit
State: MI
Zip: 48206
Country: USA
Email: moonbow_26@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I try to spend about two weeks a year backpacking in southern Utah, mostly the eastern half. To me these are sacred lands so I walk softly on the fragile terrain. These places need to be respected and protected not exploited. I oppose "Preferred Alternative" B and support "No Action Alternative" A. John Finazzo

52709-001

Response for Document 52709

52709-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Paul Fretheim.

The comment tracking number that has been assigned to your comment is OSTSD52710.

Comment Date: March 18, 2008 19:06:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD52710

First Name: Paul
Middle Initial:
Last Name: Fretheim
Organization:
Address: 219 W Main Street
Address 2:
Address 3:
City: independence
State: CA
Zip: 93526
Country: USA
Email: paul@inyopro.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Bush administration is populated with pro corporate pro oil industry hacks. Their legacy is one of tragedy.

Please don't allow one more tragedy, which is what oil sands development in the wonderful Red Rock country of Utah would be.

52710-001

Response for Document 52710

52710-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Kim Johnson.

The comment tracking number that has been assigned to your comment is OSTSD52712.

Comment Date: March 18, 2008 19:29:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52712

First Name: Kim
Middle Initial: I
Last Name: Johnson
Organization:
Address: 36955 W. Oliveto Ave.
Address 2:
Address 3:
City: Maricopa
State: AZ
Zip: 85238
Country: USA
Email: wind_river_man2004@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Glen Canyon Institute believes that our government should be promoting energy conservation and sustainable energy production - such as solar and wind - to increase energy independence and fight global climate change. We believe that before any development can be approved, all impacts to watersheds that flow into the Colorado River system must be thoroughly analyzed and mitigated. The BLM's plan falls far short of meeting the minimum level of assessment required for adequate decision-making. Alternative B, the BLM's "Preferred" Alternative," would sacrifice our public lands to develop dirty fossil fuel that will worsen climate change. This is totally unacceptable. The only responsible choice is Alternative A, the "No Action" alternative.

52712-001

52712-002

52712-001 (cont.)

Thank you.

Mr. Kim Johnson

Responses for Document 52712

52712-001: The BLM acknowledges the commentor's preference for Alternative A.

52712-002: Currently there is sufficient information on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale or tar sands leasing. In the PEIS, the BLM is analyzing the environmental consequences of an allocation decision. As a result, the ROD will not commit any resources or grant any lease rights. This process provides an opportunity for a subsequent level of land use planning, if necessary, and NEPA analysis of specific parcels which may be offered for lease and to develop specific mitigation measures to protect the resources and resource values present. At that time, if parcels are nominated for leasing within the PEIS study area, additional NEPA analysis will be required using the site-specific information within the area proposed for leasing prior to the issuance of any lease. These subsequent commercial oil shale or tar sands leasing decisions will be made at the Field Office level and will take into account any applicable decision in the RMP.

Thank you for your comment, David Mendenhall.

The comment tracking number that has been assigned to your comment is OSTSD52713.

Comment Date: March 18, 2008 19:30:54PM
Oil Shale and Tar Sands
Comment ID: OSTSD52713

First Name: David
Middle Initial:
Last Name: Mendenhall
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to comment on the Bureau of Land Management's Oil Shale and Tar Sands Draft Programmatic EIS. I strongly oppose Alternative B, the "Preferred Alternative" and support Alternative A, the "No Action" alternative in the PEIS. | 52713-001

Response for Document 52713

52713-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Gus Scott.

The comment tracking number that has been assigned to your comment is OSTSD52714.

Comment Date: March 18, 2008 19:40:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD52714

First Name: Gus
Middle Initial:
Last Name: Scott
Organization:
Address: 930 Geneva Dr.
Address 2:
Address 3:
City: Prescott
State: AZ
Zip: 86305
Country: USA
Email: gscott11@mindspring.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please, please elect Alternative A.

The damage to Utah's wonderful environmental areas would be unacceptable with any other choice than A. I have been coming to these areas for over 50 years and they are a treasure for now and for future generations. | 52714-001

Response for Document 52714

52714-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Robert Andrews.

The comment tracking number that has been assigned to your comment is OSTSD52717.

Comment Date: March 18, 2008 20:04:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD52717

First Name: Robert
Middle Initial: D
Last Name: Andrews
Organization:
Address: 1871 E Herbert Ave
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84108
Country: USA
Email: bob8lunch@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please don't allow more drilling or mining. | 52717-001

Response for Document 52717

52717-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Leslie Samuelson.

The comment tracking number that has been assigned to your comment is OSTSD52718.

Comment Date: March 18, 2008 20:10:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD52718

First Name: Leslie
Middle Initial: A
Last Name: Samuelson
Organization:
Address: 339 Dakota Circle
Address 2:
Address 3:
City: Grand Junction
State: CO
Zip: 81503
Country: USA
Email: leslie.samuelson@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As a resident of Colorado, I oppose the "preferred alternative" B for the Oil Shale and Tar Sands Draft PEIS. Instead, I support the "no action" alternative A. Exploration and development of these resources would not solve the ultimate problem of oil dependence, and would result in needless destruction. Please do not support the "preferred alternative" B! 52718-001

Response for Document 52718

52718-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Sidney Hirsh.

The comment tracking number that has been assigned to your comment is OSTSD52719.

Comment Date: March 18, 2008 20:15:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52719

First Name: Sidney
Middle Initial: M
Last Name: Hirsh
Organization:
Address: 4322 E. 7 St.
Address 2:
Address 3:
City: Tucson
State: AZ
Zip: 85711
Country: USA
Email: sidmarsha@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I support No Action, Alternative A | 52719-001

Response for Document 52719

52719-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52720.

Comment Date: March 18, 2008 20:51:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD52720

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Please reconsider this bill and vote no.

52720-001

Response for Document 52720

52720-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Corin Wood.

The comment tracking number that has been assigned to your comment is OSTSD52721.

Comment Date: March 18, 2008 21:01:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52721

First Name: Corin
Middle Initial:
Last Name: Wood
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: cwood@lostcoonhound.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I would like to express my opposition to Alternative B. The amount of damage that will be caused to large areas of several States, harming wildlife, people, and the environment. I would urge you to choose Alternative A, the No Action plan. Please do not allow the development of oil shale and tar sands on our public lands. We need to start thinking long-term for our children's sake. 52721-001

Thank you.

Response for Document 52721

52721-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Mark Pepper.

The comment tracking number that has been assigned to your comment is OSTSD52723.

Comment Date: March 18, 2008 21:12:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD52723

First Name: Mark
Middle Initial: L
Last Name: Pepper
Organization:
Address: 2427 Franklin Ave.
Address 2:
Address 3:
City: Secane
State: PA
Zip: 19018
Country: USA
Email: sparks11757@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

To Whom It May Concern' I am writing to inform the BLM that the proposed "Alternative B" for BLM Oil Shale and Tar Sands Draft Programmatic EIS is enrironmentally and economically unsound. The alternative would result in massive, irreversible ecological damage to wilderness areas under your protection due to mining efforts and greenhouse gas emissions from coal-fired power plants, at a time when our country, and the world in general are facing the realityof the need to develop alternative sources of clean energy. My belief is that taxpayers like mysels should not have to shoulder the fiscal burden that will provide a limited amount of actual energy relief, and massive profits for those few companies that will engage in this short-sighted project. The only viable solution is that of "alternative A" which is to take no further action toward development of Shale/Tar Sand extraction

52723-001

Response for Document 52723

52723-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52724.

Comment Date: March 18, 2008 21:29:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD52724

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I oppose the "Preferred Alternative" B and support the "No Action" alternative A. | 52724-001

Response for Document 52724

52724-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Jesse Call .

The comment tracking number that has been assigned to your comment is OSTSD52725.

Comment Date: March 18, 2008 21:34:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD52725

First Name: Jesse
Middle Initial: N
Last Name: Call
Organization:
Address: 317 S. 9th ave
Address 2:
Address 3:
City: pocatello
State: ID
Zip: 83201
Country: USA
Email: calljess@isu.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As a parent and outdoor zealot, I urge the BLM to choose the "No Action" alternative A, and to halt efforts to develop oil shale and tar sands on public lands. There remains few places so sacred and beautiful as these on our earth. I thank you for the opportunity to comment on the Oil Shale and Tar Sands Draft Programmatic EIS and hope for your support- Thank you, Ms. Jesse Call

52725-001

Response for Document 52725

52725-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Martin Wolf.

The comment tracking number that has been assigned to your comment is OSTSD52726.

Comment Date: March 18, 2008 21:45:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD52726

First Name: Martin
Middle Initial:
Last Name: Wolf
Organization:
Address:
Address 2:
Address 3:
City: Colorado Springs
State: CO
Zip:
Country: USA
Email: macawolf@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am extremely concerned about the environmental/ecological and sociological ramifications of oil shale & tar sands extraction in Colorado. It is impossible for there to be zero impact on any ecosystem within or downstream from extraction sites. Tampering with ecosystems means tampering with delicate webs of organisms including threatened and endangered species of birds, mammals, and plants. It also means tampering with watersheds, fisheries, and water supplies for many Colorado residents. This will in turn impact our beloved and vital tourism industry, from hunters and fishermen to campers, birders, photographers and hikers. Furthermore, we have seen repeatedly the ill effects of "boom-and-bust" cycles in Colorado, including past fiascos involving these very oil shale resources. Local communities are going to be sacrificed as workers first overwhelm their limited services, and then, once the town coffers swell and begin to meet the demand, the bust sets in and ghost towns resume their haunting. In addition, it is absurdly short-sighted (and blind-sided by the promise of quick profit) to be thinking fossil-fuel extraction in the 21st century. These resources will be a drop in the bucket of what America needs, while trashing Colorado's scenic splendor for it. Meanwhile, feasible energy alternatives are being developed in Boulder at NREL, and are being promoted throughout our forward-focused state now, with NO concommitant destruction of our state's delicate ecosystems, wildlife, outdoor recreation opportunities and scenery. The oil shale & tar sands EIS must pull no punches in holding the extraction industry's feet to the fire. Reclamation in a semi-arid state is no simple, quick, cheap task--but is in fact nearly impossible; its costs (if true reclamation is to be achieved) will far exceed the profit the industry hopes to realize. They must NOT be allowed to proceed without first, UP-FRONT, posting collateral funds for the very expensive and time-consuming reclamation which must be required of them, so our state is not trashed and left behind for their profit.

52726-001

52726-002

52726-003

52726-004

Responses for Document 52726

52726-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

52726-002: Text has been added to Section 4.11 of the PEIS covering the importance of amenities to economic development in rural areas and the potential conflict with energy development.

Many of the social and economic impacts of the "bust" after the "boom" of the Colony Project are described in Sections 3.10.1 and 3.10.2.2.1 of the PEIS. The impacts that occurred as a result of the loss of energy projects in general are discussed in Section 3.10.2.2.5. Experience and perceptions of the long-tem economic impacts of continued reliance on energy development and the impacts on attempts to diversify local and regional economies to avoid "boom" and "bust" economic development in the future are described in Section 3.10.2.2.1 of the PEIS.

52726-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this

information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

52726-004: The promulgation of regulations concerning adequate bonding and reclamation requirements is outside the scope of the PEIS.

Thank you for your comment, robert rosenfield.

The comment tracking number that has been assigned to your comment is OSTSD52727.

Comment Date: March 18, 2008 21:49:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52727

First Name: robert
Middle Initial:
Last Name: rosenfield
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

it has come to my attention that the BLM is planning to open about 2000000 acres in western states to oil and gas exploration. This not in the interest of the citizens of the u.s. you need to protect, not degrade these pristine areas. Please reconsider your policy, thank you. | 52727-001

Response for Document 52727

52727-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Chris Guthrie.

The comment tracking number that has been assigned to your comment is OSTSD52728.

Comment Date: March 18, 2008 22:15:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD52728

First Name: Chris
Middle Initial:
Last Name: Guthrie
Organization:
Address:
Address 2:
Address 3:
City: Boulder
State: CO
Zip:
Country: USA
Email: chrisguthrie@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

In the interest of protecting the environment from further development of dirty fossil fuels, I must advocate the "No Action" Alternative A, as opposed to "Preferred" Alternative B. Oil shale development would ruin the surrounding wilderness, as well as contribute to our dependency on oil. We must protect the Colorado River area and preserve one of the most beautiful places on Earth. We must stop this continuous slide toward unsustainable practices and energy sources. We can play our part by choosing Alternative A.

52728-001

Response for Document 52728

52728-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Erik Bluhm.

The comment tracking number that has been assigned to your comment is OSTSD52729.

Comment Date: March 18, 2008 22:42:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD52729

First Name: Erik
Middle Initial:
Last Name: Bluhm
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

In less than 3 centuries we Americans have pretty much decimated the land we live on. Opening some of the few pristine wildlands and watersheds we have left for commercial leasing, exploration, and development of fossil fuels is a terrible idea. I and anyone else with any sort of conscience vehemently oppose the "Preferred Alternative" B and support the "No Action" alternative A. This kind of usage is NOT in the public's interest.	52729-001

Response for Document 52729

52729-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Ronald Faich.

The comment tracking number that has been assigned to your comment is OSTSD52730.

Comment Date: March 18, 2008 22:47:55PM
Oil Shale and Tar Sands
Comment ID: OSTSD52730

First Name: Ronald
Middle Initial: G
Last Name: Faich
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State: NM
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Attachment:

Comment Submitted:

I oppose Alternative B, as currently stated, and favor the adoption of Alternative A, the "no action" option at this time. Unless and until the environmental impacts on the Colorado River watershed and National Parks and Monuments in the target areas are fully addressed and adequate mitigations guaranteed, I will remain opposed to oil shale and tar sands developments in the areas under consideration.

52730-001

52730-002

Responses for Document 52730

52730-001: The BLM acknowledges the commentor's preference for Alternative A.

52730-002: Thank you for your comment.

Thank you for your comment, Paul Burks.

The comment tracking number that has been assigned to your comment is OSTSD52731.

Comment Date: March 18, 2008 22:51:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD52731

First Name: Paul
Middle Initial: D
Last Name: Burks
Organization: Earthlight Magazine
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Address 2:
Address 3:
City: Santa Rosa
State: CA
Zip: 954093056
Country: USA
Email: pburks@earthlight.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

No to Oil Sands mining in the Southwest. It is a totally ineffective way to obtain energy from the earth (vs Sun and Wind) and a terrible destruction of one of the most beautiful areas of the Earth. | 52731-001

Response for Document 52731

52731-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Kathleen Hardt-Holoch.

The comment tracking number that has been assigned to your comment is OSTSD52733.

Comment Date: March 18, 2008 23:20:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52733

First Name: Kathleen
Middle Initial: T
Last Name: Hardt-Holoch
Organization:
Address: 246 Orchard Road
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Address 3:
City: Orinda
State: CA
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Country: USA
Email: kthardt@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment: Tar Sands comments.doc

Comment Submitted:

See Attachment.

Purpose and Need

I think the EIS does not provide an adequate need for the project. There is no discussion of what purpose this mining will fulfill--no discussion of what the tar sand would be used for, discussion of national need for resource extraction, and no compelling purpose to support the proposed project. 52733-001

Impact Analysis

I do not think the EIS adequately states the impacts nor provides any mitigation measures for the extractions. What about the impacts to sensitive species, paleontological resources, fragile desert soils, not to mention the project's contribution to greenhouse gases. Tar sand extraction is an extremely inefficient method of recovery petroleum and may well use more energy resources than the recovered petroleum may provide. This is a boondoggle to the American public to allow mining leases that will destroy our land—especially in light that most of these companies pay a pittance for these leases. Please provide the socioeconomic benefits of these leases and the community they will impact. 52733-002

Programmatic vs. Project-level Analysis

I understand that this analysis is program-level, but the analysis seems very weak and no details are provided. Surely you can reasonably assume that most extraction will occur using one or two primary methods and base your analysis on those methods. 52733-003

Please add me to your mailing list for notification of the project-level analysis for individual projects. I would like to be able to review and comment during the scoping process and review the environmental documents.

Responses for Document 52733

52733-001: Oil shale and tar sands have tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated in the Energy Policy Act of 2005 that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an environmentally sound manner using management practices that will minimize potential impacts.

52733-002: On the basis of input from the cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. The PEIS analyzes the environmental consequence of land use allocation decisions that do not commit any resources or grant any lease rights. In addition, prior to any commercial leasing and development, additional NEPA analysis will be required. Subsequent NEPA analyses will be conducted to assess the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

Potential impacts on the range of issues described in the comment (sensitive species, paleontological resources, soils, air quality, and socioeconomic issues) and measures that could be considered in future NEPA analysis to mitigate those impacts are discussed in Chapters 4 and 5 for oil shale and tar sands, respectively.

52733-003: This PEIS is a programmatic-level document analyzing land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. The BLM believes there currently is sufficient information at the programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing.

As described in the PEIS in Chapter 1, although several companies are pursuing specific technologies, industry has not yet settled on the best processes to use to develop these resources. As also described in the PEIS in Chapter 1, it is too speculative for the BLM to make assumptions on the level and type of technology.

Thank you for your comment, David Garbett.

The comment tracking number that has been assigned to your comment is OSTSD52734.

Comment Date: March 18, 2008 23:29:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52734

First Name: David
Middle Initial:
Last Name: Garbett
Organization: Southern Utah Wilderness Alliance, Grand Canyon Trust
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Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment: OSTS Draft PEIS Comments.doc

Comment Submitted:

See Attachment.

BY ELECTRONIC SUBMISSION AT OSTSEIS.ANL.GOV AND FIRST CLASS MAIL

March 18, 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory
970 S Cass Avenue
Argone, IL 60439

Re: Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement, DES 07-60 (December 2007)

Greetings:

The Southern Utah Wilderness Alliance and the Grand Canyon Trust (collectively "SUWA") appreciate the opportunity to submit comments on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement, DES 07-60 (December 2007) (the "OSTS PEIS" or the "PEIS"). SUWA members regularly use and enjoy Utah's spectacular public lands included in the planning area – particularly the regions near the Circle Cliffs special tar sands area (STSA), the San Rafael STSA, the Tar Sands Triangle STSA, the White Canyon STSA, the PR Springs STSA, the Hill Creek STSA, the Argyle Canyon STSA, the Sunnyside STSA, and the areas with wilderness characteristics found within the most geologically prospective oil shale resource – and are intensely interested in public lands issues such as this PEIS intended to consider the environmental impacts of commercial leasing, exploration, and development of oil shale and tar sands.

In short, the PEIS complies with neither the letter nor the spirit of several important federal environmental and historic preservation laws, including the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). The PEIS neither fully informs the public or the decision maker as to all of the issues associated with this proposal, nor does it adequately analyze the potential impacts of the proposed action to many of the resources that the BLM manages. In sum, the PEIS amounts to largely irrelevant document riddled with flaws as it postpones all meaningful analysis until some later date and event.

52734-001

Southern Utah Wilderness Alliance
Comments re: OSTS PEIS
March 18, 2008

SUWA offers the following specific comments regarding the impacts of oil shale and tar sands leasing and development in Utah and looks forward to reviewing BLM's detailed responses to each issue raised below:[1]

1. THE PEIS VIOLATES NEPA.

NEPA, 42 U.S.C. §§ 4321 *et seq.*, is the "basic national charter for protection of the environment." 40 C.F.R. § 1500.1. "NEPA 'prescribes the necessary process' by which federal agencies must 'take a "hard look" at the environmental consequences' of the proposed courses of action." *Pennaco Energy, Inc. v. U.S. Dep't of the Interior*, 377 F.3d 1147, 1150 (10th Cir. 2004) (quoting *Utahns for Better Transp. v. U.S. Dep't of Transp.*, 305 F.3d 1152, 1162-63 (10th Cir. 2002)) (internal citation omitted). The fundamental objective of NEPA is to ensure that that an "agency will not act on incomplete information only to regret its decision after it is too late to correct." *Marsh v. Or. Natural Resources Council*, 490 U.S. 360, 371 (1990) (citation omitted).

NEPA requires all federal agencies to prepare an "environmental impact statement" (EIS) before undertaking "major Federal actions significantly affecting the quality of the human environment." 42 U.S.C. § 4332(C).

NEPA requires that the BLM take a "hard look" when it analyzes and evaluates the impacts of proposed action "utilizing public comment and the best available scientific information." *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350 (1989). In addition to this hard look mandate, the BLM must also consider alternatives to the proposed action. NEPA requires that federal agencies "shall . . . study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternate uses of available resources," 42 U.S.C. § 4332(2)(E).

The motivating idea of NEPA is that it will "insure that environmental information is available to public officials and citizens *before* decisions are made and *before* actions are taken. 40 C.F.R. § 1500.1. The PEIS fails to accomplish this purpose. It postpones real analysis until some later date and time. However, by doing so the PEIS becomes a meaningless exercise because it fails to inform public officials and citizens of the likely impacts from oil shale and tar sands leasing and development in Utah.

The Council on Environmental Quality (CEQ) recognizes that "the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individual minor effects of multiple actions over time." CEQ, "Considering Cumulative Effects under the National Environmental Policy Act" 1 (1997) (http://ceq.eh.doe.gov/nepa/ccenepa/ccenepa.htm). See also 40 C.F.R. § 1508.7 (cumulative impacts). As the D.C. Circuit has explained, "[a] meaningful cumulative impact analysis must identify (1) the area in which the effects of the proposed project will be felt; (2) the impacts that are expected in that area from the proposed

[1] SUWA incorporates the comments submitted by Western Resource Advocates *et al.*

project; (3) other actions – past, present, and proposed, and reasonably foreseeable – that have had or are expected to have impacts in the same area; (4) the impacts or expected impacts from these other actions; and (5) the overall impact that can be expected if the individual impacts are allowed to accumulate." *Grand Canyon Trust v. FAA*, 290 F.3d 339, 345-47 (D.C. Cir. 2002). Furthermore, NEPA requires that BLM's cumulative impacts analysis provide "some *quantified* or *detailed* information," because "[w]ithout such information, neither courts nor the public . . . can be assured that the [agency] provided the hard look that it is required to provide." *Neighbors of Cuddy Mountain v. U.S. Forest Serv.*, 137 F.3d 1372, 1379 (9th Cir. 1998) (emphasis added).

A. BLM's Selection of the Range of Alternatives Must Be Modified.

NEPA requires federal agencies to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." 42 U.S.C. § 4332(2)(E). Both the Tenth Circuit and Interior Board of Land Appeals apply a "rule of reason" analysis to determine whether the range of alternatives BLM considered, "and the extent to which it discuss[ed] them," was adequate. *Utahns for Better Transp. v. Dep't of Transp.*, 305 F.3d 11521166-67 (10th 2002) (citing *City of Grapevine v. Dep't of Transp.*, 17 F.3d 1502, 1506 (D.C. Cir. 1994)). *See Owen Severance et al.*, 163 IBLA 208, 220 (2004). A reasonable alternative is one that is "non-speculative . . . and bounded by some notion of feasibility." *Utahns for Better Transp.*, 305 F.3d at 1172 (citing *Vermont Yankee Nuclear Power Corp. v. Natural Resources Defense Council*, 435 U.S. 519, 551 (1978)) (additional citations omitted). While an agency may not "completely ignor[e] a private applicant's objectives" in evaluating the reasonableness of alternatives, *Colorado Envtl. Coalition v. Dombeck*, 185 F.3d 1162, 1174-75 (10th Cir. 1999) (citations omitted), neither may it let these objectives control its consideration of alternatives. On the contrary, "the evaluation of alternatives mandated by [the National Environmental Policy Act] is to be an evaluation of alternative means to accomplish the general goals of an action; it is not an evaluation of the alternative means by which a particular applicant can reach his goals." *Id.* at 1174 (citations omitted). 52734-002

The BLM must modify alternatives B and C so that no oil shale or tar sands leases are offered in areas identified by the BLM as containing wilderness characteristics. Likewise, the BLM must also eliminate all leasing in proposed areas of critical environmental concern (ACEC).

These areas must be eliminated from the leasing proposals – Alternative B and Alternative C – because the regulations implementing NEPA prohibit actions that would limit the BLM's choice of reasonable alternatives in ongoing planning processes. 40 C.F.R. § 1506.1(a)(2). Similarly, to the extent that the proposed alternatives are not covered by an existing program statement, those alternatives must not "prejudice the ultimate decision" of the forthcoming Vernal Resource Management Plan (RMP), Richfield RMP, Price RMP, Monticello RMP, and Moab RMP by tending to determine development or limit alternatives. *See* 40 C.F.R. § 1506.1(c)(3). Finally, FLPMA

requires the BLM to "give priority to the designation and protection of areas of critical environmental concern" in the planning process. 43 U.S.C. § 1712(c)(3).

This proposed planning document comes in the midst of significant planning processes, including the preparation of RMPs for the Vernal Field Office, the Richfield Field Office, the Price Field Office, the Monticello Field Office, and the Moab Field Office and the consideration areas containing wilderness characteristics, ACEC nominations, and potential Wild and Scenic River designations. As explained below, a decision on the proposed planning document should wait until after these ongoing planning efforts are complete or consider an alternative that would eliminate impacts to areas containing wilderness characteristics, proposed ACECs, and potential wild and scenic rivers.

Currently, alternatives B and C would allow intensive development in sensitive areas identified as having wilderness characteristics, proposed for ACEC status, and potential Wild and Scenic River designation. Such development, will cause direct impacts such as surface disturbance, groundwater loss, increased traffic, increased noise, visual intrusions, degradation or destruction of natural and cultural resources, preclusion of recreational activities, and the like. The issuance of leases authorizing some surface occupancy/disturbance removes the authority of the BLM to deny all future development activity, unless related to concerns for endangered or threatened species. *See Pennaco Energy, Inc.*, 377 F.3d at 1154. It is a violation of NEPA to issue a lease allowing surface occupancy without adequate NEPA analysis. *See Sierra Club v. Peterson*, 717 F.2d 1409, 1412-15 (D.C. Cir. 1983); *Bob Marshall Alliance*, 852 F.2d 1223, 1227-28 (9th Cir. 1988); *Connor v Burford*, 848 F.2d 1441, 1445, 1448-51 (9th Cir. 1988). For this reason, the BLM must modify its present alternatives. In short, the proposed planning document and subsequent leasing will lead to a variety of impacts that will effectively foreclose certain future land management options. This is not allowed when the BLM is currently in the midst of a regional planning process. 52734-002 (cont.)

B. The PEIS Fails to Take a "Hard Look" at Resource Damage that Will Likely Be Caused by the Proposed Leasing and Subsequent Development.

The PEIS fails to take a "hard look" at the impacts of the proposed project on wildlife, air quality, cultural resources, watershed resources, wild and scenic rivers, proposed ACECs, and wilderness character. NEPA requires that BLM take a "hard look" when it analyzes and evaluates the impacts of proposed project "utilizing public comment and the best available scientific information." *Methow Valley Citizens Council*, 490 U.S. at 350. Moreover, NEPA requires that federal agencies carefully consider relevant "detailed information concerning significant environmental impacts" and share that information with the pubic in their environmental analyses. *See Blue Mountain Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1212 (9th Cir. 1998). An EIS's general statements about "possible" effects and "some risk" do not constitute a "hard look" absent a showing of why more definitive information could not be provided. *Neighbors of Cuddy Mountain*, 137 F.3d at 1380. 52734-003

In addition to evaluating the proposed project's direct effects, BLM must take a hard look at indirect effects. *See* 40 C.F.R. § 1508.8; *Airport Neighbors Alliance, Inc. v. United States*, 90 F.3d 426, 432-33 (10th Cir. 1996) (NEPA requires agencies to consider indirect environmental effects of proposed action). 52734-003 (cont.)

The BLM failed to take a "hard look" at the potential impacts from the proposed action in the following areas:

i. Wildlife

Protecting large areas of land from human interference has been documented in many places in the scientific community as being a major means of increasing biomass and preventing the loss of biodiversity. (Brooks, 2000 and 1995, Bender, 1998, Dolman, 1995) The loss of biodiversity is of special importance to special status species, as their already sensitive nature prevents them from being as tolerant to changes in their habitat.

Species with smaller populations, and thus a smaller diversity of genetic material for the population to rely on for continued existence, are more sensitive to change. This is the reason for the designation of Special Status Species. Bowles stated, "The long term goal of any conservation or restoration policy must be to preserve the evolutionary potential of a species." (2004) Preserving the evolutionary potential of a species is preserving the ability of that species to continue to exist, and thus should be at the forefront of any serious attempt to protect special status species. Special status species are described as those species being federally listed as threatened, endangered, or proposed. Additionally, both the BLM and the state of Utah maintain lists of special status species.

a. The PEIS does not fully account for the potential degradation and loss of habitat and resources on land and in waterways near proposed development sites.

The PEIS discusses the possibility for new habitat to emerge as a result of drainage patterns from sediment control ponds at the site of surface disturbance. Stating, "drainage patterns associated with sediment control ponds that caught runoff from disturbed surfaces could create habitats that would support aquatic plants and invertebrates as well as fish." PEIS at 4-61. There appears to be a lack of understanding of biology in proposals such as this. The possibility for habitat in these areas comes at an ecological cost that far outweighs the small benefits outlined here. Surface disturbance itself causes massive habitat loss, along with the construction of control ponds in areas that are in a delicate balance ecologically. The creation of these areas would disturb nutrient cycling, soil stability, and water cycles. (Belnap 1995). 52734-004

Even after these areas were created, the negative effects would linger, "Recovery from compaction and decreased soil stability is estimated to take several hundred years. The nitrogen fixing capacity of soil requires at least 50 years to recover." (Belnap). Soil

compaction and trampling from the creation of these ponds, and with the oil and gas infrastructure itself would leave a footprint on that area that would not slowly fade away. Attempting to legitimize such drastic negative impacts with the idea of habitat creation is not only deceitful, but also shows a fundamental lack of understand toward basic biological principles. 52734-004 (cont.)

The PEIS acknowledges the existence of several delicate endemic species in Utah, such as the Mountain whitefish, Mountain Sucker, Razorback sucker, Mottled sculpin, and others. Some of these fish like the Razorback sucker are on the Federal Endangered Species list, and as a result are highly sensitive to changes in their environment and cycling. Yet only acknowledging their existence without a real understanding of the threats faced, or worse, ignoring the real threat faced these species from land use and development will result in serious negative consequences and in some areas, loss of the species entirely.

The PEIS states, "Turbidity and sedimentation from erosion are part of the natural cycle of physical processes in water bodies, and most population of aquatic organisms have adapted to short term changes in these parameters." PEIS at 4-61. While turbidity and sedimentation are natural factors that occur in waterways occupied by these sensitive species, they are accustomed to natural incidences and cycles and are little accustomed to overnight changes that have lasting effects. The species adaptation to short term changes in these conditions does nothing to prepare them for long term changes in sedimentation and water content that occur when waterways are changed (i.e. drainage ponds). 52734-005

In his 1992 article, Jeffrey Barrett *et al.* observed the effects of turbidity on wild Rainbow Trout populations. He stated, "sediment producing activities, such as logging and road building, could reduce foraging success within trout populations." Studies such as these show that turbidity in water decreases fishes ability to forage for food. With some species of fish in the affected area on the Federal Endangered Species list, subtle decreases in foraging ability can be the difference in surviving. The PEIS attempts to legitimize real mortality factors in native fish by stating these disturbance are part of a "natural cycle" does not convey the damage that will be caused as a result of such disturbance.

b. The PEIS does not take proper measures to identify species of concern in affected areas; their populations, needs, and habits are not thoroughly understood.

The PEIS continues to use vague language to convey the impacts that occur with development in natural areas, on page 4-73 stating, "The response of wildlife to disturbance is highly variable and species specific." The statement is correct; however the reality that some species are affected differently than other by disturbance does nothing to help the species that are significantly affected. Further, a negative impact on any species can have a chain reaction in the ecosystem, and seemingly insignificant changes can become drastic. Statements like this are irrelevant, and do harm to protection of these species by downplaying potentially damaging consequences. 52734-006

Page 4-74 furthers this lack of biological understanding, "For example, wildlife may cease foraging, mating, or nesting or vacate active nest sites in areas where construction is occurring; some species may permanently abandon disturbed areas and adjacent habitats. In contrast, wildlife such as bears, foxes, and squirrels readily habituate and may even be attracted to human activities, primarily when a food source is accidently or deliberately made available. Human food wastes and other attractants in developed areas can increase the populations of foxes, gulls, common ravens, and bears, which in turn prey on water fowl and other birds." This paragraph is apparently an attempt to legitimize said activities in these areas; however, a true biological sense of understanding makes this paragraph appear entirely unfounded. What is being discussed in the draft is the concept of food conditioning. Food Conditioning is the modification of animal behavior based on a non natural food source.

Food conditioning of animals is well documented in the scientific literature, with little positive impact found on such conditioning. Thomas McCarthy wrote a paper about food conditioning of bears, a species mentioned in the draft as benefiting from food conditioning, which included, "Food conditioning of bears frequently results in property damage, threats to human safety, and destruction of nuisance animals [bears]." (1994) Predators such as bears and foxes are particularly susceptible to food conditioning, and will continue to return to food sources, without natural predation. When energy can be obtained easily from human sites, the need for predation is diminished, and the positive benefit of increased predation on waterfowl and other birds does not occur to any positive degree. 52734-006 (cont.)

One of the great difficulties in a draft document is that many of the readers and individuals affected by the draft are not professionals in the fields involved, and thus can easily misunderstand these concepts. Examples such as using food condition as a benefit of human disturbance can appear on the outside as genuinely positive impacts, when this is misleading, and to most of the biological community, incorrect.

When species are exposed to stresses in their environment they respond, and this response usually involved some kind of energy output. This concept is discussed in the draft, "When wildlife are experiencing physiological stress, which requires higher levels of energy for survival and reproductive success, increased human presence can further increase energy expenditures that can lead to reduced survival or reproductive outcome. Furthermore, disturbance could prevent access to sufficient amounts of forage necessary to sustain individuals." PEIS at 4-74. Winter conditions in the areas described are difficult times for species like the mule deer, and energy stores are a critical need. Disturbances associated with the types of oil and gas development described in the draft is certain to cause these kinds of responses in wildlife and ultimately contribute to their mortality. 52734-007

While some animals do have the ability to become habituated to a degree, as is mentioned in the draft, PEIS at 4-74, these animals still illicit responses to these actions. Ultimately these types of disturbances increase the mortality of species in the affected

areas, regardless of what kind of preparation is made. Daniel Edge studied the effects of disturbance on elk populations, finding that "Movements away from disturbances were significantly longer than toward disturbances.…This displacement of elk may cause substantial reductions in habitat availability."

Elk and other large mammals are not the only populations effect by disturbances near to their habitat. Smaller mammals can have their sensory organs severely affected by vehicles passing through their habitat, including hearing loss or deafness. (Brattstrom and Bondello, 1983) Hearing loss in small mammals means almost certain death as they need to constantly access situations for predators and other mortal threats. The draft mentions these data, "Brattstrom and Bondello (1983) reported that peak sound pressure levels reaching 95 DB resulted in a temporary shift in hearing sensitivity in kangaroo rats, and that they required at least 3 weeks for the hearing thresholds to recover. The authors postulated that such hearing shifts could affect the ability of the kangaroo rat to avoid approaching predators." PEIS at 4-76. With at least three weeks necessary for recovery from these types of sound pressure waves, there is little chance of a recovery. Stating that the animals will recover with time does nothing to recognize that these species need these senses in order to survive, and that survival without full hearing for more than three weeks means an increased mortality rate in the species. 52734-007 (cont.)

c. The PEIS neglects and diminishes the effects of construction and human disturbance in the areas affected on all species, importantly special status species.

The PEIS discusses the effects of human infrastructure in wildlife habitat, including buildings and pipelines. "In particular, birds may collide with transmission lines and buildings, while mammals may collide with fences. However, collisions with oil shale facilities would probably be infrequent, as human activity and project related noise would discourage wildlife presence in the immediate project area." PEIS at 4-76 The PEIS contradicts itself, early mentioning the damaging effects noise has on areas just one paragraph above, PEIS at 4-76, and following that with legitimizing this type of construction because of a positive benefit noise would have. The PEIS must be consistent in assessing these types of situations, and when citing data that demonstrates a clear negative consequence of some action, such as noise, the PEIS cannot use the same action to demonstrate positive consequences of construction. This only confuses the reader and reduces the document's legitimacy. 52734-008

The PEIS uses more double speak on page 4-79, "Most herbicide used on BLM-administered lands pose little or no risk to wildlife or wild horses and burros unless they are exposed to accidental spills, direct spray, or herbicidal drift, or they consume herbicide-treated vegetation." How herbicides pose little to no risk to wildlife, when in the same sentence they mention several possible circumstances where herbicides do affect wildlife, is not clear. The PEIS must be clear when speaking about issues 52734-009

regarding wildlife, especially when making opposing arguments in adjoining paragraphs, or in some cases in the same paragraph.[2]

52734-009 (cont.)

ii. Air Quality

The PEIS correctly states that under the Clean Air Act (CAA) and the Federal Land Policy and Management Act (FLPMA), "federal agencies cannot authorize any activity that does not conform to all applicable local, state, Tribal, and federal air quality laws, statutes, regulations, standards, and implementation plans." PEIS at 4-47, 5-40. It must specify that these standards include things such as the national ambient air quality standards (NAAQS) and increments for the prevention of significant deterioration (PSD). The BLM, via FLPMA, is tasked with ensuring that the regulations imposed by the Clean Air Act are not violated. *See infra.*

FLPMA requires the BLM to ensure that its approval of this programmatic planning document complies with all applicable air quality standards. *See* 43 U.S.C. § 1712(c)(8) (requiring BLM to "provide for compliance with applicable pollution control laws, including State and Federal air … pollution standards or implementation plans"). Regulation extends this same requirement to all BLM leases, permits, and other land use authorizations. *See* 43 C.F.R. § 2920.7(b)(3) (requiring that BLM "land use authorizations shall contain terms and conditions which shall … [r]equire compliance with air … quality standards established pursuant to applicable Federal or State law"). FLPMA and its implementing regulations thus explicitly mandate that BLM provide for compliance with the CAA's air quality standards when authorizing land management activities.

52734-010

In addition to these requirements, various RMPs also require that BLM comply with "Federal, State, and local air quality laws and regulations." *See, e.g.*, Book Cliffs RMP Record of Decision at 75. All "resource management authorizations and actions" – such as BLM's approval of the PEIS – must conform to this land use plan direction. 43 C.F.R. § 1610.5-3(a). *See also* 43 U.S.C. § 1732(a) (Secretary "shall manage the public lands … in accordance with the land use plans"); *Norton v. Southern Utah Wilderness Alliance*, 542 U.S. 55, 69 (2004) ("The statutory directive that BLM manage 'in accordance with' land use plans, and the regulatory requirement that authorizations and actions 'conform to' those plans, prevent BLM from taking actions inconsistent with the provisions of a land use plan.").

The CAA seeks to achieve its goal of providing for clean air in part by limiting increases in air pollution concentrations. National ambient air quality standards – or NAAQS – set allowable ambient maximums for various polluntants. *See* 42 U.S.C. § 7473(b)(4). These are the maximum concentration of the regulated pollutants permitted by law. *See id.* For example, ozone and $PM_{2.5}$ among other pollutants, are subject to NAAQS standards. The BLM must ensure that projects which it permits will not lead to ambient levels of these given pollutants in exceedence of the NAAQS for ozone and

[2] The bibliography for the wildlife-related comments is found at end of this document.

$PM_{2.5}$ - 35 $\mu g/m^3$ of $PM_{2.5}$ for the maximum 24-hour average, 15 $\mu g/m^3$ of $PM_{2.5}$ for the annual mean, and 0.075 parts per million of ozone for the maximum 8-hour average. *See* EPA, National Ambient Air Quality Standards (NAAQS) (http://www.epa.gov/air/criteria.html) (displaying a concise and helpful chart of NAAQS). The BLM must explicitly state that it cannot approve potential oil shale and/or tar sands projects that will lead to levels exceeding NAAQS.[3] The PEIS must also state that PSD standards will not be exceeded by any future projects. This same statement goes for all other relevant and specific federal, state, Tribal, or local air quality standard.

52734-010 (cont.)

The PEIS relies on a number of antiquated air quality standards. Specifically it must update its NAAQS for particulate matter and for ozone. $PM_{2.5}$ emission standards, for example, were first implemented by the Environmental Protection Agency in 1997. *See* National Ambient Air Quality Standards for Particulate Matter, 62 Fed. Reg. 38,652, 38,652 (July 18, 1997).[4] Furthermore, these emission standards were upheld in a significant U.S. Supreme Court case. *See Whitman v. American Trucking Ass'ns*, 531 U.S. 457 (2001). The BLM should have known of the $PM_{2.5}$ NAAQS and incorporated the correct standard into the PEIS. This same goes for ozone standards, which the Environmental Protection Agency has announced will now be lowered. Of course, the BLM is not to be expected to constantly revise and hold a NEPA document to reflect every single change in law and regulation or await new regulations, however those regulations and laws that are issued during the preparation of the PEIS should be incorporated into the document.

52734-011

As the comments of Ms. Megan Williams highlight, the PEIS must develop modeling for potential ambient emissions as a result of oil shale and tar sands development. The PEIS contains information on the various mining and extraction techniques that might be employed to develop these resources; it would not be difficult to develop models that could estimate emissions. These models could inform the public as to whether oil shale and tar sands development are likely to violate provisions or the CAA and foul the air. It is critical that the public know this information beforehand.

This information is particularly prescient in light of recent modeling by the BLM in Utah showing that even minor oil and gas projects will lead to violations of standards set under the CAA. For example, the recent Enduring Resources' Saddletree Draw Leasing and Rock House Development Proposal Environmental Assessment UT-080-07-671 (December 2007) (Rock House EA) models concentrations of $PM_{2.5}$ that would violate the 24-hour average concentration for NAAQS, assuming the baseline of 25 $\mu g/m^3$. This baseline is more accurate and higher than the baseline used by the BLM in

52734-012

[3] These standards are completely independent of attainment/non-attainment determinations. The BLM is tasked with observing the standards of the CAA such as NAAQS and PSD. It must always observe these standards and is not allowed to violate them simply because an area may or may not be in attainment. Such a determination is irrelevant to BLM's obligation to follow whatever federal and state standards may be relevant to a given pollutant in a given area.

the PEIS. The BLM must revise all baseline data to be more reflective of actual conditions in Utah.

Furthermore, the Rock House EA baseline likely understates the true background concentrations of $PM_{2.5}$ in the region; it is entirely possible that the Uintah Basin is already out of compliance with these NAAQS, even before any of the PEIS is implemented. Recently Ms. Williams wrote the following about background concentrations of $PM_{2.5}$ in the Uintah Basin:

> The $PM_{2.5}$ monitor referenced by the BLM in the [Rock House] EA (p. 6-24) is no longer operational - it appears to have operated from December 2006 until mid-December 2007.[5] However, during the short time of operation the monitor recorded several very high values of $PM_{2.5}$ in the area, including six exceedances of the 24-hour $PM_{2.5}$ NAAQS as follows:[6]

Vernal (VL)		NAAQS
$PM_{2.5}$ Actual Concentrations (24-hour average) in $\mu g/m^3$		$PM_{2.5}$ (24-hour average) in $\mu g/m^3$
01/10/07	45.1	35
01/15/07	35.5	
01/18/07	55.7	
01/27/07	63.3	
02/08/07	51.8	
12/05/07	43.3	

> The maximum 24-hour average concentration at the Vernal monitor in 2007 was 63.3 $\mu g/m^3$ based on a one-in-three day sampling frequency. The second highest 24-hour average concentration (the "high second high" value) was 55.7 $\mu g/m^3$. Both of these observed 24-hour average concentrations are more than two times the background concentration of 25 $\mu g/m^3$ used by the BLM for the [Rock House] EA. Keeping in mind that the concentration to be used as reflective of background should be determined by also evaluating "the meteorological conditions accompanying the concentrations of concern" (see 40 CFR Part 51, Appendix W, § 9.2.2), use of the maximum or high second high 24-hour average concentration from the Vernal monitor as the representative $PM_{2.5}$ background concentration – either 63.3 $\mu g/m^3$ or 55.7 $\mu g/m^3$ – is the best way to ensure public health protection. Using an average background concentration does not seem to make sense in this case since an average

52734-012
(cont.)

[5] The last filter sampled was on December 14, 2007, per correspondence with the state DAQ.
[6] Data from the State's "Particulate PM2.5 Data Archive" at http://www.airmonitoring.utah.gov/dataarchive/archpm25.htm

> would be highly impacted by the fact that there is only one year worth of somewhat incomplete data (i.e., monitoring was scheduled to occur every third day although most months contain missing data for this schedule and there are no data at all for the entire month of August 2007). These observed concentrations, where even the high sixth high concentration exceeds the NAAQS, indicate that the BLM must find a way to *reduce* $PM_{2.5}$ emissions in the area in order to avoid violating the short-term $PM_{2.5}$ NAAQS. Continuing to approve more development that adds fine particle emissions to the basin will threaten the area's attainment of the NAAQS.

52734-012 (cont.)

Thus, the BLM cannot approve the PEIS without actual modeling and improved data because to do so would violate the CAA's NAAQS requirements, among other things, which FLPMA and various applicable RMPs forbid.

iii. Cultural Resources

The PEIS completely avoids any site specific analysis of impacts to cultural resources from oil shale and tar sands development and leasing. As explained previously, this avoidance is improper as the BLM's decision to lease areas for development will limit the agency's ability to preclude harmful development in the future. *See supra*. The BLM must include a thorough discussion of impacts to cultural resources from the PEIS.

52734-013

iv. Watershed Resources

As with cultural resources, the PEIS completely avoids any real analysis of impacts to watershed resources from oil shale and tar sands development and leasing. Although the PEIS does declare that oil shale and tar sands development will likely be incredibly water intensive it does nothing to evaluate how that water use will deplete rivers, potentially harm fisheries and riparian areas, and disclose the other impacts from removing such a large amount of water from the affected watersheds. *See* PEIS at 4-29 to -43, 5-24 to -36. As explained previously, this avoidance is improper as the BLM's decision to lease areas for development will limit the agency's ability to preclude harmful development in the future. *See supra*. The BLM must include a thorough discussion of impacts to watershed resources from the planned leasing and development contemplated in the PEIS.

52734-014

v. Wild and Scenic River Designations, Proposed ACECs, and Wilderness Character

The PEIS fails to account for potential impacts to rivers proposed for Wild and Scenic River suitability status, for proposed ACECs, and to areas with wilderness characteristics. The PEIS acknowledges this failure, but suggests that it may consider these impacts at a later time. *See* PEIS at 2-52. However, as explained earlier, a decision to lease in these areas may preclude the BLM's ability to stop all types of development, which could lead to unanalyzed impacts. *See supra*. The BLM must consider impacts to these areas as part of the analysis in the PEIS.

52734-015

C. The PEIS Fails To Properly Analyze Indirect and Cumulative Impacts.

The Council on Environmental Quality recognizes that "the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individual minor effects of multiple actions over time." CEQ, *Considering Cumulative Effects Under The National Environmental Policy Act* (1997). As the D.C. Circuit has explained, "[a] meaningful cumulative impact analysis must identify (1) the area in which the effects of the proposed project will be felt; (2) the impacts that are expected in that area from the proposed project; (3) other actions – past, present, and proposed, and reasonably foreseeable – that have had or are expected to have impacts in the same area; (4) the impacts or expected impacts from these other actions; and (5) the overall impact that can be expected if the individual impacts are allowed to accumulate." *Grand Canyon Trust*, 290 F.3d at 345-47. Furthermore, NEPA requires that BLM's cumulative impacts analysis provide "some *quantified* or *detailed* information," because "[w]ithout such information, neither courts nor the public . . . can be assured that the [agency] provided the hard look that it is required to provide." *Neighbors of Cuddy Mountain*, 137 F.3d at 1379 (emphasis added). 52734-016

General statements about 'possible' effects and 'some risk' do not constitute a 'hard look' absent an explanation of why more definitive information could not be provided." *See Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1214 (9th Cir. 1998). The PEIS fails to fully quantify or identify preexisting and ongoing impacts in the project areas. Cumulative impacts analysis clearly requires that past and present actions be included in the analysis as well. The PEIS totally fails in regards to its analysis of indirect effects and cumulative impacts.

D. The Action Alternative Violates NEPA by Prematurely Limiting Reasonable Alternatives in Ongoing Planning Efforts.

As described earlier, the PEIS violated NEPA by prematurely limiting reasonable alternatives in the various RMPs being prepared in Utah. *See supra* at 4. The BLM is currently preparing RMPs for the Vernal, Richfield, Price, Moab, and Monticello field offices. These RMPs contain alternatives that would designate certain areas as ACECs, that would manage areas with wilderness characteristics for the protections of those characteristics, that would close certain areas to mineral leasing or impose no-surface occupancy stipulations, and that would propose certain rivers as eligible for inclusion in the Wild and Scenic River system. The BLM has failed to match anticipate these proposals and potential conflicts between the PEIS and these RMPs. The BLM must either withdraw the PEIS until the RMPs are completed or prepare a new alternative that would not foreclose these planning options. 52734-017

2. FAILURE TO COMPLY WITH NHPA.

The PEIS fails to comply with the NHPA because it fails to: (1) accurately identify the proposed project's "area of potential of effects," (2) assess adverse effects to historic properties from the proposed project, and (3) consult with the State Historic Preservation Officer and Indian Tribes..

A. NHPA - Background

Congress enacted the NHPA in 1966 to implement a broad national policy encouraging the preservation and protection of America's historic and cultural resources. *See* 16 U.S.C. §§ 470(b), 470-1. NHPA requires federal agencies to "take[ ]into account any adverse effects on historical places from actions concerning that property." *Friends of the Atglen-Susquehanna Trail Inc. v. Surface Transp. Bd.*, 252 F.3d 246, 252 (3rd Cir. 2001); *see* 16 U.S.C. §§ 470(f), 470h-2(d).

Pursuant to NPHA Section 106, before approving any undertaking a federal agency must identify all historic properties that may be affected by the undertaking, and must assess the effects of the project on those properties. *See* 36 C.F.R. §§ 800.4, 800.5. The procedural nature of Section 106 reinforces the importance of strict adherence to the binding process set out in the NHPA regulations: "While Section 106 may seem to be no more than a 'command to consider,' . . . the language is mandatory and the scope is broad." *United States v. 62.20 Acres of Land, More or Less*, 639 F.2d 299, 302 (5th Cir. 1981).

B. BLM Failed to Accurately Identify the Area of Potential Effect

In establishing the scope of a particular undertaking, the agency must "[d]etermine and document the area of potential effects" (the "APE"), *see* 36 C.F.R. § 800.4(a), which is defined as "the geographic area or areas which an undertaking may *directly or indirectly* cause alterations in the character or use of historic properties, if any such properties exist." *Id.* § 800.16(d) (emphasis added). "Under NHPA regulations, an agency official responsible for NEPA compliance must determine the area of potential effects of the undertaking and then take a series of steps to gather information on that area and evaluate whether the undertaking has an adverse impact on historical properties in it." *Crutchfield v. U.S. Army Corps of Eng'rs*, 154 F. Supp.2d 878, 905 (E.D.Va. 2001) (*citing* 36 C.F.R. § 804.4(a)). NHPA's implementing regulations broadly define APE to include direct and indirect effects. 52734-018

The BLM has failed to identify the APE for the PEIS from oil shale and tar sands development in Utah, thereby limiting its ability to identify historic properties and understand the potential effects of the proposed action. *See* 36 C.F.R. §§ 800.4, 800.16. The APE is likely to extend beyond the project area boundary and certainly extends beyond the area directly disturbed by the proposed wells, roads, and pipelines. Since leasing is an irretrievable commitment of resources the BLM must analyze these impacts now while it still possesses complete over the location and manner of development.

C. BLM Did Not Fully Assess Adverse Effects to Historic Properties from the Proposed Action.

The PEIS does not fully assess adverse effects to historic properties from the proposed action, as required under 36 C.F.R. §§ 800.4 and 800.5.

The PEIS completely fails to discuss historic properties and provides no analysis as to how these properties might be effected by the proposed action. Mr. Spangler's comments suggest some of the inadequacies of the PEIS in this regard. 52734-019

D. BLM Failed to Consult with the State Historic Preservation Officer and Failed to Disclose Which Indian Tribes Were Consulted.

BLM is required to consult with the State Historic Preservation Office (SHPO) and Native American tribes regarding the potential effects of an undertaking such as the proposed action. *See* 36 C.F.R. §§ 800.3 and 800.4. In addition, should BLM determine that the proposed action will result in a "no historic properties affected" finding, the documentation supporting such a finding must be made available to the public for inspection. *Id.* § 800.4(d)(1). The PEIS does not document that BLM has consulted with the SHPO. In addition, the PEIS does not disclose which Native American tribes were consulted in this process, the BLM should disclose this. Finally, BLM has not made any information regarding historic properties available for public inspection.

If the effects of the project may be adverse, the agency must then seek ways to avoid, minimize, or mitigate those adverse effects, in consultation with the State Historic Preservation Officer and the relevant Indian tribes. *See* 36 C.F.R. § 800.5. Regulations define "adverse effect" to encompass a wide range of potential direct, indirect, and cumulative impacts: "[a]n adverse effect is found when an undertaking *may alter, directly or indirectly*, any of the characteristics of a historic property . . . . *Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative*." 36 C.F.R. § 800.5(a)(1) (emphasis added). The last sentence in this section (36 C.F.R. § 800.5(a)(1)) is intended to amplify the indirect effects concept, similar to the NEPA regulations, which call for consideration of such effects when they are reasonably foreseeable effects.[7] If the agency determines that the action would have an adverse effect on an historic property, it begins consultation to identify ways to avoid, minimize, or mitigate adverse effects. *See* 36 C.F.R. § 800.5. Mr. Spangler's comments detail why consultation with various Native American tribes is necessary before this project proceeds any further. 52734-020

[7] *See* 36 C.F.R. § 800.5(a)(2) (examples of adverse effects include, but are not limited to, (i) "[p]hysical destruction of or damage to all or part of the property;" (iii) "[r]emoval of the property from its historic location;" and (iv) "[c]hange of the character of the property's use or physical features within the property's setting that contribute to its historic significance.").

Southern Utah Wilderness Alliance
Comments re: OSTS PEIS
March 18, 2008

SUWA welcomes the opportunity to meet with you and your staff to discuss our concerns regarding the proposed action and this environmental assessment. Please let me know if you would be willing to meet with SUWA staff. I look forward to hearing from you.

Sincerely,

/s/ David Garbett

David Garbett
Legal Fellow

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Responses for Document 52734

52734-001: The BLM disagrees that the PEIS does not comply with either the letter or spirit of federal environmental and historic preservation laws. The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. The PEIS provides an adequate description of environmental resources in areas that would be made available for lease application to enable a decision among alternatives. The BLM has determined that with the exception of possible impacts to property values, there are no impacts associated with these allocation decisions.

It is important to note that these allocations do not authorize the immediate leasing of lands for commercial oil shale or tar sands development. Although the PEIS provides an analysis of the types of impacts and magnitude of impacts associated with commercial oil shale and tar sands development, there is currently too much uncertainty regarding project-specific details such as project location, resources that could be affected, technologies to be deployed, and plans of development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis, if natural or cultural resources of concern are present, may include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to those resources.

52734-002: The BLM does not agree that the PEIS violates NEPA. The PEIS is a programmatic-level document that analyzes allocation decisions. The PEIS examines three alternatives that provide a wide range of land areas that would be made available for application for leasing in Colorado, Utah, and Wyoming.

None of the decisions associated with this PEIS preclude later decisions regarding the availability of lands for lease application for oil shale or tar sands development. Designation of lands as available for lease application in the record of decision for this PEIS does not preclude later exclusion based on other processes such as the RMP process.

Contrary to the statement in the comment, Alternatives B and C would not allow intensive development in sensitive areas. As mentioned above, the decision to be made is an allocation decision and does not commit any lands for leasing or development. The PEIS acknowledges the potential for such impacts, but BLM's program would allow for applicants to propose mitigations that would reduce or eliminate such impacts consistent with BLM policies that are intended to protect sensitive resources.

Also, contrary to a statement made in the comment, under the proposed program, leases allowing surface occupancy would not be issued without project-specific NEPA analyses that considered the direct, indirect, and cumulative impacts of the proposed action.

52734-003: Please see response to Comment 52734-002. In addition, the PEIS incorporates comments received from the public during scoping and on the draft PEIS and utilized the best available information.

Although the PEIS provides a "hard look" at the types of impacts and, where possible, the potential magnitude of impacts associated with commercial oil shale and tar sands development, there is currently too much uncertainty regarding project-specific details such as project location, resources that could be affected, technologies to be deployed, and plans of development. Consequently, the PEIS has taken a conservative approach that identifies the full spectrum of possible impacts that could occur if leasing and development were to occur over the areas that would be made available for lease application. Subsequent project-specific NEPA documents will be prepared to provide a more detailed analysis of the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

52734-004: The BLM believes there currently is sufficient information at the programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing

It is justifiable that the evaluation of specific occurrences of resources and supporting facilities, analyses of the environmental consequences of oil shale or tar sands development, and the assessment of the cumulative effects of oil shale and tar sands development, together with the other factors mentioned in the comment, be included in subsequent project- or site-specific NEPA documents rather than in the PEIS.

As identified by the reviewer, the PEIS identified the potential for new habitat to emerge as a result of altered drainage patterns. However, in agreement with the points made by the reviewer, the same paragraph of the PEIS already identifies that although the development of such habitats could be beneficial in some instances, their ecological value would depend on the amount of habitat created and the types and numbers of species supported. In general, it is anticipated that the ecological value of these created habitats would be limited. Habitats that promote the survival and expansion of non-native aquatic species that compete with or prey upon native species could have negative ecological impacts on existing aquatic habitats. With the noted additions, there is sufficient information pertaining to the occurrence of aquatic resources in the Piceance Oil Shale Basin on a broad programmatic level to make a reasoned choice among the alternatives

as to whether lands are suitable for future consideration for commercial oil shale leasing.

52734-005: Additional discussion of the potential for sediment impacts to aquatic species and habitats has been added to Sections 4.8.1.1 and 5.8.1.1. Text has been modified to clarify that exceeding (currently unknown) thresholds for sediment inputs to stream and river systems would be expected to have detrimental effects on aquatic resources and that the effects of sediment inputs into streams and rivers have a potential to extend downstream beyond the areas open for oil shale or tar sands development under each of the alternatives. With the noted additions, there is sufficient information pertaining to the occurrence of aquatic resources in the Piceance Oil Shale Basin on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing.

Because the number and specific characteristics of potential projects are not known at this time, the PEIS evaluates potential impacts in a relatively generic fashion. The information presented in the PEIS for the federally listed species is of sufficient detail for the purposes of the PEIS. The PEIS provides a brief discussion for each of the federally listed species that identifies the listing status, basic life history and population information, existing threats, and the potential for the species to be affected by commercial oil shale and tar sands development. The PEIS identifies all oil shale basins and STSAs that occur in the watersheds where the Colorado River endangered fishes are found and acknowledges the potential for direct and indirect impacts to these species resulting from development within the watershed. Table E-1 presents the counties and habitats in which the endangered species are found.

It is important to note that the allocations do not authorize the immediate leasing of lands for commercial development; it makes them available for potential future leasing. Subsequent project- or site-specific NEPA documents will be prepared to evaluate specific occurrences of species of concern, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis, if fish species of concern are present, may include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts on sensitive resources. Conservation measures to protect sensitive species under the preferred alternative are identified in Appendix F of the PEIS.

52734-006: The information presented in the PEIS that addresses disturbance impacts to wildlife is of sufficient detail for the purposes of the PEIS. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. These documents will evaluate specific occurrences of wildlife, analyze the environmental consequences of leasing

(including consideration of direct, indirect, and cumulative effects of disturbance to wildlife), reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. Site-specific NEPA analysis would include mitigation such as BMPs, specific protections, or avoidance to mitigate impacts to wildlife from disturbance.

Text has been added to Section 4.8.1.3.2 that emphasizes that attraction and habituation of wildlife to humans (for example due to food conditioning) are considered adverse behaviors.

52734-007: The information presented in the PEIS for wildlife is of adequate detail for the purposes of the PEIS. The PEIS identifies basic life history and population information, existing threats (including a generalized overview of disturbance), and the potential for wildlife species to be affected by commercial oil shale and tar sands development.

There is sufficient information pertaining to the occurrence of mule deer on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing.

Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. These documents will evaluate specific occurrences of wildlife species, analyze the environmental consequences to them from leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and possible mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. Site-specific NEPA analysis would include mitigation such as BMPs, specific protections, or avoidance to mitigate impacts from disturbance to wildlife.

52734-008: The information presented in the PEIS addressing noise impacts to wildlife is of sufficient detail for the purposes of the PEIS. The PEIS provides an overview of noise impacts that could occur from commercial oil shale and tar sands development. There are no contradictions in the presentation of noise effects in Section 4.8.1.3.3.

Subsequent project- or site-specific NEPA documents will be offered in a specific area. These documents will evaluate specific occurrences of species of concern, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. Site-specific NEPA analysis would include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to wildlife species due to noise.

52734-009: It would not be known until the project-specific lease stage whether herbicides would be used during the development, operation, or restoration of an oil shale or tar sands lease area. The potential use of herbicides and any mitigation measures to minimize herbicide spills or application to undesignated areas would be included in project-specific NEPA documents.

Information on the use of herbicides, in general, on BLM lands has been analyzed in a separate federal decision in the NEPA document entitled, "Final Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement," and can be found at: http://www.blm.gov/wo/st/en/prog/more/veg_eis.html.

52734-010: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans.

52734-011: See response to Comment 52734-010.

Table 3.5.3-2 in Section 3.5.3 provides a detailed list of representative criteria air pollutant concentrations. All values are lower than the ambient air quality standards applicable when the analysis was prepared, although as indicated in Table 3.5.3-2, certain ozone and particulate matter values were greater than 50% of the applicable standard (up to 93% of the 8-h ozone standard based on CASNET monitoring at the Mesa Verde, Canyonlands, and Gothic stations). EPA has recently lowered the ambient ozone standards, and will make formal determinations as to whether or not the Study Area continues to achieve the applicable National Ambient Air Quality Standards. The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process.

52734-012: See response to Comment 52734-011.

52734-013: On the basis of input from the cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. The PEIS analyzes the environmental consequences of land use allocation decisions that do not commit any resources or grant any lease rights. In addition, prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with and appropriate consultation as required by the NHPA and other authorities specific to Native American concerns. Subsequent NEPA analyses will be conducted to assess the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. If significant cultural resources are present or found to be present during requisite surveys and consultations, this specific analysis may include mitigation such as use of BMPs, specific protections, or avoidance to mitigate or eliminate adverse effects to historic properties.

Sections 4.10 and 5.10 in the PEIS provide a thorough discussion of common impacts on cultural resources that could result from future oil shale or tar sands leasing and development. Site-specific impacts would depend on a variety of factors, including the specific characteristics of the location, the proposed technology to be used, and the scale of the proposed action (e.g., single-lease,

multiple-lease, state-wide programmatic analysis). As stated in Chapters 4 and 5, the BLM will meet its obligations under Section 106 of the National Historic Preservation Act, including any consultation, data gathering (e.g., field inventory), evaluations, protections, and mitigations that may be required on the basis of the scope of the proposed action.

52734-014: Any specific impacts to water and watershed resources from oil shale and tar sands and leasing development would be addressed in the project-specific NEPA documents.

52734-015: The land use allocations analyzed in the PEIS will have no direct effect on Wilderness Areas, WSAs, other lands within the NLCS (including National Monuments), and existing ACECs currently closed to mineral development on WSRs, proposed ACECs, or areas with wilderness characteristics. The BLM has identified in the PEIS under each alternative where these areas overlap with lands that would be available for application to lease and has disclosed if these lands are leased and eventually developed that it is likely the resource values would be diminished or lost. Decisions regarding future management of these areas and leasing for oil shale or tar sands development will be based on future NEPA analysis that would assess the relative value of the resources present in a proposed lease area.

52734-016: The PEIS presents, for the purposes of analysis, a cumulative analysis based on the nature and scope of the proposed action and on available nonspeculative information. It provides a summary of the extensive ongoing activities in the Piceance Basin and elsewhere in the study area, and considers these in its overview of potential cumulative impacts (see Sections 6.1.5 and 6.2.5). For example, Table 6.1.5-4 shows that over 30,000 oil and natural gas wells are planned for installation over the 20-year study period in the affected field offices. The approximate land disturbance for these well installations, as well as from other activities, was used to estimate total cumulative land disturbance from other activities in the study area over the next 20 years. A preliminary analysis of the potential cumulative impacts from oil shale and tar sands development is also presented in the PEIS. For example, Section 6.1.5.3.10 acknowledges that income in the recreation sector may be lost due to oil shale and tar sands development, and Sections 6.1.5.3.4 and 6.1.5.3.7 identify the substantial effects that oil shale development could have (depending upon the level of development) on water use and the aquatic organisms in the habitats supplied by that water, including endangered fishes in the Upper Colorado River basin. Also, Sections 6.1.5.3.4 and 6.1.5.3.5 note that depending on the type and level of development, regional water and air impacts may limit oil shale and tar sands development.

The BLM anticipates that oil shale development would proceed in a three-step decision-making process similar to that used for federal onshore oil and gas: land use planning (i.e., amending RMPs); leasing; and approval of a drilling permit or a plan of development. In the present experimental stage of the oil shale and tar

sands industries, however, the BLM believes that the stages of NEPA compliance will be different from those used in oil and gas. The plan amendments to be completed on the basis of this PEIS would open the areas in question for leasing. The phrase "available for application for leasing" is used throughout the PEIS, rather than "available for leasing" to highlight that, unlike BLM's practice with respect to oil and gas leasing, as explained below, additional NEPA analysis would be required prior to the issuance of any lease of oil shale or tar sands resources.

As a result of the maturity of the oil and gas industry, the BLM is usually able to include sufficient site-specific analysis in its NEPA documentation for amendments to RMPs so that an additional NEPA document is not required prior to issuing an oil and gas lease in conformance with the RMP. Nonetheless, the BLM does prepare a NEPA analysis before approving a plan of operation or a drilling permit that would authorize significant disturbance of the leased area. The NEPA analysis for both decision levels includes cumulative effects analysis. Analysis of each oil and gas decision is based on technical information associated with the particular proposed action, as well as information about other reasonably foreseeable future actions in and near the area of the proposal.

In contrast, the present experimental state of the oil shale and tar sands industries does not allow this PEIS for land use allocation to include sufficient site-specific information or cumulative impact analysis to support issuance of a lease. Accordingly, unlike in oil and gas leasing, prior to oil shale leasing, additional NEPA analysis will be required. That NEPA analysis could result in decisions not to lease in specific areas, or to lease particular areas with stipulations, such as a stipulation precluding disturbance of the surface.

As with oil and gas leases, although the lease would grant the lessee the right to explore and develop the oil shale and tar sands resources, the lease would not authorize surface disturbance. Before disturbing the surface, the operator would have to obtain the BLM's approval of a plan of development through a project-level NEPA analysis. NEPA analysis at the leasing and at the development approval stage of oil shale and tar sands decision-making would be based on reasonably available technical information associated with the proposed action, and on information about other reasonably foreseeable future actions in and near the area of the proposal.

The BLM believes that cumulative impacts would be adequately assessed at the leasing stage. As required under NEPA, all subsequent NEPA documents will also analyze the cumulative effects from other reasonably foreseeable future actions. The scope and nature of the specific proposed action will drive the type of NEPA analysis that the BLM performs. The cumulative effects analysis would consider the present effects of past actions, to the extent that they are relevant, and present any reasonably foreseeable (not highly speculative) federal and nonfederal

actions, taking into account the relationship between the proposed action and these reasonably foreseeable actions.

As described in the proposed action in the PEIS, the BLM is committed to completing a NEPA analysis prior to leasing and development. However, until the scope of the potential leasing and/or development is known, we cannot commit to the scope of the NEPA analysis (regional, planning area, or local) that will be required. The proposed action will drive what analysis must be done to comply with the requirements of NEPA.

The BLM recognizes the importance of properly evaluating the indirect and cumulative impacts of the proposed action. The concerns expressed in the comment seem to stem from a misunderstanding of the BLM's proposed action, analysis provided in the document, and the decisions that are being evaluated in the PEIS. The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on threatened or endangered species.

The impact analysis provided in the PEIS goes beyond the conclusion, however, and identifies the types of impacts that could occur as a consequence of commercial oil shale and tar sands development. The reasons for presenting this information include to address the additional information needed and to provide sufficient information for the decision maker to make a reasoned choice among the alternatives. A more quantified or detailed and specific cumulative analysis would be required only if the scope of the decision was a discrete or specific location and the number of sales was identified.

Indirect impacts to resources are discussed in Sections 4 and 5, and cumulative impacts to resources are discussed in Sections 6.1.5 and 6.2.5 of the PEIS. At this time, it is not possible to provide a quantitative evaluation of indirect or cumulative effects as requested in the comment. In particular, a cumulative analysis is appropriately provided that analyzes the potential impacts to the affected environment based the narrow scope of the decision. There are many uncertainties regarding the amount of development that is reasonably foreseeable, the types of technologies that might be deployed, and the locations of potential projects. Indirect and cumulative impacts will be evaluated in project-specific NEPA assessments conducted prior to leasing and development.

52734-017: As stated in the response to Comment 52734-002, none of the decisions associated with this PEIS preclude later decisions regarding the availability of lands for lease application for oil shale or tar sands development. Designation of lands as available for lease application in the ROD for this PEIS does not preclude later exclusion based on other processes such as the RMP process.

52734-018: The BLM does not agree that the PEIS does not comply with the NHPA. The PEIS is a programmatic-level document that analyzes allocation decisions. These allocations do not authorize the immediate leasing of lands for commercial oil shale or tar sands development, and, therefore, the BLM has determined that, with the exception of possible impacts on property values, there are no impacts associated with these decisions. Although the PEIS provides an analysis of the types of impacts on historic properties that could be associated with commercial oil shale and tar sands development in Sections 4.10 and 5.10 of the PEIS, there is currently too much uncertainty regarding project-specific details, such as project location, resources that could be affected, technologies to be deployed, and plans of development, to provide the level of detail on the area of potential effect as requested in the comment.

52734-019: The PEIS fully assesses the adverse effect of the proposed action—that is, a land use allocation that does not commit any resources or grant any lease rights. Sections 4.10 and 5.10 disclose the potential impacts that could occur if oil shale or tar sands leasing and development were to occur in a sensitive area. However, the BLM has policies in place to protect cultural resources, and compliance with NEPA and the NHPA is required for any proposed leasing or development project. Project-specific details would be needed at the leasing and development stages to minimize uncertainty and allow a full assessment of adverse effects on historic properties under the NHPA. These details would include: project location, inventory and evaluation of resources that could be affected, technologies to be deployed, and plans of development, including a determination of the full area of potential effect and mitigation strategies to minimize or eliminate possible adverse effects.

Please see Document 00053 for responses to comments from Jerry Spangler representing the Colorado Plateau Archaeological Alliance.

52734-020: The BLM has consulted with the Advisory Council on Historic Preservation, the appropriate State Historic Preservation Offices (SHPOs) in Colorado, Utah, and Wyoming, and Native American tribes as identified in Section 7.3 of the PEIS. See also responses to comments from the Advisory Council and the Colorado SHPO (Documents 00193 and 00158, respectively).

On the basis of input from the cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the scope of the PEIS was changed from a leasing decision to an allocation decision. In the PEIS, the BLM analyzes a land use allocation decision and not a leasing or development decision that requires compliance with Section 106 prior to issuing the ROD for this PEIS. This decision does not commit any resources or grant any lease rights. In addition, prior to any commercial leasing and development, additional NEPA analysis will be required, as well as compliance with and appropriate consultation as required by the NHPA and other authorities specific to

Native American concerns. Subsequent NEPA analyses will be conducted to assess the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. If significant cultural resources are present or found to be present during requisite surveys and consultations, this specific analysis may include mitigation such as use of BMPs, specific protections, or avoidance to mitigate or eliminate adverse effects to historic properties.

There is no guarantee within this PEIS that lands within the areas identified under the alternatives as open to application will be leased or developed if significant cultural resources are present. Similarly, it is premature at this stage to completely deny access to particular lands without sufficient knowledge of the technologies to be applied or the specific physical area of potential effect.

The PEIS provides an early opportunity to continue discussions with the Advisory Council on Historic Preservation, SHPOs, Tribes, and the interested public on the Oil Shale and Tar Sands program, in keeping with our 1997 National Programmatic Agreement. The cultural resource information collected to date from the various overviews and previous consultations conducted for the PEIS will be brought forward into future Section 106 consultation regarding leasing. The BLM will continue to propose the phased approach to completing Section 106 for leasing. At the subsequent leasing phase, the BLM will consider using the existing 1997 National Programmatic Agreement or a new and separate Programmatic Agreement to outline the phased approach to completing Section 106 for leasing and project- or site-specific development.

Thank you for your comment, Gibney Siemion.

The comment tracking number that has been assigned to your comment is OSTSD52735.

Comment Date: March 18, 2008 23:31:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52735

First Name: Gibney
Middle Initial:
Last Name: Siemion
Organization:
Address:
Address 2:
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City:
State:
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Country:
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Attachment:

Comment Submitted:

As a research biologist focused on Colorado River watershed issues, and a lover of the Glen Canyon bioregion, I oppose the "Preferred Alternative" B and support the "No Action" alternative A. 52735-001

I believe that our government should be promoting energy conservation and sustainable energy production - such as solar and wind - to increase energy independence and fight global climate change. I believe that before any development can be approved, all impacts to watersheds that flow into the Colorado River system must be thoroughly analyzed and mitigated. The BLM's plan falls far short of meeting the minimum level of assessment required for adequate decision-making. Alternative B, the BLM's "Preferred" Alternative," would sacrifice our public lands to develop dirty fossil fuel that will worsen climate change. This is totally unacceptable. The only responsible choice is Alternative A, the "No Action" alternative. 52735-002 52735-003 52735-004 52735-001 (cont.)

Responses for Document 52735

52735-001: The BLM acknowledges the commentor's preference for Alternative A.

52735-002: Although renewable energy sources are an important part of a diverse domestic energy supply, oil shale and tar sands on the public lands are among the best prospects to supply our country's future energy needs. With the passage of the Energy Policy Act of 2005, Congress instructed the Secretary of the Interior to prepare a PEIS to establish a commercial leasing program. The BLM is conducting a phased decision-making process proceeding from land use planning to leasing to operational permitting. The land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases to assess impacts of those actions. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. Specific mitigation measures, management prescriptions, and best available practices will be applied to minimize or eliminate impacts as a result of the NEPA analysis.

52735-003: Although energy conservation and fuel efficiency are an important part of a diverse domestic energy supply, oil shale and tar sands on the public lands are among our best prospects to supply our country's future energy needs. With the passage of the Energy Policy Act of 2005, Congress instructed the Secretary of the Interior to prepare a PEIS to establish a commercial leasing program. The BLM is conducting a phased decision-making process proceeding from land use planning to leasing to operational permitting. The land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases, and potential impacts will be addressed. Part of that NEPA analysis will be to determine the impacts of the decisions, including the potential impacts to water resources and the Colorado River system. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. Specific mitigation measures, management prescriptions, and best available practices will be applied to minimize or eliminate impacts as a result of the NEPA analysis.

52735-004: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues

associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Thank you for your comment, Bruce Moehlman.

The comment tracking number that has been assigned to your comment is OSTSD52737.

Comment Date: March 18, 2008 23:53:46PM
Oil Shale and Tar Sands
Comment ID: OSTSD52737

First Name: Bruce
Middle Initial:
Last Name: Moehlman
Organization:
Address:
Address 2:
Address 3:
City:
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Zip:
Country:
Email:
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Attachment:

Comment Submitted:

I am writing to inform you that I strongly oppose Alternative B, the "Preferred Alternative" and support Alternative A, the "No Action" alternative in the PEIS.

In my opinion, Alternative B will cause irreparable harm to large areas of Colorado, Utah, and Wyoming. I have visited backcountry areas in eastern Utah and southwestern Wyoming. I do not want to see the area developed for mining purposes. I want it left in a primative condition.

52737-001

Response for Document 52737

52737-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Flo Samuels.

The comment tracking number that has been assigned to your comment is OSTSD52739.

Comment Date: March 19, 2008 06:57:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD52739

First Name: Flo
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State: CA
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Comment Submitted:

I am utterly opposed to this plan for oil or any other kind of exploration in these sensitive areas. When I go to BLM lands I want to see trees and canyons and pristine streams and lakes, not the devastation caused by this method of getting oil and gas out of the ground. 52739-001

Response for Document 52739

52739-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, D. Rex Miller.

The comment tracking number that has been assigned to your comment is OSTSD52740.

Comment Date: March 19, 2008 07:34:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD52740

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Comment Submitted:

Our government should be promoting energy conservation and sustainable energy production - such as solar and wind - to increase energy independence and fight global climate change. Before any development contemplated in the Oil Shale and Tar Sands Draft PEIS can be approved, all impacts to watersheds that flow into the Colorado River system must be thoroughly analyzed and mitigated. The present BLM plan falls far short of meeting the minimum level of assessment required for adequate decision-making. Alternative B, the BLM's "Preferred" Alternative," would sacrifice our public lands to develop dirty fossil fuel that will worsen climate change. This is totally unacceptable. The only responsible choice is Alternative A, the "No Action" alternative.

52740-001

52740-002

52740-001 (cont.)

Responses for Document 52740

52740-001: The BLM acknowledges the commentor's preference for Alternative A.

52740-002: This PEIS is a programmatic-level document that analyzes land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and they provide an effective analytical foundation for subsequent project-specific NEPA documents. Any specific impacts on water and watershed resources from oil shale and tar sands and leasing development would be addressed in the project-specific NEPA documents.

Since the alternatives in the PEIS do not authorize the immediate leasing of the lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. The cumulative analysis will include past, present, and reasonably foreseeable future actions on the full range of affected resources including but not limited to air quality, water quality, wildlife resources, habitat fragmentation, and socioeconomic impacts. In particular, the cumulative analysis will consider the present effects of past actions to the extent that they are relevant, and present and reasonably foreseeable effects of federal and nonfederal actions within the planning area. That reasonably foreseeable action can include reasonably foreseeable development scenarios and pertinent federal or nonfederal actions or effects. That analysis will provide the incremental impact of oil shale and tar sands exploration and development when added to all reasonably foreseeable actions. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to avoid or mitigate short-term and long-term adverse impacts.

Thank you for your comment, Kevin Armitage.

The comment tracking number that has been assigned to your comment is OSTSD52741.

Comment Date: March 19, 2008 08:19:31AM
Oil Shale and Tar Sands
Comment ID: OSTSD52741

First Name: Kevin
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Comment Submitted:

Dear BLM, Regarding oil shale and tar sands development, I strongly disapprove of the "Preferred Alternative" B and strongly support the "No Action" alternative A. Our nation needs to develop "alternate" energy sources such as wind and solar, rather than sacrifice public lands to a fuel source that adds to global climate change. 52741-001

Response for Document 52741

52741-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Shana Culberson.

The comment tracking number that has been assigned to your comment is OSTSD52742.

Comment Date: March 19, 2008 08:46:10AM
Oil Shale and Tar Sands
Comment ID: OSTSD52742

First Name: Shana
Middle Initial: P
Last Name: Culberson
Organization:
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Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Regarding the Oil Shale and Tar Sands Draft Programmatic EIS (Draft PEIS), I oppose Alternative B and urge you to instead accept Alternative A. It is important to all citizens for you to protect what little public lands we have left to enjoy. As populations increase and undeveloped land decreases, we need these special places to enjoy. As a frequent visitor to the southwest, especially the 4 corners area, I enjoy visiting the parks and public lands in the area and want to know they will be protected and just as beautiful each time I visit. Please choose Alternative A and make this land enjoyable for current and future generations. Thank You. 52742-001

Response for Document 52742

52742-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, paul bagley.

The comment tracking number that has been assigned to your comment is OSTSD52743.

Comment Date: March 19, 2008 09:17:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD52743

First Name: paul
Middle Initial:
Last Name: bagley
Organization:
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Address 3:
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State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
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Attachment:

Comment Submitted:

In the long term this is a bad idea, especially in arid regions. Conservation is a good idea. Government mandating energy efficiency is a great idea. More pollution is a bad idea.

Stand up for programs that do not harm wilderness for a change.

52743-001

Response for Document 52743

52743-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Ann Ewing.

The comment tracking number that has been assigned to your comment is OSTSD52744.

Comment Date: March 19, 2008 09:45:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD52744

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Attachment:

Comment Submitted:

Please do not allow extraction of oil shale and tar sands from public lands! This would greatly aggravate global warming, and would utterly ravage the environment. | 52744-001

Response for Document 52744

52744-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Ronald Parry.

The comment tracking number that has been assigned to your comment is OSTSD52745.

Comment Date: March 19, 2008 09:55:38AM
Oil Shale and Tar Sands
Comment ID: OSTSD52745

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Attachment:

Comment Submitted:

I wish to comment on the BLM Oil Shale and Tar Sands Draft PEIS. I am very strongly opposed to the BLM's "preferred alternative", alternative B, since it would open almost 2 million acres of public lands for commercial leasing, exploration, and development of fossil fuels. As is well known, extracting oil from oil shale and tar sands causes enormous environmental devastation, requires huge amounts of water, and produces large amounts of greenhouse gas emissions. It is NOT a viable way to solve our nation's energy problems! Alternative A, the "no action alternative," is the only sensible choice. 52745-001

Response for Document 52745

52745-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Troy Scotter.

The comment tracking number that has been assigned to your comment is OSTSD52748.

Comment Date: March 19, 2008 10:22:40AM
Oil Shale and Tar Sands
Comment ID: OSTSD52748

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City:
State:
Zip:
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Privacy Preference: Withhold address from public record
Attachment: OSTS Final Response.doc

Comment Submitted:

See Attachment.

Utah Rock Art Research Association
P.O. Box 511324 Salt Lake City, UT 84151-1324 www.utahrockart.org

March 19, 2008

COMMENTS ON THE OIL SHALE AND TAR SANDS PROGAMMATIC ENVIRONMENTAL IMPACT STATEMENT

The Utah Rock Art Research Association (URARA) is the largest organization dedicated to Utah rock art. Our mission is:

- To lead in the preservation and understanding of the value of rock art.
- To encourage the appreciation and enjoyment of rock art sites.
- To assist in the study, presentation, and publication of rock art research.

Our 300 members have professional, academic, and avocational interest in Utah rock art. Combined, our membership represents the largest body of knowledge regarding Utah rock art.

We appreciate the information provided within this Programmatic Environmental Impact Statement (PEIS). We also appreciate the efforts of Argonne National Lab staff to provide us with maps with the level of detail we need to effectively assess the significance of sites located within proposed boundary areas. The willingness of the Argonne lab staff to provide us with SHAPE files is a surprising, and much appreciated, exception to our experience in dealing with the Utah BLM Resource Management Plans (RMP). We also praise your idea of generating Google Earth maps for our use. This solution provided us with the detail we needed to evaluate map boundaries with respect to significant rock art sites. As a result of the Google Earth maps we withdrew concerns we had with some areas and are able to provide you with focused comments on other areas. We believe this is a best practice that should be used in all BLM generated environmental impact statements and RMPs.

Overview

The Federal Land Policy and Management Act of 1976 (FLPMA) requires that: the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use. It also requires: that public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands.

The FLPMA Sec. 202. [43 U.S.C. 1712] (c) also requires that in the development and revision of land use plans, the Secretary shall–

(1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law;

(7) weigh long-term benefits to the public against short-term benefits;
Multiple use is defined in the act as: the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and non-renewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment *with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output.* (our italics)

We recognize that this PEIS is being developed as a result of a congressional mandate outlined in Section 369 of the Energy Policy Act of 2005. However, we believe that this congressional mandate must be reconciled with the FLPMA which has contradictory values. The broad scale development of oil shale and tar sand resources within Utah, Wyoming, and Colorado is the antithesis of multiple use and emphasizes short term benefits over long term benefits. There is no doubt that scenic, historical, ecological, environmental, air, water, archeological, habitat, and recreation resources will be impaired by this decision. 52748-001

> Commercial oil shale development activities are largely incompatible with recreational land use (e.g., hiking, biking, fishing, hunting, bird watching, OHV use, and camping). As discussed in Section 4.2.1.3 regarding grazing activities, recreational land use could be precluded from those portions of the lease area, depending on the technology employed. While recreational use could be possible in undeveloped or restored portions of the lease area, the amount of land that would be available would vary from project to project. The change in the overall character of the undeveloped BLM-administered lands to a more industrialized, developed area would displace people seeking more primitive surroundings in which to hunt, camp, ride OHVs, etc. Many BLM Field Offices have designated lands as open, closed, or available for limited OHV use. Areas that would be open to application for commercial oil shale development may be currently available for some level of OHV use, and commercial oil shale development in these areas would displace this use. Even if access could be granted to portions of the lease area for recreational use, visitors might find the recreational experience to be compromised by the nearby development activities. Such impacts could also occur on recreational users of adjacent, off-lease lands. In addition, impacts on vegetation, development of roads, and displacement of big game could degrade the recreational experiences and hunting opportunities near commercial oil shale projects. To the extent that commercial developments might be clustered together (e.g., possibly in the Piceance Basin), the effect on recreation uses would be magnified by changing the overall character of a larger area and by dominating a larger portion of the landscape. (OSTS PEIS p. 4-19)

There will be a significant short term benefit to the access to petroleum resources. By our estimate, complete development of the resources under alternative B would generate over eight years of domestic petroleum supply at current usage rates.[1] 52748-001 (cont.)

[1] The Department of Energy estimates current petroleum consumption in the United States at approximately 20,000,000 barrels per day. (Annual Energy Review http://www.eia.doe.gov/emeu/aer/pdf/pages/sec5_5.pdf). Potential oil shale resources are identified as 61 billion barrels under alternative B and 31 billion barrels under alternative C. (OSTS PEIS p. ES-4). At current rates of consumption, complete and exhaustive exploitation of these resources

However, this plan contemplates the complete utilization of all commercially available oil shale and tar sand (OSTS) which violates the short term versus long term planning considerations of FLPMA. In the long term superior development practices may exist which would allow the extraction of these resources without the impacts required using current technology. 52748-001 (cont.)

Cultural Resources

We could not have described the impacts to cultural resources better than has been done on pages 4-131/132. However, we are concerned with the following decision: "This phase of analysis did not identify geographical areas that will preclude moving areas forward for leasing. During the leasing phase, the overviews and ongoing tribal consultation will be reviewed to help determine areas of sensitivity and appropriate survey and mitigation needs." (OSTS PEIS 4-133) The PEIS excluded areas from leasing based on ACEC status, proximity to scenic byways and trails, and proximity to wild and scenic rivers. Given that exclusion has been created for these criteria we see no reason why exclusion could not have been done on the basis of known, significant cultural resources. We recommend that the PEIS leasing boundaries be reconsidered in light of known, significant cultural resources. 52748-002

The PEIS demonstrates a consistent use of political double-speak with regards to cultural resources. The following viewpoint is expressed over and over in the document: "Under Alternative B, the amendment of land use plans to identify about 2 million acres of public land as available for commercial oil shale development would not result in impacts on cultural resources…Cultural resources within these areas could be adversely impacted if leasing and future commercial development occur." (OSTS PEIS 6-59; 61) This viewpoint that allowing leasing doesn't impact cultural resources, only the actual leasing does, is metaphorically similar to a bartender claiming no responsibility in the fatal accident of a drunk driver. We cannot state our concerns and recommendations with any more eloquence than Jerry Spangler of the Colorado Plateau Archaeological Alliance has already done: 52748-003

> CPAA disagrees with the basic premise that "cultural resources on federal and nonfederal lands would not be impacted by land use plan amendments" (PEIS 2-66). Amending BLM land-use plans to accommodate a particular use of public lands not anticipated at the time the plan was drafted is commonly a process initiated when the proposed activity is considered imminent and viable. Hence, the amendments to these specific land-use plans to allow for the leasing of selected and identified parcels/areas with oil shale or tar sands constitutes a *de facto* acknowledgement that these areas will be leased, even though the BLM readily admits that "uncertainty associated with the preliminary analyses indicated that BLM should defer approving the issuance of commercial leases until adequate information is available to define what the development will entail" (PEIS 2-51).
>
> In effect, BLM admits there is "uncertainty" as to the nature and scope of the development, and that current information about that development is inadequate to make informed decisions at the current time. However, these inadequacies have not precluded the BLM from offering Alternative B (preferred) and Alternative C, each with a stated intent to *facilitate* commercial leasing. Both alternatives come with the acknowledgment that leasing could lead to "construction and operation of commercial projects within the lease areas. Potential impacts may include damage or destruction, and increased potential for vandalism or theft due to increased human access" (PEIS 2-66).

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would supply 8.4 years of US petroleum needs under Alternative B and 4.2 years of consumption under Alternative C.

If the actual commercial leasing of public lands for oil shale and tar sands development constitutes a federal undertaking requiring thorough Section 106 review, as is acknowledged in the PEIS, then by logical extension any management decisions to amend the land-use plans (e.g., Alternatives B and C) to allow such leasing to occur is also an undertaking that requires full consideration of direct, indirect and cumulative impacts to cultural resources. No such consideration is offered in the PEIS. Rather, the PEIS states the "potential for future impacts on the environment have been analyzed at the programmatic level with the understanding that future leasing and development will require site-specific NEPA evaluation" (PEIS ES-5) and compliance with agency-specific processes for complying with Section 106 (PEIS 2-3).

CPAA contends that identifying lands for potential oil shale and tar sands leasing without critical analysis of the environmental suitability of those lands for leasing puts the cart before the horse. BLM has made very similar arguments in the past that the *sale* of oil and gas leases would have "no potential to affect" cultural resources, and that site-specific NEPA analysis at the time of the lease development is sufficient to comply with NEPA and NHPA. The Interior Board of Land Appeals has repeatedly rejected this assumption, emphasizing that appropriate NHPA compliance must be completed at each phase of a federal undertaking (cf. IBLA 2004-124, in SUWA v. UT 055, et al.). Furthermore, state protocol agreements specify the BLM will make reasonable efforts to identify all historic properties and sacred sites on BLM-administered lands where federal undertakings will occur.

We believe the modification of land-use plans to facilitate leasing is a federal undertaking as defined in 36CFR200.16(y) in that it is "a project, activity or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including … those requiring a Federal permit, license or approval." As such, we believe the BLM has not demonstrated "reasonable and good faith effort to identify all historic properties within the area potentially affected by the proposed undertaking, evaluate and determine whether identified properties are eligible for inclusion in the National Register, assess the adverse effects upon the identified properties deemed eligible, and develop and evaluate the means to mitigate or avoid such effects" (Save Medicine Lake Coalition, 156 IBLA 219,260 [2002]).

Also disconcerting is that Alternative B, with potential lease areas totaling about 2 million acres, is identified as the preferred alternative based on the rationale that "it would make the largest amount of potential oil resources available for leasing while still providing for an environmentally sound program and would provide the greatest flexibility in locating future development" (PEIS 2-1). This contrasts to Alternative C (830,000 acres of potential lease areas), which excludes those areas where there are already prohibitions on surface disturbance and/or seasonal limitations that have already been implemented by the BLM to protect known sensitive resources (PEIS 2-28).

In effect, the agency preference for Alternative B is based on maximum size of potential lease areas, not "an environmentally sound program." Alternative B fails to acknowledge that at-risk areas already analyzed in detail by the BLM and found worthy of enhanced environmental protection would continue to receive enhanced protection. Hence, Alternative B places at direct and imminent risk 1.17 million acres of public lands where at-risk resources have already been identified and where they are currently being managed by the BLM to protect those values. Alternative B appears to be in direct contrast to the stated intent of Congress that commercial development of oil shale and tar sands should "be conducted in an environmentally sound manner using management practices that will minimize potential impacts" (PEIS 1-1).

In light of these concerns, CPAA recommends:

- Any amendments to the relevant BLM land-use plans should be accompanied by full Section 106 compliance that includes, at a minimum, a more thorough Class I cultural resources analysis of all sites on lands identified for oil shale and tar sands leasing under Alternatives B and C. This should include the identification of highly sensitive areas where the densities of archaeological sites of National Register eligibility may make those areas unsuitable for leasing (see discussion

and recommendations hereafter related to East Tavaputs and West Tavaputs Plateaus).

(Personal correspondence from Jerry Spangler; Colorado Plateau Archaeological Alliance; Response to the Oil Shale and Tar Sand Programmatic Environmental Impact Statement)

Our only amendment to Jerry's recommendation is that we would like to see a Class II intuitive culture survey of the leasing areas. 52748-003 (cont.)

The PEIS also states the following with regards to mitigation of cultural sites: "For cultural resources that are significant for their scientific value, data recovery is one way in which some information may be salvaged should a cultural resource site be adversely impacted by development activity. Certain contextual data are invariably lost, but new cultural resources information is made available to the scientific community." (OSTS PEIS 4-132) We note that this is generally accurate, but does not apply to rock art sites. Most rock art sites exist on cliff faces or large boulders and are not amenable to recovery. It is hard to move a cliff face into a museum basement collection. It may be argued that pictures and/or drawings of rock art sites are sufficient to meet future scientific needs associated with the sites. However, pictures do not allow for the use of advanced dating techniques on patina or chemical analysis of paint. Nor do pictures allow us to understand the site in terms of its geographic context. "Place" is important in understanding the meaning of a site. As a result, rock art sites must receive special consideration in terms of cultural preservation. We recommend that the PEIS be re-evaluated to remove rock art sites eligible for national register of historic places (NRHP) status and surrounding visible topography from leasing alternatives. 52748-004

Water Resources

We are concerned about the issue of water consumption associated with the PEIS. We believe that this analysis does not consider the cumulative impacts of water consumption. The assessment of water requirements is contrasted with water that is legally available and concludes that there is sufficient legal availability of water from the Colorado River and other sources for the development of OSTS resources. (OSTS PEIS 3-72/73). However, this analysis does not consider downstream impacts on other users such as Nevada, California, and Mexico. The Scripps Institution of Oceanography/UC San Diego has completed a recent study which determines there is a 50% possibility that Lake Mead will be dry by 2021. (http://scrippsnews.ucsd.edu/Releases/?releaseID=876) Such a catastrophic impact would require the renegotiation of water allocation within the Colorado River basin. We believe that the PEIS needs to consider these downstream cumulative impacts from OSTS development in making a recommendation regarding the extent of leasing. 52748-005

Alignment With The RMP Process

Various field offices within the state of Utah have been developing new Resource Management Plans that will amend land use plans for the next decade. We believe that the Vernal, Price, Richfield, and Monticello RMPs overlap with recommendations made in this PEIS. Each of these RMPs have been released in the last few months and it is unclear to us how this PEIS interacts with the recommendations made under these revised RMPs. We do not understand how such a significant project as this PEIS could be developed independently of these RMPs. We recommend that either this PEIS incorporate the implications of the new RMPs 52748-006

or the RMPs be amended to reflect this PEIS and that these documents then be resubmitted for public comment and review. 52748-006 (cont.)

Exclusion Categories

URARA agrees that leasing should be excluded from all wilderness areas, wilderness study areas, national landscape conservation system areas, Wild and Scenic river sections (and eligible river segments), National Historic and Scenic Trails, and areas of critical environmental concern (ACECs) currently closed to mineral development (PEIS 1-7, PEIS 2-19). However, we believe that this list should be extended to include National Register of Historic Places sites and districts as well as Special Recreation Management Areas (SRMA), Special Management Areas (SMA) with cultural protection characteristics. We note that the BLM Monticello field office is actually developing new categories of SRMAs and SMAs with cultural protection components. 52748-007

Nine Mile Canyon

Of all the areas included in the leasing alternatives we are most concerned about Nine Mile Canyon. Nine Mile Canyon, an ancient thoroughfare, contains an invaluable history of habitation, agricultural and hunting activities. The rock art of early archaic, ancestral Shoshone, Fremont and Ute tribes are critical to our understanding of regional history, cultural development, and interaction. The archeology, while predominately Fremont, demonstrates a fascinating mix of both Fremont and Anasazi characteristics. (Spangler and Spangler; *Horned Snakes and Axle Grease*; p. 44-46; Uintah Publishing; 2003). This location presents an excellent opportunity to gain a better understanding of cultural groups that used the canyon through scholarly research and preservation activities. There are few places in Utah where there is such a concentration of rock art as Nine Mile Canyon and its confluences.

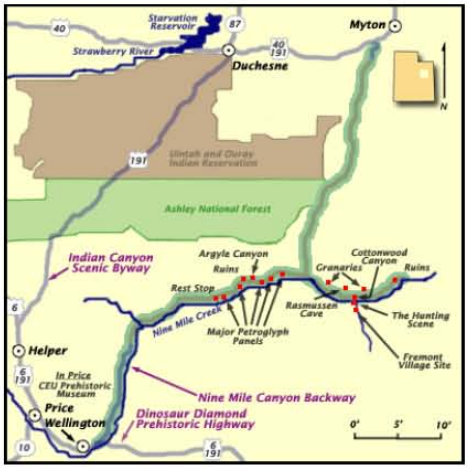
Images from Warrior Ridge, Nine Mile Canyon

There are, literally, thousands of sites within Nine Mile Canyon and its tributaries. The Argyle Canyon STSA encompasses some of the most archeological significant areas of the canyon. The area around the Gate Canyon confluence and extending east is dense with sites eligible for the NRHP. For example, Warrior Ridge, located in this region has habitation sites, pottery and lithic scatters, and a series of unique rock art sites. Human conflict is a rare motif in Utah rock art. However, sites along this ridge show many examples of anthropomorphs engaged in battle. Do these sites serve as a male initiation ceremony location? Do they document battles that occurred in the turbulent close of Fremont occupation of Utah? Research in this area has a high potential to contribute to our understanding of the ancient inhabitants of this region.

52748-008 (cont.)

The three tracts show in the above map cover this region of concern. We recommend, at a minimum, that these three tracts be eliminated from the Argyle Canyon STSA. However, we believe that you should follow your own recommendations for exclusion areas and remove larger portions of the canyon from consideration.

The PEIS eliminates areas around National Scenic Highways from consideration of leasing. (OSTS PEIS 4-130) We note with concern that the Nine Mile Canyon Backway has been excluded from table 3.1.2-1. This route is included in the National Scenic Byways http://www.byways.org/explore/byways/15780/index.html and includes significant areas impacted by the leasing areas considered for the Argyle STSA.



52748-009

"To mitigate visual impacts on high-value scenic resources in lands outside of, but adjacent to or near oil shale leasing areas, the following mitigation measures should be applied to siting, development, and operation of oil shale leases, as warranted by the result of the leasestage or plan of development-stage NEPA analyses.

• Oil shale-related development and operation activities within 5 mi of National Scenic Highways, All-American Roads, state-designated scenic highways, WSRs, and river segments designated as eligible for wild and scenic river status should conform to VRM Class II management objectives, with respect to impacts visible from the roadway/river." (OSTS PEIS 4-130)

It is not clear to us why Nine Mile Canyon has been excluded from this consideration and recommend that the Argyle STSA be amended to remove areas within 5 miles of the Nine Mile Canyon Backway.

Other Areas

We have reviewed the boundaries of the Sunnyside, San Rafael, White Canyon, and Tar Sand Triangle areas and are not aware that they include significant rock art sites. However, we believe a Class I survey of these areas be completed to ensure that we

52748-010

are not missing sites that are eligible for NRHP status. We are concerned with the White River, Hill Creek and Willow Creek areas of the East Tavaputs region and believe that these areas require further study and possible exclusion from the proposed leasing boundaries. These areas should receive a Class II survey before final consideration of leasing boundaries. 52748-010 (cont.)

It is impossible for us to support leasing in any of these areas without further information about transportation, electrical transmission, pipeline corridors, and pump stations and their impact on rock art and other cultural resources both inside and outside the leasing areas. 52748-011

Endorsement
URARA hereby endorses, and incorporates by reference, the recommendations of Jerry Spangler of the Colorado Plateau Archeological Alliance (CPAA) with regards to the Oil Shale and Tar Sands Programmatic EIS.

Yours truly,

Stephen Robinson
President, 2008

Responses for Document 52748

52748-001: With the passage of the Energy Policy Act of 2005, Congress declared the policy of the United States to include that "oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed …." Congress also required the Secretary of the Interior to prepare a PEIS for oil shale and tar sands. The FLPMA, the Mineral Leasing Act, and the Energy Policy Act of 2005 authorize use of some BLM land for commercial oil shale leasing and development. Conflicts between resource uses are not new, and resolutions to such conflicts are not decided by the land use planning decisions analyzed in this PEIS. The amendments to the RMPs will only close certain areas, and open other areas to consideration for future leasing of oil shale and tar sand. The Secretary of the Interior retains discretion over leasing decisions. The NEPA analysis for future leasing decisions will analyze resource uses, compatibility, and conflicts.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands. This analysis will balance any conflicting uses, as required by FLPMA.

52748-002: Thank you for your comment regarding the impacts descriptions in Section 4.10. The PEIS is analyzing the environmental consequences of an allocation decision. Therefore, it is premature to identify leasing boundaries. Subsequent NEPA analysis will be required prior to the leasing and development phases. This new NEPA analysis will analyze whether to offer for lease parcels of land for commercial oil shale exploration and development and under what conditions or stipulations, or whether specific parcels would be excluded from consideration.

As described in the PEIS, there are some areas that have been designated ACECs for the cultural resources they contain therein. These areas are not available for application for leasing for oil shale under Alternative C, nor are they available under Alternative B for those ACECs that are closed to other mineral development. There are many areas of known significant cultural resources that have not formally been reviewed for ACEC status, as there are many areas containing significant cultural resources that have not yet been identified or recorded. For that reason, other than the reviewed ACECs and some designated historic trails, no lands have been excluded in this PEIS strictly on the basis of the presence of cultural resources. The BLM has policies in place for protecting significant cultural resources, and the agency is subject to compliance with the National Historic Preservation Act, among other pertinent regulations, as described in Appendix D. During subsequent NEPA analysis, full consideration

will be given to the protection of cultural resources in full compliance with existing BLM policies and pertinent laws and regulations.

52748-003: This PEIS does not authorize leasing; it designates lands available for application for leasing. Lease rights could be granted after a subsequent site-specific NEPA review. Section 4.10 also describes the requisite Section 106 process that would be followed specifically for cultural resources at both future leasing and development stages. Leases may or may not be granted depending on site-specific factors and the results of required Section 106 consultations. A determination of the level of survey to be conducted will be accomplished in consultation with affected Tribal governments and the applicable SHPO(s). Lease stipulations may be applied to address specific concerns, if a lease is granted in an area where historic properties could be adversely affected.

52748-004: Rock art sites are but one specific type of cultural resource that needs to be considered. This is a site-specific issue that would be addressed when and if such resources would be affected by a leasing or development decision, associated with subsequent NEPA analysis. The commentor's concern for mitigation options for significant rock art sites is understood and would be addressed specifically during subsequent reviews and consultations. Until more information is available regarding specific locations for leasing applications and specific technological and land requirements for development, it is premature to make any leasing decisions, including substantial land use limitations.

See also the response to Comment 52748-002.

52748-005: The allocation of Colorado River water is determined by the Colorado River Compact of 1922. The Upper Colorado River Basin states are obligated to deliver 7.5 million ac-ft/yr to the lower basin states plus 0.75 million ac-ft/yr to Mexico. The development of the oil shale, if it occurs, is unlikely to reduce its obligation. Therefore, the impacts are unlikely to effect water availability in the lower basin states.

In the most recent agreement, which occurred in 2007, the seven states of the Colorado River Basin agreed that the delivery to the lower basin states could be reduced to 7 million ac-ft/yr, provided the lake level of Lake Mead is below elevation 1,025 ft. This agreement is to address the recent drought conditions in the Colorado Basin and has nothing to do with oil shale development.

52748-006: You are correct that the areas considered in the ongoing RMPs and the PEIS overlap. All decisions related to land use planning for oil shale and tar sands resources in the PEIS study area will be made in the ROD for this PEIS. The ROD will amend the existing plans (MFPs or RMPs, or ongoing RMPs if the PEIS is completed first) by making land use planning decisions on whether or not lands will be available for application for future leasing and development of oil shale or tar sands on public lands for those areas where the resource is present.

Additional site-specific NEPA analysis will be completed on any future lease application before any leases would be issued. If, as part of this pre-leasing NEPA analysis, the BLM determines that leasing and subsequent development of the oil shale or tar sands resources would cause significant impacts, for example, to ACECs, the BLM can require the applicant to: (1) mitigate the impact so that it is no longer significant, (2) move the proposed lease location, or if neither of these options resolves the anticipated conflicts, (3) the BLM can decide that development of the oil shale or tar sands resources outweighs protection of the on-site resources and approve the application. This pre-leasing NEPA analysis would include opportunities for public involvement and comment that are part of the PEIS process and every other planning and NEPA process the BLM undertakes.

52748-007: There are many areas of known significant cultural resources that have not yet been identified, recorded, or formally evaluated for National Register eligibility. The only areas with cultural and historic values that are excluded from both Alternatives B and C for tar sands are designated ACECs and National Historic and Scenic Trails. These areas are excluded because they have multiple resource values, not strictly cultural resources. For oil shale, only ACECs withdrawn from mineral entry are excluded from Alternative B while all ACECs are excluded from Alternative C. National Historic and Scenic Trails are excluded from consideration for leasing in both Alternatives B and C for oil shale. The differences in the alternatives are included to allow analysis of the differing impacts of the alternatives on various resources.

Under all alternatives, BLM would comply with all applicable requirements for cultural and historical preservation, whether affected areas are included in areas available for application for leasing. The BLM has policies in place for protecting significant cultural resources, such as those listed on the National Register as sites or districts or deemed eligible for listing, and the agency is subject to compliance with the National Historic Preservation Act, among other pertinent regulations, as described in Appendix D. During subsequent NEPA analysis, full consideration will be given to the protection of cultural resources in full compliance with existing BLM policies and pertinent laws and regulations.

52748-008: Thank you for your recommendation; please see the response to Comment 52748-007.

52748-009: The PEIS does not eliminate “areas around National Scenic Highways” from consideration from leasing. Instead, as noted in Section 5.9.2, the Draft PEIS states that tar sands-related development and operation activities near National Scenic Byways, All American Roads, and state-designated scenic highways should conform to particular VRM Class II or Class III objectives depending on distance of the development/activity from the designated roadway. As indicated by the Official Designations page of the National Scenic Byways Program Web site (http://www.byways.org/explore/byways/15780/designation.html), the Nine-

Mile Canyon Backcountry Byway is officially designated as a BLM Backcountry Byway. It is not a National Scenic Byway, All-American Road, or state-designated scenic highway. It therefore would not be subject to this mitigation measure; however, it would still be subject to mitigation measures for all sensitive visual resources and the requirements of the VRM Class designation for that area as specified in the RMP.

The STSA boundaries were determined by an Act of Congress; amending the boundaries of the STSAs is outside the scope of the PEIS.

52748-010: A determination of the level of survey to be conducted will be accomplished in consultation with affected Tribal governments and the applicable SHPO(s). Section 4.10 of the PEIS describes the requisite Section 106 process that would be followed at both future leasing and development stages. Leases may or may not be granted depending on site-specific factors and the results of required consultations. As stated in the response to Comment 52748-002 above, this PEIS analyzes the environmental consequences of a land allocation decision and not the consequences of a leasing decision.

52748-011: The BLM, in consultation with its cooperating agencies, has also determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. To still be responsive to Congress's direction, the focus of the PEIS was changed prior to release of the public draft to only identify public lands opened or closed to application for commercial oil shale or tar sands leasing. The BLM encourages your continued vigilance and any comments you may have regarding any future leasing decisions. Future NEPA analyses will consider the area of potential effect for the action to be taken, whether it is a leasing or development decision. This analysis will include consideration of the direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures, as well as the level of development that may be anticipated.

Thank you for your comment, Jon Porter, MD.

The comment tracking number that has been assigned to your comment is OSTSD52749.

Comment Date: March 19, 2008 10:38:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD52749

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State:
Zip:
Country:
Email: fossilsrfr@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to oppose, strongly, alternative B of the Oil Shale and Tar Sand EIS. I believe that wasting money on this, as yet commercially unproven oil source, while devastating the many wilderness (and non-wilderness) areas involved is fiscally unsound. Further, I understand that additional energy use must be added (coal-fired power plants) which seems to compound the environmental and fiscal waste. I urge the BLM to choose alternative A, and reject any further consideration of development of oil shale and tar sands on public lands.

52749-011

Response for Document 52749

52749-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, James Ward.

The comment tracking number that has been assigned to your comment is OSTSD52750.

Comment Date: March 19, 2008 10:39:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD52750

First Name: James
Middle Initial: H
Last Name: Ward
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

As a person that worked on a oil shale in 1965 I think that are to maney unanswered questions. Here are my concerns, the amount of water and power needed compared to the value of the power gained does not make sense. Thank You for not spending any more time or money on a bad project.	52750-001

Response for Document 52750

52750-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Steve Skinner.

The comment tracking number that has been assigned to your comment is OSTSD52751.

Comment Date: March 19, 2008 11:01:45AM
Oil Shale and Tar Sands
Comment ID: OSTSD52751

First Name: Steve
Middle Initial:
Last Name: Skinner
Organization:
Address: P.O. Box 1388
Address 2:
Address 3:
City: Carbondale
State: CO
Zip: 81623
Country: USA
Email: steve@kdnk.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am OPPOSED to this destructive energy extraction process. This represents a step in the wrong direction for our country which should be spending these efforts on conservation and alternative sources of energy. Please DO NOT enable the continued abuse of the land for an unsustainable lyfestyle. Thank you! Steve Skinner Carbondale, CO	52751-001

Response for Document 52751

52751-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Richard Hills.

The comment tracking number that has been assigned to your comment is OSTSD52752.

Comment Date: March 19, 2008 11:11:49AM
Oil Shale and Tar Sands
Comment ID: OSTSD52752

First Name: Richard
Middle Initial: G
Last Name: Hills
Organization:
Address: 787 E Center St
Address 2:
Address 3:
City: Centerville
State: UT
Zip: 84014
Country: USA
Email: rhills@weber.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose mining of oil shale and tar sands because of the massive environmental degradation which cannot be repaired adequately. Also I oppose this because of the huge amount of energy	52752-001
that will have to be supplied by coal or oil-fired electrical generation plants which will degrade air quality and emit mercury. This project cannot be considered permanent as when the deposits have	52752-002
been exhausted, Americans will have to begin cutting down on consumption anyway.	52752-001 (cont.)

Responses for Document 52752

52752-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52752-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

The potential emissions of any air pollutant (including mercury) would not result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

The quantity and source of electrical power that might be needed for potential development would require making many speculative assumptions and, therefore, is premature at this stage in the process.

Thank you for your comment, Amy kAISER.

The comment tracking number that has been assigned to your comment is OSTSD52754.

Comment Date: March 19, 2008 11:42:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD52754

First Name: Amy
Middle Initial:
Last Name: kAISER
Organization:
Address: 85 n. 7th street
Address 2:
Address 3:
City: Carbondale
State: CO
Zip: 81623
Country: USA
Email: amymoon@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I want no action taken on this plan. I oppose Action Plan B. Please stick with No Action A. Lets preserve what we have. | 52754-001

Response for Document 52754

52754-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Joel Tuhy.

The comment tracking number that has been assigned to your comment is OSTSD52755.

Comment Date: March 19, 2008 11:50:12AM
Oil Shale and Tar Sands
Comment ID: OSTSD52755

First Name: Joel
Middle Initial:
Last Name: Tuhy
Organization: The Nature Conservancy
Address: P.O. Box 1329
Address 2:
Address 3:
City: Moab
State: UT
Zip: 84532
Country: USA
Email: jtuhy@tnc.org
Privacy Preference: Don't withhold name or address from public record
Attachment: OilShaleTarSandsPEIS_Comments_TNC.doc

Comment Submitted:

Electronic file of letter is attached. Hard copy of identical letter is being sent to Argonne IL mailing address. See Attachment.

The Nature Conservancy
Protecting nature. Preserving life.™

The Nature Conservancy
Moab Project Office
P.O. Box 1329
Moab, UT 84532

tel [435] 259-4629
fax [435] 259-2677

nature.org/utah

March 19, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Gentlemen:

The Nature Conservancy (TNC), Utah Chapter, would like to thank the Bureau of Land Management (BLM) for the opportunity to provide comments on the Draft Oil Shale and Tar Sands Leasing Programmatic Environmental Impact Statement (PEIS) for oil shale and tar sands resources on BLM-managed public land in Colorado, Utah and Wyoming.

The Nature Conservancy is dedicated to preserving the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters these species and communities need to survive. The Conservancy has nearly one million members and over 1,900 corporate sponsors. We currently have programs in all 50 states and in 27 other countries. To date our organization has protected more than 14.5 million acres in the United States and more than 101 million acres in other countries through local partner organizations. The Conservancy manages more than 1,400 private preserves in the United States – the largest private system of nature sanctuaries in the world. Our conservation work is grounded in sound science, strong partnerships with other private and public landowners, and tangible results at local places.

Working with partners to take a science-based approach to conservation planning, the Conservancy has completed assessments of the biological resources for the Wyoming Basins, Utah-Wyoming Rocky Mountains, and Utah High Plateau Ecoregions, which when combined, cover much of the proposed PEIS planning area. Our comments are based upon that assessment work and other projects completed in the planning area. We in the TNC Utah Chapter are most knowledgeable about the biological resources in our state, and thus will limit these comments to application of the PEIS in Utah.

We begin our comments by stating support for Alternative A, The No Action Alternative. We believe that Alternative A is the most prudent course, given the combination of: (1) the sensitivity of ecological resources in the Uinta Basin, and (2) the lack of knowledge about impacts to those resources that would proceed from oil shale and tar sands leasing. We understand that the BLM was obliged to evaluate establishment of commercial leasing programs for oil shale and tar sands development under the Energy Policy Act of 2005. Hopefully you have fulfilled this obligation by virtue of producing this PEIS; we also urge that you fulfill your management duty to protect sensitive resources on public lands by selecting Alternative A.

52755-001

Rationale for Selecting Alternative A for both Oil Shale and Tar Sands Leasing

– Lack of Information to Evaluate Impacts Realistically

As documented in the PEIS, there is interest in oil shale development but no commercial production is currently being undertaken in the United States. Given this state of the industry, the PEIS notes that both published information and communications with companies holding the R&D leases were inadequate to describe future commercial technologies and associated needs, including processes, power, water, and employees, and the amount of land that will be disturbed. As stated in the PEIS: "without this information, it is not possible to define what related impacts will be" (PEIS, page 2-50). Nor has the industry given any firm indication when or where commercial oil shale production may begin (PEIS, page 6-40).

Similarly, as noted in the PEIS, no tar sands have been developed, no project proposals have been submitted, no commercially viable technology is available in the United States, and no foreseeable development of tar sands exists on public lands within next 20 years (PEIS, pages 2-37 and 38). 52755-002

Because of this lack of information, the BLM is wise not to attempt to issue leases for commercial development of oil shale or tar sands on the basis of this PEIS. However, we question the wisdom of taking even the preliminary step of designating public lands as open for application to lease under Alternatives B and C. Implementing one of these Alternatives, especially Alternative B, may give the industry false hope that they will be able to proceed when, in reality, BLM may not be able to meet its dual mandate of protecting sensitive resources and making areas available for oil shale and tar sands development.

– The Sensitive Species Mandate

A number of sensitive species will likely be adversely affected under development that could proceed under either of the action alternatives. TNC is particularly concerned with potential impacts to the Pariette cactus, Uinta Basin hookless cactus, clay reed-mustard, and shrubby-reed mustard (all of which occur only in Utah); and to the Graham beardtongue and White River beardtongue (which occur mostly in Utah, and entirely within the PEIS planning area). No alternate opportunities exist to conserve or maintain these plants elsewhere. If they are not conserved in the locations they currently inhabit, they will likely go extinct or (at best) require more stringent federal listing. 52755-003

We are also concerned about potential impacts that oil shale and tar sands leasing may have on several other species, including the black-footed ferret, white-tailed prairie dog and the four Colorado River endangered fishes. Regarding the endangered fishes, the Green River from Jensen to Sand Wash (approximately 60 river miles) is the critical river reach for razorback sucker, including the prime spawning bar and the largest and most important floodplain rearing habitat in the entire Upper Colorado basin. This reach of river is also at the core of the largest remaining Colorado pikeminnow population, and contains key backwater habitat for this

species. The Endangered Fish Recovery Program has acquired and reopened several floodplain parcels in this reach of river, for rearing of young fish of these species. Further, recent sampling has confirmed that the lower White River contains a significant number of adult Colorado pikeminnow. 52755-003 (cont.)

The options outlined in this oil shale and tar sands PEIS are being considered prior to the adoption of a Vernal Resource Management Plan (RMP). Nevertheless, we assume (and urge) that general protection commitments for special status plants and animals contained in the Draft Vernal RMP will be carried forward into the approved Final Vernal RMP. The following management commitments for special status species are common to all alternatives listed in the Draft Vernal RMP:

- Special Status Species will be preserved and their habitat enhanced (Draft RMP, page 2-29);
- All specific goals and objectives of all recovery plans and conservation plans and strategies will be implemented (Draft RMP, page 2-30); and 52755-004
- Non-listed sensitive species and the habitats upon which they depend will be managed in such a manner as to preclude the need to list them as either threatened or endangered (Draft RMP, page 2-30).

We also assume (and urge) that these same protections will be granted to all special status species under the oil shale and tar sands PEIS. However, one of the major problems with the PEIS is that it has not and cannot – given the lack of information about the industry and the species – predict if the special-status species mandates can be met. It seems imprudent and arbitrary to make major decisions in light of such uncertainty.

– Comparison With Other Alternatives

While we support Alternative A, Alternative B does offer more protections for special status species than Alternative C. However, based on the information and scale of maps available to us, Alternative B would still allow leasing in the habitat for all of the plant species of concern identified above on page 2, except the Pariette cactus.

52755-005

Given the lack of information on how oil shale and tar sand development will impact special status species, and whether potential exists for mitigation or reclamation (not a certainty for the plants), we are disappointed that the neither of the Action Alternatives (B or C) takes the clear and important step to AVOID areas that have high conflict with other values.

Actions to Consider Prior to Leasing

In the sense of being better to "look before we leap," TNC recommends that two pre-conditions be addressed prior to any PEIS leasing decisions:

1. **Wait until the Vernal RMP is finalized.** Until the BLM's Vernal Resource Management Plan is approved and implemented, it is impossible to assess cumulative effects from prospective oil shale and tar sands development, because the effects even of traditional oil and gas development are unknown. 52755-006

2. **Learn more about indirect effects to sensitive plants.** Not only are we concerned with the direct effects that oil shale and tar sands development could have on special status plants, we believe it is also necessary to know how these plants are affected by the indirect impacts such as road dust, habitat/pollinator fragmentation, invasive species, etc. One example of this "need to know" is affirmed in the Conservation and Research Plan for *Penstemon scariosus* var. *albifluvis*, *Penstemon goodrichii*, *Astragalus equisolensis*, and *Penstemon grahamii* developed for the BLM by Red Butte Garden. As noted in this Plan:

> "Not only does the Intermountain West have many rare plant species, but little is known about their basic biology and most plant populations are not being visited on any regular basis . . . it is not enough to hope to protect rare plant species by protecting a portion of their habitat. We must develop an understanding of the ecological requirements necessary for each species' long-term survival."

This multi-plant Conservation Plan further notes that "it is imperative that the BLM and the USFWS take actions to collect the necessary data *now* in order to be capable of making sound management decisions, and prevent the need for listing in the future."

52755-007

Reactive lease stipulations and mitigation measures will not be most effective without a better understanding of rare plant biology. For example, in recent comments on the Castle Peak and Eightmile Flat Oil and Gas Expansion Project DEIS, TNC noted that the proposed mitigation measures only address direct effects to plants (e.g. controlling employees and contractors from driving OHVs off established roads and trails to avoid Uinta Basin hookless cactus). Given the lack of information about cactus viability requirements, for example, it is impossible to determine if steps such as these would be adequate. In this oil shale / tar sands PEIS, the BLM is setting in motion the possibility to develop these mineral resources before the true cost to all resources can be assessed.

As a way to mitigate the generally defined impact, the PEIS states that "adherence to BLM policy and consultation with the USFWS could reduce the incremental contribution of commercial oil shale development to cumulative impacts" (PEIS, page 5-161). Again, this seems to be putting off the difficult analysis that should be completed and resulting choices made before expectations are created. More information is needed about both industry's practices and needs, and individual species and natural communities, before an informed, tailored leasing decision can be made that truly fulfills BLM's mandate to manage and maintain species, plant and animal communities.

A More Reasonable Approach

We are all still learning about the special status plants of the PEIS planning area. We currently have a basic knowledge about their location, but know little about their long-term survival needs and much less about what they need to remain viable over the long term. Given this lack of knowledge, we offer the following recommendations as the BLM moves forward with their decision making:

1. Be conservative. Err on the side of conserving the plants, your most limited resource.

2. Begin to develop the knowledge about these sensitive biotic resources so that in the future the BLM can adequately estimate the effects of its actions and choose the proper course of action. BLM is supporting a number of plant monitoring efforts that are going in the right direction. We applaud these efforts.

3. Go slow. Allow the research effort to proceed under Alternative A, developing the needed information about the technology. With a little more time and more information about both biotic and abiotic resources, a more supportable leasing decision can be made in the future.

52755-008

* * * * *

Thank you once again for the opportunity to provide these comments, and for giving them serious consideration in this oil shale / tar sands leasing process.

Sincerely yours,

Joel S. Tuhy

Joel S. Tuhy
Director of Science, Utah Field Office

cc: Dave Livermore, Utah State Director
Chris Montague, Director of Conservation Programs

Responses for Document 52755

52755-001: The BLM acknowledges the commentor's preference for Alternative A.

52755-002: Congress declared its intent in the Energy Policy Act of 2005 that the Nation pursue the development of oil shale and tar sands resources, among other unconventional fuels, if it can be done in an environmentally sound manner. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives when considering whether lands should be opened or closed for application for commercial oil shale or tar sands leasing. The PEIS analyzes the environmental consequences of this allocation decision. The PEIS also describes the requirement for additional site-specific NEPA analysis prior to both issuance of commercial leases and approval of proposed exploration or development projects.

The BLM believes this phased or staged approach ensures that commercial oil shale and tar sands development programs meet the intent of Congress and make areas available for oil shale and tar sands development while taking advantage of the best available practices to minimize impacts and offer opportunities for states, local communities, and the public to participate in the process.

52755-003: The comment expresses concern for impacts on a number of federally listed threatened and endangered species and provides information on the importance of the area for the continued survival of these species. The impacts of leasing and development on these and other listed species are presented and discussed in Sections 4.8 and 5.8 of the PEIS.

The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is primarily a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the threatened or endangered species.

52755-004: Currently there is sufficient information on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing. The PEIS is analyzing the environmental consequences of an allocation decision. As a result, the ROD for this PEIS will not commit any resources or grant any lease rights. This process provides an opportunity for a subsequent level of land use planning, if necessary, and NEPA analysis of specific parcels that may be offered for lease and to develop specific mitigation measures to protect the resources and resource values present. At that time, if parcels are nominated for potential leasing within the area of the Vernal RMP, additional NEPA analysis will be required using the site-specific information concerning special status plants and animals within the area affected prior to the issuance of any lease. These subsequent commercial oil shale

or tar sand leasing decisions will be made at the field office level and will take into account applicable decisions in the RMP.

52755-005: The PEIS is a programmatic-level document analyzing allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives, as to whether lands are suitable for future consideration for commercial oil shale leasing.

It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis, if plant species of concern are present, may include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to sensitive resources.

52755-006: The PEIS presents, for the purposes of analysis, a cumulative analysis based on the nature and scope of the proposed action and on available nonspeculative information. The PEIS analyzes the environmental consequence of an allocation decision that does not commit any resources or grant any lease rights. Programmatic EISs have been considered adequate without site-specific analysis when the federal action does not contain a site-specific or critical decision. This is the case in the PEIS. In addition, prior to any commercial oil shale leasing, additional NEPA analysis will be required. Because there will be additional environmental analysis prior to leasing, a cumulative analysis is not required to be presented showing the impacts of leasing and development.

In the future, if parcels are nominated for potential leasing within the area of the Vernal RMP, a NEPA analysis including a cumulative analysis will be required prior to any leasing. This cumulative analysis would include other Reasonably Foreseeable Future Actions such as local oil and gas exploration and development associated with the Vernal RMP.

52755-007: Please see the response to Comment 52755-005 regarding the level of analysis in programmatic documents. In addition, the types of impacts mentioned in the comment are discussed in the PEIS and are summarized in Tables 4.8.1-4 and 5.8.1-4.

52755-008: Congress requires the BLM to move forward with this PEIS. Future information from the RD&D projects should be useful in making decisions regarding leasing and plans of development. The BLM agrees with the commentor’s point that

future information might lead to additional or modified measures to conserve special status plants. Such measures could be analyzed at the leasing or plan of development stage.

Thank you for your comment, Rich Holtzin.

The comment tracking number that has been assigned to your comment is OSTSD52756.

Comment Date: March 19, 2008 13:16:24PM
Oil Shale and Tar Sands
Comment ID: OSTSD52756

First Name: Rich
Middle Initial: K
Last Name: Holtzin
Organization:
Address: 1407 W Romney Ave
Address 2:
Address 3:
City: Flagstaff
State: AZ
Zip: 86001
Country: USA
Email: richholtzin@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Whatever you folks at BLM are up to this time why not alter the bad karma and do something right - reconsider what the Glen Canyon Field Institute is trying to get through to you. This planet and its resources really isn't all about you but it's all about us. And if your agency is supposedly protecting us from the woes of a downtrodder environment then who is going to protect us from you? 52756-001

Thanks for listening.

Response for Document 52756

52756-001: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, David Dzidzikashvili.

The comment tracking number that has been assigned to your comment is OSTSD52757.

Comment Date: March 19, 2008 13:22:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD52757

First Name: David
Middle Initial:
Last Name: Dzidzikashvili
Organization:
Address: 88 Washington Street
Address 2: Apt. 9
Address 3:
City: Boston
State: MA
Zip: 02135
Country: USA
Email: dzidz@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Great information and resources for interested individuals. 52757-001

Response for Document 52757

52757-001: Thank you for your comment.

Thank you for your comment, Andy Radford.

The comment tracking number that has been assigned to your comment is OSTSD52759.

Comment Date: March 19, 2008 14:24:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD52759

First Name: Andy
Middle Initial:
Last Name: Radford
Organization: American Petroleum Institute
Address: 1220 L Street, NW
Address 2:
Address 3:
City: Washington
State: DC
Zip: 20005
Country: USA
Email: radforda@api.org
Privacy Preference: Don't withhold name or address from public record
Attachment: BLMCOMMENTS 3 19 08.pdf

Comment Submitted:

See Attachment.

Doug Morris
Group Director
Upstream and Industry Operations

1220 L Street, NW
Washington, DC 20005-4070
USA
Telephone 202-682-8089
Fax 202-682-8426
Email morrisd@api.org
www.api.org

VIA U.S.MAIL AND E-MAIL

March 19, 2008

BLM Oil Shale and Tar Sands Resources Draft Programmatic EIS Comments
Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Ladies and Gentlemen:

API appreciates this opportunity to provide written comments on the draft Oil Shale and Tar Sands Resource Management Plan Amendments that address land use allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS) as provided in the December 21, 2007 Federal Register Notice.

API is a trade association representing nearly 400 member companies involved in all aspects of the oil and natural gas industry. A number of our members are actively pursuing technology to develop oil shale resources impacted by this rulemaking.

Resource estimates for the oil shale resource in the Colorado, Utah, and Wyoming is estimated at between 1.2 and 1.8 trillion barrels of oil in place and as much as 500 billion to 1.1 trillion barrels of that oil is considered potentially recoverable. These domestic reserves resources will be needed by our country in the future to meet our growing demand needs and could potentially reduce our reliance on foreign imports.

This PEIS plays a critical role in moving the U.S. towards a commercial leasing program and also provides for environmentally sound development of unconventional energy resources. As such, API strongly supports Alternative B as the only realistic opportunity for the development of oil shale resources. Alternative A is a no action alternative and would result in no development of a significant strategic energy resource. Alternative C is overly restrictive and would not allow for the efficient, economic management of the program in a manner that would optimize responsible development of the oil shale resource. Therefore, we view Alternative C as a non-development alternative. 52759-001

An equal opportunity employer

energy API

Oil shale represents a significant domestic resource that has the potential to increase supplies, jobs, and economic activity while being developed in an environmentally responsible and socially sustainable manner. We appreciate the opportunity to comment on the draft PEIS and encourage the agency to strongly consider our recommendations as well as those of our members and allied trade associations. 52759-001 (cont.)

Should you have any questions regarding these comments please contact Andy Radford at 202-682-8584 or radforda@api.org.

Sincerely,

Doug Morris

Response for Document 52759

52759-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Steve Threlkeld.

The comment tracking number that has been assigned to your comment is OSTSD52760.

Comment Date: March 19, 2008 14:24:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD52760

First Name: Steve
Middle Initial: W
Last Name: Threlkeld
Organization:
Address: 4262 Bancroft Drive
Address 2:
Address 3:
City: La Mesa
State: CA
Zip: 91941
Country: USA
Email: s-threlkeld@cox.net
Privacy Preference: Don't withhold name or address from public record
Attachment: BLM Oil Shale EIS - Comment Letter to Sherry Thompson.doc

Comment Submitted:

Sherry Thompson, Project Manager BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory 9700 S. Cass Ave. Argonne IL 60439

March 19, 2008

Dear Ms. Thompson,

If the fantastic sums of money proposed to be spent developing the oil shale's and tar sands of BLM lands were applied towards developing solar energy instead, nearly as much or more energy could be produced cleanly for our country over the long term. Solar energy is collected indefinitely, rather than being consumed after two or three decades as fossil fuels usually are!

Most importantly, solar energy does not contribute to the greenhouse gasses that are likely fueling a disastrous global climate change scenario, nor creating irrevocable environmental impacts to the land solely to service the energy needs of one generation. 52760-001

We can no longer afford the reckless methods of the past in providing for the energy needs of our country. Such actions, if left unchecked, will come to be viewed historically as the selfish and immoral actions of a single irresponsible generation.

I have no desire to be part of such a generation without expressing my profound opposition to it.

Lastly we cannot in good conscience be instructing other developing countries (such as China and India) to drastically reduce their emission of greenhouse gasses while we continue engaging in hypocritical practices at home. It is time instead for America to regain the reigns of leadership in this all-important human endeavor of reversing the production of greenhouse gas emissions that are fueling global climate change. And there is only one way to accomplish this successfully: by example! 52760-002

Sincerely,

Steven W. Threlkeld See Attachment.

Steven W. Threlkeld
4262 Bancroft Drive
La Mesa, CA 91941

March 19, 2008

Sherry Thompson, Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Ms. Thompson,

If the fantastic sums of money proposed to be spent developing the oil shale's and tar sands of BLM lands were applied towards developing solar energy instead, nearly as much or more energy could be produced cleanly for our country over the long term. Solar energy is collected indefinitely, rather than being consumed after two or three decades as fossil fuels usually are!

Most importantly, solar energy does not contribute to the greenhouse gasses that are likely fueling a disastrous global climate change scenario, nor creating irrevocable environmental impacts to the land solely to service the energy needs of one generation.

We can no longer afford the reckless methods of the past in providing for the energy needs of our country. Such actions, if left unchecked, will come to be viewed historically as the selfish and immoral actions of a single irresponsible generation.

I have no desire to be part of such a generation without expressing my profound opposition to it.

Lastly we cannot in good conscience be instructing other developing countries (such as China and India) to drastically reduce their emission of greenhouse gasses while we continue engaging in hypocritical practices at home. It is time instead for America to regain the reigns of leadership in this all-important human endeavor of reversing the production of greenhouse gas emissions that are fueling global climate change. And there is only one way to accomplish this successfully: by example!

Sincerely,

Steven W. Threlkeld

Responses for Document 52760

52760-001: Although renewable energy sources are an important part of a diverse domestic energy supply, oil shale and tar sands on the public lands are among the best prospects to supply our country's future energy needs. With the passage of the Energy Policy Act of 2005, Congress instructed the Secretary of the Interior to prepare a PEIS to establish a commercial leasing program. The BLM is conducting a phased decision-making process proceeding from land use planning to leasing to operational permitting. The land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases to assess impacts of those actions. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. Specific mitigation measures, management prescriptions and best available practices will be applied to minimize or eliminate impacts as a result of the NEPA analysis.

52760-002: Thank you for your comment.

Thank you for your comment, richard johnson.

The comment tracking number that has been assigned to your comment is OSTSD52761.

Comment Date: March 19, 2008 14:47:33PM
Oil Shale and Tar Sands
Comment ID: OSTSD52761

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Attachment:

Comment Submitted:

Thank you for this opportunity. I definitly oppose alternative B and support alternative A (no action). I do not want any more of my country or my public lands torn up for energy supplies when CONSERVATION is the only way we will ever be self sustaining in our energy needs. Thanks Richard Johnson	52761-001

Response for Document 52761

52761-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Joseph Adam Roeder.

The comment tracking number that has been assigned to your comment is OSTSD52762.

Comment Date: March 19, 2008 14:59:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52762

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Comment Submitted:

I oppose the Preferred Alternative B and am strongly in favor of the No Action Alternative. Please do not open up our national treasures to oil shale and gas exploration	52762-001

Response for Document 52762

52762-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Brooke Bell.

The comment tracking number that has been assigned to your comment is OSTSD52763.

Comment Date: March 19, 2008 15:34:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD52763

First Name: Brooke
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Attachment: oil shale DEIS 031808.doc

Comment Submitted:

See Attachment.

ANADARKO PETROLEUM CORPORATION

TELEPHONE: 303/452-5603
1099 18TH STREET, DENVER CO 80202

March 20, 2008

Bureau of Land Management
Oil Shale & Tar Sands Draft
Programmatic Environmental Impact Statement
Argonne National Laboratory
9700 S. Cass Avenue
Argonne, IL 60439

RE: Comments on Draft Programmatic Oil Shale and Tar Sands Environmental Impact Statement

To Whom it May Concern:

Anadarko Petroleum Corporation (Anadarko) submits the following comments for consideration by the Bureau of Land Management (BLM) as it finalizes the Programmatic Oil Shale and Tar Sands Environmental Impact Statement (Programmatic EIS). BLM issued the notice of availability for the draft Programmatic EIS on December 21, 2007. 42 Fed. Reg. 72751 (December 21, 2007). BLM has prepared the Programmatic EIS as required by Section 369 of the Energy Policy Act of 2005.

Anadarko is one of the largest independent oil and gas exploration companies in the United States and is unique in that it owns extensive mineral and fee interests in Colorado, Wyoming and Utah, including lands prospective for oil shale development. The oil shale resources represent a potential significant source of domestic reserves to meet the nation's growing demands for energy sources. This Programmatic EIS represents a critical first step on the path towards potential development of oil shale resources from federal lands.

The Programmatic EIS analyzes three alternatives for amendment of existing land use plans in Colorado, Utah and Wyoming to allow for leasing of lands for oil shale development – a No Action Alternative (no plan amendments and no oil shale leasing would be allowed) and two alternatives, B and C, that analyze amending land use plans in the three states to allow for oil shale leasing. Under Alternative B, BLM would amend various land use plans to allow for the leasing of approximately 1.9 million acres of land with the majority of the lands being available in Wyoming (approximately 1 million of the 1.9 million). Under Alternative C, various land use plans would be amended to allow for the leasing of only 830,296 acres with the bulk of the available acreage being located in Utah (490,460 acres). Anadarko supports the adoption of Alternative B as it is the only alternative that would realistically allow for the eventual development of a domestic oil shale program. That lands that would be made available under Alternative C are

52763-001

mostly non-contiguous parcels that would not allow for the efficient and economic development of the underlying oil shale resources. 52763-001 (cont.)

Because this is a programmatic document, Anadarko believes that BLM should refrain from adopting any mitigation measures. Analysis and imposition of any such measures are better suited to more site-specific analysis. As BLM has itself recognized in this Programmatic EIS, this is only the first step in the process. Before BLM may lease lands for oil shale development, it will need to propose and adopt regulations governing leasing and operations. Analysis and imposition of any necessary mitigation measures would be more applicable at that stage of the process rather than this one. 52760-002

As BLM moves forward with this document and promulgation of regulations, BLM must address the potential conflict with development of oil and gas resources. Although the Programmatic EIS notes the existence of such resources, the document is devoid of any discussion regarding how BLM will address potential conflicts. BLM should remedy this deficiency in the final document. 52760-003

Anadarko appreciates BLM's efforts in taking this first step towards a viable domestic oil shale program and encourages BLM to complete the process in a timely manner.

Sincerely,

Brooke S. Bell
Manager Regulatory Affairs – Rockies Region
Anadarko Petroleum Corporation

Response for Document 52763

52763-001: The BLM acknowledges the commentor's preference for Alternative B.

52763-002: As discussed on pages 4-1 and 5-1 of the Draft PEIS, the PEIS provides examples of mitigation measures that the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final, or a comprehensive list of required stipulations or management prescriptions. Potential conservation measures for threatened and endangered species are discussed in Appendix F on pages 4-106 and F-3.

52763-003: Promulgation of regulations to address the potential conflict between oil shale and oil and gas development is outside of the scope of the PEIS. Nevertheless, the BLM will exercise its authority in the leases, applicable statutes, and eventual regulations to manage federal mineral development in the public's best interest.

Overall, it is BLM's policy to optimize the recovery of both resources in an endeavor to secure the maximum return to the public in revenue and energy production; prevent avoidable waste of the public's resources utilizing authority under existing statutes, regulations and lease terms; honor the rights of each lessee, subject to the terms of the lease and sound principles of resource conservation; and protect public health and safety, and mitigate environmental impacts.

The PEIS does recognize that commercial oil shale development is largely incompatible with other mineral development activities and will likely preclude other mineral resource development while there is ongoing oil shale development and production (see Section 2.3.3). While it is possible that undeveloped portions of an oil shale lease area could be available for other mineral development, such development would be unlikely to occur on a widespread basis. As with the coal and coalbed methane conflict, it is BLM's policy to encourage companies to resolve conflicts between themselves and when requested, the BLM will assist in facilitating agreements between the companies (Washington Office Instruction Memorandum 2006-153, May 11, 2006).

In particular, the PEIS notes that lands within the Multimineral Zone identified in the White River RMP (BLM 1997b) would be made available for application for commercial lease only if the applicant can demonstrate that it would use technologies that allow recovery of oil shale resources without preventing the recovery of or otherwise destroying other minerals (i.e., nahcolite and dawsonite)(see Section 3.1.1.3).

Thank you for your comment, Carolyn Hopper.

The comment tracking number that has been assigned to your comment is OSTSD52764.

Comment Date: March 19, 2008 15:36:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD52764

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Comment Submitted:

Comments concerning BLM Oil Shale and Tar Sands Draft Programmatic EIS. I strongly oppose the "Preferred Alternative" and support Alternative A, the "No Action" alternative in the PEIS.	52764-001
My reasons are: is quite certain to cause massive, irreversible damage to large areas of Utah, Colorado, and Wyoming which includes devastating the land and water, endangering wildlife and their habitats, harming people in local communities and generating massive greenhouse gas pollution that would add to global climate change. The BLM has admitted that more research is needed before we know the true impacts of the technology or if it is commercially feasible. It is time to slow down in picking the pockets of wildlife and public land so that there may be something left in the future that is not devasted by technology and that rivers, land and animals are not displaced or polluted and that we have a healthier planet and country to look forward to. It is time to move away from fossile fuels which will run out in the not too distant future and consider a reasonable range of alternatives. Leave a legacy of leaving the land better off in the future not destroyed. The land under consideration is not rich in water. Please save it for those who need it and not technology.	52764-002 52764-003

Responses for Document 52764

52764-001: The BLM acknowledges the commentor's preference for Alternative A.

52764-002: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

In consultation with our cooperating agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The PEIS's analysis provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

52764-003: The scope of the PEIS is to identify public lands that would be available or would not be available for application for the potential leasing of oil shale or tar sands in the future. This scope is consistent with the instructions of Congress in the Energy Policy Act of 2005 instructing the BLM to develop oil shale and tar sands resources in an environmentally sound manner. The alternatives in the PEIS focus on amending land use plans and identifying public lands that would be available or would not be available for application for the potential leasing of oil shale or tar sands in the future. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct impacts, watershed impacts, indirect impacts, and cumulative effects; additional reasonable alternatives; and mitigation measures.

Thank you for your comment, Melissa Thrailkill.

The comment tracking number that has been assigned to your comment is OSTSD52766.

Comment Date: March 19, 2008 15:52:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52766

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Attachment: Comments_CenterforBiologicalDiversity_Oilshale.tarsands.doc

Comment Submitted:

See Attachment.

March 19, 2008

BLM Oil Shale and Tar Sands DPEIS
Argonne National Laboratory
EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Re: Oil Shale and Tar Sands Resources DPEIS

Dear Reviewers:

Thank you for the opportunity to comment on the Bureau of Land Management's ("BLM") Programmatic Environmental Impact Statement ("DPEIS") regarding the Draft Oil and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming. These comments are submitted on behalf of the Center for Biological Diversity ("Center"), a non-profit public interest conservation organization with over 40,000 members nationally, and the Center for Native Ecosystems ("CNE"), a non-profit public interest organization dedicated to conserving and recovering the native species and ecosystems of the Rocky Mountain region.

The Center works through science, law, and creative media to secure a future for all species, great or small, hovering on the brink of extinction. The primary goal of the Center's Climate, Air, and Energy Program is to reduce United States greenhouse gases and other harmful air pollutants in order to protect biological diversity, public health, and the environment. The Center's Public Lands Program watchdogs activities that do harm to species and their habitat on lands held in trust for the common good, including mining and drilling for metals and fossil fuels, and works to stop environmentally destructive projects and ensure that the nation's public lands are managed with minimal damage.

CNE is dedicated to conserving and recovering the native species and ecosystems of the northern Rockies region. CNE values the clean water, fresh air, healthy communities, sources of food and medicine, and recreational opportunities provided by native biological diversity. CNE passionately believes that all species and their natural communities have the right to exist and thrive. CNE uses the best available science to forward its mission through participation in policy, public outreach and organizing, administrative processes, legal action, and education.

In short, the Center and CNE believe that the DPEIS must be revised and recirculated prior to approval as its deficiency in content, analysis, and conclusion are so severe as to render the documents and any decision approving them legally infirm. The DPEIS fails to comply with the mandates of the National Environmental Policy Act, 42 U.S.C. §§4331 et seq. ("NEPA") to analyze the direct, indirect and cumulative environmental effects of the action and to consider a reasonable range of alternatives. The DPEIS also shows that the proposed development would be contrary to the

52766-001

substantive requirement of the Energy Policy Act of 2005 ("EPAct"), which states that such development must proceed in an "environmentally sound manner." 52766-001 (cont.)

While the flaws of the DPEIS are both numerous and diverse, our primary concerns flow from four related categories of inadequate analysis, and hence uninformed and unwise decisionmaking: (1) the failure to comply with the EPAct; (2) the failure to disclose, analyze, and otherwise take into account the greenhouse gas emissions inevitably resulting from the proposed land use amendments that would permit oil shale and tar sands development on public lands; (2) the failure to disclose, analyze, and otherwise take into account the observed and projected effects of global warming on the resources affected by the amendments and potential leases; (3) the failure to adequately disclose, analyze, mitigate and take into account the impacts of the proposed action on public lands; and (4) the failure to adequately disclose, analyze, mitigate and take into account the impacts of the proposed action on ecological resources and special status species such as oil shale endemics and species protected under the Endangered Species Act, 16 U.S.C. § 1531, et seq. 52766-002

As this comment letter will demonstrate, the vast energy inputs required for extraction of oil from oil shale and tar sands may produce up to four times more greenhouse gas pollution than conventional oil production. Additionally, cumulatively speaking, when one considers the greenhouse gas pollution that will result from the burning of the oil produced, it is abundantly clear that oil shale and tar sands production brings a global warming impact that the nation cannot afford. Furthermore, the potential leasing program will directly, indirectly and cumulatively result in major infrastructure development that will seriously and negatively impact public lands and ecological resources in the area, detrimentally affecting many species and their habitats. 52766-003

Yet, the BLM fails to consider and disclose relevant information necessary to assess these reasonably foreseeable environmental impacts. The BLM's failure to investigate and analyze scientific information on oil shale and tar sands development's environmental impacts is a blatant violation of the EPAct and NEPA. Without this information, the DPEIS lacks any substance, affecting every aspect of the environmental review and decisionmaking process and rendering it impossible for the BLM to reveal the true costs of the proposed project to the public and decisionmakers. What's more, without this information, the BLM cannot adequately demonstrate how this proposed project is environmentally sound. The DPEIS must be supplemented to include this information before the BLM can legally issue any final regulations regarding the resource management plans or any commercial leases permitting oil shale or tar sands development on the nation's public lands. 52766-004

Discussion

I. THE ALTERNATIVES SET FORTH IN THE DPEIS WOULD NOT COMPLY WITH THE SUBSTANTIVE AND PROCEDURAL REQUIREMENTS OF THE EPACT AND NEPA.

A. The Program Would Not Meet the Requirements of Section 369 of the EPAct.

1. Oil Shale and Tar Sands Development Cannot Proceed Because, as the DPEIS Demonstrates, it Cannot Be Done in an "Environmentally Sound Manner."

Section 369 of the EPAct makes clear that as a substantive matter, oil shale or tar sands development on public lands in the Rockies may proceed, if at all, only in an "environmentally sound manner." Thus, while NEPA standing alone does not necessarily mandate an environmentally sound outcome as a substantive matter, such result is required here. See, e.g., Wyo. Outdoor Council v. U.S. Army Corps of Eng'rs, 351 F. Supp. 2d 1232, 1240 (D. Wyo. 2005) ("NEPA mandates that federal agencies take into consideration the impacts of their actions on the environment in the hopes that such consideration will lead to environmentally sound decisions that balance the needs of humans and the environment in which they live").

The DPEIS and other studies demonstrate, however, that oil shale and tar sands development, as would be facilitated by the proposed action, would not proceed in an "environmentally sound" way. According to the DPEIS, the proposed development could destroy habitat, alter topography, displace birds and animals, kill animals, destroy plants including many oil shale endemic species, and could even drive some highly imperiled plant species to extinction, like the clay reed-mustard, Dudley Bluffs bladderpod, Dudley Bluffs twinpod, shrubby reed-mustard, and Uinta Basin hookless cactus. It will also, as described below, require vast energy inputs that may produce up to four times more greenhouse gas pollution than conventional oil production—rendering a global warming impact that the nation and world simply cannot afford.

Indeed, such impacts are not just possible, but quite likely. Many studies have documented the severe environmental effects of oil shale and tar sands development. See, e.g., Environmental Defence (2008) at 7-18 (documenting impacts of tar sands development, including toxic contamination of air and water, and increased global warming); WWF (2008) at 13-53 (documenting impacts to land, air, water, and climate); Rand (2005) at 35-43 (documenting environmental and social impacts of oil shale development in the United States); OTAa (1980) at 255-356 (discussing environmental considerations relevant to oil shale development in the United States); OTAb. For example, tar sands development in Canada is some of the most polluting, toxic, greenhouse-gas emitting, energy-intensive, destructive, and unsustainable activities on earth, and it is most certainly not "environmentally sound." Environmental Defence (2008); WWF (2008). Oil shale development on public lands is likely to have long-lasting, devastating consequences. Rand (2005); OTAa (1980). As unconventional sources of fossil fuel energy, there really is no way to avoid the insidious impacts that

52766-005

will inevitably result from oil shale and tar sands development, or minimize them to an "acceptable" degree. 52766-005 (cont.)

At the very least, it is clear that the BLM lacks sufficient information to be able to evaluate fully the environmental consequences of such development—in particular, about project-specific technologies and their impacts to sensitive species and their habitats—as the agency itself acknowledges. If the BLM cannot determine whether oil shale and tar sands development will proceed in an environmentally sound manner, it cannot proceed with the proposed action. 52766-006

2. BLM Must Disclose and Fully Consider the Environmental Consequences of the Proposed Development.

Section 369 directs the Secretary of Interior to complete a DPEIS for a commercial leasing program for oil shale and tar sands resources on public lands. Thus, by the terms of Section 369 as well as NEPA and CEQ's implementing regulations, BLM must fully and adequately analyze the environmental impacts of this development, but as explained below, the draft DPEIS fails to sufficiently review the environmental consequences of oil shale and tar sands leasing in these states. 52766-007

As a general matter, however, BLM has apparently concluded that its ability to perform environmental reviews and take into account the far-reaching and devastating impacts of oil shale and tar sands leasing in the Rockies is somehow limited. Even if the agency does not think that it has the authority to do something—in this case, deciding not to open land to leasing—it must still adequately analyze a true "no action" alternative in the draft DPEIS because the point of an EIS is to inform the public and Congress about the environmental consequences of its proposed activities.[2] 52766-008

Indeed, it would certainly seem that Congress wants such information. An omnibus budget bill passed and signed by President Bush in late 2007 prohibits publication of any final regulations establishing a commercial leasing program this fiscal year, and Congress recently refused to support an amendment that would have removed this moratorium. This suggests that Congress is increasingly concerned about the connection between global warming and leasing of oil shale and tar sands in these three states and wants the BLM to fully consider the environmental consequences of oil shale and tar sands leasing. 52766-007 (cont.)

Accordingly, the BLM must adequately analyze and inform the public and Congress about the severe environmental consequences that such leasing will undoubtedly have, and must complete a full and faithful analysis of environmental consequences pursuant to NEPA and the EPAct.

[2] As discussed below, BLM has failed to develop a proper "no action" alternative. 52766-008 (cont.)

B. The BLM Must Consider the Environmental Consequences of its Actions Under Sections 368 and 369 of the EPAct in a Single EIS.

Section 368 of the EPAct directs several federal agencies (including the BLM) to designate corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on federal land, starting with the Western states. As the BLM recognizes, designation of these so-called "West-wide Energy Corridors" will be "likely to impact energy development throughout the western United States, including commercial oil shale and tar sands development" by "removing administrative and planning barriers for potential pipelines, electric transmission lines and associated infrastructure." DPEIS at 1-12.

NEPA requires federal agencies to take a "hard look" at environmental consequences and perform an analysis commensurate with the scale of the action at issue. *See* 40 C.F.R. § 1508.8; *see also* 40 C.F.R. § 1502.4 (NEPA requires federal agencies to "prepare statements on broad actions so that they are relevant to policy and are timed to coincide with meaningful points in agency planning and decisionmaking"). Agencies must also prepare a single EIS for multiple actions where activities are "connected," "similar," or have "cumulatively significant impacts." *Compare* 40 C.F.R. § 1508.7 (defining "cumulative impact") *with* 40 C.F.R. § 1508.25 (defining conditions warranting preparation of a single EIS).

Through Section 368, the BLM and other federal agencies are subjecting rights-of-way on public lands in the Western states to a new approval policy, and in the process, "removing administrative and planning barriers for potential pipelines, electric transmission lines and associated infrastructure" for oil shale and tar sands development. DPEIS at 1-12. As such, the proposed West-wide Energy Corridors and oil shale and tar sands development would have a compounded effect throughout the planning area and beyond—and would impact many sensitive resources, species, special places, and the local and global climate. These direct, indirect, and cumulative effects must be considered together in a comprehensive or programmatic document, where BLM will be best able to address the manner of achieving its proposed implementation of Sections 368 and 369 and the potential environmental consequences that would result. 52766-009

To account for the implications of the new energy policies and procedures as proposed in the DPEISs for the West-wide Energy Corridors and the proposed oil shale and tar sands development, a separate (and/or programmatic) EIS for both proposals is required.

II. THE DPEIS FAILS TO ANALYZE ALL GREENHOUSE GAS EMISSIONS FROM THE PROPOSED PROJECT.

The BLM failed to consider the greenhouse gas emissions that would result from the project as required by NEPA. The DPEIS must analyze all phases of the project, including production and the combustion of the fossil fuels to be produced. Failure to 52766-010

conduct this analysis is arbitrary, capricious, and contrary to the express mandates of NEPA. 52766-010 (cont.)

NEPA is the "basic national charter for protection of the environment." 40 C.F.R. § 1500.1(a). Congress passed NEPA in 1969, casting the statute as a landmark national effort to "encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation." 42 U.S.C. § 4321.

To accomplish these goals, all federal agencies must assess the environmental impacts of their proposals before taking any action on them. The preparation of an Environmental Impact Statement ("EIS") lies at the heart of NEPA, and must provide a "full and fair discussion" of impacts like greenhouse gas emissions and global warming implications, fully informing "decisionmakers and the public of the reasonable alternatives which would avoid or minimize" these impacts. 40 C.F.R. § 1502.1.

The purpose of the NEPA review process is two-fold: "First, it places upon [the action] agency the obligation to consider every significant aspect of the environmental impact of a proposed action. Second, it ensures that the agency will inform the public that it has indeed considered environmental concerns in its decisionmaking process." Kern v. United States Bureau of Land Management, 284 F.3d 1062, 1066 (9th Cir. 2002). See also Columbia Basin Protection Ass'n v. Schlesinger, 643 F.2d 585, 592 (9th Cir. 1981) ("[T]he preparation of an EIS ensures that other officials, Congress and the public can evaluate the environmental consequences independently.")

These dual objectives require that environmental information be disseminated "early enough so that it can serve practically as an important contribution to the decisionmaking and will not be used to rationalize or justify decisions already made." 40 C.F.R. § 1502.5. See also Marsh v. Oregon Natural Resources Council, 490 U.S. 360, 371 (1989) ("the broad dissemination mandated by NEPA permits the public and other government agencies to react to the effects of a proposed action at a meaningful time"); Metcalf v. Daley, 214 F.3d 1135, 1143-44 (9th Cir. 2000). Ultimately, an EIS does not satisfy NEPA unless "its form, content, and preparation substantially (1) provide decision-makers with an environmental disclosure sufficiently detailed to aid in the substantive decision whether to proceed with the project in light of its environmental consequences, and (2) make available to the public, information of the proposed project's environmental impacts and encourage participation in the development of that information." Trout Unlimited v. Morton, 509 F.2d 1276, 1283 (9th Cir. 1974).

In the DPEIS at issue, the BLM failed to adequately analyze how oil shale and tar sands development will contribute to an increase in greenhouse gas emissions and how this increase will undoubtedly contribute to global climate change and adversely affect ecosystems and species. Instead, the BLM simply summarizes information on greenhouse gas emissions and global climate change and concludes that "neither the state 52766-010 (cont.)

of the science, nor current monitoring systems are adequate to indicate what influence global climate change may have throughout the study area." DPEIS 3-97.

In similar fashion, when describing what effects oil shale and tar sands development will have on greenhouse gas emissions and global climate change, the BLM once again simply summarizes basic information on the subject and concludes that the "direct emissions of climate change air pollutants" from both oil shale and tar sand development facilities "are likely to be a small fraction of global emissions." DPEIS 4-48; 5-41.

By ignoring the effects of greenhouse gas emissions on the environment, the BLM has failed to completely consider a critical aspect of the problem, rendering each and every section of the DPEIS incomplete and inadequate. Because the BLM improperly chose not to consider how the leasing program will contribute to all greenhouse gas emissions, the DPEIS evaluates global climate change as if it were a phenomenon independent of a commercial leasing program. Instead, the DPEIS should have discussed the draft program's significant direct and cumulative contribution to global warming. Its failure to do so is an egregious violation of NEPA. 52766-010 (cont.)

The public and decisionmakers are entitled to know the true costs and impacts of all aspects of the land use amendments, including the greenhouse gas emissions resulting from the production of fuel from oil shale and tar sands and the use of the developed fuel. Laying bare the true impacts and costs of the direct and cumulative greenhouse gas emissions from the oil shale and tar sands program, and disclosing alternatives and mitigation measures, would very likely lead to increased energy conservation and use of renewable energy sources. The BLM prevented this result by producing a DPEIS that hid the true greenhouse gas emissions of its proposed land use amendments. As explained further below, this error has infected every aspect of the decisionmaking process. As such, the BLM must prepare a revised DPEIS that properly considers the potential greenhouse gas and global warming implications of the land use amendments, prior to proceeding to issue final regulations concerning a leasing program or issuing any leases under such regulations.

A. The Cursory Evaluation of Greenhouse Gas Emissions and Global Climate Change in the DPEIS is Inadequate under NEPA.

Before detailing the DPEIS' improper analysis of how oil shale and tar sands development will result in a rise in greenhouse gas emissions, and, therefore contribute significantly to global warming, it is important to point out that the BLM's complete failure to address this critically important issue limited the BLM's ability to truly appreciate how the land use plan amendments would directly and cumulatively add to greenhouse gas emissions and contribute to global warming. 52766-011

As briefly stated above, when discussing oil shale and tar sands production's affect on climate, the BLM provides two paragraphs of information essentially summarizing the basic knowledge of greenhouse gas emissions and their contribution to

global warming. The BLM acknowledges scientific reports identifying the effects greenhouse gas emissions have on the global climate and recognizes that the burning of fossil fuels has caused carbon dioxide concentrations to increase "dramatically" and are "likely to contribute to overall climatic changes," that the International Panel on Climate Change ("IPCC") recently found that the climate is unequivocally warming and that anthropogenic greenhouse gas concentrations are very likely the cause of the observed increase in global average temperatures, that the global mean surface temperatures have increased nearly 1.0 ºC (1.8ºF) from 1890 to 2006, and that increasing concentrations of greenhouse gas emissions "are likely to accelerate the rate of climate change." See DPEIS 4-48; 5-41. Nevertheless, the BLM, goes on to state that the "assessment of [greenhouse gas] emissions and climate change is in its formative phase" and, therefore, it is still impossible to know "with confidence the net impact on climate" and that the "direct emissions" from oil shale and tar sand development facilities "are likely to be a small fraction of global emissions." See DPEIS 4-48; 5-41.

This analysis is faulty under NEPA because it fails to adequately disclose pertinent information on greenhouse gas emissions, global warming and their known net impacts on climate changes and misrepresents the state of the science. First, the assessment of greenhouse gas emissions and climate change is beyond its "formative phase." Rather, the basic physics underlying global warming are as well established as any phenomena in the planetary sciences. The IPCC report cited by the BLM concluded that planetary warming is now "unequivocal" (Alley et al. 2007).

52766-011 (cont.)

In addition, the report gives a future outlook of global warming impacts by evaluating a range of emissions scenarios. These scenarios assume differing levels of population and economic growth, technological innovation, and other factors, such as better environmental management, that will influence overall greenhouse gas emissions (Alley et al. 2007). Based on this range of possible scenarios and results from the world's leading climate models, the IPCC predicts that the globally averaged surface temperature will increase by 1.1 to 6.4º C and that sea level will rise between 18 and 60 cm by the end of this century. (Alley et al. 2007). The more greenhouse gases are emitted into the atmosphere, the more warming will occur, and it is very likely that the changes in the global climate system as a result would be larger and more pronounced than the ones already observed. (See Alley et al. 2007). This warming is in addition to the warming already "in the pipeline" (Hansen et al. 2005). Because anthropogenic greenhouse gas emissions have altered the energy balance of the earth by 0.85 ± 0.15 watts per square meter and because of the lag time in the climate system, as of 2005 the Earth was already committed to at least .6ºC (1ºF) of additional warming even absent additional greenhouse gas emissions (Hansen et al. 2005).

What's also important and completely ignored in the DPEIS is scientists' ability to predict future changes from continued greenhouse gas emissions. For example, scientists are able to tell us, with a high degree of certainty, that additional warming of more than 1ºC (1.8ºF) above year 2000 levels will constitute "dangerous climate change," with particular reference to sea level rise and species extinction (Hansen 2006, Hansen et al. 2006a, b, American Geophysical Union 2007). This is because warming of greater

than 1°C may induce positive climate feedbacks, such as the release of large amounts of methane from thawing arctic permafrost, that will further amplify the warming (Hansen 2006; Hansen et al. 2006a,b).

Several types of greenhouse gases cause this threatening warming, and the DPEIS must assess and disclose all of the greenhouse gas emissions the project will likely produce. Furthermore, this analysis must include an evaluation of the emissions that will result from all phases of the projects, from construction of the lease sites, to the production of the fuel, to the combustion of the fuel eventually produced. 52766-011 (cont.)

1. The DPEIS Must Assess Carbon Dioxide Emissions.

Carbon dioxide is one of the most important greenhouse gases and tends to stay in the atmosphere for centuries (Archer 2005). The IPCC found that emission rates of carbon dioxide have grown by 80 percent from 1970 to 2004 and that the 2005 atmospheric concentration of carbon dioxide at 379 parts per million greatly exceeded the natural range over the last 650,000 years (Bernstein et al. 2007). The rise of carbon dioxide emissions in the air is commensurate with the rise of global temperatures.

Scientists have described the atmospheric carbon dioxide ceiling that must not be exceeded in order to avoid a dangerous rise in temperatures. Previously, scientists have described this "ceiling" as approximately 450 parts per million (ppm) of carbon dioxide, and have warned that this may need to be adjusted downwards (Hansen 2006, Hansen 2006a,b). Recently, Dr. James Hansen has stated that the limit will need to be revised downward to 350 ppm (McKibben 2007). We are already well past that ceiling at 383 ppm (McKibben 2007). 52766-012

It is possible to slow and then reverse the increase in carbon dioxide emissions concentrations by slashing anthropogenic emissions, improving land use, and utilizing alternative energy sources. See, e.g. Hansen 2006, Hansen et al. 2006a,b; Hansen and Sato 2004. However, the necessary measures have not yet been implemented, and carbon dioxide emissions have continued to increase by 2 percent per year since 2000 (Hansen 2006; Hansen et al. 2006a,b). If this growth continues, the 35 percent increase in carbon dioxide emission between 2000 and 2015 will make it impossible to get below even the previously identified ceiling of 450 ppm (Hansen 2006; Hansen et al. 2006a,b).

2. The DPEIS Must Assess Methane Emissions Resulting from the Project.

Methane is the most important of the non-CO_2 pollutants, with a global warming potential 21 times greater than carbon dioxide, and an atmospheric lifetime of 12 years (Forster and Ramaswamy 2007). Methane constitutes approximately 20% of the anthropogenic greenhouse effect globally, the largest contribution of the non-CO_2 gases. As a precursor to tropospheric ozone, methane emissions have an even more powerful impact on climate. In the Arctic, which is already struggling in the face of global warming, this impact is strongest in winter months, which can result in an acceleration of 52766-013

the onset of spring melt (Shindell 2007). Tropospheric ozone, unlike other greenhouse gases, absorbs both infrared radiation and shortwave radiation (visible light). Thus, tropospheric ozone is a particularly powerful greenhouse gas over highly reflective surfaces like the Arctic, because it traps shortwave radiation both as it enters the Earth's atmosphere from the sun and when it is reflected back out again by snow and ice. Reducing global methane emissions will reduce ozone concentrations in the sensitive Arctic and elsewhere.

52766-013 (cont.)

3. The DPEIS Must Assess Black Carbon or Soot Resulting from the Project.

Black carbon, or soot, consists of particles or aerosols released through the inefficient burning of fossil fuels, biofuels, and biomass (Quinn et al. 2007). Black carbon warms the atmosphere, but it is a solid, not a gas. Unlike greenhouse gases, which warm the atmosphere by absorbing longwave infra-red radiation, soot has a warming impact because it absorbs shortwave radiation, or visible light (Chameides and Bergin 2002). Black carbon is an extremely powerful greenhouse pollutant. Scientists have described the average global warming potential of black carbon as about 500 times that of carbon dioxide over a 100 year period (Hansen et al. 2007; *see also* Reddy and Boucher 2007). This powerful warming impact is remarkable given that black carbon remains in the atmosphere for only about four to seven days, with a mean residence time of 5.3 days (Reddy and Boucher 2007).

Black carbon presents a particularly troubling problem for the Arctic. It contributes to warming in this region through the formation of "Arctic haze" and through deposition on snow and ice which increases heat absorption (Quinn et al. 2007; Reddy and Boucher 2007). Arctic haze results from a number of aerosols in addition to black carbon, including sulfate and nitrate (Quinn et al. 2007). The effects of Arctic haze may be to either increase or decrease warming, but when the haze contains high amounts of soot, it absorbs incoming solar radiation and leads to heating (Quinn et al. 2007).

52766-014

Soot also contributes to heating when it is deposited on snow because it reduces reflectivity of the white snow and instead tends to absorb radiation. A recent study indicates that the direct warming effect of black carbon on snow can be three times as strong as that due to carbon dioxide during springtime in the Arctic (Flanner 2007). Black carbon emissions that occur in or near the Arctic contribute the most to the melting of the far north (Reddy and Boucher 2007; Quinn et al. 2007).

Black carbon is a significant contributor to global climate change, and, like methane and carbon dioxide, its emissions must be reduced to curb future warming of the earth.

4. The DPEIS Must Assess Nitrous Oxide and All Other Greenhouse Gas Pollutants.

Nitrous oxide has a global warming potential 310 times that of carbon dioxide and an atmospheric lifetime of approximately 114 years (Forster and Ramaswamy 2007). It constitutes the second largest proportion of anthropogenic non-CO_2 gases at 7%. The main sources of nitrous oxide emissions are agriculture, wastewater, fossil fuel combustion, and industrial adipic and nitric acid production. As discussed further below, because oil shale and tar sands production relies heavily on fossil fuel combustion, and because the fuel eventually produced will also be burned by consumers, the project will likely lead to an increase in nitrous oxide emissions. The BLM must explore these emissions in its DPEIS. The BLM must also discuss any other greenhouse gas pollutants that may result from the proposed project. 52766-015

In sum, the science concerning greenhouse gases and global warming is advanced and makes clear that we must stop the growth of greenhouse gas emissions, and then rapidly reduce overall emissions to a very small fraction of current levels. The DPEIS fails to acknowledge this critical context in which the oil shale and tar sands development's greenhouse gas emissions must be analyzed. The greenhouse gas intensive oil shale and tar sands development is completely incompatible with any rational energy policy to reduce greenhouse gas emissions on the timeframe that scientists tell us is absolutely necessary. Without analyzing the greenhouse gas emissions from the proposal within the overall context of the climate crisis we are facing, the BLM cannot comply with its legal obligations to fully analyze and disclose the unacceptable impact the commercial leasing program will have on the environment. 52766-016

B. The DPEIS Improperly Fails to Include Relevant and Available Information on Oil Shale and Tar Sands Development's Contribution to Greenhouse Gas Emissions.

The DPEIS's conclusion that direct emissions of greenhouse gases from oil shale and tar sands development facilities are "likely to be a small fraction of global emissions" is inadequate because, as mentioned above, it fails to place these emissions in the context of the larger global warming problem. Moreover, it summarily reaches this conclusion without even attempting to analyze all the greenhouse gas emissions that will result from such development.[3] 52766-017

[3] In Appendix A, the BLM discusses only those likely greenhouse gas emissions that will result from a plant operating an Alberta Taciuk Processor, which is one that results in the least amount of greenhouse gas emissions. This is an adequate because it only looks at one technology and fails to look at the greenhouse gas emissions resulting from all phases of production, as explained in this comment letter. Furthermore, based on the science regarding greenhouse gas emissions and their contribution to global warming and climate change, based on the information included in tables A-15 and A-16, the DPEIS reaches the wrong conclusion that oil shale and tar sands production, even using the cleanest of technologies is not a significant impact. See also Brandt, *Converting Green River oil shale to liquid fuels with the Alberta Taciuk Processor: energy inputs and greenhouse gas emissions*, for a more detailed discussion of the greenhouse gas emissions resulting from ATP processing.

The BLM selects alternative B as its preferred alternative, which would amend nine existing BLM resource management plans ("RMP") to make almost 2 million (1,991,222) acres of public land available for commercial lease applications for developing oil shale within Colorado, Utah, and Wyoming. DPEIS ES-3-4. It would also make 431,224 acres available for commercial lease applications for tar sands in Utah. DPEIS ES-6. The BLM chose this alternative because it would "make the largest amount of potential oil resources available for application for leasing, while still providing for an environmentally sound program." DPEIS ES-3. But because the BLM failed to include widely available information on the environmental impacts of oil shale and tar sands development, the DPEIS does not, and cannot, establish how this program is environmentally sound. Likewise, the BLM's failure to include and analyze this available information makes it virtually impossible for the BLM to design RMP amendments that would achieve their purpose of, among others, identifying technology restrictions and stipulating requirements for future NEPA analyses and consultation activities. DPEIS 6-35. 52766-018

The primary reason the BLM gives for failing to include relevant information on oil shale and tar sands development is that because it is purportedly not clear what potential development projects will look like and what technologies potential lessees will utilize, the "magnitude of impacts and the applicability and effectiveness of mitigation measures" can't be assessed at the programmatic level. DPEIS ES-7. Therefore, the BLM concludes, these impacts and mitigation measures will have to be evaluated on a "project-by-project basis with consideration of site-specific factors . . . and project-specific factors," such as the size of operations, technology, water consumption and air emissions. DPEIS ES-7. Yet, in determining its alternatives in amending the land use plans pursuant to the mandates of the 2005 EPAct, the BLM makes many assumptions about a commercial oil shale and tar sands leasing program. These assumptions, discussed further below, should not only serve as the basis for determining what land use plans should be amended and how, but should also be used to determine the overall environmental impacts of such a program. Thus, the BLM's failure to use its own assumptions to examine the environmental impacts of the proposed project violates NEPA. 52766-019

1. The DPEIS Improperly Omitted Oil Shale Development's Contribution to an Increase in Greenhouse Gas Emissions and Global Warming.

It is well known and understood that producing fuel from oil shale requires "significant energy inputs," whether the shale is heated for retorting above ground or in situ (Bartis et. al. 2005). Because most of this energy will be supplied by fossil fuels, the production of petroleum products from oil shale will "entail significantly higher emissions of carbon dioxide, compared with conventional crude oil production and refining (Bartis et. al. 2005). Additionally, the extreme temperature needed for surface retorting can also cause a release of carbon dioxide from the mineral carbonates contained in oil shale. (Bartis et. al. 2005; Johnson 2004). Thus, oil shale extraction, upgrading and refining will unquestionably and directly lead to a significant increase in greenhouse gas emissions. (Bartis et al. 2005). 52766-020

The DPEIS admits as much, recognizing that "[a]dditional power generation capacity would need to be developed" in the program area to "support commercial oil shale development." DPEIS 4-13, see also DPEIS Appendix A at A-101 (explaining the refinery market's response to oil shale production, stating that converting the heavier crude oil shale feedstock into "high-value products requires substantial amounts of energy"). In its analysis of "impact-producing factors for individual facilities by commercial oil shale technology," the BLM assumes a level of 50,000 bbl/day of oil for surface mining and underground mining and 200,000 bbl/day of oil for an in situ facility. DPEIS 4-2. Asserting that more definitive information is not available regarding the power requirements of commercial oil shale development, the DPEIS assumes that existing energy capacity would need to be expanded through a "combination of construction of new power plants and expansion of existing power plants." DPEIS 4-14. It also makes an assumption that to support a 200,000 bbl/day oil shale in situ facility, 2,400 MW of additional electricity generation capacity would be needed. DPEIS 4-14. To meet this demand, the DPEIS assumes that the increased electricity capacity would be provided by conventional coal-fired power plants. DPEIS 4-14.

Thus, BLM understands that a lot of energy will be needed to produce the energy locked inside the oil shale and that this energy will come from the burning of fossil fuels – the primary contributor to climate changing anthropogenic greenhouse gases. Glaringly missing from the impacts analyzed, however, is the increase in greenhouse emissions that will result from this increased energy consumption and these emissions contribution to global warming.

52766-020 (cont.)

The BLM's failure to disclose the greenhouse gas emissions that would result from the proposed project violates NEPA. The 2,400 MW of electricity needed to maintain a 200,000 bbl/day oil shale in situ facility, which would come from coal-fired power plants would result in millions of tons of greenhouse gas emissions. This is a considerable amount of greenhouse gas emissions, especially when considering that the BLM predicts that during the initial phase of development, production of oil shale in Colorado may reach 1,000,000 bbl/day, and that this level will increase to 2 million bbl/day once the oil shale industry reaches its highest-volume of energy production. DPEIS 4-15. Such production would result in huge amounts of greenhouse gas emissions. Studies suggest that ten new power plant and five new coal mines would be needed to support a 1,000,000 bbl/day facility. (Udall & Andrews 2004). The amount of energy needed to produce oil shale is also troubling, considering that the energy content of oil shale is incredibly low, containing just one-tenth the energy of crude oil and one-sixth the energy of coal. (Udall 2004).

Finally, the DPEIS fails to consider other project sources of greenhouse gas emissions as well, including but not limited to emissions from the construction of the facilities and infrastructure support, transportation of the oil shale product to refineries, increases in housing developments and energy consumption by the influx of new employees to the region, refining of the product, and increased traffic from the population growth.

2. The DPEIS Improperly Omitted Tar Sands Development's Contribution to an Increase in Greenhouse Gas Emissions and Global Warming.

In the same way that the DPEIS failed to include relevant information concerning oil shale technologies, so, too, did it neglect to describe and analyze important information regarding tar sands development and greenhouse gas emissions. Because of the well-developed tar sands production in Canada, there is a considerable amount of information available on the environmental impacts of producing fuel from tar sands, including their resulting increase in levels of greenhouse gas emissions. In its DPEIS, however, the BLM states that the easily accessible information available about the Canadian tar sands (oil sands) industry is inapplicable to its analysis of tar sands in Utah because of the different chemical characteristics between the two. DPEIS 5-2.

According to the DPEIS, the Canadian tar sands have an aqueous layer between the sand and the bitumen, which makes the separation easier. DPEIS 5-2. This is hardly an adequate excuse for failing to disclose what is known about the impacts tar sands development has had on the Canadian environment, especially considering the BLM's entire DPEIS is based on a speculative industry and speculative technology. At least the Canadian information would be relevant in giving the BLM, the public and other decision makers a more specific starting point in formulating some concrete idea as to how tar sands development in Utah might lead to an increase in greenhouse gas emissions and contribute to global warming. Furthermore, because the bitumen is actually easier to separate from the sands in Canada, emissions data from the Canadian tar sands industry could be used as a minimum benchmark for development in Utah. 52766-021

In assessing the "impact-producing factors for individual facilities by commercial tar sands technology," the BLM assumed a production rate of 100,000 bbl/day. DPEIS 5-2. It looked at technologies such as surface mines with surface retort or solvent extraction projects, assuming a production rate of 200,000 bbl/day, and in situ facilities with steam injection or combustion, assuming a production rate of 20,000 bbl/day.

Again, just as in its analysis of oil shale development, the BLM recognizes that additional power will be needed to support commercial development projects of the Utah tar sands. It anticipates that this need can be met by "expansion of existing coal-fired plants in Utah." DPEIS 5-11. The DPEIS goes on to conclude, just as it does with oil shale development, that the direct emissions of greenhouse gases from tar sands facilities will be a small fraction of global emissions. DPEIS 5-41. This conclusion is faulty. It is a conclusion based on an analysis that does not take into account the full implications of greenhouse gases and global warming, that does not consider the actual level of greenhouse gases that will eventually be produced by the development of tar sands, and that is not based on relevant, known information concerning tar sands developments' adverse impacts to the environment.

Developing tar sands is very energy intensive (Dyer 2008). Producing one barrel of synthetic crude oil from bitumen in Alberta, Canada's tar sands generates approximately three times more greenhouse gas emissions than conventional crude oil – 85.5 kg of greenhouse gases per barrel of tar sands oil versus 28.6 kg of greenhouse gases per barrel of conventional oil (Woynillowicz 2005; Chazan 2008; Kolbert 2007). In Canada, tar sands' carbon dioxide emissions—excluding those emissions resulting from actual use of the fuel produced—were at an estimated 40 million tons for 2007 (Hatch & Price 2008). Similarly, research evaluating information submitted by tar sand companies in Canada found that two of the companies are the country's third and sixth largest greenhouse gas emitters, and tar sands, in general, is expected to be the single largest contributor to the increase in greenhouse gas emissions in Canada (Dyer 2008; Chazan 2008). Perhaps recognizing the detrimental affects tar sands development presented to Canada's environment and global warming, the Canadian government recently initiated legislation requiring future oil sands facilities in the country to meet certain greenhouse emissions goals (Dowd 2008). 52766-021 (cont.)

This information concerning Canada's tar sands production is relevant to an analysis of potential impacts from the development of tar sands in the United States, even if the bitumen is easier to extract and the production levels are advanced. Regardless of the differences, it's clear that tar sands production facilities would create significant new sources of greenhouse gas emissions. The BLM must analyze this important aspect of the project before proceeding with its proposed land use amendments.

Finally, as with its oil shale analysis, the BLM failed to consider other sources of greenhouse emissions associated with the tar sands facilities, including construction, infrastructure build-up, transportation of the fuel, refining and increase flows in traffic and energy consumption due to population growth.

3. The DPEIS Fails to Evaluate the Greenhouse Gas Emissions that Will Result from the Combustion of the Fossil Fuels Produced by the Project.

Not only did the DPEIS fail to evaluate the greenhouse gas emissions that will result from the production of oil shale and tar sands, it also ignored another important and large component of the project's greenhouse gas emissions—the combustion of the fuel produced for energy. This is obviously a foreseeable result of any program permitting the commercial production of oil shale and tar sands. 52766-022 (cont.)

As in analyzing the emissions resulting from the production of the oil resources, the BLM could use the production assumptions, mentioned above, that it relied upon in drafting the DPEIS. A more accurate and complete analysis, would look at the greenhouse gas emissions that would result from the combustion of the fuel produced from a fully developed oil shale and tar sands program. As mentioned earlier, the DPEIS anticipates that a full-scale oil shale facility would produce 2 million barrels of fuel per day, while a full-scale tar sands facility would produce up to 300,000 barrels per day.

Thus, a significant amount of oil resources are expected to be produced by a commercial oil shale and tar sands facility, and the greenhouse gas emissions from the volume of fossil fuels anticipated to be produced will be on the order of billions of tons of carbon dioxide emissions. This will be a highly significant contribution to global warming and the DPEIS must analyze this environmental impact. 52766-022 (cont.)

C. The DPEIS Fails to Analyze the Cumulative Impacts of Oil Shale and Tar Sands Development.

The DPEIS' analysis and resulting conclusion are also defective because they fail to address the cumulative impacts a commercial leasing program will have on global climate change. NEPA's cumulative impacts analysis requirement was added to address problems like greenhouse gas emissions that may appear individually insignificant, but cumulatively create a serious environmental problem. Given the available information on oil shale and tar sands production's role in increased levels of greenhouse gas emissions, as well as the scientific literature on greenhouse gas emissions' contribution to global climate change and the adverse impacts on ecosystems and species worldwide, it is "reasonable to anticipate a cumulatively significant impact on the environment" from a commercial leasing program. 40 C.F.R. § 1508.27(b)(7); see also Center for Biological Diversity v. National Highway Traffic Safety Administration, 508 F.3d 508, 549. Indeed, it is difficult to imagine a more important cumulative impact analysis than that for oil shale and tar sands commercial production.

The DPEIS fails to evaluate the "incremental impact" the project will have on climate change. It ignores how the greenhouse gas emissions resulting from the actual production of fuel from oil shale and tar sands on the land and from the combustion of the fuel once it's introduced into the market will impact climate change and the environment more generally when considered in light of other past, present, and reasonably foreseeable actions. See CBD v. NHTSA, 508 F.3d at 549. The BLM cannot attempt to avoid addressing this cumulative impact by breaking the leasing program down into small parts and requiring individual site-specific environmental reviews. See 40 C.F.R. § 1508.27(b)(7). Instead, the agency must address these cumulative impacts at the programmatic level. The American public and our decisionmakers are entitled to understand the impacts that result from the greenhouse gas emissions of our fossil fuel use. The DPEIS should have disclosed and analyzed the greenhouse gas emissions from past, proposed and estimated future production. It also should also have examined other major sources of greenhouse gas emissions to provide an adequate overall description of cumulative impacts. The DPEIS fails to do so. 52766-023

As discussed above, the commercial production of oil shale and tar sands will undeniably lead to an enormous amount of greenhouse gas emissions, and the DPEIS improperly minimizes this impact by dismissing the project's emissions as a "small fraction" of "total emissions." But even if one were to accept this mischaracterization of the project's impacts, it does not excuse the BLM from its duty to provide a thorough cumulative impacts analysis. As described above, global warming is the great challenge of our day, and achieving the reductions that are necessary to avoid climate disaster will

require seizing all possible reduction opportunities. The carbon dioxide emissions from oil shale and tar sands facilities may not be ignored. The DPEIS must conduct a true analysis of all the greenhouse gas emissions that will result from commercial production of oil shale and tar sands including impacts to species and ecosystems, impacts to communities and cultures, public health and safety and economic impacts.

52766-023 (cont.)

1. The DPEIS Failed to Analyze Greenhouse Gas Emissions' Threat to Ecosystems and Endangered Species.

As discussed above, the dangerous consequences of continued "business as usual" greenhouse gas emissions are all too foreseeable. Global warming is already profoundly changing our planet, representing the most significant and pervasive threat to biodiversity worldwide and affecting both terrestrial and marine species from the tropics to the poles.

The IPCC report recognizes this, finding that the resilience of several ecosystems is likely to be overcome this century by a dangerous brew of climate change, associated disturbances, such as flooding, drought, wildfire, insects and ocean acidification, and other environmental drivers like pollution and over-exploitation of resources (Bernstein et al. 2007). Along with increases in global average temperatures beyond 1.5-2.5° C and accompanying increased levels of atmospheric carbon dioxide concentrations will come major changes in ecosystem structure and function, species' ecological interactions, and species' geographical ranges (Bernstein et al. 2007). In fact, global warming has already resulted in the extinction of at least dozens of species (Pounds et al. 2006). Absent major reductions in greenhouse gas emissions, by the middle of this century upwards of 35 percent of the earth's species will be extinct or committed to extinction as a result of global warming (Thomas et al. 2004).

Other scientific reports have reached the same conclusion as the IPCC that anthropogenic warming has had a recognizable influence on biological systems (Adger et al. 2007). In a study published in *Nature* in 2003, the authors reported a "globally coherent fingerprint of climate change impacts across natural systems" (Parmesan and Yohe 2003). In documenting this "fingerprint" of global warming on ecosystems, scientists have predicted three categories of measurable impacts from recent warming: (1) earlier timing of spring events and later autumn events (i.e. changes in "phenology"), (2) extension of species' range poleward or upward in elevation, and (3) a decline in species adapted to cold temperatures and an increase in species adapted to warm temperatures (Parmesan and Galbraith 2003).

In the abstract, changes in phenology, distribution, or even an abundance of a species may not by themselves be harmful to the species' long-term persistence. But if such changes put essential life history traits of the species out of sync with other components of the ecosystem, or if natural or anthropogenic barriers prevent poleward or upward migration, the consequences can be catastrophic.

The Edith's checkerspot butterfly (*Euphydryas editha*) and the American pika (*Ochotona princeps*), two North American species, demonstrate such deleterious effects of global warming.

The Edith's checkerspot butterfly is one of the first species for which scientists documented a clear range shift due to global warming. The butterfly's range has moved both northward and upward in elevation in response to a 0.72° C increase in regional warming (Parmesan and Yohe 2003). The range shift was not due to butterfly populations actually moving, but instead to a higher proportion of population extinctions in the southern and lowland portions of the range (Parmesan and Yohe 2003). These population extinctions are the result of the fact that the species' host plant, *Plantago erecta*, now develops earlier in the spring, while the butterfly's caterpillars continue to hatch at the same time (Parmesan and Yohe 2003). As a result, the caterpillars now hatch on plants that have already completed their lifecycle and dried up, instead of on younger edible plants (Parmesan and Yohe 2003). The tiny checkerspot caterpillars are unable to move far enough to find other food and, as a result, starve to death (Parmesan and Yohe 2003).

Another animal struggling under the heavy hand of climate change is the American pika. This small mammal, a relative of the rabbit, is adapted to life in talus piles on high, treeless mountain peaks. Fossil evidence demonstrates that pikas once ranged widely over North America, but their range has contracted to a dwindling number of isolated peaks during the warm periods of the last 12,000 years (Krajick 2004). Pikas are limited by their metabolic adaptation to their cold habitat niche (Krajick 2004). Hence, while more mobile alpine species such as birds may be able to shift their ranges poleward as warming temperatures and advancing treelines, competitors, and predators impact their mountain habitat, pikas are generally incapable of such long range dispersal (Krajick 2004). Rather, they can only migrate upslope as the climate warms (Krajick 2004). In large portions of its range, however, the American pika is already occupying the highest elevation talus habitats that exist on a given mountain range; in such cases there is no upslope habitat to migrate to, and the mountain's population will ultimately disappear as the climate continues to warm. Already, at least 9 of 25 (36%) of pika populations found in the Great Basin have been extirpated and the pika range has shifted upslope by 900 feet in this region. This small creature may well become one of global warming's first victims.

Species like the checkerspot butterfly and American pika demonstrate how climate change brought about by global warming will influence the earth's biodiversity as various species struggle to adapt to their changing habitats. Likewise, sensitive ecosystems, some literally melting under the impacts of global warming, have provided even more evidence of the dire consequence global warming will have on the earth's biological balance.

The Arctic has experienced the effects of global warming earlier and more intensely than any other area on the planet. Over the past 100 years, average Arctic temperatures increased at almost twice the global average rate (Alley et al. 2007).

Specifically, in parts of Alaska and western Canada, winter temperatures have increased by as much as 3.5° C in the past 30 years (Rozenzweig et al. 2007). Over the next 100 years, under a moderate emissions scenario, annual average temperatures in the Arctic are projected to rise an additional 3-5° C over land and up to 7° C over the oceans (Meehl et al. 2007).

This rapid warming of the Arctic is reflected in the devastating melt of the Arctic sea ice, which is highly sensitive to temperature changes. In 2007, summer sea-ice extent reached an unpredicted and utterly stunning new record minimum (Stroeve et al. 2008). At 1.63 million square miles, the minimum sea-ice extent on September 16, 2007 was about one million square miles (equal to the area of Alaska and Texas combined) below the average minimum sea ice extent between 1979 and 2000 and 50 percent lower than conditions in the 1950s to the 1970s (Stroeve et al. 2008; National Snow and Ice Data Center (NSIDC) 2007a Arctic Sea Ice News Fall 2007 available at http://www.nsidc.org/news/press/2007_seaiceminimum/20070810_index.html). This minimum was lower than the sea-ice extent most climate models predicted would not be reached until 2050 or later (Stroeve et al. 2008).

This stark reality of global warming in the Arctic is having a disturbing and demonstrated effect on polar bears. One of the most ice-dependent of all Arctic species, polar bears require sea-ice habitat for survival (Regehr et al. 2007, Derocher et al. 2004). For example, polar bears rely on sea ice as a platform from which to hunt ringed seals and other prey, to make seasonal migrations between the sea ice and their terrestrial denning areas, and for other essential behaviors such as mating. As the sea ice rapidly melts away, so, too, does the polar bears' essential habitat.

The scientific projections of future melting of the sea ice are particularly troubling. Under optimistic future emissions scenarios, summer sea ice will decline 50-100 percent by the end of the century (Holland et al. 2006). Under more likely scenarios, however, leading sea ice researchers now believe that the Arctic could be completely ice free in the summer by 2030 (Stroeve et al. 2008) or even by 2012 (Kizzia 2008). Even without a complete disappearance of sea ice, scientists have predicted a cascade of impacts to polar bears from global warming and melting ice that will affect virtually every aspect of the species' existence, including their hunting season and ability to efficiently hunt their ice-dependent prey; female bears' ability to reach their preferred denning areas on land; and increases in bear-human interactions (Derocher et al. 2004).

The combined effects of these global warming consequences on individual bears' reproduction and survival translate into impacts on polar bear populations. Polar bear populations are already declining. The Western Hudson Bay polar bear population has declined by 22 percent since 1987, from 1,194 bears to 935 (Aars et al. 2006). Likewise, the Polar Bear Specialist Group has classified the Southern Beaufort Sea polar bear population as declining (Aars et al. 2006). Within this group of polar bears, researchers have observed starvation, increased drownings, and cannibalism motivated by nutritional stress, a behavior without precedent (Regehr et al. 2006; Amstrump et al. 2006; Monnett & Gleason 2006). U.S. Geological Survey biologists, in a landmark series of reports

released in September 2007, have concluded that under a business as usual emissions scenario, two-thirds of the world's polar bears will be extirpated by 2050 (Amstrup et al. 2007).

The Center for Biological Diversity petitioned the U.S. Fish and Wildlife Service ("FWS") to list the polar bear as a threatened species under the Endangered Species Act ("ESA") due to global warming in February 2005. In December 2006, Secretary of Interior Dirk Kempthorne announced that the polar bear met the criteria for listing as "threatened" under the ESA, and currently, the FWS is preparing a final listing determination of the polar bear. The Arctic has been one of the hardest hit regions in the world by global warming, and, as a result, the species depending on it as a habitat, such as the polar bear, will continue to face dire consequences unless greenhouse gas emissions are rapidly reduced.

Another ecosystem providing scientists with early warning signs of the adverse impacts of global warming on biodiversity is the coral reef ecosystem (Hoegh-Guldberg 1999). An estimated 30 percent of coral reefs globally are already severely degraded and 60 percent may be lost by 2030 (Hughes et al. 2003). The primary cause of coral reef degradation on a global scale is bleaching, the expulsion of symbiotic algal zooxanthellae from coral triggered, inter alia, by elevated sea temperatures (Hoegh-Guldberg 1999). The oceans absorb a large percentage of the extra heat in the climate system due to global warming, and since 1961 the average temperature of the global ocean has increased to depths of at least 3,000 m in some areas (Alley et al. 2007). This warming causes the coral to release algae, which attaches directly to the coral. This leaves the coral white, weakened and more susceptible to death.

In 1998, which at the time was the warmest year on record, bleaching occurred in every ocean, ultimately resulting in the death of 10-16 percent of the world's living coral (Hoegh-Guldberg 2005). In 2005, which eclipsed 1998 as the warmest year on record, a major bleaching event swept through the Caribbean, bleaching over 90 percent of live coral in some areas and resulting in the ultimate death of about 20 percent of living coral region-wide (Hansen et al. 2006; Federal Response to the 2005 Caribbean Bleaching event, available at http://coralreefwatch.noaa.gov/caribbean2005/docs/2005_bleaching_federal_response.pdf (last accessed Jan. 29, 2008). Before this unprecedented single-year die-off even began, the Caribbean contained the world's most degraded coral reefs, having already lost as much as 80 percent of live coral over the preceding 30 years (Gardner et al. 2003). Thus, it will not take many more episodes like the 2005 bleaching event before living coral reefs in the Caribbean disappear entirely (Hoegh-Guldberg 2005).

Two types of coral—the elkhorn coral (*Acropora palmata*) and staghorn coral (*Acropora cervicornis*)—have already begun to disappear. Because of bleaching caused by warmer waters, these coral have gone from being dominant species to being listed as "threatened" under the ESA. For at least the past 3,000 years, these coral were the dominant reef-building corals in the Caribbean (Hughes 1994). Virtually every reef from the Florida Keys, across the Caribbean to the Mesoamerican Reef in Belize, was largely

comprised of one or the other (or both) of these formerly ubiquitous species (Hughes 1994). Over the past 30 years, however, the two species have declined by upwards of 90 percent (Hughes 1994). The primary drivers of the decline have been disease and temperature-induced bleaching (Hughes 1994). Additionally, the period of decline coincided with an ongoing period of increased hurricane activity, with intense storms destroying entire reef tracts in certain areas (Precht & Aronson 2004). The cumulative result was that by the beginning of the 21st Century, elkhorn and staghorn corals had been reduced to a scattering of mostly small colonies amidst a large sea of coral rubble.

While coral reefs are threatened by many additional factors, including pollution and direct destruction from dredging and other activities, climate change is an increasingly dominant threat. There is clear evidence that the record-setting ocean temperatures of 1998 and 2005 that triggered widespread bleaching and mortality are the product of global warming (Hansen 2006; Alley et al. 2007). And while the link between coral bleaching and global warming is relatively intuitive, even the outbreaks of coral disease that ravaged the elkhorn and staghorn coral species have been linked to elevated water temperatures (Harvell et al. 2002). Finally, scientific evidence indicates that global warming increases the probability of severe weather events like the series of intense hurricanes that have so impacted Caribbean reefs in recent decades (Santer et al. 2006; Alley et al. 2007).

Carbon Dioxide is also dangerously threatening the ocean's chemistry and marine species. At the same time oceans absorb increased heat added to the climate from the burning of greenhouse gases, so, too, do they absorb the increased levels of the most important greenhouse gas—CO_2. The growth in atmospheric CO_2 concentrations leads to increasing acidification of the ocean, and this acidification only adds to the global warming-induced changes threatening the survival of coral and other important marine species (Alley et al. 2007).

Acidification occurs as a natural result of the ocean's carbonate buffer system. Carbon dioxide that is absorbed by seawater reacts to form carbonic acid, which dissociates to form bicarbonate and releases hydrogen ions, which then bond with carbonate ions to form more bicarbonate. This reaction reduces the amount of carbonate ions and decreases pH. Reduction in carbonate is an important concern because many organisms depend on it to form their shells and skeletons. Thus, as CO_2 enters the oceans' waters, there is a profound impact on the entire marine ecosystem, for ocean acidification severely affects many calcifying species like coral and phytoplankton that play a crucial role in supporting marine life.

A recent comment letter signed by the top 25 marine scientists who study ocean acidification emphasized that the decrease in pH due to un-checked CO_2 emissions will be devastating and irreversible on human time scales (Caldiera 2007). The authors predict that without immediate carbon dioxide emissions reductions, pH will decrease by more than 0.2 units by mid-century, and the IPCC estimates that over the 21st century, the ocean's pH level could decrease to as much as 0.35 units (Caldiera 2007; Alley et al. 2007).

Already, the oceans have taken up about 50 percent of the CO_2 that humans have produced since the industrial revolution, and this has lowered the average ocean pH by 0.11 units (Sabine 2004; Alley et al. 2007). Currently, the ocean takes up about 22 million tons of CO_2 each day (Feely 2006). While preindustrial levels of atmospheric CO_2 hovered around 280 ppm, they have now increased to over 380 ppm; if current trends continue, they will increase another 50 percent by 2030 (Orr et al. 2005; Turley 2006). These rising CO_2 levels will take time to reverese even after corrective measures are implemented, and over time, the ocean will absorb up to 90 percent of this CO_2, greatly affecting the oceans' pH level (Kleypas 2006).

This foretells a stark future for marine life. Due to acidification, within our lifetimes, coral reefs may erode faster than they can rebuild (Feely 2006). Corals are extremely vulnerable to ocean acidification and scientists studying acidification predict that coral reefs will decline in density and diversity unless CO_2 emissions are stabilized at present levels (Hoegh-Guldberg et al. 2007). Under conservative models of future CO_2 emissions, most of the world's coral reefs, already bleaching in the warmer waters, will erode to rubble by the end of the century (Hoegh-Guldberg et al. 2007). Corals provide vital functions for marine ecosystems, and their loss will likely bring grave impacts to the oceans and the species that inhabit them.

Ocean acidification also impacts calcifying plankton species at the base of the marine foodchain. Like coral, plankton also play a vital role in the marine ecosystem. These organisms contribute much of the organic material entering the marine food chain and are responsible for about 50 percent of the earth's primary production (Royal Society 2005). Carbon dioxide uptake by the ocean causes impaired growth and development for calcifying plankton, and acidification dissolves the protective armor of some plankton, limiting their ability to survive. Thus, as the ocean absorbs more CO_2 and pH levels continue to decrease, the marine environment is expected to undergo profound changes due to impacts at many different levels in the food chain.

All this information, which should have been included and analyzed in the DPEIS, demonstrates that global warming is the greatest threat to the future of the earth's plant, animals and ecosystems. Not surprisingly, given the broad suite of impacts we are already experiencing, the projections of future impacts to biological diversity from global warming are grim. The leading study on the quantification of risk to species from climate change, published in 2004 in *Nature*, included over 1,100 species distributed over 20% of the earth's surface area (Thomas et al. 2004). Under a relatively high emissions scenario, 35%, under a medium emissions scenario 24%, and under a relatively low emissions scenario, 18% of the species studied would be committed to extinction by the year 2050 (Thomas et al. 2004). Extrapolating from this study to the Earth as a whole reveals that over a million species may be at risk. It is important to note that we are currently on a trajectory to exceed the emissions assumed in the high warming scenario used by Thomas et al. in 2004 (Raupach et al. 2007). The essential message is that we must reduce emissions immediately in order to save many thousands of species and protect the ecosystems upon which we all depend.

Failure to address the project's greenhouse gas emissions and global warming's devastating impacts on the earth's ecosystems and species prevented the BLM from adequately considering how oil shale and tar sands production will cumulatively impact this growing problem. It must address this issue before issuing final regulations regarding a commercial leasing program and before issuing any leases under such a program. 52766-024

2. The DPEIS Failed to Analyze the Cumulative Impacts Commercial Oil Shale and Tar Sands Development will have on Local Water Supplies.

In regard to oil shale development, for mining and surface retorting, water is needed for dust control during materials distraction, crushing, and transport; for cooling and reclaiming spent shale; for upgrading raw shale oil; and for various plant utilities associated with power production and environmental control (Bartis et al. 2005). The U.S. Water Resources Council estimates that oil shale development will increase annual consumptive water use in the Upper Colorado Region by about 150,000 acre-feet per year for each million barrels per day of production (Bartis et al. 2005). While the in situ process reduces a number of these water requirements, the facilities will still need considerable volumes for oil/natural gas extraction, postextraction cooling, products upgrading and refining, environmental control systems and power production (Bartis et al. 2005). Likewise, tar sands production also relies on large amounts of water (Dyer et al. 2008). It takes approximately 2-4.5 barrels of water to extract and upgrade one barrel of oil from a tar sands mine (Dyer et al. 2008).

52766-025

The DPEIS gives only "generic impacts" on how water resources in the study area will be affected should commercial leasing for oil shale and tar sands be permitted, recognizing that withdrawal of water from a surface body may reduce its flow and that a "reduction or loss of flow in domestic water wells from dewatering operations or from production of water for industrial uses." DPEIS 6-43-44, 6-184-185. Based on the information above, the DPEIS clearly understates the potential impact oil shale and tar sands development will have on water resources in the project area. This is important because at the same time production of fuel from oil shale and tar sands in the U.S. will depend on large amounts of water, the greenhouse gas emissions from the project will contribute to the global warming which dangerously threatens the water supply. Thus, not only does the BLM fail to adequately examine how production will directly impact the water supply, it also ignores the cumulative impact the greenhouse gas emissions from the project will have on water resources.

In a recent article published in *Science*, researchers found that an increase in atmospheric greenhouse gases has contributed to a "coming crisis in water supply for the western United States" (Barnett 2008). The research found that between 1950 and 1999, a shift in the character of mountain precipitation occurred, with more winter precipitation falling as rain instead of snow, earlier snow melt, and associated changes in river flow (Barnett 2008). The variants among the "most important metrics of the western

hydrological cycle," include snow pack, the timing of runoff of the major western rivers, and the average January through March temperatures in the mountainous regions of the western U.S. (Barnett 2008). Using several climate models and comparing the results, the researchers found that "warmer temperatures accompany" decreases in snow pack and precipitation and the timing of runoff, impacting river flow and water levels (Barnett 2008). These researchers concluded with high confidence that up to 60 percent of the "climate related trends of river flow, winter air temperature and snow pack between 1950-1999" are human-induced (Barnett 2008). This, the researchers wrote, is "not good news for those living in the western United States." (Barnett 2008).

The impact greenhouse gas emissions and global warming is having on the western United States' water resources is a critical consideration that the BLM must analyze in its final EIS. Likewise, it must analyze how the changes in the water systems in the project area will affect plants and animals that will be impacted by the project. Many species will be detrimentally affected not only by the direct impact of water usage by oil shale and tar sands facilities, but also by the cumulative impact the facilities will have on global warming and the resulting adverse effect on the river flow and water levels. The DPEIS must also analyze how the project's direct impact on species from impacts like habitat destruction may act in a cumulative and synergistic way with impacts to species from global warming. 52766-026

D. The DPEIS Fails to Properly Consider a "No Project" Alternative.

After failing to disclose and analyze any greenhouse gas emissions of potential oil shale and tar sands development, the DPEIS continues to compound its error by failing to analyze a legitimate "no action" alternative. Alternative A analyzed in the DPEIS is essentially a no leasing alternative. Under this alternative, the six research, development and design (RD&D) projects already taking place in the project area would continue to move forward on the 160-acre leases granted by the BLM, and the DPEIS does not assess future commercial leasing at these or any other locations. DPEIS 6-1. In analyzing Alternative A, the BLM relied primarily on the six environmental assessments completed for the RD&D projects, all of which made Findings of No Significant Impact. DPEIS 6-1. The BLM should have done a more thorough analysis of the ongoing and potential environmental impacts of these six projects. 52766-027

Interestingly, the primary reason the BLM gives for failing to adequately consider the "no action" alternative is that it would be inconsistent with the EPAct. DPEIS 2-51. The BLM also uses this reasoning to justify its refusal to consider alternatives that evaluated the development of alternate energy sources, including renewable energy, and ways to reduce the nation's dependence on oil. DPEIS 2-51-52. The BLM incorrectly reads the EPAct as giving it the freedom to do an inadequate EIS under NEPA by shutting out any alternatives that would not make the most land available for commercial leasing, or that would analyze reasonable alternatives to a leasing program in general. This is improper.

The EPAct does not give the BLM freedom to ignore the environmental consequences of a commercial leasing program, but instead does the exact opposite by requiring the agency to do an environmental impact statement under NEPA. Thus, the EPAct in no way precludes the BLM from analyzing the greenhouse gas emissions under each alternative, which is an environmental impact that should be analyzed under NEPA, and it does not prohibit the agency from describing for decisionmakers the true environmental costs of a leasing program. In fact, the Act requires it by directing the BLM to follow NEPA.

The "heart" of an EIS is the section evaluating the alternatives. 40 C.F.R. § 1502.14. This regulation under NEPA requires that the action agency use the information and analysis discussed in the sections on the affected environment and the environmental consequences to draft an alternatives section that describes the "environmental impacts of the proposal and the alternatives in comparative form," "sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public." *Id.* In its alternative analysis, the agency should include those "reasonable alternatives not within the jurisdiction of the lead agency." *Id.* at 1502.14(c). Thus, while the BLM may not have the jurisdictional authority to override the EPAct, it must still comply with its obligations under NEPA, which include producing an evaluation of reasonable alternatives that would address the harmful environmental impacts of a commercial leasing program.

Furthermore, given the information regarding greenhouse gas emissions and global warming and its impact on ecosystems and species, it would not be inconsistent with the EPAct for the BLM to follow NEPA and analyze any other alternatives that did not evaluate opening public lands for leasing. The BLM must include alternatives that may not be within the lead agency's jurisdiction, that would accomplish the project's basic purpose and reduce impacts. Such alternatives were given short shrift. For example, research shows that the energy to be supplied by the proposed project could be obtained through more stringent energy conservation measures (SWEEP 2007). Such measures would provide the energy at less cost (indeed, most likely at a cost savings) and without the environmental costs. It is nonsensical for the government to be promoting oil sands and tar shale development before all available energy conservation measure have been implemented, yet an energy conservation alternative was not seriously and fully considered.

52766-027
(cont.)

Such alternatives would, at the least, give decisionmakers an understanding of the cost and benefits between opening public lands for commercial leasing and keeping these lands closed, as well as provide insight into other reasonable energy alternatives that would be more environmentally sound and prudent. This analysis could, in the end, give Congress an incentive to reconsider oil shale and tar sands development and/or enact legislation that addresses the nation's energy needs without relying on destructive environmental practices that will intensify global warming and the detrimental impacts that come with it. The BLM essentially forecloses this possibility by ignoring its duties under NEPA to do a thorough analysis of the environmental impacts and reasonable alternatives.

III. THE DPEIS FAILS TO DISCLOSE AND CONSIDER THE INDIRECT, DIRECT, AND CUMULATIVE IMPACTS TO SENSITIVE SPECIES AND THEIR HABITAT.

A. The BLM has Failed to Gather Adequate Baseline Data.

NEPA requires the BLM to "describe the environment of the areas to be affected or created by the alternatives under consideration." 40 C.F.R. § 1502.15. Without establishing baseline conditions, "there is simply no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with NEPA." Half Moon Bay Fishermans' Marketing Ass'n v. Carlucci, 857 F.2d 505, 510 (9th Cir. 1988).

Here, however, the BLM has failed to gather and analyze the baseline data that is necessary in order to fully understand the impacts of the proposed action to species and habitat, thereby foreclosing its ability to comply with NEPA.

1. DPEIS Lacks Basic Information About the Current Status of Many Species that Would be Threatened by the Proposed Action.

The DPEIS lacks basic information about the current status of many species that would be threatened by the proposed action, including oil shale endemics and federally listed species.

For example, for some special status species, the DPEIS omits or gets wrong basic life history needs. For example, Appendix E simply lists the habitat description for Colton's milkvetch (*Astragalus coltonii* var. *moabensis*) as "not available." However, a quick search on Natureserve (the Natural Heritage Program's national database) gives the following habitat description for this subspecies: "Pinyon/juniper and mountain brush communities 4400-6900 ft" (NatureServe 2008a). Similarly, for Ownbey's thistle (*Cirsium ownbeyi*), the only county listed in the DPEIS is Sweetwater, while both Natureserve and the USDA's PLANTS database indicate that it is also found in Uintah County, Utah (NatureServe 2008b). The DPEIS describes *Penstemon debilis* habitat as "Rocky clay loam soils of sagebrush hills and flats at elevations between 7,000 and 8,500 ft.", DPEIS at E-15, which is incorrect. This is important, because this is actually an oil shale endemic species, as the DPEIS notes: "steep, oil shale outcrop slopes of white shale talus at 8,000 to 9,000 ft in elevation." *Id.* at 3-173. 52766-028

In addition, throughout the DPEIS the BLM refers only to *Sclerocactus glaucus*, when this taxon has now been split into three different species, including *Sclerocactus wetlandicus* and *Sclerocactus brevispinus*. Most if not all of the occurrences of these latter two species are within areas that the BLM proposes to open to oil shale and tar sands leasing, and this decision could constitute jeopardy. In September, the Fish and Wildlife Service ("FWS") found that *Sclerocactus brevispinus* warrants uplisting to endangered status. The finding made no mention of the additional threat of oil shale and tar sands development, yet based on conventional oil and gas drilling alone, the FWS 52766-029

observed that "[t]he species cannot tolerate the cumulative effects from existing and proposed energy projects, especially due to the extent of roads within *S. brevispinus* habitat." 72 Fed. Reg. 53217 (Sept. 18, 2007). Yet in the DPEIS, the BLM fails to recognize that *Sclerocactus brevispinus* even exists. These are just a few representative examples of the DPEIS's inadequate analysis of current conditions and potential impacts of commercial oil shale and tar sands leasing. 52766-029 (cont.)

Similar deficiencies abound for federally listed species as well. The DPEIS's cursory information about bonytail does not reveal that: the species is virtually extinct due to the transformation of the Colorado River ecosystem from an erratic and turbulent river system into a series of calm reservoirs and channelized river reaches; that although the low number of bonytail makes monitoring difficult, populations are thought to be declining; that designated bonytail critical habitat includes the upper basin (the Green River and upper Colorado River subbasins), and the lower basin (the mainstem and its tributaries from Lake Mead downstream to the Mexican border) and that bonytail have been found in both basins; and that the species has an Endangered Species Act recovery plan and is a subject of three additional, major recovery or conservation programs for the Colorado River Basin (FWS 2001; FWS 2002a; ADFG 2001; Mueller 1995; Mueller 2006). 52766-030

The DPEIS also fails to make clear that all known populations of clay reed-mustard are located on federal lands that have been leased for oil and gas activities, that the entire remaining individuals of the species are underlain by oil shale deposits, and that continued development of oil and gas wells and ancillary facilities and future potential oil shale development is likely to threaten the continued existence of this species (FWS 1994a). 52766-031

There is no mention of the 2002 recovery plan for Colorado pikeminnow or what measures it contains (FWS 2002b), that the humpback chub is experiencing a declining population trend (FWS 2002c; USGS 2003), that an inter-agency team declared in 1997 that the current strategy to recover the Utah prairie dog is not working and is unlikely to ever result in the recovery of the species (Utah Prairie Dog Implementation Team 1997), or that threats to the whooping crane include oil spills and gas leaks (FWS 2005). 52766-032

The list goes on. For many listed species—including the autumn's buttercup, Ute ladies'-tresses, clay reed-mustard, Dudley Bluffs bladderpod, Dudley Bluffs twinpod, humpback chub, Jones cycladenia, last chance townsendia, Maguire daisy, Wright fishhook cactus, bonytail, Debeque phacelia, Parachute beardtongue, western yellow-billed cuckoo, and the White River beardtongue—the DPEIS lacks basic information about current status or population trends that is rudimentary to an adequate impacts analysis. For instance, the Dudley Bluffs bladderpod was surveyed in 2006, and the results indicate a declining population trend, but this information is not provided in the DPEIS (Krishnan 2007). Meanwhile, the species is known to occur only in the Piceance Basin—*i.e.*, an area where extensive oil shale development would be permitted to move forward under the proposed action. Similarly, the DPEIS does not mention that demographic monitoring of Wright fishhook cactus populations conducted between 1993 52766-033

and 2000 found no sizeable populations with adult cacti greater than 9cm wide (the size class responsible for the most reproduction), noted low recruitment and a low mortality-to-recruitment ratio, and indicated that populations of Wright fishhook cactus appeared to be in a slow decline (Kass et al. 2000). 52766-033 (cont.)

Moreover, the DPEIS lacks basic baseline data regarding climate change, against which impacts of the proposed development may be analyzed. As discussed above, warming of the climate system is unequivocal, as is now evident from observations of increases in global average air and ocean temperatures, widespread melting of snow and ice, and rising global average sea level (IPCC 2007). As the BLM proposes facilitating the leasing of numerous oil shale and tar sands leases and related projects under the DPEIS, this baseline data must be included in the DPEIS. 52766-034

While the DPEIS acknowledges that rare species are inherently more vulnerable to the effects of disturbance like that which would accompany oil shale or tar sands development, the BLM must also consider how this program will contribute to climate change and therefore further imperil rare species in the region. Many of the rare plants that will be affected by oil shale and tar sands development are edaphic endemics—*i.e.*, species tied to very specific substrates, many only found growing on oil shale. These species may be particularly hard-pressed to respond to climate change, because the soils they rely on may be restricted to very narrow elevational and/or latitudinal bands that do not allow for refugia from warmer, drier conditions. These plants are literally tied down to oil shale soils, and cannot march up a mountain or move north in response to climate change without leaving behind the soils they require. The IPCC has come to consensus about several factors relevant to the potential threat of climate change to endemic species, including the following:

- With global average temperature changes of 2°C above pre-industrial levels, many terrestrial, freshwater and marine species (particularly endemics across the globe) are at a far greater risk of extinction than in the recent geological past (medium confidence). Fishlin et. al. 2007 at p. 213. 52766-035
- Warming and drying trends are likely to induce substantial species-range shifts, and imply a need for migration rates that will exceed the capacity of many endemic species. Id. at p. 226.
- The likely synergistic impacts of climate change and land-use change on endemic species have been widely confirmed. Id. at p. 241.

The DPEIS must be revised to include all of this basic information, so that the environmental consequences of the proposed action may be meaningfully considered. Without establishing these baseline conditions, there is no way for the BLM or the American public to fully understand, at this crucial, programmatic scale, the effects that the proposed action will have on the environment.

2. The DPEIS Lacks Basic, Baseline Information About the Technologies That Would be Used.

Full disclosure and analysis of the technologies that will be used, and the known impacts of each technology to these resources is axiomatic to an adequate NEPA analysis. *See* 40 C.F.R. § 1500.1(b) ("NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA."). As it is only through disclosure and consideration of this basic information that a true assessment of the impacts from use of such technologies can be made, the DPEIS's impacts analysis fails completely without it.

While Appendix A of the DPEIS gives a general overview of the technologies that could be used to extract oil shale and tar sands, nowhere does the DPEIS actually delineate which technologies will be used or where. Without this information, the BLM is fundamentally hampered in its ability to provide a full and fair discussion of the impacts of using these technologies—including the extent to which land, topography, soils, and water will be altered, and the degree to which species and their habitat will be impacted or how. 52766-036

Thus, the BLM has not gathered or analyzed enough baseline data to determine the direct or indirect impacts of this project on the environment, as required by NEPA, and the DPEIS fails without this basic, baseline information as well.

B. The DPEIS Fails to Take a Hard Look at the Direct, Indirect, and Cumulative Effects of the Proposed Action.

An EIS must contain a "full and fair discussion of significant impacts, whether direct, indirect, or cumulative." 40 C.F.R. § 1508.8. As explained above, the DPEIS does not explore a full range of reasonable alternatives and the alternatives presented are not backed by sufficient baseline data to enable a full understanding of the possible environmental impacts. As explained in this section, the DPEIS falls short of a full and fair discussion of the actual impacts that the alternatives would have on ecological resources.

1. The DPEIS Fails to Take a Hard Look at the Actual Direct, Indirect, and Cumulative Impacts to Ecological Resources.

While proposing to open up the "largest amount" of public land possible of oil shale, absent from the DPEIS is an adequate analysis of the actual, direct and indirect impacts of oil shale and tar sands technologies to paleontological, water, and cultural, as well as ecological resources, which include aquatic resources, plant communities and habitats, wildlife, and threatened and endangered species. The DPEIS instead defers consideration of the actual impacts that could result from the alternatives at this crucial programmatic level to future, site-specific analyses, revealing only that there is the "potential for impacts" but failing to disclose what those impacts could actually be or evaluate what they would mean for these resources. 52766-037

NEPA defines "direct effects" as those "which are caused by the action and occur at the same time and place." 40 C.F.R. § 1508.8(a). Indirect effects are those "which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable" and "may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." Id. A "cumulative impact" is the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7.

There are 210 plant and animal species that occur in oil shale basins or STSAs, including oil shale endemics and species that are listed under the federal Endangered Species Act or state law. These species will undoubtedly be directly, indirectly, and cumulatively impacted by the proposed action—and some could be pushed over the brink toward extinction. 52766-038

It is known, *e.g.*, that diverting water resources for oil shale, including reservoir construction and diversion facilities, will directly reduce stream flows, increase salinity in rivers and streams, and alter the very topography of the land. This could cause impacts that would be long-lasting and catastrophic for imperiled fish species in the area—*e.g.*, bonytail, which has no self-sustaining wild populations left, and razorback sucker, one of the most imperiled fishes in the Colorado River Basin and already in steep decline. Indeed, the DPEIS does not disclose, *e.g.*, the effects of tar sands development to Canadian fisheries in Alberta, where pickerel in Lake Athbasca have started to appear deformed, with "[p]ushed in faces, bulging eyes, humped back, crooked tails" and "[g]reat big lumps" that, if poked, "spray[] water" (ED 2008). 52766-039

The DPEIS also fails to mention that through vast extractions and/or contamination of groundwater, the proposed action would facilitate hastened declines for imperiled species that are dependent on healthy riparian habitats, like the autumn buttercup, Ute ladies'-tresses, southwestern willow flycatcher—*i.e.*, all species that are already suffering from low population sizes, habitat degradation, and water diversion in an arid region with growing human population and numerous nearby oil and gas and other development projects. The DPEIS also does not fully evaluate the impacts to numerous plant species with highly-specific habitat requirements that could be functionally wiped out, including clay reed-mustard, Dudley Bluffs bladderpod, Dudley Bluffs twinpod, shrubby reed-mustard, and Uinta Basin hookless cactus—*i.e.*, imperiled plants that are all found on shale-derived soils. 52766-040

Several wildflowers have been protected under the Endangered Species Act specifically because of the threat of commercial development of oil shale, but the DPEIS does not consider the impacts of the alternatives to what this could mean for oil shale endemic wildflowers. A thorough analysis of direct, indirect, and cumulative effects of 52766-041

potential oil shale and tar sands development is essential before determining which areas should be available for leasing. The BLM must take a "hard look" at how each alternative would impact each of the special status species in Appendix E, and ensure that the agency is not contributing to the need to list any species, not undermining any existing recovery plans or Conservation Agreements, not sanctioning the adverse modification of designated critical habitat, or permitting leasing in areas where oil shale or tar sands development could jeopardize the future existence of any species.

52766-041 (cont.)

The DPEIS also fails to analyze the absence of any protections for oil shale endemics like Graham's penstemon (*Penstemon grahamii*) despite the BLM's past assurances that this would occur.[4] Instead, the DPEIS actually opens up most of the former critical habitat proposal for the penstemon to leasing, and we were not able to locate any specific conservation measures in the DPEIS for this species. This is not surprising because the BLM was extremely vague about what actions the BLM would actually take in the PEIS to protect *Penstemon grahamii*:

> the BLM will develop the necessary conservation measures to protect this and other species from the future potential impacts of oil shale and tar sands development. This will be accomplished through the recently initiated Programmatic Environmental Impact Statement (PEIS) for the Oil Shale/Tar Sands Commercial Leasing Program and concurrent development of the associated regulatory program. Required conservation measures for *P. grahamii* and other species will be generated through the PEIS process and will be applied to oil shale and tar sands development projects. While we cannot describe what the specific conservation measures will be, because they are yet to be developed, they will incorporate effective conservation measures for *P. grahamii* and other species.

52766-042

Letter from Clarke to BLM (May 10, 2006) at 5-6. In this same letter, Director Clarke suggested that the BLM would consider making the proposed critical habitat areas for *Penstemon grahamii* off-limits to oil shale and tar sands leasing:

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[4] On May 10, 2006, Kathleen Clarke submitted to the FWS official comments on the proposal to protect *Penstemon grahamii* under the Endangered Species Act, and claimed that there was little to no overlap between potential oil shale and tar sands commercial development and penstemon habitat, and that the PEIS would incorporate conservation measures for this species:

> In reference to the U.S. Fish and Wildlife Service (FWS) concerns over future oil shale and tar sands development, we show that the *P. grahamii* proposed critical habitat occurs over only a very small fraction of the potential oil shale resource. Historical oil shale activities, proposed oil shale research and development projects, and future possible commercial development do not overlap with that proposed critical habitat. This lack of overlap significantly minimizes or eliminates potential impacts to *P. grahamii* by associated infrastructure development. Further, there is time for our agencies to work together in developing a commercial oil shale and tar sands leasing and regulatory program by 2008 that will serve to effectively conserve this and other species.

Letter from Clarke, BLM to FWS (May 10, 2006) at 1.

> There is an opportunity now for the FWS to participate as a cooperator in the PEIS process and work with the BLM to evaluate potential impacts of oil shale development on *P. grahamii* and other species and to develop the appropriate conservation measures to be applied at the leasing stage. Such measures would take the form of lease stipulations or in allocations of land use, such as areas of no leasing, to be implemented in the amended RMPs. The policy direction under the [Energy Policy] Act is to conduct a PEIS for a commercial leasing program, adopt regulations, and consult with governors and others on the interest in leasing, but there is no policy direction in the Act as to the outcome of the NEPA process. The PEIS process will identify the significant resource conflict issues and identify effective means to reduce or eliminate those conflicts.

52766-042 (cont.)

Id. at 29.

This amounts to a string of empty promises that have been broken. Our understanding is that the FWS is currently fighting to be involved in the DPEIS process now after the BLM made its no effect finding and indicated that it does not intend to formally consult under the ESA.[5] The PEIS does not actually take a hard look at conflicts like leasing habitat critical to the recovery of *Penstemon grahamii* or other species, nor does it seriously consider what changes in land use allocation or stipulations may be necessary to conserve this or any of the other oil shale endemic species. Taking these actions for *Penstemon grahamii* is especially critical because this species currently has no special status. The FWS took the BLM's promises at face value and withdrew the

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[5] The DPEIS provides conflicting information about whether the BLM intends to undergo Section 7 consultation with the FWS. On page 7-6, the DPEIS states that consultation on portions of the DPEIS will occur; page 4-99 suggests that BLM is making a "may affect" finding for a whole list of species; and pages 6-291-292 indicate that the BLM has made a "no effect" finding, will not prepare a biological assessment, and will not enter into Section 7 consultation at this time. The BLM essentially claims that opening an area to leasing has no effect on the environment and therefore consultation is not required. However, it is clear that the BLM is required to formally consult with the FWS over the impacts to listed species and critical habitat that could result from the proposed action. The ESA's implementing regulations make absolutely clear that "[e]ach federal agency shall review its actions *at the earliest possible time*" to determine whether an action may affect protected species, and, if so, to engage in the appropriate level of conferral. 50 C.F.R. § 402.14(a) (emphasis added); see also Wilderness Soc'y v. Wisely, 524 F. Supp. 2d 1285, 1301 (D. Colo. 2007) ("the BLM's duty to confer with the FWS arises as of the time that it was possible for the two agencies to engage in meaningful conference regarding the decision to be made"). Thus, the BLM must consult with the FWS on the decision to amend these RMPs to make lands available for oil shale and tar sands leasing. After all, commercial oil shale and tar sands development is the main threat that led to protection under the Act for many of the listed species found in these areas. The specifics of how oil shale and tar sands development may proceed are not necessary for the two agencies to have a meaningful conversation about potential impacts—the FWS should already have valuable information about areas that should be off-limits to leasing and development in order to recover imperiled species, and this would come to light during consultation. It is also worth noting that consultation is already stale on many if not all of these plans already. We are aware that the BLM has been working on programmatic BAs for years to remedy this, but that process has been stalled for some time now. Since the agency is already vulnerable to being brought up on Endangered Species Act violations, it makes little sense to further exclude input from the FWS now.

52766-043

penstemon from the Candidate list, and the BLM has not even yet added it to the Sensitive lists for Utah or Colorado. 52766-043 (cont.)

The BLM must take a close look at impacts to other oil shale endemic species as well. For example, the Dudley Bluffs plants are already under considerable pressure from conventional oil and gas drilling, especially the Piceance Development Project. Like *Sclerocactus brevispinus*, currently authorized roads and wells may have already disturbed the Dudley Bluffs plants too much; adding a new industry to their habitat may be more than they or their pollinators can tolerate. 52766-044

Indeed, the lack of analysis in the DPEIS is utterly disappointing. Rather than simply listing where special status species may occur within oil shale or tar sands areas, the BLM should work with the Natural Heritage Programs to identify what proportion of the known occurrences of each species would be made available for leasing under each alternative, and disclose what proportion of the high-quality occurrences could be offered for lease. The areas that the BLM is considering opening to development are centers of endemism, and it is highly likely that the current alternatives would open to leasing every known occurrence of multiple species. 52766-045

The direct and indirect impacts to ecosystems would be no less severe. Oil shale and tar sands extraction and refinement technologies—some of the most destructive human activities on earth (ED 2008; WWF 2008)—will undoubtedly cause severe environmental impacts to land, topography, water, and soils, which are the building blocks of habitat for sensitive species and their habitat and are already rare and rapidly diminishing. 52766-046

This may be the only decision point where the agencies consider the cumulative effects of this entire industry—and this is precisely why a programmatic EIS must fully consider impacts from this program. Deferring analysis until leases are issued or projects are approved results in a shell game; a piecemeal approach where the BLM may not realize until it is too late that all of the best recovery habitat for an imperiled species has already been sacrificed. Indeed, this is certainly the case with conventional oil and gas leasing in the West now. 52766-047

The DPEIS admits that development has the "potential" to destroy or fragment habitat, displace birds and animals, and kill animals and plants. The DPEIS also admits that the proposed action will involve development—and, hence, impacts—that will last throughout the entire life of the project, *i.e.*, for decades. What the DPEIS does not do is connect these "potential," long-term impacts to the *actual* impacts to resources that will or could result with any specificity—including ecological resources like wildlife, plant communities, and threatened and endangered species. The DPEIS give short shrift to these impacts at this crucial programmatic level, characterizing them repeatedly as "potential" threats but never documenting what the impacts to specific ecological resources could actually be. 52766-048

There are two basic reasons why the BLM does not adequately assess these and other impacts in the DPEIS. First, as discussed above, the BLM's ability to assess the impacts of these practices to species is fundamentally hampered by its failure to gather baseline data about the current status of species, population trends, and inventories. Second, in the absence of more specificity about the technologies that will be used and where, the agency cannot assess what the actual impacts to species and habitat will be. Both of these factors are remedied only by gathering and disclosing the necessary information, as NEPA requires. 52766-049

Yet, the notion that it is not possible for the BLM to engage in this analysis is simply not accurate. Indeed, to develop Alternative C, the BLM engaged in a version of the very analysis that it failed to do for the proposed action – thus, it analyzed the "possible impacts associated with individual commercial oil shale development projects" and, on the basis of this "impacts analyses," developed Alternative C, which as a result of this analysis excludes vast areas that are specially protected by existing land use plans. As a result, under Alternative C, the DPEIS claims that all habitat for several wildlife species would be protected—including habitat for the imperiled greater sage grouse. Notably, this analysis is based on protective measures in land use plans which are largely designed to protect sensitive species and lands, and do not hinge on the impacts of the likely, highly destructive technologies. 52766-050

2. The DPEIS Fails to Properly Consider the Cumulative Impacts to Ecological Resources.

Another fundamental analysis that is lacking in the DPEIS is the discussion of cumulative impacts. NEPA's regulations define a "cumulative impact" as:

> the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

40 C.F.R. § 1508.7.

In order for the agency to "consider" cumulative effects, "some quantified or detailed information is required," since, without it, "neither the courts nor the public, in reviewing the Forest Service's decisions, can be assured that the Forest Service provided the hard look that it is required to provide." Neighbors of Cuddy Mountain v. U.S. Forest Service, 137 F.3d 1372, 1379 (9th Cir. 1998). General statements about "possible" effects and "some risk" are generally insufficient, and it is not appropriate for the agency "to defer consideration of cumulative impacts to a future date." *Id.* at 1380; *see also Lands Council* [cite] (cumulative impacts analysis insufficient where there was "no catalog of past projects," "no discussion of how those projects (and differences between the projects) have harmed the environment," only a "vague discussion of the general

impact of prior timber harvesting," and "no discussion of the environmental impact from past projects on an individual basis, which might have informed analysis about alternatives presented for the current project").

The DPEIS's cumulative effects analyses for the alternatives is insufficient because it only vaguely discusses the possible effects of myriad other activities affecting federally listed species and their habitat, and defers more in-depth analysis to a future date. There is no catalog of past projects or discussion of how those projects have harmed the environment. There is only a vague discussion of the general impact of past projects, and no discussion of the environmental impact from past projects on an individual basis, which might have informed analysis about alternatives presented for the current project. These shortcomings render the DPEIS's analysis insufficient. See, e.g., Kern v. BLM, 284 F.3d at 1078 (failure to include a cumulative impact analysis of actions within a larger region renders NEPA analysis insufficient). 52766-051

3. The DPEIS Does Not Discuss the Irreversible or Irretrievable Commitments of Resources That Would be Involved in the Proposal Should it be Implemented.

The DPEIS acknowledges that the environmental consequences of all of the alternatives will be constant and long-lasting, but at the same time, claims that yet-unknown mitigation measures will reduce or eliminate the "potential" effects to species and habitat. Given the impossibility of developing mitigation measures for impacts that are not even identified, the DPEIS does not—and cannot—assess the likelihood that such measures would actually be appropriate or effective. But it is nonsensical to conclude that long-term displacement and killing of animals and plants—not to mention alteration of topography—could possibly be mitigated in these circumstances, *e.g.*, where some plant species are might be obliterated from the wild as a result of the proposed action. Similarly, the DPEIS also repeatedly claims that unspecified reclamation measures will restore the affected areas. However, again, given the long-term, severe environmental impacts (which would last for decades), and without more detail about reclamation measures that could possibly restore degraded areas and even altered topography, the inescapable conclusion is that these areas could never be reclaimed, in all likelihood, and species and habitat would likely never be restored. 52766-052

Accordingly, the BLM should simply concede and disclose candidly that as a result of the proposed action, resources are likely to be lost, and species are likely to go extinct or become severely compromised in the wild and their habitats perhaps forever degraded, and that this result is an irreversible or irretrievable commitments of resources should the proposed action be implemented.

4. The DPEIS Fails to Disclose and Consider the Energy Requirements of the Various Alternatives and Mitigation Measures.

NEPA's implementing regulations make clear that, when disclosing and assessing the environmental consequences of preparing an EIS a federal agency must include a 52766-053

discussion of the "[e]nergy requirements and conservation potential of various alternatives and mitigation measures." *See* 40 C.F.R. §§ 1502.16(e). Not only is this required by the CEQ regulations but it is particularly important here, where all of the alternatives would facilitate the nation's transition to substitutes for oil, and where the proposed development is incredibly energy-intensive (UCEI 2008; ED 2008; WWF et al. 2008; Bartis et al. 2005; OTAa 1980; OTAb 1980). Hampered in part by its lack of baseline data (as discussed above), the DPEIS lacks a discussion of this consequence. As a result, the DPEIS fails for lack of this crucial information.

52766-053 (cont.)

IV. The RD&D Program Violates NEPA.

The DPEIS discusses the RD&D program, which involves six projects would move forward on the 160-acre leases, each of which has an identified preference right lease area for almost 5,000 acres of additional, future commercial development. The BLM has incorporated this program into Alternative A—the so-called "No Action" alternative—but as discussed above, Alternative A is fundamentally flawed and contrary to NEPA. However, the RD&D program is unlawful for the following reasons as well.

A. The BLM's Findings of No Significant Impact for its RD&D program are Unlawful.

The DPEIS states that the BLM evaluated the environmental and socioeconomic impacts of the RD&D activities on the six leases prior to issuance of the leases through the preparation of EAs, and that four environmental assessments were prepared and Findings of No Significant Impact ("FONSIs") were issued for each project. The BLM also conducted no formal consultation of the impacts of these projects to listed species pursuant to the ESA. This is patently unlawful. The RD&D leases involve over 30,000 acres of oil shale development, the environmental consequences of which must be considered in a full EIS and pursuant to formal consultation under the ESA.

52766-054

B. The RD&D Program Violates NEPA's Limitation on Actions During the NEPA Process.

NEPA's implementing regulations prohibit federal agencies, until an agency issues a record of decision, from taking any action concerning the proposal that will have an adverse environmental impact or limit the choice of reasonable alternatives. 40 C.F.R. § 1506.1. By authorizing over 30,000 acres of oil shale and tar sands development, all of the alternatives authorize federal action that will clearly have adverse environmental impacts. These impacts are discussed in the DPEIS itself and confirmed by the numerous studies and technical reports cited there and herein. As such, RD&D leasing must be halted unless or until the BLM prepares a DPEIS that fully and fairly discusses the environmental consequences of moving forward with these leases.

52766-055

Conclusion

As discussed above, we believe that the DPEIS is so deficient that the BLM's only option is to completely revise the documents, update them to include an accurate, current and complete discussion of the impacts of the greenhouse gas emissions from a commercial leasing program to global warming and the program's contribution to this problem, and of the impacts on listed species from the direct, indirect and cumulative effects of a leasing program. 52766-056

Sincerely,

/s/
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Responses for Document 52766

52766-001: The BLM disagrees with the statement that the PEIS fails to comply with NEPA. The PEIS provides an evaluation, based on the best information available, of the direct, indirect, and cumulative impacts of amending land use plans for the purposes of allowing application for leasing under three alternatives. The BLM has concluded that these allocation decisions would have no impact on the environment, other than possible impacts on property values, because these allocations do not commit any lands or resources to development. Additional project-specific NEPA evaluations that take into consideration the location, technologies, and affected resources would be conducted prior to any actual leasing or development decisions. With the application of existing BLM policies and project-specific mitigation requirements, the BLM is confident that resource protection would be factored into all future leasing and development decisions.

52766-002: The criticisms presented in the comment seem to stem from a misunderstanding of the purposes of the PEIS. The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. The PEIS provides adequate description of environmental resources in areas that would be made available for lease application to enable a decision among alternatives. Detailed site-specific surveys for sensitive and protected resources in project areas would be required prior to any leasing or development decisions.

It is important to note that none of the decisions to be made on the basis of this PEIS will authorize the immediate leasing of lands for commercial oil shale or tar sands development. Although the PEIS provides an analysis of the types of impacts and magnitude of impacts associated with commercial oil shale and tar sands development, there is currently too much uncertainty regarding project-specific details such as the number of projects that will be proposed, project locations, specific resources that could be affected, technologies to be deployed, and plans of development to enable the level of analysis identified in the comment. Because of this uncertainty, the BLM has taken a fairly conservative approach to evaluating impacts and has disclosed the resources in all geologically prospective areas to the extent known. It will be the role of subsequent project- or site-specific NEPA documents to analyze the environmental consequences of leasing, exploration, and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values.

Global climate change is discussed in Section 3.1.5.2. See also the response to Comment 52766-003.

52766-003: The PEIS cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions proposed in the

PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

This PEIS does include in the cumulative impacts analysis a discussion of the possibility of land disturbance and other impacts from planned power lines, both those required for oil shale and tar sands facilities and those planned for other purposes (e.g., the transmission and pipeline rights-of-way are included in the total acreage estimate of 14,000 acres for an oil shale facility [Table 6.1.5-9 of the PEIS], and the potential impacts from other energy corridors are also acknowledged in Section 6.1.5.3.1). The impacts of greenhouse gas emissions from oil shale, tar sands, and ancillary facilities are not assessed at this time, because the lack of scientific tools designed to predict climate change on regional or local scales limits the ability to quantify potential future impacts (see Sections 4.6.1 and 5.6.1).

It would be inappropriately speculative at this time to attempt to present analysis of impacts from power generation for oil shale/tar sands development, because the amount of power required would vary with technology to be implemented, and because the source of the power (and therefore the impacts) is unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. Refinery requirements are also highly speculative at this time; however, the PEIS does include a preliminary assessment of these requirements, concluding that, even if significant oil shale/tar sands development occurs over the next 20 years, new national refining facilities are unlikely to be needed, although expansion of existing refineries would likely occur (see Sections 4.1.7 and 5.1.6).

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, it is justifiable that the evaluation of specific occurrences of resources and supporting facilities, analyses of the environmental consequences of oil shale or tar sands development, and the assessment of the cumulative effects of oil shale and tar sands development together with the other factors mentioned in the comment be included in subsequent project- or site-specific NEPA documents rather than in the PEIS.

52766-004: See the response to Comment 52766-002.

52766-005: The potential impacts of commercial oil shale and tar sands development are discussed in Chapters 4 and 5 of the PEIS. The comment identifies many of the impacts that also are discussed in the PEIS. In addition to describing these potential impacts, the PEIS identifies potential mitigation strategies that could be applied to protect resources. A full evaluation of the impacts and success of

mitigation strategies must await project-specific NEPA evaluations that take into consideration site-specific resources and conditions.

52766-006: The PEIS analyzes the environmental consequences of proposed allocation decisions in sufficient detail for the decision maker to choose which lands would be available for further consideration for leasing. The proposed allocations do not authorize the immediate leasing of lands for commercial development nor do they create any development rights. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. This future analysis will be done in the context of ongoing and anticipated future development of other resources within the area of influence of any proposed oil shale lease.

52766-007: The BLM believes that the PEIS fulfills the requirements of Section 369 of the Energy Policy Act of 2005 and NEPA. The PEIS evaluates and presents to the public the impacts of the proposed action—to identify lands available for application for commercial oil shale and tar sands leases. The PEIS provides an evaluation, based on the best information available, of the direct, indirect, and cumulative impacts of amending land use plans for the purposes of allowing application for leasing under three alternatives. The BLM has concluded that these allocation decisions would have no impact on the environment, with the exception of possible impacts on property values, because these allocations do not commit any lands or resources to development. Additional project-specific NEPA evaluations that take into consideration the location, technologies, and affected resources would be conducted prior to any actual leasing or development decisions.

52766-008: The BLM has evaluated a no-action alternative in the PEIS that is consistent with CEQ's definition of the no-action alternative. CEQ discusses the meaning of the no-action alternative in the "Forty Most Asked Questions" memorandum published in the *Federal Register* in 1981 (46 FR 18026). It states ". . . the 'no action' alternative may be thought of in terms of continuing with the present course of action until that action is changed. Consequently, projected impacts of alternative management schemes would be compared in the EIS to those impacts projected for the existing plan. In this case, alternatives would include management plans of both greater and lesser intensity, especially greater and lesser levels of resource development." In the case of BLM's proposed oil shale and tar sands program, the no-action alternative would be continuation of BLM's existing program, which includes the six approved RD&D projects and lands already made available for lease applications for commercial oil shale and tar sands development in Utah and Colorado.

52766-009: Sections 6.1.5.1.4 and 6.2.5.1.4 of the PEIS describe the potential impacts from new energy transmission corridors that are being assessed in a separate

programmatic EIS being prepared by DOE and other federal agencies (including the BLM), as mandated by Section 368 of the Energy Policy Act. Sections 6.1.5.3 and 6.2.5.3 discuss the potential cumulative impacts of future oil shale and tar sands development in addition to other major activities in the study area, including energy corridor designation.

The cumulative impacts analysis in the PEIS summarizes the past, present, and reasonably foreseeable other activities (e.g., transmission corridor designation, oil and gas development, coal mining, minerals development) for the study area, and presents a preliminary qualitative assessment of the incremental impacts of those activities considered in conjunction with oil shale and tar sands development. At this preliminary stage, when the specifics of the extent of future oil shale and tar sands development are unknown, the discussion of the potential impacts of oil shale development is based on the BLM's experience with comparable surface-disturbing activities from other types of mineral development. In order that the decision maker might have sufficient information to make a reasoned choice among the alternatives, the BLM has developed a general analysis of the potential incremental impacts from all past, present, and reasonably foreseeable actions, in conjunction with a single hypothetical oil shale or tar sands facility, with the understanding that there might be more than one, or even many, oil shale/tar sands facilities developed in the future. For the purpose of this analysis, parameters for consideration such as land disturbed, water use, and jobs created were developed where possible. For some parameters (such as air emissions), no estimates with respect to possible development could be made because the data would depend entirely on technology-specific inputs.

Prior to leasing (when site-specific and technology-specific data will be available), or approval of a plan of development (when accurate information on water use, air emissions, employment, etc., will be available), additional environmental analysis will be performed, including a cumulative analysis, as appropriate.

52766-010: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The

combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 in the Draft PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

52766-011: See response to Comment 52766-010.

52766-012: See response to Comment 52766-010.

52766-013: See response to Comment 52766-010.

52766-014: The potential emissions of any air pollutant (including light-absorbing carbon, black carbon, or soot) would not result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

See also response to Comment 52766-010.

52766-015: See response to Comment 52766-010.

52766-016: See response to Comment 52766-010.

52766-017: See response to Comment 52766-010.

52766-018: In developing the PEIS, the BLM used the best available information regarding existing oil shale and tar sands technologies, and environmental resource characteristics in the most geologically prospective portions of oil shale basins

and STSAs. It is expected that the existing RD&D program will provide additional information on the impacts of different technologies, the effectiveness of different mitigation strategies, as well as the information needed to improve extraction and refinement processes. A full evaluation of future development impacts will be conducted on a project-specific basis using, among other things, the information gained in the RD&D program. This information, along with application of existing BLM policies and practices to protect the environment, will provide for an environmentally sound program.

52766-019: To evaluate the impacts of a fully developed oil shale and tar sands program as suggested in the comment would require development of an RFDS and using assumptions of impacts based on existing technology. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. In addition, development of such an analysis at this time would not take advantage of the information that will be gained as a result of the ongoing RD&D program. Instead, the BLM intends to evaluate future leasing and development proposals on a project-specific basis.

52766-020: See response to Comment 52766-010.

The quantity and source of electrical power that might be needed for potential development would require making many speculative assumptions and, therefore, is premature at this stage in the process.

52766-021: See response to Comment 52766-020.

52766-022: See response to Comment 52766-010.

52766-023: This PEIS is a programmatic-level document analyzing land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. The BLM believes there currently is sufficient information at the programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing.

The BLM anticipates that oil shale development would proceed in a three-step decision-making process similar to that used for federal onshore oil and gas: land use planning (i.e., amending RMPs); leasing; and approval of a drilling permit or a plan of operations. In the present experimental stage of the oil shale and tar sands industries, however, the BLM believes that the stages of NEPA compliance will be different from those used in oil and gas.

As a result of the maturity of the oil and gas industry, the BLM is usually able to include sufficient site-specific analysis in its NEPA documentation for amendments to RMPs so that an additional NEPA document is not required prior to issuing an oil and gas lease in conformance with the RMP. Nonetheless, the BLM does prepare a NEPA analysis before approving a plan of operation or a drilling permit that would authorize significant disturbance of the leased area. The NEPA analysis for both decision levels includes a cumulative effects analysis. Analysis of each oil and gas decision is based on technical information associated with the particular proposed action, as well as information about other reasonably foreseeable future actions in and near the area of the proposal.

In contrast, the present experimental state of the oil shale and tar sands industries does not allow this PEIS for land use allocation to include sufficient site-specific information or cumulative impact analysis to support issuance of a lease. Accordingly, unlike in oil and gas leasing, prior to oil shale or tar sands leasing, additional NEPA analysis will be required. That NEPA analysis could result in decisions not to lease in specific areas, or to lease particular areas with stipulations, such as a stipulation precluding disturbance of the surface.

Before proceeding with development, the operator would have to obtain the BLM's approval of a plan of development through a project-level NEPA analysis. NEPA analysis at the leasing and at the development approval stage of oil shale and tar sands decision-making would be based on reasonably available technical information associated with the proposed action, and on information about other reasonably foreseeable future actions in and near the area of the proposal.

Additional and more-detailed cumulative impact analysis for transmission corridors, power generation (including greenhouse gas emissions), and refining needs will be conducted at two subsequent stages of development: for NEPA analysis of any leasing decisions, and for NEPA analysis for sites with specific plans of development being evaluated. As required under NEPA, all subsequent NEPA documents will also analyze the cumulative effects from other reasonably foreseeable future actions. The scope and nature of the specific proposed action will drive the type of NEPA analysis the BLM performs. The cumulative effects analysis would consider the present effects of past actions, to the extent that they are relevant, and present any reasonably foreseeable (not highly speculative) federal and nonfederal actions, taking into account the relationship between the proposed action and these reasonably foreseeable actions. The BLM believes that cumulative impacts would be adequately assessed at the leasing stage.

As described in the proposed action in the PEIS, the BLM is committed to preparing NEPA analyses prior to leasing and development. However, until the scope of the potential leasing and/or development is known, we cannot commit to the scope of the NEPA analysis (regional, planning area, or local) that will be required. The proposed action will drive what analysis must be done to comply with the requirements of NEPA.

52766-024: See response to Comment 52766-010.

52766-025: The BLM recognizes the water needed for oil shale development and existing water uses in the Upper Colorado River Basin will continue to evolve over the next 20 years. There are many uncertainties in projecting water uses. To reduce such uncertainties, the analysis of potential impacts on water resources is based on the latest available data, including current water use data and projected water uses documented in individual states' water plans. Currently, the BLM is not committing to any level of oil shale and/or tar sands development based on this PEIS. If the BLM later decides to accept lease applications for development, more project-specific analyses of environmental impacts would be made. At that time, many of the uncertainties would be better defined and the project-specific analyses would be more meaningful.

The projected impacts of greenhouse gases on climate are based on models that in turn rely on assumptions. The assumptions could differ among different models. The modeling results vary and are sometimes contradictory. Therefore, it would be speculative to use the results in evaluating the impacts of the greenhouse gas emissions on water resources.

52766-026: Please see response to Comment 52766-003.

52766-027: The BLM has evaluated a no-action alternative in the PEIS that is consistent with CEQ's definition of the no-action alternative (see response to Comment 52766-008). The PEIS examines three alternatives (including the no-action alternative) that provide a wide range of land areas that would be made available for application for leasing in Colorado, Utah, and Wyoming. Because the BLM's proposed action is to identify lands available for application for commercial oil shale and tar sands leases, alternatives of other energy production types as suggested in the comment are not appropriate because they would not be comparable. Other energy alternatives are most appropriately considered at the leasing and development stages of projects. Project-specific NEPA evaluations that include consideration of energy alternatives, including conservation, would be performed at that time.

52766-028: Appendix E of the PEIS has been modified in response to the comment.

52766-029: Section 3.7.4.1 of the PEIS has been revised to include recent USFWS findings for the Uinta Basin hookless cactus complex.

52766-030: The recovery goals document referred to in the comment served as the reference for several of the descriptions in the text (USFWS 2002a). Section 3.7.4.1 of the PEIS has been revised to identify the specific rivers in which critical habitat for the bonytail has been designated.

52766-031: As stated in Section 3.7.4.1 of the PEIS, "potential threats to the clay-reed mustard include a variety of ground-disturbing activities, such as oil and gas exploration and development (its entire habitat is underlain by oil shale), building stone removal, and OHV use (USFWS 1994a). The clay reed-mustard potentially occurs in the Uinta Basin and the Asphalt Ridge, Hill Creek, Pariette, P.R. Spring, and Raven Ridge STSAs."

52766-032: The information presented in the PEIS on these and other federally listed species is of sufficient detail for the purposes of the PEIS. The PEIS provides a brief discussion for each species that identifies the listing status, basic life history and population information, existing threats, and the potential for the species to be affected by commercial oil shale and tar sands development. The recovery plans mentioned in the comment serve as important reference to the species descriptions in Section 3.7.4.1. More detailed project-specific NEPA assessments and ESA consultations will be conducted prior to leasing and development.

52766-033: See response to Comment 52766-032.

52766-034: See response to Comment 52766-010.

Section 3.5.1.2 of the PEIS indicates "The assessment of GHG emissions and climate change is in its formative phase, and it is not yet possible to know with confidence the net impact on climate." In addition, the Final PEIS has been modified to include the following text: "The lack of scientific tools designed to predict climate change on regional or local scales limits the ability to quantify potential future impacts. However, potential impacts to air quality due to climate change are likely to be varied. For example, if global climate change results in a warmer and drier climate, increased particulate matter impacts could occur due to increased wind-blown dust from drier and less stable soils. Cool season plant species' spatial ranges are predicted to move north and to higher elevations, and extinction of endemic threatened/endangered plants maybe accelerated. Due to loss of habitat, or due to competition from other species whose ranges may shift northward, the population of some animal species may be reduced. Less snow at lower elevations would be likely to impact the timing and quantity of snowmelt, which, in turn, could impact aquatic species."

52766-035: See response to Comment 52766-034.

52766-036: See response to Comment 52766-023.

As with oil and gas leases, although the lease would grant the lessee the right to explore and develop the oil shale and tar sands resources, the lease would not authorize surface disturbance. Before disturbing the surface, the operator would have to obtain the BLM's approval of a plan of development through a project-level NEPA analysis.

NEPA analysis at the leasing and at the development approval stage of oil shale and tar sands decision-making would be based on reasonably available technical information associated with the proposed action, and on information about other reasonably foreseeable future actions in and near the area of the proposal.

52766-037: The BLM's proposed action is to identify lands available for application for commercial oil shale and tar sands leases. The proposed action does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on paleontological, water, cultural, or ecological resources (including aquatic resources, plant communities and habitats, wildlife, and threatened and endangered species). Although the BLM has determined that there are no impacts to these resources associated with the proposed action, the PEIS includes an evaluation of the direct, indirect, and cumulative impacts of commercial oil shale and tar sands development in Chapters 4, 5, and 6. The PEIS does much more than simply reveal that there is a "potential for impacts" if development should occur. For ecological resources, the magnitude of impacts (small, moderate, and large) in various impact categories (e.g., habitat fragmentation, water depletions) is discussed in Section 4.8.1 and 5.8.1.

52766-038: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the threatened or endangered species.

The impact analysis provided in the PEIS is presented to the extent possible. Potential direct and indirect impacts of project development on federally and state-listed species are discussed in Sections 4.8.1.4, 5.8.1.4, 6.1.1.7.4, 6.1.2.7.4, 6.1.3.7.4, 6.2.1.7.4, 6.2.2.7.4, and 6.2.3.7.4 of the PEIS. Cumulative impacts to threatened and endangered species are discussed in Sections 6.1.5.3.7 and 6.2.5.3.7 of the PEIS. In deciding whether to lease or to approve plans of development, the BLM will comply with the ESA, including all necessary consultations with the USFWS. In addition to compliance with the ESA, the BLM will offer leases only in conformance with its policies and procedures for protecting BLM-designated sensitive species to prevent or eliminate adverse impacts.

52766-039: The potential impacts of water depletions on stream flows, water quality, and aquatic resources are identified in the PEIS. The potential for development of oil shale and tar sands resources to result in water depletions in the Colorado River basin is clearly identified in the PEIS. Sections 4.8.1.1 and 5.8.1.1 identify that such depletions could have detrimental effects on aquatic resources in general, and Sections 4.8.1.4 and 5.8.1.4 specifically recognize that any water depletions from the upper Colorado River basin are considered an adverse effect on endangered Colorado River fishes and that oil shale development could result in

significant adverse impacts on those species as a consequence. The PEIS also identifies a potential for contaminants from oil shale and tar sands development activities to affect aquatic organisms in affected watersheds.

52766-040: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the threatened or endangered species.

The impact analysis provided in the PEIS qualitatively indicates the types of impacts that could occur, based on the BLM's experience with other types of mineral development. The reasons for presenting this information include to address additional information needed, and to provide sufficient information for the decision maker to make a reasoned choice among the alternatives. Such qualitative impacts on threatened and endangered species that are dependent on riparian systems, including those related to groundwater extraction, contamination, and changes in hydrology, are discussed in Sections 4.8.1.2, 4.8.1.4, and 5.8.1.4 of the PEIS. Cumulative impacts on these species are discussed in Sections 6.1.5.3.7 and 6.2.5.3.7. Impacts on species dependent on shale-derived soils are discussed in the same sections of the PEIS.

52766-041: As stated in the response to Comment 52766-040, the proposed action does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the threatened or endangered species. However, potential future direct and indirect impacts on species dependent on shale-derived soils are discussed in Sections 4.8.1.2, 4.8.1.4, 5.8.1.4, 6.1.1.7.4, 6.1.2.7.4, 6.1.3.7.4, 6.2.1.7.4, 6.2.2.7.4, and 6.2.3.7.4 of the PEIS. Cumulative impacts on these species are discussed in Sections 6.1.5.3.7 and 6.2.5.3.7. As stated in the PEIS, each alternative would require adherence to BLM policy on the protection of sensitive species and project-specific ESA Section 7 consultation with the USFWS. These consultations must include a consideration of cumulative effects.

52766-042: The PEIS identifies lands that have the opportunity for potential future leasing decisions and makes no decision on leasing any lands. The decision to lease (or not lease) will be based on future NEPA analysis where site-specific information will be available for the area under consideration. Appropriate stipulations can and will be developed for those areas that are eventually identified for leasing. Although the overburden is less than 500 ft thick and surface mining would be more economically feasible, underground mining can be required where surface disturbance could create unacceptable risks. Graham's beardtongue is a sensitive species on both the Colorado and Utah BLM sensitive species lists and, as such, is protected by the policies established in BLM Manual 6840. In addition, the BLM is signatory to the interagency Graham's beardtongue Conservation Agreement

and is committed to accomplishing the tasks identified in it to ensure attainment of its goals and objectives, and ultimately, the long-term conservation of the species. The Conservation Agreement has not yet been signed by all involved parties.

52766-043: The text describing Section 7 consultation in Chapters 4, 6, and 7 of the PEIS has been revised for consistency.

The federal action at issue here is the amendment of land use plans to identify lands that are available for commercial leases for oil shale or tar sands development. The amendment makes no decision to authorize, fund, or issue any lease. The BLM has examined the potential effects on listed species and designated critical habitat of amending land use plans to identify lands as available for application for commercial leases for oil shale or tar sands development. As a result of this examination, the BLM has determined that its proposed action of amending land use plans would have no effect on these species or on critical habitat, and, therefore, Section 7 consultation whether formal or informal, is not necessary. This determination is based on the following:

1) The amendment of land use plans to identify lands as available for application for commercial leasing for oil shale or tar sands development would have no impact on the environment. The amendments do not commit the BLM to a particular course of action, or authorize any ground-disturbing activity; they merely allow the BLM to consider granting leases—in the future—for oil shale or tar sands development

2) The amendment of land use plans for such purpose does not create any legal right that would allow ground-disturbing activities without further agency decision making and compliance with applicable statutes, including ESA and NEPA.

3) An application for a commercial lease in areas that may be identified as available for such application as a result of the proposed land use plan amendments, or an application for approval of any ground-disturbing activities that may occur in these areas in the future, is subject to full policy and legal review at the time it is filed and may be denied by the BLM.

Early coordination with the USFWS occurred during the development of the PEIS. Not only is the USFWS a cooperating agency, the BLM and USFWS have met on several occasions and developed a list of conservation measures that may be applied to address species conservation at the next level of NEPA decision.

52766-044: As stated in the response to Comment 52766-040, the proposed action does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the threatened or endangered species. However, potential future direct and indirect impacts on species dependent on

shale-derived soils are discussed in Sections 4.8.1.2, 4.8.1.4, 5.8.1.4, 6.1.1.7.4, 6.1.2.7.4, 6.1.3.7.4, 6.2.1.7.4, 6.2.2.7.4, and 6.2.3.7.4 of the PEIS. Cumulative impacts on these species are discussed in Sections 6.1.5.3.7 and 6.2.5.3.7. As stated in the PEIS, each alternative would require adherence to BLM policy on the protection of sensitive species and project-specific ESA Section 7 consultation with the USFWS. These consultations must include a consideration of cumulative effects.

52766-045: The information on species locations used to identify which special status species could occur in oil shale and tar sands areas is based at least in part on Natural Heritage records. As stated in the comment, and acknowledged in the PEIS (see Sections 3.7.2 and 3.7.4), the areas being considered for leasing support a variety of endemic plant species, including species that appear dependent on oil-shale derived soils. It should be noted that the proposed action does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on threatened or endangered species. Future leasing and development decisions will consider impacts on sensitive and threatened and endangered species and will include consultations with the USFWS. These consultations must consider each project in the context of other factors affecting each species within its range.

52766-046: The direct and indirect impacts of commercial oil shale and tar sands development on ecological resources are discussed in Sections 4.8.1 and 5.8.1 of the PEIS. These sections acknowledge the potential for significant impacts on these resources and identify potential mitigation measures that could be applied to reduce impacts. All future BLM leasing and development decisions must take into consideration existing developments, the status of resources, project-specific impacts, and cumulative impacts on those resources. Existing BLM directives charge the agency with managing resources in a sustainable manner.

52766-047: The cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). The evaluation presented in Sections 6.1.5 and 6.2.5 of the PEIS summarizes the extensive current and planned other activities (for example, oil and gas development, coal mining, minerals development) for the study area and the potential for these activities to contribute to the cumulative impacts of oil shale and tar sands development. A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available. These project-specific evaluations will consider the impacts of all other past, present, and reasonably foreseeable future actions in the affected region.

52766-048: The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and they provide an effective analytical foundation

for subsequent project-specific NEPA documents. There is sufficient information pertaining to impacts on ecological resources on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, the specific number and locations of projects cannot be identified within the PEIS. Subsequent project-specific NEPA documents will be prepared that will evaluate the specific technology to be used to process oils shale or tar sands, gather and use area-specific baseline information of the ecological resources upon which to assess actual impacts, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects (including those of other existing or reasonably foreseeable future oil shale and tar sands leases), reasonable alternatives, and mitigation measures to protect ecological resources, as well as what level of development may be anticipated. Project-specific NEPA analysis would also include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important ecological resources. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders.

52766-049: See response to Comment 52766-048.

52766-050: As mentioned in the comment, the existence of existing lease stipulations or protective measures were used by the BLM to identify those areas to be excluded from consideration under Alternative C. This readily available information is useful, but could not be used to provide any greater definition to the analysis of the impacts of Alternatives A or B. It would be inappropriate to conclude that the absence of existing protections means the absence of important resources.

52766-051: The PEIS presents, for the purposes of analysis, a cumulative analysis based on the nature and scope of the proposed action and on available nonspeculative information. The summary of the existing environment given in Chapter 3 provides the status of the study area as it currently exists, including impacts resulting from past development (e.g., current water and air quality, current ecological environment). It provides a summary of the extensive ongoing and planned future activities in the Piceance Basin and elsewhere in the study area, and considers these in its overview of potential cumulative impacts (see Sections 6.1.5 and 6.2.5). The potential cumulative impacts from oil shale and tar sands development are also identified in the PEIS. For example, Sections 6.1.5.3.4 and 6.1.5.3.7 identify the substantial effects that oil shale development could have (depending upon the level of development) on water use and the aquatic organisms in the habitats supplied by that water, including endangered fishes in the Upper Colorado River basin. Also, Sections 6.1.5.3.4 and

6.1.5.3.5 note that depending on the type and level of development, regional water and air impacts may limit oil shale and tar sands development.

This PEIS is a programmatic-level document analyzing land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. BLM believes there currently is sufficient information at the programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing.

The BLM believes that cumulative impacts would be adequately assessed at the leasing stage. As required under NEPA, all subsequent NEPA documents will also analyze the cumulative effects from other reasonably foreseeable future actions. The scope and nature of the specific proposed action will drive the type of NEPA analysis the BLM performs. The cumulative effects analysis would consider the present effects of past actions, to the extent that they are relevant, and present any reasonably foreseeable (not highly speculative) federal and nonfederal actions, taking into account the relationship between the proposed action and these reasonably foreseeable actions.

As described in the proposed action in the PEIS, the BLM is committed to performing NEPA analyses prior to leasing and development. However, until the scope of the potential leasing and/or development is known, we cannot commit to the scope of the NEPA analysis (regional, planning area, or local) that will be required. The proposed action will drive what analysis must be done to comply with the requirements of NEPA.

52766-052: Discussion of irreversible and irretrievable commitment of resources is provided in Sections 6.1.6.3 and 6.2.6.3 of the PEIS. This section indicates that the amendment of land use plans to identify lands available for application for leasing for commercial oil shale development would not result in the irreversible or irretrievable commitment of resources. However, the potential irreversible and irretrievable commitment of resources occurring during future development is acknowledged, particularly for threatened and endangered species.

52766-053: The potential impacts of power generation for oil shale/tar sands development are too speculative for analysis at this time, because the amount of power required varies with technology to be implemented, and also because the source of the power (and therefore the impacts) is unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. More detailed assessment of the impacts of required power generation would likely be possible as a part of NEPA analyses conducted for site- and technology-specific plans of development.

52766-054: The BLM disagrees with the comment that the Findings of No Significant Impact for its RD&D program are unlawful on the basis of failure to conduct formal consultation under the ESA. Formal consultation under Section 7 of the ESA is required if a determination is made that a project may affect one or more listed species. For most projects, a determination was made that project activities would not affect listed species. For one project (EGL), a determination was made that the project may affect several listed species. For this project, consultation with the USFWS was conducted.

52766-055: The impacts of the six RD&D projects were evaluated in project-specific environmental assessments that fulfilled the BLM's NEPA obligation for these projects. The RD&D decisions were made separately and prior to the proposed action that is evaluated in this PEIS.

52766-056: The BLM believes that the analysis in the PEIS is appropriate for the programmatic decision to be made. Please see the responses to comments 52766-010 and 52766-037 regarding greenhouse gas emissions and endangered species, respectively.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52767.

Comment Date: March 19, 2008 15:57:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52767

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
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Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I've spent significant parts of the last 25 years roaming this area- it is one of the most incredible places on earth. The preferred alternative is a bad idea! Amazingly short sighted. NO ACTION! | 52767-001

Response for Document 52767

52767-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Joe Gren .

The comment tracking number that has been assigned to your comment is OSTSD52768.

Comment Date: March 19, 2008 16:28:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD52768

First Name: Joe
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Last Name: Gren
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Address 3:
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State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

The OSTS DEIS itself does not begin to account for the adverse environmental and social impacts that will result from oil shale and tar sands in the United States. These comments are filed to support the adoption of alternative A, the no action alternative, be adopted by the lead agency. A decision that adopts either alternatives B or C will have unjustifiable consequences on the natural environment, cultural heritage and human health. The current and future generations will suffer dramatically from any decision authorizing such widespread permitting of fossil fuel energy development. OSTS development will have irreversible impacts on public lands throughout Colorado, Utah and Wyoming, and adversely impact wildlife habitat, water quality and air quality. 52768-001

The following comments focus on the shortcomings of the DEIS' assessment of carbon emissions. The air pollutants associated with actual development of OSTS, transportation of fossil fuels emanating from extractions sites and subsequent combustion of carbon based fuels will contribute to global climate change. The DEIS fails to actually address how the quantity of carbon dioxide that will be admitted from projects associated with OSTS development, transportation and combustion. Merely stating "[h]owever, neither the state of the science, nor current monitoring systems are adequate to indicate what influence global climate change may have throughout the study area" at page 3-97 is unacceptable. It is unreasonable and capricious for an agency to concede that anthropogenic development, such as OSTS development, would very likely contribute to global climate change and then not present any reasoning why OSTS would or would not contribute to global warming. Please further explain how OSTS will contribute to global climate change and how federal permitting agencies will control carbon emissions. 52768-002

The assertion that "Increasing CO2 concentrations also lead to preferential fertilization and growth of specific plant species" at id is also arbitrary and not supported by scientific data. This conclusary statement does not justify emitting more carbon into the atmosphere. Please either present evidence and take a hard look at the link between carbon emissions, OSTS development and plant health or remove this unreasoned statement from the EIS. Furthermore, it is unclear why the 52768-003

agency limited its review of national park air sheds to Class I air sheds that are only within 50 miles. See 3-110. Please explain the decision to limit the analysis to parks within 50 miles and why the this section fails to include Rocky Mountain National Park and the Indian Peaks Wilderness. Thank you for your time and attentiveness to the above concerns. 52768-004

Responses for Document 52768

52768-001: The BLM acknowledges the commentor's preference for Alternative A.

52768-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52768-003: The relationship between increasing CO_2 concentrations and plant response is addressed in the IPCC Fourth Assessment Report, available online at: http://www.ipcc.ch/ipccreports/ar4-wg2.htm. The report specifically stated that CO_2 fertilization is the "stimulation of plant photosynthesis due to elevated CO_2 concentrations, leading to either enhanced productivity and/or efficiency of primary production. In general, C3 plants show a larger response to elevated CO_2 than C4 plants." However, this factual biochemical relationship was in no way intended to "justify emitting more carbon into the atmosphere."

52768-004: The mandatory federal PSD Class I areas listed in the draft PEIS are those closest to the oil shale and tar sands resources.

Thank you for your comment, Will Rusho.

The comment tracking number that has been assigned to your comment is OSTSD52769.

Comment Date: March 19, 2008 16:31:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD52769

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Attachment:

Comment Submitted:

I strenuously oppose any authorization of oil shale mining. First it would devastate the scenic cliffs of Utah, Colorado, and Wyoming, leaving only huge piles of rubble. So I oppose Alternative B. Also, oil shale mining must be uneconomical, using great quantities of energy to extract oil. I therefore support NO ACTION.	52769-001

Response for Document 52769

52769-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Kenneth Parsons.

The comment tracking number that has been assigned to your comment is OSTSD52770.

Comment Date: March 19, 2008 16:33:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52770

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Privacy Preference: Don't withhold name or address from public record
Attachment: RIO BLANCO COUNTY COMMENTS.doc

Comment Submitted:

See Attachment.

RIO BLANCO COUNTY COMMENTS
ON
OIL SHALE PEIS DRAFT

Introduction

Rio Blanco County thanks the BLM for including us as a Cooperating Agency during the PEIS process. When this process began, we understood the purpose of the PEIS project was to provide for commercial leases for the extraction and processing of oil shale. However, the purpose was changed roughly a year into the process from awarding commercial leases, to identifying what lands might be made available for commercial leasing at a future date. One reason for this change in purpose was, as we understood it, driven by a lack of definition of what processes had the potential to be commercially viable for the extraction and processing of shale oil. Without a clear understanding of these processes, it is extremely difficult to determine the impacts that might be experienced in the tri-state area where oil shale operations would take place. Further, there was a need for a contemporary, in-depth look at the current socioeconomic status in the region prior to projecting what the affect of oil shale leasing and development might be.

It is our understanding that no surface mining activities would take place within Colorado; that the purpose of the PEIS study was to identify lands that might be made available for commercial leasing at some time in the future; that the bulk of Volumes 2 and 3 address the various existing technologies for extraction of the petroleum product from the shale material, and the refining of the product, it seems premature to provide in depth comments until the specific process is known, which could be totally different than those discussed in the draft document, that prior to any future commercial leasing, additional site specific NEPA analysis would be conducted and analyzed; and, that this PEIS would be used, as the basis, to amend 12 land use plans in Colorado, Utah, and Wyoming, to provide the opportunity for leasing.

Rio Blanco County submitted comments on an earlier draft document, provided to Cooperating Agencies. Virtually all of the comments submitted at that time still apply to this Public Oil Shale and Tar Sands PEIS publication, and have been included in these comments, as appropriate. The earlier draft document contained four "Alternatives" none of which were viewed favorably by Rio Blanco County.

Research and Development

We reiterate our concern that none of the alternatives provide for a continuation of RDD leasing even though there is currently no proven commercial in-situ shale oil extraction process. This would seem to close the door to any research project which does not now currently have a RDD lease or own the mineral rights to oil shale outright. This does not seem conducive to developing a viable domestic commercial shale oil industry expediently. 52770-001

Local Government and Housing

The PEIS referred to Federal, State and private property owner reviews and approvals, but omitted reference to local government review and approval. Further, the PEIS document does not address how, or if, local land use codes and regulations will be considered in the commercial leasing process, or how such consideration would take place. Local community housing would include "temporary housing built in local communities" per the PEIS document. This appears to run counter to current local land use codes, and expressed views of local government. Given the current and projected levels of natural gas development in the Piceance and Uinta basins and the current utilization of mancamps due to housing limitations, this approach would mean building complete new towns from scratch. Significant limitations on domestic water sources will likely prevent the construction of new towns in Rio Blanco County. The PEIS proposes large, employer-housing compounds located on Federal lands, but does not provide sufficient discussion regarding the socioeconomic impacts that will be caused by such developments; i.e. schools, recreation, shopping, supply and demand impacts on prices, governmental services, etc. No expectations of local governments and/or communities related to employer provided, remote housing was discussed. 52770-002

SocioEconomics

In general, there is a need for the PEIS to address cumulative time lines, population growth, and labor needs in the same section, charts, and analysis for socioeconomic impacts. For example, population growth, in the different communities within Rio Blanco County, appears to be higher than those shown in the PEIS document, which refers to the growth as "moderate". At the present time, Rio Blanco projections for the county are an increase from approximately 6,200 people to approximately 18,000 people by 2030, which is not deemed as moderate.

A socioeconomic study is nearing completion which could potentially fill this need. This study, funded by the state of Colorado, has been overseen by a committee of local government officials from the study area and representatives of affected state agencies. The report documents the development and calibration of the Northwest Colorado Socioeconomic Projection (NWCSP) model and presents socioeconomic and fiscal forecasts for a multi-county region of northwest Colorado. The study area encompasses Mesa, Garfield, Rio Blanco and Moffat counties although economic projections recognize the resort influences in some adjoining counties and the interrelationship with similar resource development in nearby Wyoming and Utah. It is the hope of Rio Blanco County that this study, available April 11, 2008, at www.agnc.org, can be incorporated into the documentation for this PEIS. 52770-003

Air Quality

In reference to the conclusion stated on page ES-6 of "Some minor impacts on sensitive species, air quality, and visual resources may occur off-site. The environmental analyses completed previously by the BLM onthe projects resulted in Findings of No Significant 52770-004

Impact." does not seem warranted. The current and projected levels of natural gas development in the Piceance and Uinta basins, coupled with 3 class I wilderness areas just to the east (prevailing winds from the west), combusting natural gas at this level will likely violate air quality limits. The two recent air quality warnings for ozone issued in the upper Green River basin of Wyoming bear witness to how rapidly air quality can be affected by development in hitherto pristine regions. 52770-004 (cont.)

Power Generation

The PEIS assumes that any additional power requirements would come from conventional coal-fired generation facilities. Given current and projected levels of natural gas development in the Piceance and Uinta basins coupled with 3 class I wilderness areas just to the east (prevailing winds from the west), combusting coal conventionally in Moffat Co, CO, and Uintah Co, UT, is not a realistic assumption. Current projections for the Central Rockies indicate that current power production is already inadequate to deal with current growth rates. One new power plant is already under construction at Bonanza, UT, and more are needed. Also, given the time frames included in the PEIS document for commercial operations to ramp up, there would not appear to be adequate time to permit, build, and test new coal fired generation plants. The abundance of natural gas in the region, and to be produced as a by product of the oil shale recovery operations, gas fired generation facilities should have been included in the PEIS document and evaluated. Local impacts would be greatly altered based on the number and type of additional power generation facilities required. 52770-005

Miscellaneous

There was not a clear understanding or definition of the "threshold effects" statements contained in the PEIS documents. For example: how is "moderate effect" and "large effect" defined? A table showing these definitions, thresholds and effects would be very helpful. 52770-006

The PEIS document does not adequately deal with the adverse impacts of reductions in traditional recreational use of the Federal lands involved; or the lack of local facilities to support traditional recreational uses of lands in, or near, the ROI. 52770-007

Summary

Rio Blanco County thanks the BLM for this opportunity to critique the OSTS PEIS as it applies to our region. We see several areas such as air quality, power generation, and socioeconomic impacts which need further analysis and hope that these concerns may be addressed in order to provide a document which accurately and realistically depicts the implications of oil shale development.

Responses for Document 52770

52770-001: The description regarding the relationship of the RD&D projects to the PEIS, including the PRLA acreages, have been rewritten to clarify their situation. The scope of the analysis for the PEIS does not include review of the decisions by the Secretary to issue the existing RD&D leases described in Section 1.4.1. Those leases authorize activities on six 160-acre parcels located in Colorado and Utah and also identified conditions under which commercial development could occur on 4,970-acre preference right lease areas included in the leases. A total of 30,720 acres may be developed under terms of these leases. The RD&D leases are prior existing rights, and they are not subject to decisions in the PEIS with the exception that both Alternatives B and C address the subsequent availability of the lands contained in the leases should the initial lease holder relinquish the existing leases. Additional RD&D leases may occur on lands open for oil shale leasing.

52770-002: Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and they provide an effective analytical foundation for subsequent project-specific NEPA documents. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures, as well as what level of development may be anticipated. This future analysis will be done in the context of ongoing and anticipated future development of other resources within the area of influence of any proposed oil shale lease and will take into account the types of local government impacts raised in this comment.

52770-003: Given the programmatic nature of the PEIS, the purpose of the analysis of socioeconomic impacts is to provide an overview of the type and magnitude of impacts that would likely occur with the construction and operation of representative oil shale, tar sands, and ancillary facilities.

The socioeconomic analysis described in the PEIS was limited to estimating impacts for an ROI in each state based on the likely residential location of project workers and, consequently, the region in which the majority of socioeconomic impacts of the prospective facilities would most likely occur. If commercial-scale resource development occurs, additional NEPA analyses would be undertaken, taking into account actual worker residential locations by county, and the consequent impacts on county population growth.

Population baseline data and projections were the most recent data available when the Draft PEIS was released. Population projections for each ROI, including data for 2004 presented in Section 6.1.1.10, were taken from county, population forecasts prepared by each state and reflect growth rates projected in those forecasts. The report cited in the comment was used to describe the potential growth of the oil and gas industry in northwest Colorado in the PEIS.

52770-004: Thank you for your comment.

52770-005: Evaluation of the complete impacts of power requirements for oil shale/tar sands development is considered to be too speculative for analysis at this time. The amount of power required varies with technology to be implemented, and the source of the power (and therefore the impacts) is unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources.

52770-006: The potential magnitude of impacts in different impact categories (e.g., habitat fragmentation and water depletions) are defined for ecological resources in Sections 4.8.1 and 5.8.1 of the PEIS. Impact magnitude is described in these sections as small, moderate, or large using the following definitions. A small impact is one that is limited to the immediate project area, affects a relatively small portion of the local population (less than 10%), and does not result in a measurable change in carrying capacity or population size in the affected area. A moderate impact could extend beyond the immediate project area, affect an intermediate portion of the local population (10 to 30%), and result in a measurable but moderate (not destabilizing) change in carrying capacity or population size in the affected area. A large impact would extend beyond the immediate project area, could affect more than 30% of a local population, and result in a large, measurable, and destabilizing change in carrying capacity or population size in the affected area.

Generally, for other resources the meaning of comparative statements can be understood from the context of impact descriptions in the text that are specific to each resource area.

52770-007: Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. The PEIS is considering the effects of the proposed decision to identify lands for application for commercial leasing, and no rights in federal lands are included in the proposed actions. The BLM did consider impacts on recreation use in the Land Use and Socioeconomic sections of Chapter 6 and found that, other than possible socioeconomic impacts on property values, there were no significant impacts associated with the proposed decision.

The issue of the adequacy of local recreation facilities is a highly specific issue and is beyond the scope of the PEIS considering land allocation decisions. This is an issue that may be addressed in subsequent NEPA analysis considering an application(s) for commercial leasing depending upon the situation in the particular area that would be affected.

Thank you for your comment, Thomas Corcoran.

The comment tracking number that has been assigned to your comment is OSTSD52771.

Comment Date: March 19, 2008 16:41:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD52771

First Name: Thomas
Middle Initial: J
Last Name: Corcoran
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Privacy Preference: Don't withhold name or address from public record
Attachment: Center for Unconventional Fuels Comments PART 1 of 2.pdf

Comment Submitted:

See Attachment.

PART 1 of 2

THE CENTER FOR UNCONVENTIONAL FUELS

March 18, 2008

Comments on:

BLM'S OIL SHALE and TAR SANDS PROGRAMMATIC EIS

PLEASE NOTE:

Included in this submission are supporting materials cited by the CENTER FOR UNCONVENTIONAL FUELS COMMENTS. The comments, themselves, were originally submitted by mail on March 14, 2008 without the supplementary materials added here.

The following documents are included in this submission:

1. CENTER FOR UNCONVENTIONAL FUELS COMMENTS ON: BLM'S OIL SHALE and TAR SANDS PROGRAMMATIC EIS
   Part 1 of 2

2. Task Force on Strategic Unconventional Fuels, *America's Strategic Unconventional Fuels, Volume I: Preparation Strategy, Plan and Recommendations* (September 2007).
   Referenced at Footnote 1.
   Part 1 of 2

3. Task Force on Strategic Unconventional Fuels, *Development of America's Strategic Unconventional Fuels Resources: Initial Report to the President and the Congress of the United States* (September 2006).
   Referenced at Footnote 2.
   Part 1 of 2

4. Task Force on Strategic Unconventional Fuels, *America's Strategic Unconventional Fuels, Volume III: Resource and Technology Profiles* (September 2007).
   Referenced at Footnote 3.
   Part 2 of 2

5. *Secure Fuels from Domestic Resources: The Continuing Evolution of America's Oil Shale and Tar Sands Industries* (June 2007).
   Referenced at Footnote 3.
   Part 2 of 2

See OSTS-00085

THE CENTER FOR UNCONVENTIONAL FUELS

March 14, 2008 Comments on:

BLM'S OIL SHALE and TAR SANDS PROGRAMMATIC EIS

Introduction and Summary

The Oil Shale, Tar Sands, and Other Strategic Unconventional Fuels Act of 2005 declares the following "policy of the United States:"

> United States oil shale, tar sands, and other ***unconventional fuels are strategically important domestic resources that should be developed*** to reduce the growing dependence of the United States on politically and economically unstable sources of foreign oil imports.

Two years later, the Task Force created by Congress to study and implement this policy drew the following conclusions:

> ***The Task Force concurs that the domestic and global fuels supply situation and outlook is urgent***. Increasing global oil demand, declining reserve additions, and our increasing reliance on oil and product imports from unstable foreign sources require the Nation to take ***immediate action*** to catalyze a domestic unconventional fuels industry.

The Center for Unconventional Fuels (CUF), is an organization dedicated to the environmentally sound development of domestic unconventional fuels resources, urges the Bureau of Land Management (BLM) to remain focused on attainment of these goals in developing the Programmatic Environmental Impact Statement (PEIS) for the Oil Shale and Tar Sands Resource Management Plan. The December 2007 draft PEIS would encourage expedited development through selection of Alternative B, which would make the largest amount of resources available for development, as the preferred alternative.

TASK FORCE ON STRATEGIC UNCONVENTIONAL FUELS

America's Strategic Unconventional Fuels

Oil Shale • Tar Sands • Coal Derived Liquids
• Heavy Oil • CO_2 Enhanced Recovery and Storage

Volume I – Preparation Strategy, Plan, and Recommendations

Completed: February 2007
Published: September 2007

IN RESPONSE TO SECTION 369 OF THE ENERGY POLICY ACT OF 2005 (P.L. 109-58)

TASK FORCE ON STRATEGIC UNCONVENTIONAL FUELS

DEVELOPMENT OF AMERICA'S STRATEGIC UNCONVENTIONAL FUELS RESOURCES

INITIAL REPORT TO THE PRESIDENT AND THE CONGRESS OF THE UNITED STATES

PREPARED IN RESPONSE TO SECTION 369(h) (5)(A) OF THE ENERGY POLICY ACT OF 2005 (P.L. 109-58)

September 2006

Response for Document 52771

See Responses for Document 00085

Thank you for your comment, Laura Nelson.

The comment tracking number that has been assigned to your comment is OSTSD52772.

Comment Date: March 19, 2008 16:42:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52772

First Name: Laura
Middle Initial:
Last Name: Nelson
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Email: lnelson@ecoshale.com
Privacy Preference: Don't withhold name or address from public record
Attachment: RLR PEIS Letter.pdf

Comment Submitted:

See Attachment.

March 19, 2008

Via Overnight Delivery and Electronic Mail
(http://ostseis.anl.gov/involve/comments/index.cfm)

Bureau of Land Management
Oil Shale and Tar Sands Resources Draft
Programmatic EIS Comments, 9700 South Cass
Avenue, Argonne IL 60439

Re: *Re: BLM Oil Shale and Tar Sands Draft PEIS (72 Federal Register 245)*

Dear Sir or Madam:

Red Leaf Resources ("RLR") appreciates the opportunity to provide comment on the Bureau of Land Management's ("BLM") "Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement" ("Draft PEIS"). Our comments provided here focus on oil shale and are supportive of BLM's preferred option, "Alternative B," for oil shale development as contained in the Draft PEIS.

We recognize the importance of moving oil shale development forward to meet national energy needs and improve domestic security and view the Draft PEIS as an important step in this process. As such, we do not advocate revising Alternative B as contained in the Draft PEIS; however, we do identify considerations that we believe will clarify leasing decisions on a going forward basis. Specifically, we address in our comments the need to promote development of the full scope of all economically viable oil shale reserves. We also advocate that a commercial leasing program that allows reasonable access to locations conducive to oil shale development must be established to fully and formally support the development our national oil shale resources. 52772-001

In support of our advocacy, we provide the following: (1) An overview of demand growth and the critical need to develop domestic energy alternatives to meet domestic requirements; (2) A review of the resource potential domestically, inclusive of recommended improvements to estimates contained for potential available reserves; (3) An update on

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technological considerations an review of technological opportunities; (4) A clarification on the environmental laws governing mineral and resource development; (5) Support for the need to appropriately value socio-economic benefits from development; and (6) A reaffirmation of the requirements of the 2005 Energy Policy Act .

52772-001 (cont.)

Energy Demand

Domestic demand for petroleum products is expected to grow on average by 1% annually. [1] To meet growing demand, the United States has increasingly relied on imports of petroleum based products, including oil. Today, oil imports make up nearly one-third of US oil consumption.

Importation of oil will continue to steadily increase, unless new domestic opportunities are realized. The Energy Information Administration (EIA) has estimated that imports of crude oil will increase from about 22 million barrels currently to over 28 billion barrels by 2030.[2]

Under the direction of Section 369 of the 2005 Energy Policy Act, the Federal Strategic Unconventional Fuels Task Force produced two comprehensive reports identifying the potential for unconventional fuels in the United States.[3] Unconventional fuel sources were defined to include tar sands, oil shale, coal-to-liquids (CTL), heavy oil, and enhanced oil recovery (EOR). Three cases for developing these fuel sources were identified: a base case, measured case and accelerated case. Given demand growth, it was determined that only under the accelerated case for development could significant strides be made in meeting growing national demand for liquid fuels. Even with aggressive efficiency gains assumed, the need for liquid unconventional fuels remains a key element to meeting energy demand and reducing reliance on imported, less secure, fuel sources. This finding is succinctly articulated in the graph below:

[1] US DOE EIA, Annual Energy Outlook, 2007, Reference Case Table A.1.
[2] Ibid.
[3] Two reports were developed and are available at http://www.unconventionalfuels.org/publications.html. The first report is titled "Development of America's Strategic Unconventional Fuels Resources," September 2006. The second report is entitled "America's Strategic Unconventional Fuels," September 2007.

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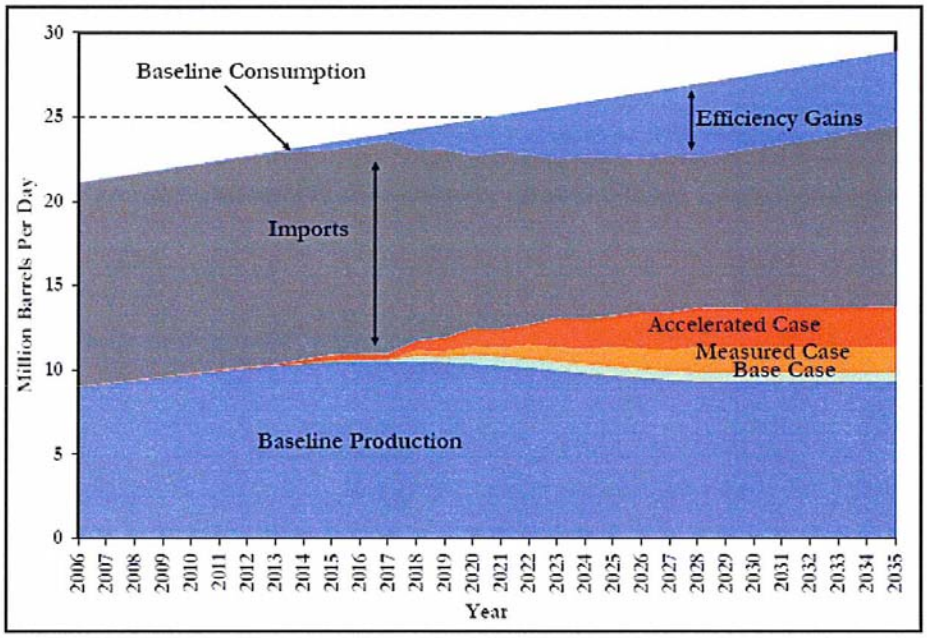
Figure III- 12. Production Potential for Oil Shale in the Base, Measured, and Accelerated Cases



*"America's Strategic Unconventional Fuels," September 2007

Oil Shale Resource

The Western United States is home to the world's largest deposits of oil shale. The Draft PEIS identifies 61 billion barrels of potential oil shale resources present in Colorado, Utah and Wyoming on the acreage identified under Alternative B. This is significantly lower than the estimate of 1.2 trillion barrels projected by The Strategic Unconventional Fuels Task Force and represented in its reports. We believe this difference is in part due to differing assessments of "economic viability."

52772-002

In the draft PEIS, BLM seems to have arbitrarily chosen a criteria for determining that the resources for Utah and Colorado to be considered geographically viable are those consistent with a 25 gallon oil equivalent per ton of shale . This criterion for Wyoming was subjectively reduced to a 15 gallon per ton consideration. The distinction was based on the fact that Wyoming resources are less rich than those in Utah and Wyoming. RLR believes that these arbitrary distinctions unduly restrict resource access and that it would be more reasonable for BLM to consider economic options for oil shale development that are consistent with established methods for determining reserve estimates for minerals.

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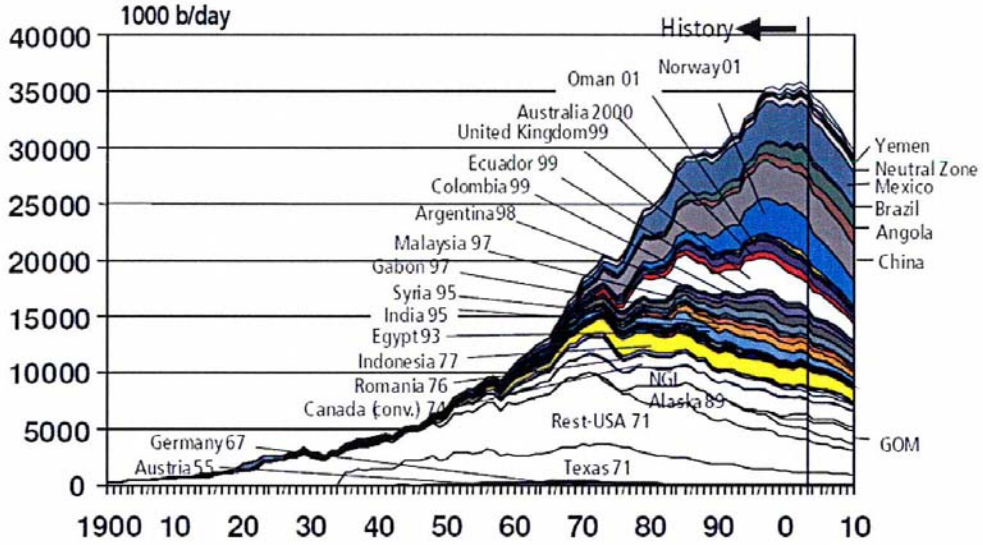
With seventy percent of the estimated 1.2 trillion barrels of reserves located on properties that are managed by the federal government, it is critical that future analysis and leasing decisions consider the full potential for development.

This is all the more critical as rates of growth for conventional world oil supplies are peaking--as indicated in the graph below.



Source: Industry database, 2003 (IHS 2003)
OGJ, 9 Feb 2004 (Jan-Nov 2003)

As noted above, we view the Draft PEIS as an important step in making these resources available for commercial development. However, it is important that BLM not arbitrarily limit availability by underestimating economically recoverable reserves.

We recognize that changing the 'geologically prospective' classification criteria at this stage of the PEIS process would delay the movement toward commercial leasing and availability of public lands and do not recommend this change. However, as the process moves forward, or if for other reasons the process is delayed, we urge BLM to consider an appropriate reserve estimation methodology so as to avoid elimination of commercially viable resources and to enhance the information on the value of the resource.

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Technologies

RLR acknowledges the difficulties in managing lands for multiple uses, but is concerned about the impact that Alternatives A and C may have upon on the nation's energy supplies. RLR is also concerned about pressure from groups opposed to oil shale development that may result in additional restrictive measures specified in Alternatives C being incorporated into the RMPs identified for revision. Eliminating lands from commercial oil shale leasing or imposing unreasonable restrictions on development will negatively impact the local economy and the production of domestic energy sources. 52772-003

Advances in technology and changing market demand allow RLR and other operators to economically recover resources that were previously unavailable. BLM must consider the nature of changing technologies and circumstances driving technological innovation. As a case in point, RLR observes that the price of oil has nearly doubled since BLM initiated the Draft PEIS process from roughly $50 a bbl to over $100/bbl. Thus, RLR further encourages that limiting evaluations and land availability in an overly prescriptive manner will prevent technologies from deploying to emancipate vast energy resources that could provide increased security and stability to domestic liquid fuel supplies. Succinctly, it is in the domain of BLM to ensure that there is sufficient flexibility in its management decisions to appropriately manage the public lands in light of ever-changing resource demands, uses, and technologies. 52772-004

Approximately 53 technologies exist today for the development of oil shale and tar sands resources to produce liquid fuels.[4] Many of these technologies do not use water and some result in significantly lower emissions than methods used historically. To continue to assert the "doom-and gloom" scenarios of extreme water use, "tailings deposits," air emissions, and wildlife impacts merely foster misinformation about current technological availability and is not consistent with anticipated due diligence that will be pursued on the part of participants in a new oil shale industry. 52772-005

Environmental Issues

A. Air Quality

BLM asserts that it cannot determine air quality impacts because the exact locations and technologies to be used in the development of oil shale resources are not known. RLR argues that exact determinations are not required.

First, BLM cannot attempt to impose air emission regulations through its normal management responsibilities. State Departments of Environmental Quality (DEQ) and/or EPA have jurisdiction over such matters. Rather than attempting to regulate air quality or air emissions, the BLM should defer to the expertise of the proper regulatory authority to state DEQ's and/or EPA and should presume that air quality will meet the applicable standards. 52772-006

[4] US DOE Office of Petroleum Reserves, "Secure Fuels from Domestic Resources," June 2007.

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Moreover, air quality regulations exist such that the appropriate authority(ies) can and will take required action(s) to ensure that its air quality standards are met. From a NEPA perspective, the BLM should simply inform the public that EPA and/or state environmental/air quality authorities will monitor and enforce air quality standards in the respective states where development takes place.

Emissions are extraordinarily complex and depend upon a number of factors including the technology employed, engineering practices, and the particular characteristics of the development area. However, each operator in this new industry will be required to reduce and manage emissions to meet specific standards through engineering and site-specific practices. By not giving credit to existing regulations and to not anticipate due diligence on the part of industry actors interferes with the ability to appropriately develop mineral leasing options for oil shale development. RLR asserts that the appropriate regulatory authority lies with state environmental quality offices and/or EPA. To the extent that gaps exist in current air quality regulations, it is in the domain of these entities to correct these voids because BLM does not have authority over air quality. 52772-006 (cont.)

BLM could provide clarity around this issue by affirming that BLM's only management goal and subsequent actions taken will be directed toward ensuring authorities responsible for air quality regulations will be invited to participate in any future NEPA review designed to determine development parameters for oil shale. Moreover, and without exception to the previous statements herein, RLR notes that various control strategies can be employed to eliminate or reduce oil shale related emissions and that technologies exist or are under development to do so.

B. Mitigation

Common to all alternatives in the Draft PEIS is the assertion of wildlife and species impacts associated with oil shale development. BLM concludes that various impacts will be realized dependent on technologies and locations employed. RLR concurs that local impacts from development can occur and recognizes the need to manage such impacts. However, this is also a case where industry participants are not likely to operate with excursion.

BLM notes throughout the Draft PEIS the respective management practices common to all development scenarios. While it may not be possible for BLM to know the full extent to which operations might impact wildlife and its habitat, it is possible to determine that numerous management actions exist to mitigate such impacts, including regulations for mitigation and reclamation activities. RLR recommends that it is not reasonable to limit oil shale development based on unknown impacts when BLM in its Draft PEIS notices a multitude of existing management practices to offset or minimize such impacts and that such management action can be applied to development of oil shale resources as appropriate to the time, location, and technology considerations present. 52772-007

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Socio-Economic Considerations

RLR finds the socioeconomic analysis presented in the Draft PEIS flawed because the BLM fails to quantify the economic impacts of expanded oil shale development on the creation of jobs and increased revenue streams to states and counties where resources are located.

Table 4.1.1-7 indicates a projection of 388 lost jobs in Utah in the recreation sector if there is a 10% impact on recreational employment. It further suggests a loss of 776 jobs if recreational employment drops by 20%. RLR finds this information misleading. First, the average income based on the data provided in the recreational sector is between $8,100-8,200annually. Conversely, employment in the oil and gas sector in producing counties in Utah is approximately $65,000 annually.[5] Since the oil shale sector will provide employment analogous to oil and gas, it can be expected that average income potential will be commensurate with averages for the oil and gas industry. Further, unlike oil and gas which is inherently cyclical due to the lifecycle of producing wells, an oil shale operation, which is more akin to a manufacturing plant, will offer steady employment for decades. 52772-008

Commercial Leasing

RLR strongly recommends that BLM stay focused on the Requirements of Section 369 of the Energy Policy Act of 2005.

The Energy Policy Act of 2005 ("the Act"), Public Law 109-58 (H.R. 6), was enacted by Congress on August 8, 2005. The Act includes Section 369 which is referred to as the "Oil Shale, Tar Sands, and Other Strategic Unconventional Fuels Act of 2005" (Sec. 369(a) (1)). Section 369 not only declares the policy of the United States with regard to oil shale, but also imposes a number of obligations on the U.S. Department of the Interior (i.e. BLM) for the leasing of oil shale and tar sands deposits in Colorado, Utah, and Wyoming. As for policy, Section 369 (b)(1) provides, in part: "oil shale…fuels are strategically important domestic resources that should be developed to reduce the growing dependence of the United States on politically and economically unstable sources of foreign oil imports."

In the Notice of Availability published in the *Federal Register* on December 21, 2007, the BLM makes the following statement: "This Draft Oil Shale and Tar Sands Resources PEIS is being prepared to meet the requirements established by Congress in Section 369 of the Energy Policy Act of 2005…." (72 FR 72751). A similar statement is made by BLM on its web page for the Oil Shale & Tar Sands Programmatic EIS ("In accordance with Section 369(d)(1) of the Energy Policy Act of 2005…, the BLM is preparing the PEIS").

[5] "The Structure and Economic Impact of Utah's Oil and Gas Exploration and Production Industry--Phase I: The Uinta Basin," Bureau of Economic and Business Research, University of Utah, November 2007.

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However, RLR is concerned that the timing and focus of the PEIS fail to meet the explicit requirements of Section 369. Accordingly, we highlight here the obligations of the BLM under Section 369:

A. Timing of Section 369.

Section 369(c) provides in pertinent part that, "not later than 180 days after the enactment of [the Act]…[the BLM] *shall* make available for leasing such land as the [BLM] considers necessary to conduct research and development activities…for the recovery of liquid fuels from oil shale…on public lands" (emphasis added). Thus, the statutory deadline for making research and development lands available for leasing was in **February 2006.**

Section 369(d)(1) provides in pertinent part that, "Not later than 18 months after the date of enactment of [the Act]…the [BLM] *shall* complete a programmatic environmental impact statement for a *commercial leasing program* for oil shale…on public lands…within…Colorado, Utah, and Wyoming" (emphasis added). Thus, the statutory deadline for completing the required PEIS for a commercial oil shale leasing program was in **February 2007.**

Section 369(d)(2) provides in pertinent part that, "Not later than 6 months after the completion of the programmatic environmental impact statement under this subsection, the [BLM] *shall* publish a *final* regulation *establishing such* [*commercial leasing*] *program"* (emphasis added). Thus, the statutory deadline for publishing final commercial oil shale leasing regulations was in **August 2007.** 52772-009

Section 369(e) provides in pertinent part that, "Not later than 180 days after publication of the final regulation required by [Section 369(d)], the [BLM] *shall* consult with the Governors of States with significant oil shale…resources on public lands…to determine the level of support…in the development of …oil shale resources. If the [BLM] finds sufficient support and interest exists in *a State,* the [BLM] may conduct a *lease sale in that State*…." (emphasis added). Thus, the statutory deadline for conducting an actual lease sale in interested States was in **February 2008.**

The BLM published in the *Federal Register* on December 13, 2005 a "Notice of Intent" to prepare the PEIS for "Oil Shale and Tar Sands Resources Leasing on Lands Administered by the BLM in Colorado, Utah, and Wyoming" (70 FR 73791). However, it was not until December 21, 2007 (two years later) that the BLM published in the *Federal Register* the "Notice of Availability" of the draft PEIS for public comment (72 FR 72751). Under the plain language of the Act, however, the BLM should have had the PEIS *completed* by February 2007 and should have commenced actual *leasing* of public lands containing oil shale by February 2008. The BLM has not met these mandatory deadlines.

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B. Focus of Section 369.

In addition to establishing an aggressive schedule in the Act for actual commercial leasing of oil shale resources, Congress also provided requirements for the BLM to follow in drafting and preparing the PEIS. For example, in Section 369(d)(1), the Act provides that the BLM was to "complete a programmatic environmental impact statement *for a commercial leasing program for oil shale* and tar sands resources on public lands…." Similarly, in Section 369 (d)(2), the Act requires the BLM to "publish a final regulation establishing *such [commercial leasing] program.*"

In the BLM's 2005 Notice of Intent ("NOI") on the PEIS, the agency stated, in accordance with the unambiguous requirements of the Act, that it intended to prepare a PEIS for "Oil Shale and Tar Sands Resources *Leasing*…." (70 FR 73791). In the same notice the BLM also stated, again in accordance with the clear requirements of the Act, that the PEIS would "inform the development of the *regulations* required by section 369(d)(2)" of the Act (70 FR 73791). However, two years later in the Notice of Availability, the BLM dramatically changed the substance of the PEIS from leasing to "evaluat[ing] the amendment of 12 resource management plans to designate public lands…managed by the …BLM for *application* for commercial leasing…." Further, the BLM stated that "[s]ince the NOI was published…input from cooperating agencies has led BLM to conclude that critical information…is not available at this time" (72 FR 72751-52). Finally, the BLM indicated it has now "limited the purpose and need for the PEIS" to more of an evaluation of the oil shale and tar sands resources "present on public lands" (72 FR 72752). This indicates a critical (and improper) substantive change from what Congress expressly directed the BLM to do. 52772-010

Conclusion:

RLR believes that the current energy situation is urgent and must be addressed in a manner that allows for the sustainable development of our domestic unconventional fuel resources. Technologies, regulations, and legislation exist to ensure that sustainable oil shale development can take place. **We strongly recommend that BLM adopt the preferred Alternative B without further delay and simultaneously pursue a commercial leasing program**. This is both compliant with the requirements of EPAct 05 Section 369 and meets the critical need for the United States to move forward in the development of strategic unconventional fuels for purposes of greater energy security.

Sincerely,

Laura Nelson, PhD
VP, Energy and Environmental Development

6985 Union Park Center, Suite 375 / Cottonwood Heights, UT 84047 / Office 801 878 8100 Fax 801 878 8101 / www.ecoshale.com

Responses for Document 52772

52772-001: The BLM acknowledges the commentor's preference for Alternative B.

52772-002: The numbers cited in the PEIS alternatives for potential recoverable reserves were created for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The numbers were developed using the values that described the minimum quality and thickness that was deemed to be economic. Those values are a minimum 25 ft thickness and a minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming the values used were 15 ft thick and 15 gallons per ton. These values coupled with the acreage in each of the alternatives created the numbers in question. It is true that using more exact isopachs and quality data if available would have provided much higher values for each of the alternatives, but the alternatives would remain comparable.

52772-003: The BLM acknowledges the commentor's preference for Alternative B.

52772-004: The BLM is proposing a three-phased or staged approach to oil shale and tar sands development that includes NEPA analysis at the allocation, leasing, and plan of development stages. This approach would provide the flexibility to consider the effects of advances in extraction technologies and to understand their impacts on economic, social, and environmental conditions.

52772-005: Thank you for your comments. The BLM believes that the technologies being investigated in each of the six ongoing RD&D projects have the greatest likelihood of being the technologies used for future commercial-scale oil shale development. However, the BLM holds this belief without prejudice, and anyone is free to apply for future leases for oil shale development using alternative technologies to the ones evaluated in this PEIS.

52772-006: The BLM recognizes the authority and responsibility of local, state, and Tribal air quality regulatory agencies to implement the federal Clean Air Act, with EPA oversight. The BLM also recognizes these agencies' ability to establish air quality requirements which are more stringent than the federal standards. All BLM actions (either direct or by use authorization) must comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, and implementation plans. However, the FLPMA directs that "the public lands be managed in a manner that will protect the quality of … air and atmospheric … values" and that " in managing the public lands the Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." Therefore, the BLM has the legal authority to limit potential air quality impacts from activities it conducts or approves, subject to its management discretion.

As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically

prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans.

52772-007: Additional site-specific NEPA analysis will be completed on any future lease application before any leases would be issued. If, as part of this pre-leasing NEPA analysis, the BLM determines that leasing and subsequent development of the oil shale or tar sands resources would cause significant impacts, the BLM can require the applicant to: (1) mitigate the impact so that it is no longer significant; (2) move the proposed lease location, or, if neither of these options resolves the anticipated conflicts (3) the BLM can decide that development of the oil shale or tar sands resources outweighs protection of the on-site resources and approve the application. This pre-leasing NEPA analysis would include opportunities for public involvement and comment that are part of the PEIS process and every other planning and NEPA process the BLM undertakes.

52772-008: As discussed in Section 4.11.1.5, recreational resources in each ROI may have a value that is potentially much larger than what is suggested by existing visitation and the consequent impact of visitation expenditures on the economy of each ROI. These resources may have nonmarket value, where it is possible that many individuals are willing to pay more to continue to use recreational resources in each ROI than the cost of using them, and some individuals may place a value on the preservation of recreational resources for their own future use or the use of future generations.

As there are clearly additional valuation issues in the assessment of impacts of oil shale and tar sands development on recreation, simply comparing incomes produced by oil shale and tar sands development with income associated with recreational activities on land that may potentially be lost as a result of oil shale and tar sands development does not take these additional considerations into account.

52772-009: It is true that BLM has not met the Congressionally mandated time frames for the PEIS in the Energy Policy Act (EPA) of 2005. The language in the EPA directed the Secretary of the Interior to "complete a programmatic environmental impact statement for a commercial leasing program for oil shale and tar sands resources on public lands….

It is important to recognize that there is no existing program for leasing federal oil shale resources. Unlike the cases for oil and gas or other mineral development, most of the baseline data necessary to progress with the NEPA analysis had to be put together, using various sources, from within the BLM and external to the BLM. A good portion of time was spent upfront, collecting and/or developing all the data necessary to move the project forward. For example, Fischer Assay had to be collected and then analyzed to determine the quality and thickness of the Green River Formation in Utah and Wyoming. This was necessary in order to determine the geologically prospective lands in these states. GIS data had to be collected and, in many cases, digitized for all three states and then manipulated to produce the essential maps. While data from previous national oil shale efforts are plentiful, much of the data needed to be updated or were not useful in light of the new proposed technologies.

As you indicated in your comment, the BLM published in the *Federal Register* on December 13, 2005, a "Notice of Intent" to prepare the PEIS for "Oil Shale and Tar Sands Resources Leasing on Lands Administered by the BLM in Colorado, Utah, and Wyoming" (70 FR 73791). In August of 2007, after review and discussion of an internal preliminary Draft PEIS by our 14 cooperating agencies and internal BLM staff, the document was modified. The BLM is no longer using the PEIS as the document that would complete the NEPA requirements for leasing. Given that the development technologies for in-situ production of oil shale are just emerging, there is a lack of information regarding resource use and subsequent impacts. Consequently, the BLM changed this document to a resource

allocation document that identifies the BLM-managed lands for which applications to lease oil shale and tar sands resources would be accepted in the future. The BLM had to go back and revise the document, and this took additional time.

Working cooperatively with 14 other federal, state, and local governments, while extremely worthwhile, also takes time. While the BLM recognizes this unusually specific timetable, we also remain committed to working closely with the states and local governments to achieve a proper balance in land use allocation and environmental protection. The states of Utah, Colorado, and Wyoming, along with a number of local governments, have been working with us from the beginning as cooperating agencies to draft the PEIS. We look forward to continuing this relationship as we plan for responsible oil shale development and to obtain further input from the public as well.

52772-010: Please see the response to Comment 52772-009 for some information relevant to this comment.

In addition, when complying with Congress's directives, the BLM is still subject to all existing laws and regulations unless specifically exempted by the Congress. The changes in the scope of the PEIS are a result of compliance with the requirements of NEPA and FLPMA. However, the allocation decisions in the PEIS would be the first step in establishing a long-term leasing program, as identified in the response to Comment 52772-009.

Thank you for your comment, Crawford MacCallum.

The comment tracking number that has been assigned to your comment is OSTSD52774.

Comment Date: March 19, 2008 16:53:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD52774

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Attachment:

Comment Submitted:

I strongly oppose the "Preferred Alternative" B and support the "No Action" alternative A. | 52774-001

Response for Document 52774

52774-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Cinda Houston.

The comment tracking number that has been assigned to your comment is OSTSD52775.

Comment Date: March 19, 2008 17:05:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52775

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Address 3:
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State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am an admirer of Nine Mile Canyon and have spent enough time in the canyon to witness the current excessive commercial traffic. On two occasions I have been camping in the canyon to be awakened at an early hour when the first large truck traveled through. In my view this canyon is a National Archaeological Treasure but is not being treated as such. It appears to be being exploited rather than protected. I have concerns that the negative effect the additional traffic from additional drilling will have on the rock art condition as well as the future and current visitor experience. If you extrapolate the increased traffic for the additional wells being considered this will increase the traffic to over a thousand vehicles per day. We need more protection of the cultural resources in Nine Mile Canyon. In my view there should be a full time archaeologist at a minimum to monitor and help protect the rock art. This rock art is a non-renewable treasure. 52775-001

My other concern is the negative effect that the added traffic will have on the environment in general and therefore the ecosystem that exists. We cannot change whatever negative effect has already occurred, but please do not approve more wells that are sure to further damage the archaeological treasures that exist, either directly, or indirectly through the dust and chemical exposure. Let's not be a bad example for our future generations. 52775-002 52775-003

Responses for Document 52775

52775-001: The BLM integrates the protection of resource values such as cultural resources with its responsibilities for land use planning and resource management under FLPMA to ensure that the effects of any activity or undertaking are taken into account. In addition, the National Programmatic Agreement, which regulates BLM's compliance with the National Historic Preservation Act, serves as the procedural basis for BLM managers to meet their responsibilities under Section 106 and 110.

Until 1980, Section 106 of the NHPA required agencies to consider the effects of their undertakings only on properties listed on the National Register of Historic Places. However, in 1980, Section 106 was amended to require agencies to consider an undertaking's effects on properties included in or eligible for inclusion in the National Register. Since that time, the BLM, through its land use planning process, outlines specific management prescriptions and mitigation measures to protect sites both listed and eligible for the National Register. Any potential surface-disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation. The decisions analyzed in the PEIS include no commitment by BLM to offer for leases public lands without additional NEPA analysis. This additional analysis will take into consideration the effects of increased traffic as a consequence of oil shale development.

52775-002: On the basis of input from the cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. The PEIS analyzes the environmental consequence of land use allocation decisions that do not commit any resources or grant any lease rights. In addition, prior to any commercial leasing and development, additional NEPA analysis will be required.

In general, the effects of increased traffic as a result of future leasing and projected development are discussed within the individual resource areas in Chapters 4 and 5. Transportation effects also have been added to the discussion in the socioeconomic section.

52775-003: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Thomas Corcoran.

The comment tracking number that has been assigned to your comment is OSTSD52777.

Comment Date: March 19, 2008 17:12:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD52777

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Attachment: Center for Unconventional Fuels Comment PART 2 of 3.pdf

Comment Submitted:

See Attachment.

PART 2 of 3

THE CENTER FOR UNCONVENTIONAL FUELS

March 18, 2008

Comments on:

BLM'S OIL SHALE and TAR SANDS PROGRAMMATIC EIS

PLEASE NOTE:

Included in this submission are supporting materials cited by the CENTER FOR UNCONVENTIONAL FUELS COMMENTS. The comments, themselves, were originally submitted by mail on March 14, 2008 without the supplementary materials added here.

The following documents are included in this submission:

1. CENTER FOR UNCONVENTIONAL FUELS COMMENTS ON: BLM'S OIL SHALE and TAR SANDS PROGRAMMATIC EIS

2. Task Force on Strategic Unconventional Fuels, *America's Strategic Unconventional Fuels, Volume I: Preparation Strategy, Plan and Recommendations* (September 2007). Referenced at Footnote 1.

3. Task Force on Strategic Unconventional Fuels, *Development of America's Strategic Unconventional Fuels Resources: Initial Report to the President and the Congress of the United States* (September 2006). Referenced at Footnote 2.

4. Task Force on Strategic Unconventional Fuels, *America's Strategic Unconventional Fuels, Volume III: Resource and Technology Profiles* (September 2007). Referenced at Footnote 3.

5. *Secure Fuels from Domestic Resources: The Continuing Evolution of America's Oil Shale and Tar Sands Industries* (June 2007). Referenced at Footnote 3.

TASK FORCE ON STRATEGIC UNCONVENTIONAL FUELS

America's Strategic Unconventional Fuels

Oil Shale • Tar Sands • Coal Derived Liquids • Heavy Oil • CO_2 Enhanced Recovery and Storage

Volume III – Resource and Technology Profiles

Completed: February 2007
Published: September 2007

IN RESPONSE TO SECTION 369 OF THE ENERGY POLICY ACT OF 2005 (P.L. 109-58)

Response for Document 52777

See Responses for Document 00085

Thank you for your comment, Thomas Corcoran.

The comment tracking number that has been assigned to your comment is OSTSD52778.

Comment Date: March 19, 2008 17:14:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52778

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Attachment: Center for Unconventional Fuels Comment PART 3 of 3.pdf

Comment Submitted:

See Attachment.

PART 3 of 3

THE CENTER FOR UNCONVENTIONAL FUELS

March 18, 2008

Comments on:

BLM'S OIL SHALE and TAR SANDS PROGRAMMATIC EIS

PLEASE NOTE:

Included in this submission are supporting materials cited by the CENTER FOR UNCONVENTIONAL FUELS COMMENTS. The comments, themselves, were originally submitted by mail on March 14, 2008 without the supplementary materials added here.

The following documents are included in this submission:

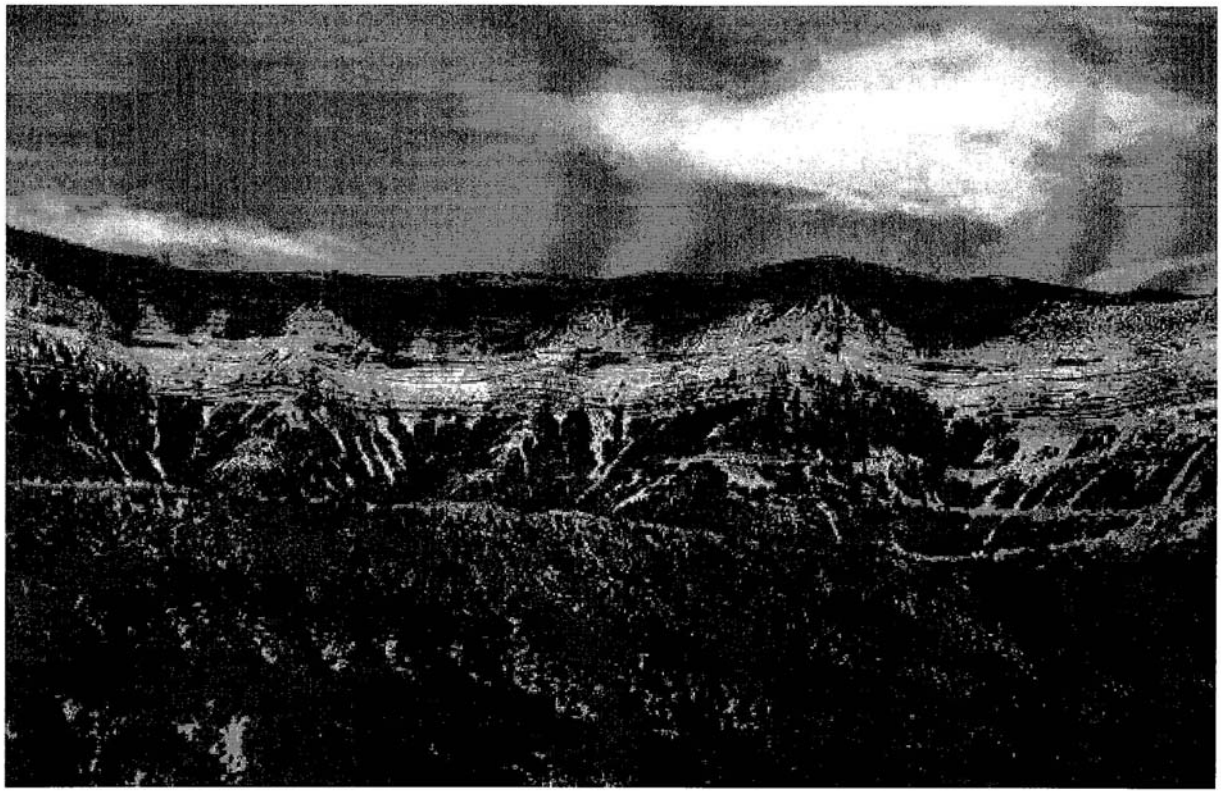
1. CENTER FOR UNCONVENTIONAL FUELS COMMENTS ON: BLM'S OIL SHALE and TAR SANDS PROGRAMMATIC EIS

2. Task Force on Strategic Unconventional Fuels, *America's Strategic Unconventional Fuels, Volume I: Preparation Strategy, Plan and Recommendations* (September 2007). Referenced at Footnote 1.

3. Task Force on Strategic Unconventional Fuels, *Development of America's Strategic Unconventional Fuels Resources: Initial Report to the President and the Congress of the United States* (September 2006). Referenced at Footnote 2.

4. Task Force on Strategic Unconventional Fuels, *America's Strategic Unconventional Fuels, Volume III: Resource and Technology Profiles* (September 2007). Referenced at Footnote 3.

5. *Secure Fuels from Domestic Resources: The Continuing Evolution of America's Oil Shale and Tar Sands Industries* (June 2007). Referenced at Footnote 3.



Secure Fuels from Domestic Resources

The Continuing Evolution of America's Oil Shale and Tar Sands Industries

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Profiles of Companies Engaged in Domestic Oil Shale and Tar Sands Resource and Technology Development

U.S. Department of Energy
Office of Petroleum Reserves
Office of Naval Petroleum and Oil Shale Reserves
June 2007

Response for Document 52778

See Responses for Document 00085

Thank you for your comment, john Woodling.

The comment tracking number that has been assigned to your comment is OSTSD52779.

Comment Date: March 19, 2008 17:27:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD52779

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Comment Submitted:

See Attachment.

Comments Regarding the Oil Shale and Tar Sand Programmatic Environmental Impact Statement

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March 19, 2008

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Executive Summary

The draft PEIS was written in a general and vague manner. Almost no specifics were included. The description of aquatic resources (fish) was so vague that little information about species distribution is available. As a result, a description of specific potential impacts was not included and cannot be developed based on information in the draft PEIS. Aquatic resources will be adversely impacted by oil shale in a variety of ways.

Specific mitigation actions cannot be described based on the draft PEIS. The entire draft PEIS states the obvious with insufficient information upon which to make a decision. The draft PEIS has multiple inadequacies that need to be addressed. As written BLM's analysis of aquatic resources lacks sufficient, accurate and reliable information and does not support selection of the Preferred Alternative.

52779-001

1 The PEIS does not adequately describe ambient aquatic resources in the oil shale areas of Colorado. The draft PEIS omitted fish distribution data that demonstrates the presence of BLM species of concern and Colorado species of concern in the White River and Piceance Creek. These fish species are the flannelmouth sucker and the mountain sucker. The presence of these species of concern in Piceance Creek would have to be included in the PEIS before any decisions proposed in the PEIS could be finalized. As written BLM's analysis of aquatic resources lacks sufficient, accurate and reliable information and does not support the Preferred Alternative.

52779-002

2 The PEIS does not adequately describe ambient aquatic resources in rivers downstream of oil shale areas in Colorado. The draft PEIS omitted fish distribution data that demonstrates the presence of federally and state listed fish species, BLM species of concern and Colorado species of concern in the White River, Colorado River and Yampa River. These fish species include the four federally listed species, three species of concern to the BLM and one Colorado species of concern. These stream reaches will be impacted by changes in water quantity and water quality and Section 7 consultations will result. The presence and distribution of these species would have to be included in the PEIS before any decisions proposed in the PEIS could be finalized. As written, BLM's analysis of aquatic resources lacks sufficient, accurate and reliable information and does not support the Preferred Alternative.

52779-003

3 The draft PEIS did not adequately describe the influence non-oil shale human activities will have on acquisition of water needed to mine and produce oil from the shale. The draft PEIS indicates that unallocated water is available for consumptive use in the production of oil shale. Actual existence of available water in Colorado is not a certainty. Existing water regimes in the White River, Colorado River and Yampa River are based on agreements with various governmental agencies and water users to protect federally listed fish such as the Colorado pikeminnow. Additional water depletions will result in section 7 consultations with the US Fish and Wildlife Service.

52779-004

4 The draft PEIS does not consider appropriate monitoring that could be used to develop mitigation measures to lessen impacts to water quality associated with oil shale development. The draft PEIS indicated that water discharged from oil shale sites would have "lower quality" than receiving waters. An intensive water quality monitoring program needs to be a part of the PEIS to accurately describe ambient conditions in areas where oil shale development is likely. The draft PEIS indicated that specific locations for oil shale are not known. However, the Piceance Creek is mentioned throughout the document as a likely location for oil shale development. A water quality sampling program of Yellow Creek, Piceance Creek and the White River upstream and downstream of Yellow Creek and Piceance Creek is needed. These data could be used during actual oil shale development. 52779-005

5 The draft PEIS does not consider rather simple mitigation measures that could be applied to all oil shale development projects that could reduce the amount of potential water contamination. The PEIS could suggest that oil shale companies avoid construction and land disturbance within 300 feet of perennial streams. The roots of riparian vegetation protect against bank erosion and the stems and leaves entrap sediments moving towards the stream as part of overland surface storm flows. This set back would result in lower erosion rates and reduce direct flow of sediment from construction areas to streams and rivers. 52779-006

6 The draft PEIS appears to include an unsupported assumption and conclusion that native fishes in river reaches downstream of land that may be developed for oil shale are "adapted" to high sediment loads. An additional assumption appears to be included that these fishes are "adapted" to further increases in sediments. The term adapted must be used with caution. Adaptation assumes genetic change. In this case the writers of the draft PEIS seem to be indicating that these species have the genetic content to survive and breed in environmental conditions that may occur. The four federally listed species and the BLM species of concern have indeed survived for eons in streams that drain a highly erodable geology. Sediments during high flow conditions are indeed high. However, the water in other time periods is crystal clear. Any conclusion that these populations are "adapted" to further increases in sediment loadings is not warranted. The authors in this case did not appear to adhere to NEPA regulation 40 C.F.R. 1502.24, which requires making explicit reference to scientific and other sources relied on to reach this conclusion. 52779-007

7 The entities involved in the preparation of the draft PEIS did not appear to include possible cumulative water quality impacts of oil shale development on aquatic resources. Water depletions may well lead to increases in total dissolved salt loads, increased temperatures and selenium levels. Variation in any single parameter may not result in the decrease in the distribution and abundance of fish and mussel species. For example increasing temperatures could result in downstream migration of the Colorado pikeminnow (as described above) and at the same time increasing sediment loads in the lower portions of critical habitat (as described above) would further deplete food resources for the Colorado pikeminnow. The combination of these impacts would further reduce the population numbers of federally listed fish far downstream of the stream 52779-008

segments currently described in the draft PEIS. The combination of factors may have far reaching impacts. Salt and selenium are conservative contaminants that will not settle from solution. Cumulative impacts could extend far downstream. 52779-008 (cont.)

8 The entities involved in the preparation of the draft PEIS did not appear to include possible cumulative impacts of oil shale development on aquatic resources in combination with other development actions. Gas development has spread throughout the Piceance basin. Tens of thousands of gas wells are planned. No mention of the gas industry growth is made concerning aquatic resources in the Piceance Creek basin. Possible cumulative impacts include infrastructure such as roads, connection between wells and underground mining that influence ground water and springs, human related activities such as housing developments and waste water treatment plants and others. Oil shale development will not take place in a vacuum. The draft PEIS needs to include a discussion of the cumulative impacts to aquatic resources from gas and oil shale production to validate any change proposed by the final PEIS. As written BLM's analysis of aquatic resources lacks sufficient, accurate and reliable information and does not support the Preferred Alternative. 52779-009

9 The draft PEIS did not consider the impact to aquatic resources that may result from increased human population and increased nutrient loadings to streams associated with additional effluent flows from domestic wastewater treatment plants. Eutrophication is a process that impacts all streams and rivers. Some nutrient increase may well increase productivity. Too much increase results in lowered diversity and localized species extirpation. A general loss of mussel populations across North America has resulted from stream eutrophication. 52779-010

10 The draft PEIS ignores many regulations and agreements that will influence oil shale development. The draft PEIS did not contain mention of a seven state agreement limiting salt loadings to the Colorado River by upstream states. Oil shale will result in higher instream salt loadings. These loadings will impact other entities. This information and discussion is needed in the PEIS. The draft PEIS does not consider other water quality standards that will likely be impacted by oil shale such as the selenium standard and temperature standards. The current listing of the mainstem Colorado River on the Colorado Water Quality Control Commission 303d list of impaired waters for selenium is not presented in the draft PEIS. The flow regimes needed to protect federally listed species probably limit the amount of "new" stream flow depletions that are available for oil shale production. Other entities release water to flow through critical habitat to support federally and state listed fish species. These releases do not represent water that can be used by oil shale. Water for oil shale can be obtained by retiring land from agricultural production and using pre-existing consumptive water rights. The draft PEIS would be better served to acknowledge this reality and not indicate that up to 340,000 acre feet of additional water is available in Colorado for oil shale production. 52779-011

11 The draft PEIS presents one assertion concerning NPDES permits that may be in error. Section 4.5.1.3 (page 4-34, first three lines on the page) includes the statement that 52779-012

> "Since discharge of surface runoff at a mining site is exempted from NPDES permits surface runoff not intercepted at these sites could create a nonpoint source of contaminants and degrade the water quality of downgradient surface water bodies."

The authors of the draft assumed a 30-year old exemption from the NPDES system applies to the oil shale industry. This assumption was not corroborated by Colorado Water Quality Control Division personnel. Evidently, the Colorado Attorney General may be the office that makes the actual interpretation of the exemption claim. The exemption is not appropriate for two reasons. First this exemption was created for oil and gas development where the short-term disturbance associated with drilling a well was coupled with a small amount of land disturbance such as a drill pad. Underground oil shale mines and surface retorts will exist for many years and disturb large areas of land, similar to the disturbance from coal mines which are not exempted from the NDPES process. Underground and surface oil shale developments should be treated the same way as the coal industry. In addition oil shale is not oil but an organic marlstone (Cook et al. 2007). By definition the exemption cannot be applied to "oil" shale development. If the exemption applied to marlstone the exemption would have been specifically worded to include marlstone. Erroneous use of language is not justification for an inappropriate exemption from the NPDES program. BLM's assertion regarding the NPDES exemption lacks accurate, reliable information and does not support the Preferred Alternative.

52779-012 (cont.)

12 The assertion regarding the NPDES exemption ignored another water quality issue. The draft PEIS indicated that "discharged water" from oil shale activities would lower water quality (Section 4.5.1.3) in receiving streams. The draft NPES ignored probable results of "lowered water quality." Continued addition of pollutants will eventually result in stream standard violations. The Colorado Water Quality Control Commission places such streams on the 303d list and a reclamation plan is required. The oil shale industry would then be required to participate in restoration activities that would have been avoidable through inclusion in the NPDES program.

52779-013

Overall the draft PEIS does not accurately describe the aquatic resources found in waters that would be impacted by oil shale development and does not address regulations and processes that protect these resources. As written BLM's analysis of aquatic resources lacks sufficient, accurate and reliable information and does not support the Preferred Alternative.

52779-001 (cont.)

General comments

PEIS content describing aquatic resources.

The Programmatic Environmental Impact Statement (PEIS) for oil shale development was written in very general terms. Little detail was included for any topic, including aquatic resources that may be negatively impacted by oil shale development. The stated objective of the PEIS was to provide adequate information for the US Bureau of Land Management to change 12 land use plans and to support the continuation of 6 existing test oil shale projects. BLM's analysis of aquatic resources lacks sufficient, accurate and reliable information and does not support selection of the Preferred Alternative.

The PEIS indicated numerous times that exact information regarding location of future oil shale mines in Colorado was unknown as was the extent of these mines. The same comments were made as to exact electrical and water needs since location of potential mines was unknown. Section 6.1.2.7.1 (page 6-67 last paragraph contains the observation that industry has not indicated when production "might begin." Such content makes interpretation of even this general document difficult.

Some outcomes for oil shale seem to be more probable than others. The Piceance Creek basin drains an area mentioned multiple times in the REIS as a probable source of oil shale development (Section 6.1.2.7.1 page 6-67 last paragraph). More specific information concerning the Piceance basin could have been included in the PEIS. Many coal plants have been built in the Yampa River basin north of the White River and Piceance Creek. A power plant to supply the needs of oil shale development would likely be constructed in the Yampa River Valley near the town of Craig, Colorado. Previous oil shale development projects were planned along ridge tops and valley north and west of Rifle, Colorado. The PEIS should have adequately described the aquatic resources of the Piceance basin, the mainstem White River downstream of the confluence with Piceance Creek and the Yampa River downstream of Craig, Colorado. Specific information pertaining to federally listed fish species in the mainstem Colorado River downstream of Rifle, Colorado should likewise have been included to and through critical habitat in Utah. In addition, specific information pertaining to federally listed fish in the Green River in Utah needs to be included as the potadrmous populations of the Colorado pikeminnow *Ptychocheilus lucius* found in the Yampa and Green Rivers in Colorado migrate to the Green River each year to spawn.

52779-014

Specific comments pertaining to Aquatic resources

The PEIS devotes three pages (4-61 through 4-63) to fish species (Section 4.8, common impacts to Aquatic Resources). Three main categories of impacts are listed, (1) direct disturbance of habitats, (2) sedimentation of habitat and (3) change in water quantity and water quality. Further explanations in those pages briefly outline how new aquatic habitats may form due to oil shale development, how increased sedimentation may

52779-015

adversely affect the survival of fish, how erosion may increase sedimentation, how contaminants could enter water from leachate from spent shale, and other sources and how toxic materials could enter the stream from accidental spills. No details are provided and only one paragraph of information was presented for each topic listed in the preceding sentence.

52779-015 (cont.)

Aquatic resources are an important component of the natural resources in the oil shale basins. This portion of Colorado has an arid temperate climate. Rivers are few and widely separated. The mainstem Colorado River is the largest river in northwest Colorado and has an annual mean flow of 3394 cubic feet per second near Rifle, Colorado (USGS flow records for the Colorado River below Glenwood Springs, Colorado).

The White River and Yampa River are the other two river basins likely to be impacted by oil shale development in Colorado. The White River basin drains the lands underlain by the oil shale bearing deposits. The Yampa River basin is a likely choice to build coal fired electric generation plants to supply the energy needed to extract oil from the oil shale. The mean annual flow of the White River below Meeker is 657 cfs and that of the Yampa is 1520 cfs (USGS flow records for the White River below Meeker, Colorado and the Yampa River above the Little Snake River). The mean annual discharge of Piceance Creek is 38 cfs at the mouth with the White River (USGS flow records for Piceance Creek at confluence with the White River). These three relatively small rivers drain all of northwest Colorado and more specifically all the areas where oil shale development is described in the PEIS. Large-scale impacts to aquatic resources can result from oil shale development as a result of the large area involved, the high likelihood of erosion in an arid climate and lack of dilution water.

52779-016

1.0 Aquatic species overview

1.1 Fish and mussel species found in rivers the would be impacted by oil shale development in Colorado

1.1.1 Fish A total of 13 fish species are native to waters on the western side of the Continental Divide in Colorado (Table 1). These fish species inhabit waters in the Colorado River basin, the White River and the Yampa River basin. Both the Federal and Colorado State governments list four species as endangered species, the bonytail chub, *Gila elegans*, the humpback chub, *Gila cypha*, Colorado pikeminnow, *Ptychocheilus lucius,* and the Razorback sucker, *Xyrauchen texanus* (Table 1). In addition, three species are declining in abundance and distribution throughout their respective natural ranges to the point interstate governmental supported work groups have been established to reverse the trend toward extinction. This "Three Species" group includes the bluehead sucker, *Catostomus discobolus,* the Flannelmouth sucker, *Catostomus latipinnis,* and the Roundtail chub, *Gila robusta*. The Bureau of Land Management also lists these three species as "BLM sensitive." The state of Colorado lists the roundtail chub as a species of concern (Colorado Division of Wildlife, 2007). The Colorado River cutthroat trout, *Oncorhynchus clarkii pleuriticus,* is listed as a species of concern in Colorado (Colorado

52779-017

Division of Wildlife, 2007) and has been petitioned for federal listing. The subspecies has not been listed at the present time but recent developments about the genetic purity of some populations will only result in renewed interest in listing the Colorado River cutthroat trout. The mountain sucker, *Catostomus platyrhynchus,* has a limited distribution in Colorado found only in the White and Yampa Rivers. Little is known about the distribution, range and abundance of the mountain sucker. Colorado lists this as a species of concern (Colorado Division of Wildlife, 2007). Overall 69% of the native fish species are on some type of protective list, even in the absence of oil shale production.

Other trout species have been widely stocked throughout Colorado including the mainstem Colorado River basin, the White River basin and the Yampa River basin. These species include the brown trout, *Salmo trutta*, the rainbow trout, *Oncorhynchus mykiss*, the brook trout, *Salvelinus fontinalis*, and the lake trout *Salvelinus namaychus*. These species provide a high level of recreation and economic benefit to the citizens of Colorado and visitors to the state.

In addition a wide variety of warm water fish species have become established in reservoirs throughout western Colorado that also provide sport-fishing opportunities. These species include the northern pike, *Esox lucius*, yellow perch *Perca flavescens*, the Walleye, largemouth bass *Micropterous salmoides*, smallmouth bass, *Micropterous dolemieu*, black crappie, *Pomoxis nigromaculatus,* and others. Reproducing populations of many of these species have established populations in the mainstem Yampa River and Colorado River as well as many reservoirs. These populations support a large percentage of the angling pressure in northwest Colorado.

52779-017 (cont.)

1.1.2. Mussels At least five species of freshwater mussel (fingernail and pill clams, Family Sphaeriidae) inhabit waters in Rio Blanco and Garfield Counties in streams and rivers that may be impacted by oil shale development (Table 2). Little is known about historic distribution of this group of minute clams (Wu, 1978). Current status of Colorado Sphaeriidae is unknown (Harrold and Guralnick. 2007) but some closely related species have experienced significant declines in population numbers in the last decades (Wilson et al. 1995). Mussels in general have declined in numbers and distribution across North America in the last several decades. *Pisidium* sp. have been collected in the both the White River and Piceance Creek.

1.2 Fish and mussel species potentially impacted by oil shale development as described in the PEIS.

The PEIS does not accurately assess the distribution of federally listed fish species, BLM species of interest or state species of interest inhabiting Colorado Rivers throughout the area potentially impacted by oil shale development. Information is either completely missing or partially missing concerning distribution of federally listed fish species BLM species of interest of state species if interest in areas the will be impacted by oil shale development. Information readily available to the BLM was not included in the PEIS.

The BLM can obtain this needed fish distribution data from the Colorado Division of Wildlife

52779-017 (cont.)

1.2.1 federally listed species

Incomplete information was presented in the PEIS concerning federally listed species that inhabit Colorado rivers basins that will be impacted by oil shale development. The Colorado pikeminnow, the razorback sucker, humpback chub and bonytail chub are federally listed species that will be impacted by oil shale development. The State of Colorado and the federal government designate all four species as threatened or endangered. All four inhabit Colorado rivers that drain the area to be impacted by oil shale.

The Colorado Pikeminnow is a federally listed fish that inhabits the Colorado, White and Yampa Rivers in stream reaches that will be impacted by oil shale development in Colorado. The Colorado pikeminnow inhabits the White River downstream of Kenney Reservoir. This population is only resource where anglers are assured of catching Colorado pikeminnow in June (Frank Pfeifer, personal communication). These fish migrate downstream to the Green River or the Yampa River to spawn. The adult pikeminnow then return to the White River downstream of Kenney Reservoir for the remainder of the year. Larval Colorado pikeminnow move downstream to nursery areas in the Green River to develop into fingerling fish. These nursery areas are downstream of the confluence of the Yampa River and Green River. The reproductive cycle of Colorado pikeminnow evolved in response to the annual flow regime of the Green River basin. Adults migrate and spawn as river flow stage peaks due to melting snow in the mountains high above the oil shale areas. Larval fish migrate downstream on the peak flows to nursery areas in the Green River. The nursery areas are located in flooded backwaters maintained by these early summer elevated stream flows. Juveniles return to the river as waters recede from the flooded backwaters. Maintaining and improving adequate stream flow regimes is an important facet of the recovery program for Colorado pikeminnow.

52779-018

Colorado pikeminnow inhabit the mainstem Colorado River from a point downstream of a dam in Debeque Canyon to the Utah-Colorado border. Debeque is downstream of Rifle, Colorado. Historic habitat for the species may well extend upstream from the border all the way to Glenwood Springs (Clee Sealing, personal communication). Installation and operation of fish passages around two dams in the mainstem river upstream of Palisade, Colorado will result in upstream recolonization of the mainstem Colorado River. The numbers of this population have increased over the last decade (US FWS data, Grand Junction, Colorado). Efforts to recover this species in the mainstem Colorado River appear to be making some progress. Part of this recovery effort involves a multi agency effort, called the Upper Colorado River Endangered Fish Recovery Program. The Programmatic Biological Opinion for the Recovery Program requires that upstream water users release 10,850 acre feet of water to the mainstem Colorado River each summer to protect this Colorado pikeminnow population. This water release is deemed to be a component of actions that are making some progress toward recovery of the species (Doug Osmundson, personal

Colorado pikeminnow also inhabit the Yampa River from Craig, Colorado, downstream to the Utah-Colorado border. Adult Colorado pikeminnow inhabit the Yampa River from Craig, Colorado downstream to the Colorado-Utah border. These potadromous fish migrate downstream to spawning bars near the Green River and return upstream to the Yampa River each year following reproductive activities.

The survival of the Colorado pikeminnow is directly dependent on maintaining a flow regime in the White River, the Yampa River, the Green River and the mainstem Colorado River that imitates to some degree the natural flow regime of high spring and early summer flows followed by lower flows the remainder of each year.

The PEIS does note that Colorado pikeminnow are found in Rio Blanco County, Colorado but contains no mention of the populations that inhabit the Yampa River or mainstem Colorado, perhaps because the populations are not found directly in the area where oil shale development will occur. However pikeminnow populations in the Yampa River would be negatively impacted by oil shale development as would the population in the mainstem Colorado River near Grand Junction, Colorado. In addition Colorado pikeminnow would be negatively impacted in the Green River downstream of the confluence with the White River. In general, pikeminnow will be negatively affected in reaches downstream from oil shale and tar sands development.

The bonytail is the second federally listed species inhabiting the Colorado and Yampa Rivers in stream reaches that will be impacted by oil shale development. The PEIS does not mention the populations of this species inhabit Colorado rivers that would be impacted by oil shale development. The bonytail is currently restricted to the mainstem Colorado River through the City of Grand Junction. Fish in the Colorado mainstem are the result of stocking programs designed to reintroduce the species. The object of the reintroduction program is to once again have a naturally reproducing population of the species in an area considered to be a part of the original home range of the bonytail.

52779-018 (cont.)

The humpback chub is a third federally listed fish species that inhabits the mainstem Colorado River and the Yampa River downstream of the oil shale lands in Colorado. The humpback inhabits river segments with narrow deep channels in deep canyons. Colorado populations are limited to the Blackrocks area of the Colorado River west of Grand Junction, Colorado and one population in a canyon close to the Utah border. Recent data indicates these populations may not be viable. Little recent recruitment of younger age classes to the population has been observed (Colorado Division of Wildlife fish records, Fort Collins, Colorado).

The razorback sucker is the fourth federally listed fish species that inhabits the mainstem Colorado River, Yampa River and White River downstream of oil shale lands in Colorado. The razorback is a large river fish that appears to be restricted to these three river segments located downstream of the areas where oil shale development is predicted by the PEIS in Colorado.

The PEIS does not present information concerning these last three federally listed species other than to note that water depletions could result in adverse impacts (Table 6.1.1-2.). The three rivers that drain the project area are the Colorado River mainstem on the south, the White River, through the center of the oil shale lands and the Yampa River along the north side of the oil shale lands where coal plants could be constructed to provide needed power. The federally listed species present in river segments downstream of oil shale development need to be discussed in far more detail since extensive impacts in the headwater regions of any river will impact aquatic resources in downstream reaches. This discussion needs to include all stream and river reaches where oil shale impacts can influence federally listed species. This includes not only the White River, Yampa River and Colorado River in Colorado but these waters and the Green River in Utah.

52779-018 (cont.)

1.2.2 Species of concern

Table 4.8.1-3 listed the bluehead sucker, flannelmouth sucker and roundtail chub (BLM species of interest) as inhabiting waters in the State of Wyoming. In addition the mountain sucker is listed as a species of concern in Colorado (Colorado Division of Wildlife, 2007). No mention is made of populations of these four species in Colorado except in Chapter 6 except where the roundtail chub and flannelmouth sucker were noted to inhabit the White River in a stream reach crossed by OSEC utilities (PEIS table 6.1.1-1.).

The bluehead sucker inhabits Colorado rivers and streams that will be impacted by oil shale development. In actuality the bluehead sucker is found in the mainsteam Colorado River from the Colorado-Utah border upstream past Rifle, Colorado (Colorado Division of Wildlife data bases). The species is also present in the White River from the Colorado-Utah border upstream past the confluence of Piceance Creek. The bluehead sucker also inhabits the Yampa River from Hayden, Colorado downstream to the Colorado-Utah border.

52779-019

Flannelmouth sucker populations are also found in rivers and streams throughout Colorado that will be impacted by oil shale development. The species inhabits the same stream reaches where the bluehead sucker is found in Colorado. In addition the flannelmouth sucker inhabits the lower reaches of Piceance Creek (Krizman and Martin 2008-in process).

The roundtail chub also inhabits the same stream reaches on the mainstem Colorado, White and Yampa Rivers as described for the bluehead sucker and flannelmouth sucker. The roundtail chub is very abundant in the Colorado River mainstem from Rifle, Colorado downstream to the Utah-Colorado border. The population in the mainstem Colorado River from Rifle, Colorado downstream to the lower section of DeBeque Canyon is not more numerous than other populations in the State of Colorado but individual fish are larger than other populations in Colorado (Doug Osmundson personal communication).

The PEIS does not mention the mountain sucker at all. The mountain sucker is native to Colorado and as noted is considered a species of concern in Colorado (Table 1). The small fish appears to be endemic to the White and Yampa River basins in the state (Woodling, 1981). Mountain sucker are rather rare in the Colorado River basin of Utah (Sigler and Sigler 1996). Mountain sucker are listed as common throughout Wyoming except the fish is absent from the southeastern portion of the state and extirpated from the North Platte basin (Baxter and Stone 1995). The State of Washington listed the species as a candidate for state listing as threatened or endangered in the late 1990s and appears to be conducting studies to support any such decision (Wydoski and Whitney 2003).

52779-019 (cont.)

The species is not widely distributed in Colorado but seems limited to smaller streams and rivers in the White and Yampa River basins. One of these streams is Piceance Creek. Mountain sucker were collected through much of Piceance Creek in 2006 (Krizman and Martin 2008-in process). The fish spawns in May through July in clear waters.

Information concerning the distribution of BLM fish species of interest and Colorado species of interest was not included in the PEIS. As a result any conclusions by the PEIS concerning aquatic resources were premature and may not be appropriate.

1.2.3 Sport fish

Reservoirs provide much of the angling opportunity in the portion of northwest Colorado where oil shale development may occur. In particular Kenney Reservoir on the White River was built in part to provide angling opportunity, the reservoir is not used to store water. Black crappie are extremely prolific in Kenney Reservoir. The lower Yampa River provides excellent smallmouth bass fishing along with the chance to catch a trophy size northern pike. Rifle Gap Reservoir and Harvey Gap reservoir provide angling opportunities in the Colorado River basin for northern pike, walleye, yellow perch and trout. These two reservoir fisheries are dependent on water storage programs.

Piceance Creek contains naturally reproducing trout populations. Brook trout have been collected in Piceance Creek since the early 1970's (Woodling 1975). Recent sampling by the Colorado Division of Wildlife found brook trout, brown trout and rainbow trout in Piceance Creek (Colorado Division of Wildlife data records).

52779-020

The draft PEIS should include discussions as to the potential impacts on these sport fisheries due to oil shale development and existing water storage and management programs. Consideration is warranted as to impacts due to potential change in storage in reservoirs that provide warm water fishing opportunity in western Colorado.

1.2.4 Native mussels

Mussel species have been declining in distribution and numbers throughout the United States for the past two decades. This decline has been attributed in part to declining water quality (Wilson et al. 1995). One species, Pisidium nitidum was found to be less common "than previously thought" (Harrold and Guralnick 2007). Two others inhabit

52779-021

the White River near Meeker, Colorado (Wu 1978), *P. compressum* and *P. casertanum*. *P. casertanum* was also the most abundant member of this family found in Colorado (Harrold and Guralnick 2007). Pisidium sp. are found in the Piceance Creek basin (Krizman and Martin 2008-in process). Nationwide distribution of these small fingernail and pill clams has decreased over the last several decades. Initial increases in numbers attributable to higher nutrient levels were followed by extensive population declines as nutrient enrichment levels became excessive. 52779-021 (cont.)

1.2.5 Adequacy of Draft PEIS description of environment baseline conditions to determine effect of oil shale development on fish and mussel assemblages in the oil shale development area of northwestern Colorado.

The draft PEIS does not adequately describe existing aquatic resources (fish species and mussel species distribution) of Colorado. The draft PEIS is inadequate to assess impacts and to determine the extent of oil shale development's negative effects to aquatic resources due to the omission of data that accurately describes fish distribution. 52779-022

The draft PEIS did not incorporate fisheries data relevant to understanding environmental impacts to native fish populations in western Colorado attributable to oil shale development. Records were not included in the PEIS that documented presence of some fish species within oil shale areas of Colorado (Colorado Division of Wildlife fish data base). The PEIS did not even mention the Mountain sucker a species of concern in Colorado. The mountain sucker inhabits much of Piceance Creek basin. Presence of the flannelmouth sucker in Piceance Creek was not mentioned in the PEIS although this is listed as a BLM species of concern. 52779-023

Perhaps more importantly, the PEIS did not address pertinent stream reaches that contain federally listed fish species in Colorado, or BLM species of concern or Colorado species of concern. The lower sections of the White River, Colorado Rivers and Yampa River all contain federally listed fish, BLM species of concern or Colorado species of concern. These rivers do not directly drain lands where specific oil shale development is likely to occur. However these rivers are located within a very few miles of lands to be mined from oil shale. Waterways draining lands to be developed for oil shale drain directly to these three rivers. Changes in water quantity or quality will impact these fish species and these factors need to be included in the PEIS analysis when making decisions relating to proposed oil shale development. 52779-024

The PEIS failed to describe aquatic resources in northwest Colorado in enough detail to even support the limited goal of the manuscript of changing 12 land use plans. This failure included the omission of data describing the actual distribution and fish in the proposed oil shale development region of Colorado and nearby critical habitats for federally listed fish species 52779-025

2.0 Impacts to aquatic resources attributable to water depletions associated with oil shale

The draft PEIS indicated multiple times that oil shale production will result in a large increase in consumptive water use and associated water depletion of streams and rivers.

Actually providing additional water may be more difficult than claiming water exists "somewhere" in the various rivers of western Colorado. The PEIS projected that the White River has 100 cfs flow available for oil shale if an additional 16,000 acre feet of storage is constructed (PEIS page 4-42, paragraph 2), presumably in the White River basin. The PEIS did not consider the effects of the White River population of Colorado pikeminnow on any proposal to decrease White River flows. The White River peak spring snowmelt flows provide water to inundate nursery backwaters far downstream in the Green River. These nursery areas provide habitat for developing larval Colorado pikeminnow. Base flows in the White River downstream of Kenney Reservoir support adult Colorado pikeminnow for the remainder of the year. Kenney Reservoir is not used to store water. The flow in equals the flow out of the impoundment. The reservoir is operated in a manner to protect the Colorado pikeminnow population in the White River based on existing flow regimes. Any proposed depletion of White River flows would result in Section 7 consultations with the US Fish and Wildlife Service. 52779-026

Approval of additional consumptive uses of White River waters is not likely due to the presence of the federally listed Colorado pikeminnow. Conversion of existing water rights is probable. The Shell Corporation is purchasing a 70 cfs (50,000 acre feet) senior water right from the YZ ranch (BLM 2007). Companies interested in oil shale development probably recognize the problems associated with approval of new water depletions and will instead rely on purchase of existing agricultural water supplies for use in oil shale production.Conversion of consumptive water rights from one use to another appear to be the viable option for obtaining water needed for oil shale development in northwestern Colorado. 52779-027

Approval of additional consumptive water rights in the mainstem Colorado River will require Section 7 consultations with the US FWS. Colorado pikeminnow inhabit the mainstem Colorado River downstream of DeBeque, Colorado to the Colorado-Utah border. Oil shale development may occur near the town of Rifle in the mainstem Colorado River basin. Rifle, Colorado is located upstream of DeBeque. Water users upstream of River are required to release a flow of 10,825 acre feet through the summer months to maintain Colorado pikeminnow in a 15 mile reach of the Colorado River through Grand Junction, Colorado as a requirement of the Programmatic Biological Opinion for the Upper Colorado River Endangered Fish Recovery Program. Water diverted near Rifle, Colorado for oil shale would negate the benefit of the water released upstream in the effort to protect Colorado pikeminnow populations in the Grand Junction, Colorado portion of the basin. Water that does not reach this 15-mile river segment would have to be augmented from another source. Upstream water users would object to depletion of water from the mainstem Colorado during the summer months near Rifle. 52779-028

The same issue would be encountered in the mainstem Yampa River. Colorado pikeminnow inhabit the mainstem Yampa River from Craig, Colorado downstream to the Colorado-Utah border. Recently Colorado pikeminnow have been collected upstream of Craig, Colorado (Finney 2008) an indication of some progress in protecting and enhancing the distribution of the Colorado pikeminnow and an indication the species range is expanding upstream. Mean August flows in the Yampa River near Maybell Colorado in August are 363 cfs, due to diversions of water for agricultural uses. Approval of further depletions would result in Section 7 consultation with the US Fish and Wildlife Service and all entities involved in the movement of more than 10,000 acre feet of water to the 15 mile reach in Grand Junction, Colorado. 52779-029

Instream flows and factors related to flow are important to species in addition to the Colorado pikeminnow. Mean low flow depth is critical to survival of many native fish species in northwest Colorado. Anderson (2005) found a positive correlation between mean low flow depth and the numbers of fish present including the bluehead sucker, flannelmouth sucker and the roundtail chub. Abundance of these three species was higher in streams where late fall and winter water depths were deepest. Typically fall and winter flow in the Dolores River flows are very low. The numbers of the bluehead sucker, flannelmouth sucker and the roundtail chub are correspondingly very low. The mainstem Colorado River has relatively deep water columns in late fall and winters. The numbers of the bluehead sucker, flannelmouth sucker and the roundtail chub are very high. Water depletions in the mainstem Colorado River during fall and winter would result is lower numbers of these three species, all of which are listed as BLM sensitive species. 52779-030

The PEIS did note that water depletions would cause an adverse impact to federally listed species. Page 4-100 (last two lines of page 100 and first lines of page 101) included the statement that "Any water depletions from the upper Colorado River Basin are considered an adverse effect on endangered Colorado River fishes… Water depletions for individual projects could be quite large and represent a significant adverse impact on these riverine fish." The PEIS however did not appear to include the actual distribution of fish species other than those which are federally listed when developing this conclusion. Eight of the 13 native fish species in western Colorado would be adversely impacted by water depletion associated with oil shale development. 52779-031

The presence of federally listed species and the dependence of these populations on spring runoff flows will restrict the approval of any significant new consumptive water depletions in Colorado for oil shale development. The US FWS listing of the Colorado pikeminnow and the other three federally listed fish stated that lack of snowmelt flows was one reason for the decline of these fish species, including the Colorado pikeminnow. Thus, additional storage or depletion of White River flows is not likely without very complicated water exchanges. 52779-032

The PEIS needs to address the issue of stream depletions in the context of existing flow agreements to protect federally listed fish species, BLM sensitive species, the species listed as sensitive by the DOW, and with some mention of the economic value of sport 52779-033

fish species residing in existing reservoirs. The PEIS would be far more accurate if the document indicated that retiring land from agriculture is the principle method by which oil shale companies would attempt to obtain needed water. Oil shale development will transform an unknown, and potentially very large amount of northwestern Colorado from a rural agricultural ranching area to an industrial energy colony. However, the PEIS needs to address the actual reality of water depletions based on an accurate representation of distribution of fishes in northwest Colorado, not the incomplete representation currently described

52779-033 (cont.)

3.0 Water quality

The PEIS presented very general information regarding common impacts to water resources (Section 4.5.1) and impacts to aquatic resources (4.8.1) attributable to water quality degradation resulting from oil shale development. The PEIS content concerning water quality was general enough to be applied to any large-scale development in northwest Colorado, southwest Wyoming or northeast Utah. Specific information is not included nor any connection to other regulatory standards.

Water quality both limits and enhances aquatic resources inhabiting streams. Water can be so pure that little aquatic life is found. Any contaminant can be naturally present or added by human activity to a level that eliminates all aquatic life. Most dissolved gases and solids found in water control the aquatic species that inhabit the water. The importance of some constituents is well known, such as dissolved oxygen. A small amount of iron and zinc are required for all life forms, too much is quickly lethal. Even the amount of carbon dioxide and carbonate present can protect life by forming the natural buffering capacity of water to protect life from sudden shifts in the acid-base relationship, pH. Aquatic life can tolerate and survive in water that has some contamination but when conditions are too extreme sensitive species start to disappear. The Colorado Water Quality Control Commission has adopted standards that are presumed to be adequate to protect 95% of all species that would normally be found in an area. The standards as adopted are not designed to protect all life. The standards do allow for some limited negative impacts of the entire aquatic community.

52779-034

Five aspects of water quality should be addressed in much greater detail, sediments, nutrients, salt and temperature.

3.1 Sediment

Erosion results in increased sediment loads in streams and rivers. Excessive sediment may overwhelm a stream's capacity to move the load and damage aquatic life (Cairns 1977). The PEIS notes that erosion is a serious potential problem. The PEIS is written in such general terms that few specific observations can be made.

The PEIS indicated that fish species such as cutthroat trout and mountain whitefish are more sensitive to increased sediment loading in comparison to fish species adapted to streams with relatively higher suspended sediments such as the "humpback chub, Colorado pikeminnow and the flannelmouth sucker, (Section 4.8.1.1, bottom page 4-61).

52779-035

This statement could be taken interpreted by readers as evidence that increased sediment loadings from oil shale would not be harmful to the federally listed fish species such as the humpback chub and Colorado pikeminnow. Qualifiers were added in the PEIS indicating, "aquatic habitats that normally have turbid water might be less sensitive to light or moderate increases in sediments" (page 4-62).

Such assertions are not supported by any cited documentation. The four federally listed species and the BLM species of concern do inhabit waters that are often turbid. However, presence in turbid water does not mean these species are "adapted" to further increases in sediment loadings. The flannelmouth sucker is found in many streams that are clear most of the year such as the Eagle River just downstream of Wolcott, Colorado. In contrast the rainbow trout, *Oncorhynchus mykiss*, inhabits the same stream reach where turbidity is extremely high during parts of the year.

Sediment loads must exceed 10% (100,000 mg/L) or so before causing acute mortality to fish. The level of impact decrease as sediment loads decrease. Chronic impacts occur at much lower levels.

Subtle population impacts to federally listed fish species may result from relatively small increases in sediment loads. Fine sediments may cover the stream substrate and reduce the amount of plant (periphyton) growth. The number of adult Colorado pikeminnow may be partly limited by the amount of periphyton in the Colorado River basin in Colorado and Utah (Osmundson et al. 2002). Periphyton may be limited due to accumulation of fine sediments in riverbeds. Aquatic macroinvertebrates feed on periphyton and in turn are preyed upon by the fish that serve as a food base for the piscivorous Colorado pikeminnow. Osmundson et al (2002) found that Colorado pikeminnow were concentrated in the upstream portions the mainstem White River and Colorado River in Colorado where sediment is lower, and periphyton and aquatic macroinvertebrates are more abundant than in downstream reaches.

52779-035 (cont.)

Additional sediment loadings from any anthropogenic source, including oil shale development may well decrease periphyton growth at various locations from the oil shale lands downstream to an in Utah. The draft PEIS intimation that fish species already threatened with extinction are "adapted" to further increases in sediment loadings is unwarranted and may well be incorrect. Instead, increased sedimentation in the upper White River, Colorado River and Yampa River could well be expected to further decrease numbers of adult Colorado pikeminnow. Long-term sediment increases in the oil shale lands may eventually reduce numbers of Colorado pikeminnow at locations all the way into Utah.

The draft PEIS describes mitigation actions that could reduce the amount of sediment reaching streams and rivers if oil shale development occurs. For example use of the BLM goldbook and BLM road construction guidelines. The draft PEIS did not describe all mitigation measures that should be used as Best Management Practices to assure that sediment loadings to streams from oil shale are minimized. Protection of riparian vegetation also reduces the amount of sediment that enters streams while the roots of

52779-036

riparian plants retards erosion. The PEIS could suggest that oil shale companies avoid construction and land disturbance within 300 feet of perennial streams. The roots of riparian vegetation protect against bank erosion and the stems and leaves entrap sediments moving towards the stream as part of surficial storm flows. This set back would result in lower erosion rates and reduce direct flow of sediment from construction areas to streams and rivers.

52779-036 (cont.)

Bridges will have to be built at road crossings. The PEIS should add a discussion describing time periods where river and stream crossings would not be appropriate due to breeding seasons for fish species of interest. For example in-stream construction of bridges or culverts should be avoided in the months of May through July when mountain suckers spawn. Flannelmouth suckers appear to spawn when temperatures reach 11° C. Building bridges and culverts in "dry" seasons would also help mitigate environmental degradation attributable to increased sediment loads that potentially impact fish reproduction.

52779-037

The PEIS lacks an adequate discussion of sediment loadings to streams from intermittent streams. Intermittent streams in the oil shale lands tend to he headwater systems. These streams flow during storm events and during spring snowmelt periods. These streams also tend to have a higher gradient than perennial streams. Water velocity is faster in high gradient streams than low gradient streams at the same water volume. Water flowing at higher velocities transports more sediment and larger size sediments than streams with lower velocities. Intermittent streams typically are the source of more sediment to a river system than bank and substrate erosion in perennial stream reaches. Intermittent streams drain much of the oil shale land in Colorado. Roads built up these intermittent drainages access some areas. The PEIS should include a discussion of this issue and include mitigation actions to minimize sediment loadings from intermittent streams.

52779-038

3.2 Nutrients

Aquatic plants require certain nitrogen and phosphorus containing compounds to survive. These compounds are called nutrients and must be in delicate balance for species' survival. Nutrient concentrations can be present in such minute concentrations that plant growth is limited. Conversely, nutrient concentrations can be present in excessive concentrations that also can result in harm to the aquatic community. Nitrogen bearing compounds include ammonia, nitrite and nitrate. Both ammonia and nitrite compounds prove deleterious or toxic to aquatic life when present in excessive concentrations.

Effluent from wastewater treatment plants is a source of nutrients to streams and rivers. The PEIS contained the prediction that 950 jobs will be created for every 50,000 bbl/day underground oil shale production facility. (Chapter 4, page 4-11). Many people will move into this section of Colorado if oil shale development occurs. The domestic waste from this population will contribute significant amounts of nutrients and other pollutants to waters of the state merely by living in the region. This is an arid land with few small and widely separated rivers.

52779-039

Wherever new residents settle, nutrients loadings will increase. In smaller towns such as Meeker on the White River a significant increase in population may require an additional treatment of sewage to meet stream standards.

An assessment of the impacts of nutrients on aquatic resources is not possible due to lack of detail in the PEIS. One observation can be made. People settling into smaller towns close to the areas where oil shale mining is probable will contribute to a higher nutrient loading in small receiving waters like the White River. Individuals living and working out of "man camps" may increase nutrient loadings to even smaller streams such as Piceance Creek and Yellow Creek.

Limited data indicates that very small bivalves of the family *Sphaeriidae* inhabit the White River and tributaries to the White River in areas where oil shale development is possible, including Piceance Creek. Mussels in general have been decreasing in abundance and distribution throughout the United States in the last two decades. This disappearance appears to be in part due to excess nutrient loads to streams and rivers.

52779-039 (cont.)

These species are not listed as threatened or endangered in Colorado but the group appears to be rather widely distributed in the White River drainage. The PEIS should include a discussion of the amount of nutrients that will be added to Colorado streams and rivers from increased waste water effluents and possible impacts from eutrophication of these waters.

3.3 Salt

Salt loading to any stream or river in the entire Colorado River basin may impact all dischargers in the basin. This statement applies to any discharger in the seven states in the Colorado River basin. Salt loadings in the lower Colorado basin were so high that water was not suitable for some uses in the lower portions of the basin. The Colorado River Basin Salinity Control Forum was created to rectify issues related to salt loading in the lower basin. All seven states are members. Salt standards have remained unchanged in the basin since 1976. The salt standard is 723 g/L downstream of Hoover Dam based on a flow weighted average annual value. The Colorado Water Quality Control Commission (WQCC) adopted this value as the salt standard to be applied to all waters on the western side of the Continental Divide in Colorado (WQCC regulation 39). Colorado has agreed to meet this standard in the Colorado River downstream of Hoover Dam. The salt load must be reduced by some entity or entities if salt levels increase in the Colorado River.

52779-040

Oil shale development will increase the salt loading to the Colorado River basin. Oil shale is neither oil nor shale (Atkins). This material is actually an organic marlstone that would turn into oil if left alone for many tens of millions of years. The oil shale deposits in northwestern Colorado were originally the bottom of a vast salten lake. The passage of time resulted in the creation of oil shale in the deposits. This shale contains large amounts of salts.

A bullet statement on page 4-30 of the PEIS (Section 4.5) contained the information that spent oil shale piles and mine tailings for underground mines would be a source of salt. Section 4.5.1.3 indicated that controlled discharge of water from mine sites to receiving streams would be point sources and that discharged water would lower instream water quality. Detailed information concerning the impact of salt on rivers in the Colorado basin was not provided.

The ramifications of salt increases in the seven state wide Colorado River basin extend far beyond the small portions of land to be mined for oil shale. Measurable increases in salt loading will have to be off-set by removal of salt loadings in other areas. However, the PEIS did not present information about this consideration.

No description of the impacts of additional salt loads was provided in the PEIS even in the small scale of Piceance Creek. The Piceance Creek drainage basin overlies various sedimentary rock formations that are fairly soluble. As a result, dissolved salt concentrations are relatively high in comparison to most Colorado headwater streams. Total dissolved salt concentrations ranged from 920 mg/L to 2,272 mg/L in mainstem Piceance Creek in 1982 (reproduced in Gray et al. 1983), where "saline springs" were the source of many of the salts in the water column. These salt loadings exceed the mean annual standard applied to Colorado waters of 723 g/L downstream of Hoover Dam based on a flow weighted average annual value. Underground mining for shale, road construction, and above ground disposal of spent shale would all increase the salt loading to Piceance Creek. The relative addition of salt to the system would be higher than many other portions of Colorado due to erodable nature of the various strata in the basin and the presence of oil shale deposits in the basin.

52779-040 (cont.)

Potential impacts to the fish and mussel assemblages in Piceance Creek are unknown at this time. A total dissolved concentration of 1,000 mg/L has been considered adequate to protect a variety of aquatic life. Juvenile Colorado pikeminnow were found to avoid total dissolved salt concentrations of 4,440 mg/L (Pimental and Bulkley 1983). The potential toxicity of dissolved salts depends has many aspects including the ratio of salts present and the different salts that can be present. Existing total salt concentrations are relatively high but probably do not result in direct toxicity to the fish assemblage in Piceance Creek. Additional salt added to Piceance Creek could reach concentrations that will prove harmful to aquatic resources. The maximum total dissolved salt concentration at the mouth of Piceance Creek was almost half of the level that is avoided by Colorado pileminnow and greater than a level considered to be protective of a variety of aquatic life. Massive underground oil shale development and associated surface activities could facilitate increased salt loadings to Piceance Creek.

52779-041

Both the flannelmouth sucker and the mountain sucker inhabit Piceance Creek. The flannelmouth sucker is listed by the BLM as a species of concern. The Colorado Division of Wildlife lists the mountain sucker as a species of concern. The PEIS would have to be modified to address the presence of these two species in Piceance Creek and potential increases in salt levels attributable to current oil shale activities before asserting

that even the existing test oil shale programs are not resulting in adverse impacts to these species of concern. Further modifications are warranted to include information about the dissolved salt regulation adopted by the State of Colorado. 52779-041 (cont.)

Dissolved salt concentrations are an abiotic factor that would be negatively influenced by water depletions. The draft PEIS indicated that water depletions would result from oil shale development. Significant depletions would result in section 7 consultations with the US Fish and Wildlife Service. Extensive water depletions may not be possible due to the needs of federally listed fish. If significant depletions happen then increased total dissolved salt concentrations may well result in summer months due to loss of dilution water. Any impacts due to increased salt concentrations would depend on the magnitude of increase. Many factors influence potential toxicity of total dissolved salts but the draft PEIS does not include a discussion of this potential negative environmental effect. 52779-042

3.4 Selenium

Selenium associated with shale deposits has been a pollutant of concern for many years in streams throughout northwestern Colorado. A Selenium Task Force in Mesa County has striven for years to affect decreased selenium levels in the mainstem of the Colorado River. Selenium concentrations are elevated in some streams draining areas that may be impacted by oil shale development. Shale typically contains high concentrations of selenium. Selenium is found in measurable concentrations in Piceance Creek, but not at levels that exceed current stream standards. Selenium concentrations can be expected to increase in the Piceance basin and subsequently in the White River during oil shale development.

Selenium concentrations are another abiotic factor that would be negatively influenced by water depletions. The draft PEIS indicated that water depletions would result from oil shale development. Significant depletions would result in section 7 consultations with the US Fish and Wildlife Service. Extensive water depletions may not be possible due to the needs of federally listed fish species. If significant depletions happen then increased selenium concentrations may well result in summer months. Increased selenium could result in reproductive failure in adult fish. Many factors influence selenium toxicity but the draft PEIS does not include a discussion of this potential negative environmental effect. 52779-043

Selenium concentrations in Colorado streams and rivers have been a source of contention during Colorado Water Quality Control Commission rulemaking hearings. The Colorado Water Quality Control Commission established selenium stream standards at levels higher than suggested by the US Fish and Wildlife Service. In addition the Colorado River downstream of the Gunnison River to the Utah border is listed on the 303d List of impaired waters for selenium (Colorado Water Quality Control Commission, 2008). The PEIS should take into account this issue due to the pervasive presence of federally listed fish species in rivers and streams drained by lands where oil shale development may result in mobilization of selenium for disturbed lands into waters of the state, including the mainstem Colorado River. 52779-044

3.5 Temperature

Temperature is perhaps the most important abiotic component of aquatic ecosystems. The native aquatic communities developed over time in response to the temperature regime of streams and rivers. The stream channels also developed over time in response to the historic flow regime. Anthropogenic environmental changes have resulted in shallower water columns in streams and wider stream channels. Summer water temperatures have probably increased over the last several decades in many streams where summer time flows are lower due to diversions for agriculture. 52779-045

The mountain sucker is rather sensitive to temperature. Temperatures greater than 20°C "are harmful" (Sigler and Sigler 1996). A limited distribution coupled with sensitivity to higher temperatures that are a result of streambeds becoming wider due to increased erosion would make this species susceptible to negative impacts attributable to oil shale development. The mountain sucker is found in Piceance Creek and is listed as a species of concern to the State of Colorado. As noted in other portions of this document, the mountain sucker is not mentioned in the PEIS. BLM's analysis of a Colorado species of concern lacks sufficient, accurate and reliable information and does not support of the Preferred Alternative.

Annual temperature regimes may be influenced by water depletion associated with oil shale development. Water depletion in stream reaches adjacent or flowing through oil shale production areas will influence water temperatures in lower elevation stream reaches that support federally listed fish populations such as the Colorado pikeminnow and the razorback sucker. Water velocity decrease and water temperatures increase as a result of water depletion. Thus, depletions in stream flow for oil shale production, or power plant operation would increase temperatures in successive downstream river reaches. A temperature range of 22°C to 25°C is considered to be protective of razorback suckers (Bulkley and Pimentel 1983). At temperatures of 27.4°C adult razorback suckers begin exhibiting avoidance behavior and leave the area. Maximum growth of Colorado pikeminnow occurs at a temperature of 25°C (Bulkley and Pimentel 1983, Doug Osmundson, personal communication). Growth of pikeminnow slows at 27°C and decreases by 50% at 30°C. The difference between protective and ideal conditions did not differ a large amount from deleterious conditions. 52779-046

Temperature is thus an environmental factor that should have been discussed in more detail in the draft PEIS. The US Geologic Service often has temperature monitoring devices installed at flow gauges. Stream temperature data could have been analyzed for sites in and around potential oil shale sites. Tolerance data for various fish species such as the Colorado pikeminnow could have been compared to stream data. Results would indicate what general levels of water temperature increases could be tolerated before various fish species could not survive in various stream reaches.

Stream temperatures would be negatively influenced by water depletions. The draft PEIS indicated that water depletions would result from oil shale development. Significant

depletions would result in section 7 consultations with the US Fish and Wildlife Service. Extensive water depletions may not be possible due to the needs of federally listed fish. If significant depletions happen then stream temperatures may well increase during summer months. Increased temperatures in trout streams could result in elimination of the trout. Increased temperatures in non-trout waters could negatively impact other species. All fish species have a temperature range that is needed for the completion of an entire life cycle. Adult fish can survive higher temperatures. Not all portions of rivers and streams need to support each portion of each species life cycle. However, the draft PEIS does not include a discussion of this potential negative effect. 52779-046 (cont.)

3.5 Impacts from accidental spills into streams and rivers attributable to oil shale development.

The topography of the oil shale lands in Colorado results in construction of rather curving roadways often constricted in narrow canyons. These roads have tight sharp curves with narrow roadways. Development of oil shale will result in accidents involving large tractor-trailer trucks and release of toxicants to the environment. Since roads follow streams and rivers some of these accidents will result in release of toxicants to the stream and resulting fish kills. These accidents happen in Colorado and do result in fish kills. Gasoline spilled into streams resulted in serious and extensive fish kills in Clear Creek and Cochetopa Creek in the 1990's. These fish kills resulted in the loss of thousands of fish. Many streams draining the oil shale land are relatively small and have little dilution water. The PEIS did not include this impact of oil shale on water resources and aquatic resources. 52779-047

3.6 Actions needed to mitigate negative impacts to water resources attributable to oil shale development.

As noted in the PEIS water discharged from oil shale sites will have lower water quality (Section 4.5.1.3). Specific actions to mitigate water quality degradation were not included in the document because specifics about oil shale are not known at this time. Location, inception dates, size of facilities are all unknown, with one exception. Piceance Creek will in all probability be the site of intense oil shale development.

A rather intense water quality monitoring program is needed in Piceance Creek to describe ambient conditions. The Piceance Creek basin has been used for ranching and haying for many decades. Gas development is a current intensive activity with thousands of wells planned. The existing water quality is characterized by high total dissolved salt loadings and alkaline water. A water quality database describing current seasonal fluctuations would provide an important tool in the future if oil shale development becomes a reality. 52779-048

The PEIS could be modified to recommend and initiate a multi-year water quality sampling program in the Piceance Creek basin. Multiple sites should be sampled several times a year for constituents such as suspended solids, total dissolved solids, pH, dissolved oxygen, selenium, nutrients, and sulfate and dissolved oxygen. Temperature

loggers should be installed to monitor temperatures automatically multiple times per hour for a period of multiple months. Sites on the White River upstream and downstream of Piceance Creek and Yellow Creek should be part of this monitoring program. These data could then be used to assist in the assessing any impacts to water quality in this basin attributable to oil shale development. This monitoring program need not be vast an exceedingly costly operation. The analytes described above are not costly and in many cases can be determined in the field.

The PEIS omits mention of any program to determine current ambient water quality conditions prior to initiation of oil shale development in any portion of Colorado. The Piceance Creek basin is an obvious area where a water quality program prior to oil shale development will provide an important database by which to assess environmental impacts attributable to the industry. The need for additional water quality data is not limited to the Piceance Creek basin. The PEIS considers and discuss water quality data needs in all three major drainages that could be impacted by oil shale, the Colorado River mainstem, the White River and the Yampa River from Hayden, Colorado downstream to the Colorado-Utah border.

52779-048 (cont.)

4.0 Inadequacies of PEIS in disclosing and describing environmental consequences of oil shale development.

The draft PEIS was written in a general and vague manner. Almost no specifics were included. The description of aquatic resources (fish) was so vague that little information about species distribution is available. As a result, a description of specific potential impacts was not included and cannot be developed based on information in the draft PEIS. Aquatic resources will be adversely impacted by oil shale in a variety of ways. Specific mitigation actions cannot be described based on the draft PEIS. The entire draft PEIS states the obvious with insufficient information upon which to make a decision.

4.1 The PEIS does not adequately describe ambient aquatic resources in the oil shale areas of Colorado. The draft PEIS omitted fish distribution data that demonstrates the presence of BLM species of concern and Colorado species of concern in the White River and Piceance Creek. These fish species are the flannelmouth sucker and the mountain sucker. The presence of these species of concern in Piceance Creek would have to be included in the PEIS before any decisions proposed in the PEIS could be finalized.

4.2 The PEIS does not adequately describe ambient aquatic resources in rivers downstream of oil shale areas in Colorado. The draft PEIS omitted fish distribution data that demonstrates the presence of federally and state listed fish species, BLM species of concern and Colorado species of concern in the White River, Colorado River and Yampa River. These fish species include the four federally listed species, three species of concern to the BLM and one Colorado species of concern. These stream reaches will be impacted by changes in water quantity and water quality and Section 7 consultations will result. The presence and distribution of these species would have to be included in the PEIS before any decisions proposed in the PEIS could be finalized.

4.3 The draft PEIS did not adequately describe the influence non-oil shale human activities will have on acquisition of water needed to mine and produce oil from the shale. The draft PEIS indicates that unallocated water is available for consumptive use in the production of oil shale. Actual existence of available water in Colorado is not a certainty. Existing water regimes in the White River, Colorado River and Yampa River are based on agreements with various governmental agencies and water users to protect federally listed fish such as the Colorado pikeminnow. Additional water depletions will result in section 7 consultations with the US Fish and Wildlife Service along with

4.4 The draft PEIS does not consider appropriate monitoring that could be used to develop mitigation measures to lessen impacts to water quality associated with oil shale development. The draft PEIS indicated that water discharged from oil shale sites would have "lower quality" than receiving waters. An intensive water quality monitoring program needs to be a part of the PEIS to accurately describe ambient conditions in areas where oil shale development is likely. The draft PEIS indicated that specific locations for oil shale are not known. However, the Piceance Creek is mentioned throughout the document as a likely location for oil shale development. A water quality sampling program of Yellow Creek, Piceance Creek and the White River upstream and downstream of Yellow Creek and Piceance Creek. These data could be used during actual oil shale development.

4.5 The draft PEIS does not consider rather simple mitigation measures that could be applied to all oil shale development projects that could reduce the amount of potential water contamination. The PEIS could suggest that oil shale companies avoid construction and land disturbance within 300 feet of perennial streams. The roots of riparian vegetation protect against bank erosion and the stems and leaves entrap sediments moving towards the stream as part of surficial storm flows. This set back would result in lower erosion rates and reduce direct flow of sediment from construction areas to streams and rivers.

4.6 The draft PEIS appears to include an unsupported assumption and conclusion that native fishes in river reaches downstream of land that may be developed for oil shale are "adapted" to high sediment loads. An additional assumption appears to be included that these fishes are "adapted" to further increases in sediments. The term adapted must be used with caution. Adaptation assumes genetic change. In this case the writers of the draft PEIS seem to be indicating that these species have the genetic content to be survive and breed in environmental conditions that may occur. The four federally listed species and the BLM species of concern have indeed survived for eons in streams that drain a highly erodable geology. Sediments during high flow conditions are indeed high. However, the water in other time periods is crystal clear. Any conclusion that these populations are "adapted" to further increases in sediment loadings is not warranted. The authors in this case did not appear to adhere to NEPA regulation 40 C.F.R. 1502.24: and use explicit reference to scientific and other sources relied on to reach this conclusion. However, this inference may be an unintended result of multiple edits of this section.

4.7 The entities involved in the preparation of the draft PEIS did not appear to include possible cumulative water quality impacts of oil shale development on aquatic resources. Water depletions may well lead to increases in total dissolved salt loads, increased temperatures and selenium levels. Variation in any single parameter may not negatively impact the distribution and abundance of fish and mussel species. For example increasing temperatures could result in downstream migration of the Colorado pikeminnow (as described above) and at the same time increasing sediment loads in the lower portions of critical habitat (as described above) would further deplete food resources for the Colorado pikeminnow. The combination of these impacts would further reduce the population numbers of federally listed fish far downstream of the stream segments currently described in the draft PEIS. The combination of factors may have far reaching impacts. Salt and selenium are conservative contaminants that will not settle from solution. Cumulative impacts could extend far downstream.

4.8 The entities involved in the preparation of the draft PEIS did not appear to include possible cumulative impacts of oil shale development on aquatic resources in combination with other development actions. Gas development has spread throughout the Piceance basin. Tens of thousands of gas wells are planned. No mention of the gas industry growth is made concerning aquatic resources in the Piceance Creek basin. Possible cumulative impacts include infrastructure such as roads, connection between wells and underground mining that influence ground water and springs, human related activities such as housing developments and waste water treatment plants and others. Oil shale development will not take place in a vacuum. The draft PEIS needs to include a discussion of the cumulative impacts to aquatic resources from gas and oil shale production to validate any change proposed by the final PEIS.

4.9 The draft PEIS did not consider the impact to aquatic resources that may result from increased human population and increased nutrient loadings to streams associated with additional effluent flows from domestic wastewater treatment plants. Eutrophication is a process that impacts all streams and rivers. Some nutrient increase may well increase productivity. Too much increase results in lowered diversity and localized species extirpation. A general loss of mussel populations across North America has resulted from stream eutrophication.

4.10 The draft PEIS ignores many regulations and agreements that will influence oil shale development. The draft PEIS did not contain mention of a seven state agreement limiting salt loadings to the Colorado River by upstream states. Oil shale will result in higher instream salt loadings. These loadings will impact other entities. This information and discussion is needed in the PEIS. The draft PEIS does not consider other water quality standards that will likely be impacted by oil shale such as the selenium standard and temperature standards. The flow regimes needed to protect federally listed species probably limit the amount of "new" stream flow depletions that are available for oil shale production. Other entities release water to flow through critical habitat to support federally and state listed fish species. These releases do not represent water that can be used by oil shale. Water for oil shale can be obtained by retiring land from agricultural production and using pre-existing consumptive water rights. The draft PEIS would be

better served to acknowledge this reality and not indicate that up to 340,000 acre feet of additional water is available in Colorado for oil shale production.

4.11 The draft PEIS presents one assertion concerning NPDES permits that may be in error. Section 4.5.1.3 (page 4-34, first three lines on the page) includes the statement that

> "Since discharge of surface runoff at a mining site is exempted from NPDES permits surface runoff not intercepted at these sites could create a nonpoint source of contaminants and degrade the water quality of downgradient surface water bodies."

The authors of the draft assumed a 30-year old exemption from the NPDES system applies to the oil shale industry. Colorado Water Quality Control Division personnel did not corroborate this assumption. Evidently, the Colorado Attorney General may be the office that makes the actual interpretation of the exemption claim. The exemption is not appropriate for two reasons. First this exemption was created for oil and gas development where the short-term disturbance associated with drilling a well was coupled with a small amount of land disturbance such as a drill pad. Underground oil shale mines and surface retorts will exist for many years and disturb large areas of land, similar to the disturbance from coal mines, which are not exempted from the NDPES process. Underground and surface oil shale developments should be treated the same way as the coal industry. In addition oil shale is not oil but an organic marlstone (Cook et al. 2007). By definition the exemption cannot be applied "oil" shale development. If the exemption applied to marlstone the exemption would have been specifically worded to include marlstone. Erroneous use of language is not justification for an inappropriate exemption from the NPDES program. BLM's assertion regarding the NPDES exemption lacks accurate, reliable information and does not support of the Preferred Alternative.

4.12 The assertion regarding the NPDES exemption ignored another water quality issue. The draft PEIS indicated that "discharged water" from oil shale activities would lower water quality (Section 4.5.1.3) in receiving streams. The draft NPES ignored probable results of "lowered water quality." Continued addition of pollutants will eventually result in stream standard violations. The Colorado Water Quality Control Commission places such streams on the 303d list and a reclamation plan is required. The oil shale industry would then be required to participate in restoration activities that would have been avoidable through inclusion in the NPDES program.

I appreciate the opportunity to submit these comments.

John Woodling, PhD.

Table 1. Native Fish Species and legal status of fish species on the western side of the Continental Divide in Colorado. C = Colorado River, W = White River and Y = Yampa River. Status taken from PEIS and Colorado Division of Wildlife, 2007.

Species	Distribution as listed in PEIS	Colorado Distribution by River	Status
Minnows Cyprinidae			
Colorado pikeminnow *Ptychocheilus lucius*	No specific information	C, W, Y	Federal endangered state threatened
Roundtail chub *Gila robusta*	Wyoming, mentioned in White River.	C, W, Y	BLM sensitive, "Three species" Colorado species of concern
Bonytail chub *Gila elegans*	Not mentioned	C, Y	Federal and Colorado endangered
Humpback chub *Gila cypha*	Wyoming, not mentioned in CO.	C, Y	Federal endangered Colorado threatened
Speckled dace *Rhinichthys osculus*	Not mentioned	C, W, Y	
Suckers Catostomidae			
Razorback sucker *Xyrauchen texanus*	Wyoming, not mentioned in CO.	C, W, Y	Federal and Colorado endangered
Bluehead sucker *Catostomus discobolus*	Wyoming, not mentioned in CO.	C, W, Y	BLM sensitive, "Three species"
Flannelmouth sucker *Catostomus latipinnis*	Wyoming, mentioned in White River.	C, W, Y	BLM sensitive, "Three species"
Mountain sucker *Catostomus platyrhynchus*	Not mentioned	C, W, Y	Colorado species of concern
Sculpin Cottidae			
Paiute sucker *Cottus beldingi*	Not mentioned	C	
Mottled sculpin *Cottus bairdii*	Not mentioned	C, W, Y	
Salmonidae			
Colorado River cutthroat trout *Salmo clarkii stomias*	Mentioned as possibly present in Wy and Co	C, W, Y	Petitioned for federal listing, Colorado species of concern
Mountain whitefish *Prosopium williamsoni*	Not mentioned	C, W, Y	

Table 2. Native Mussel species and distribution in northwest Colorado. Distribution data taken from Wu and Brabauer (1978).

Species	Distribution in northwest Colorado
Sphaerium striatinum	Rio Blanco and Moffat County
Pisidium compressum	Rio Blanco County
Pisidium nitidum	Rio Blanco County
Pisidium milium	Rio Blanco and Garfield County
Pisidium casertanum	Rio Blanco and Garfield County

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Response for Document 52779

52779-001: The PEIS analyzes the environmental consequences of proposed allocation decisions in sufficient detail for the decision maker to choose which lands would be available for further consideration for leasing. The proposed allocations do not authorize the immediate leasing of lands for commercial development nor do they create any development rights. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and possible mitigation measures, as well as what level of development may be anticipated. This future analysis will be done in the context of ongoing and anticipated future development of other resources within the area of influence of any proposed oil shale lease. Fishery resources, especially the Colorado River fishes, will be a major concern and will be considered during subsequent NEPA analysis.

52779-002: Additional information pertaining to the occurrence and distribution of fish species (especially sensitive native fish species) within the Piceance Basin has been added to Sections 3.7.1 and 3.7.1.1.4 of the PEIS, including information about roundtail chub, bluehead sucker, flannelmouth sucker, and mountain sucker.

The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. With the noted additions, there is currently sufficient information pertaining to the occurrence of aquatic resources in the Piceance Basin on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to evaluate specific occurrences of species of concern, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis, if fish and other aquatic species of concern are present, may include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts on sensitive resources.

52779-003: Additional information pertaining to the occurrence and distribution of fish and mussel species within the Piceance Basin has been added to Sections 3.7.1 and 3.7.1.1.4 of the PEIS. The information presented in the PEIS for the federally listed species is of sufficient detail for the purposes of the PEIS. The PEIS provides a brief discussion for each of the federally listed species that identifies

the listing status, basic life history and population information, existing threats, and the potential for the species to be affected by commercial oil shale and tar sands development. The PEIS identifies all oil shale basins and STSAs that occur in the watersheds where the Colorado River endangered fishes are found and acknowledges the potential for direct and indirect impacts to these species resulting from development within the watershed. Table E-1 presents the counties and habitats in which the endangered species are found.

See the response to Comment 52779-002 regarding the programmatic nature of this PEIS and subsequent NEPA analysis.

52779-004: The existence of available water in Colorado, as well as in the other two states, is not a certainty. The Draft PEIS indicated that unallocated water is not readily available for consumptive use in the production of oil shale, as stated in Section 3.4.1.

52779-005: The general monitoring of surface water quality is conducted by the USGS and the states. If an oil shale project is proposed, its specific location would be known. Affected streams and aquifers are then identified and monitored. Therefore, it would be more appropriate to design a water quality monitoring system at the project level. The PEIS is a programmatic-level document that analyzes allocation decisions and not leasing or development decisions. The monitoring requirements are going to be written in regulations for leasing that are to be developed in the future.

52779-006: Protection of wetlands and streams by using buffers is described in Sections 4.5.3 and 4.8.2. The buffers are also specified in BLM guidelines, as mentioned in the PEIS.

52779-007: Additional discussion of the potential for sediment impacts on aquatic species and habitats has been added to Sections 4.8.1.1 and 5.8.1.1. Text has been modified to clarify that exceeding (currently unknown) thresholds for sediment inputs to stream and river systems would be expected to have detrimental effects on aquatic resources and that the effects of sediment inputs into streams and rivers have a potential to extend downstream beyond the areas open for oil shale or tar sands development under each of the alternatives.

52779-008: The cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS, (i.e., amending land use plans to allow certain lands to be considered for future leasing). At this preliminary stage, when the specifics of the extent of future oil shale and tar sands development are unknown, it is neither required nor possible for this PEIS to present a detailed cumulative effects analysis of the impacts of leasing and development on aquatic resources.

Impacts to aquatic resources would depend on many factors, including project locations, technologies to be used, and various activities involved in the development. The water depletion issue would be handled in NEPA documents at the project-level when these factors are better defined. Leachate concerns were discussed in the Draft PEIS in Sections 4.5.1.3 and 4.8.1. Instream flow water rights are tools used by CWCB to protect endangered fish species. These water rights are not likely to be exchanged or traded for oil shale development.

52779-009: The cumulative impacts analysis in the PEIS summarizes the past, present, and reasonably foreseeable other activities (for example, oil and gas development, coal mining, minerals development) for the study area, and presents a preliminary qualitative assessment of the incremental impacts of those activities considered in conjunction with oil shale and tar sands development. At this preliminary stage, when the specifics of the extent of future oil shale and tar sands development are unknown, the discussion of the potential impacts of oil shale development is based on the BLM's experience with comparable surface-disturbing activities from other types of mineral development. In order that the decision maker might have sufficient information to make a reasoned choice among the alternatives, the BLM has developed a general analysis of the potential incremental impacts from all past, present, and reasonably foreseeable actions, in conjunction with a single hypothetical oil shale or tar sands facility, with the understanding that there might be more than one, or even many oil shale/tar sands facilities developed in the future. For the purpose of this analysis, parameters for consideration such as land disturbed, water use, and jobs created were developed where possible. For some parameters (such as air emissions), no estimates with respect to possible development could be made because the data would depend entirely on technology-specific inputs.

Prior to leasing (when site-specific and technology-specific data will be available), or approval of a plan of development (when accurate information on water use, air emissions, employment, etc., will be available), additional environmental analysis will be performed including a cumulative analysis, as appropriate.

The projected level of oil and gas development assumed does include thousands of wells (e.g., in Table 6.1.5-4, a projection of 1,500 wells installed/yr in the affected Colorado field office areas over the 20-yr study period is given). The summary of other development given in Tables 6.1.5-4 through 6.1.5-6 was used in the cumulative impact assessment for aquatic resources in Section 6.1.5.3.7. Additionally, the assessment considered other activities such as residential and commercial development (see introduction to Section 6.1.5.3.7). The cumulative assessment for aquatic resources provides a discussion of multiple potential causes for direct disturbance of aquatic habitats, sedimentation as a consequence of soil erosion, changes in water quantity or quality, and changes in human access to aquatic habitats.

52779-010: Text discussing potential increases in nutrient loading associated with oil shale and tar sands development and the potential for impacts to aquatic resources has been added to Sections 4.8.1.1 and 5.8.1.1

52779-011: The issue of salt loadings to the Colorado River was described in Section 3.4.1.2. Selenium and temperature were part of the impaired stream issue that was discussed in Section 3.4.1.3. A list of 303(d) impaired streams is provided in Table 3.4.1-1. Section 3.4.1.4 of this PEIS recognized instream flow requirements in some streams in the oil shale areas; a list of streams that have existing instream flow requirements has been added in Section 4.8.

52779-012: Colorado has been delegated permit authority for the NPDES permit program including stormwater permits for all areas except Indian lands and federal facilities. Therefore, the State of Colorado has the permitting authority for point sources on BLM lands. The state has also been delegated authority for the §404 dredge and fill program. However, in the 1987 amendments to the CWA, Congress explicitly excluded stormwater runoff from the definition of a point source. Runoff from mining operations or oil and gas exploration, production, or treatment operations is exempt from the NPDES permit program if that runoff is composed entirely of flows from conveyances or conveyance systems used for collecting and transporting precipitation runoff. To qualify for the exemption, however, the runoff must not be contaminated by contact with any overburden, raw material, intermediate product, finished product, by-product, or waste product located on the site of operation. (Source: BLM, Western States Water Laws, available at: http://www.blm.gov/nstc/WaterLaws/Chap2.html, accessed 4/11/08). Stormwater runoff was excluded from the definition of a point source. Runoff from mining operations or oil and gas exploration, production, or treatment operations is exempt from the NPDES permit program if that runoff is composed entirely of flows from conveyances or conveyance systems used for collecting and transporting precipitation runoff.

52779-013: This PEIS does not ignore the potential water quality impact on existing streams. A list of 303d streams in Colorado and the two other states is provided in this PEIS, and common impacts on streams are described (see Sections 4.51 and 3.4.1.3 and Table 3.4.1-1). Any discharges to these streams should be addressed at the project level when the specific location of a project site is defined.

52779-014: See the response to Comment 52779-001. In addition, the more specific information suggested for the river sections mentioned is not needed to support the current land allocation decisions.

52779-015: Because the number and specific characteristics of potential projects are not known at this time, the PEIS evaluates potential impacts in a relatively generic fashion appropriate for a programmatic EIS and sufficient to make decisions regarding land use allocations. In addition to the discussion of the types of impacts that would be common to all the oil shale alternatives (Section 4.8.1.1),

the level of impacts associated with oil shale alternative A are discussed in Section 6.1.1.7.1; those associated with Alternative B are discussed in Section 6.1.2.7.1; and those associated with alternative C are discussed in Section. 6.1.3.7.1. The impacts of alternatives on threatened and endangered species are compared in Section 6.1.4.7.1.

52779-016: All surface water bodies and groundwater near an oil shale development site would be affected in terms of flows and water quality. This is demonstrated in Section 4.5.1.

52779-017: See response to Comment 52779-002. Information about mussel species within the basin has also been added. Brief descriptions of angling opportunities in nearby streams and reservoirs of the Piceance Basin has also been added to Section 3.7.1.1.4.

52779-018: The information presented in the PEIS on these and other federally listed species is of sufficient detail for the purposes of the PEIS. The PEIS provides a brief discussion for each species that identifies the listing status, basic life history and population information, existing threats, and the potential for the species to be affected by commercial oil shale and tar sands development. The PEIS identifies all oil shale basins and STSAs that occur in the watersheds where the Colorado River endangered fishes are found and acknowledges the potential for direct and indirect impacts on these species resulting from development within the watershed. The PEIS also states that all water depletions from the Colorado River Basin would be considered an adverse impact on these fishes.

52779-019: See response to Comment 52779-017.

52779-020: Text has been added to Sections 4.8.1.1 and 5.8.1.1 identifying the potential for impacts to fishing opportunities in nearby reservoirs if water storage is altered by oil shale development or if populations of targeted species are reduced due to effects on water quality or quantity.

52779-021: The overall distribution of mussel species within the surface water features located in the areas potentially available for oil shale and tar sands development under the various alternatives is not well known. Text has been added to Section 3.7.1 to identify that mussels are likely to be present in many of the aquatic habitats in the vicinity of oil shale and tar sands areas, including brief summaries of known presence in particular systems for which information is available. Text has also been added to Sections 4.8.1.1 and 5.8.1.1 identifying that mussel species could also be affected if oil shale and tar sands development negatively affects water quality or quantity.

52779-022: See response to Comment 52779-017.

52779-023: See response to Comment 52779-017.

52779-024: See response to Comment 52779-018.

52779-025: See response to Comment 52779-017.

52779-026: The potential for development of oil shale resources to result in water depletions and water use conflicts in the Colorado River basin are identified in Section 4.5 of the PEIS. Section 4.8.1.1 identifies that such depletions could have detrimental effects on aquatic resources in general, and Section 4.8.1.4 specifically recognizes that any water depletions from the upper Colorado River basin are considered an adverse effect on endangered Colorado River fishes and that oil shale development could result in significant adverse impacts. Text has been added to Section 4.8.1.4 and 5.8.1.4 regarding the impacts of impoundment and changes in stream flows in downstream areas.

52779-027: This issue raised in the comment is discussed in Section 6.1.5.3.4 of the Draft PEIS.

52779-028: Any water depletions from a river in Colorado have to adhere to many regulations, including instream flow requirements that were discussed in Sections 3.4.1 and 4.5.2 of the Draft PEIS. Please see also the response for Comment 52779-004.

52779-029: CWCB has the exclusive authority to protect instream flows. A list of stream segments with current instream flows requirements in Water Divisions 5 and 6 has been added to the PEIS and is presented in Appendix I. Protection of Endangered Species Fishes is described in Section 3.7.4. The general stream flow impacts on aquatic resources are described in Section 4.8.1.4.

This PEIS is a programmatic-level document that analyzes land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and provide an effective analytical foundation for subsequent project-specific NEPA documents. Any specific impacts on water and watershed resources from oil shale and tar sands leasing and development would be addressed in the project-specific NEPA documents.

52779-030: See response to Comment 52779-029.

52779-031: Sections 4.8.1.1 and 5.8.1.1 have been modified to more clearly identify that water depletions could adversely affect native fish species.

52779-032: See response to Comment 52779-029.

52779-033: The potential for development of oil shale resources to result in water depletions in the Colorado River basin are already identified in the PEIS. Section 4.8.1.1 identifies that such depletions could have detrimental effects on aquatic resources in general, and Section 4.8.1.4 specifically recognizes that any water depletions

from the upper Colorado River basin are considered an adverse effect on endangered Colorado River fishes and that oil shale development could result in significant adverse impacts.

Because the number and specific characteristics of potential projects are not known at this time, the PEIS evaluates potential impacts from these and other factors in a relatively generic fashion appropriate for a programmatic EIS and sufficient to make decisions regarding land use allocations. In addition to the discussion of the types of impacts that would be common to all the oil shale alternatives (Section 4.8.1.1), the level of impacts associated with oil shale alternative A are discussed in Section 6.1.1.7.1; those associated with Alternative B are discussed in Section 6.1.2.7.1; and those associated with Alternative C are discussed in Section. 6.1.3.7.1.

52779-034: Additional text pertaining to potential impacts of oil shale and tar sands development on water quality aspects such as sediments, nutrients, salt loading, and temperatures have been added to Sections 4.8.1.1 and 5.8.1.1 of the PEIS. Because the number and specific characteristics of potential projects are not known at this time, the PEIS evaluates potential impacts from these and other factors in a relatively generic fashion appropriate for a programmatic EIS and sufficient to make decisions regarding land use allocations. In addition to the discussion of the types of impacts that would be common to all the oil shale Alternatives (Section 4.8.1.1), the level of impacts associated with oil shale alternative A are discussed in Section 6.1.1.7.1; those associated with Alternative B are discussed in Section 6.1.2.7.1; and those associated with Alternative C are discussed in Section. 6.1.3.7.1.

52779-035: Additional discussion of the potential for sediment impacts to aquatic species and habitats has been added to Sections 4.8.1.1 and 5.8.1.1. Text has been modified to clarify that exceeding (currently unknown) thresholds for sediment inputs to stream and river systems would be expected to have detrimental effects on aquatic resources and that the effects of sediment inputs into streams and rivers have a potential to extend downstream beyond the areas open for oil shale or tar sands development under each of the alternatives.

52779-036: See response for Comment 52779-006.

52779-037: The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and provide an effective analytical foundation for subsequent project-specific NEPA documents. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to evaluate specific occurrences of species of concern, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable

alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis, if fish and other aquatic species of concern are present, may include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts on sensitive resources.

52779-038: In arid or semi-arid environments, all streams, regardless of whether they are intermittent or perennial, are sensitive to environmental changes because of sensitive soil conditions around them and large flow fluctuations. Treating perennial and intermittent streams separately is relatively arbitrary. The proximity of river bodies is an important factor in terms of sediment loadings to streams. This issue would be handled at the project level when the location of a project site is determined.

52779-039: The impact of domestic waste from population growth has been added to the common impact Section (Section 4.5.1.3).

52779-040: See response for Comment 52779-011.

52779-041: Additional information pertaining to the occurrence and distribution of fish species (especially sensitive native fish species) within the Piceance Oil Shale Basin has been added to Sections 3.7.1 and 3.7.1.1.4 of the PEIS, including information about roundtail chub, bluehead sucker, flannelmouth sucker, and mountain sucker. Information about mussel species within the basin has also been added.

The potential for development of oil shale and tar sands to affect loadings of sediment, salts, and other water-borne constituents is addressed in Sections 4.5 and 5.5 of the PEIS, and the potential impacts of such water quality changes to affect aquatic resources are identified in Sections 4.8.1.1 and 5.8.1.1 of the PEIS.

Because the number and specific characteristics of potential projects are not known at this time, the PEIS evaluates potential impacts in a relatively generic fashion appropriate for a programmatic EIS and sufficient to make decisions regarding land use allocations. In addition to the discussion of the types of impacts to aquatic resources that would be common to all the oil shale alternatives (Section 4.8.1.1), the level of impacts to aquatic resources associated with oil shale Alternative A are discussed in Section 6.1.1.7.1; those associated with Alternative B are discussed in Section 6.1.2.7.1; and those associated with Alternative C are discussed in Section. 6.1.3.7.1. The impacts of alternatives on threatened and endangered species are compared in Section 6.1.4.7.1.

52779-042: Water depletion may cause water quality deterioration due to increasing proportions of groundwater discharge that generally has poorer water quality (see Section 4.5.1.2). The water quality includes salt loading and selenium. A sentence

has been added to specify that salt loading and selenium are part of the water quality discussion.

52779-043: See responses for Comments 52779-011 and 52779-042.

52779-044: See response for Comments 52779-011.

52779-045: A paragraph has been added to Section 4.5.1 to address temperature effects of water withdrawal/depletion from surface water bodies.

52779-046: Information regarding the presence of mountain sucker in the Piceance Basin has been added to Section 3.7.1.1.4 of the PEIS. Text has been added to Sections 4.8.1.4 and 5.8.1.4 regarding the impacts of changes in water temperature on endangered fishes.

52779-047: Text identifying the potential for transportation of petroleum products to result in accidental spills that could kill aquatic organisms has been added to Sections 4.8.1.1 and 5.8.1.1.

52779-048: See response for Comment 52779-005.

Thank you for your comment, Bruce Lytle.

The comment tracking number that has been assigned to your comment is OSTSD52780.

Comment Date: March 19, 2008 17:28:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD52780

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Attachment: Draft PEIS Comment Letter.pdf

Comment Submitted:

I am submitting a comment letter and three appendices. The appendices will follow in subsequent emails.

Thanks,

Bruce Lytle See Attachment.

LYTLE WATER SOLUTIONS, LLC

March 19, 2008

BLM Oil Shale and Tar Sands Programmatic EIS
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Subject: Comments Related to Water Rights Issues in the *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement.*

Project No. 1148-08

To Whom It May Concern:

The Bureau of Land Management (BLM) issued the draft Programmatic Environmental Impact Statement (PEIS) on December 21, 2007. This PEIS examines alternatives for making BLM-administered lands available for oil shale and tar sands resource development. One of the principal issues that will affect both oil shale and tar sands development is the legal and physical availability of water and the associated impacts with the development of these water resources. Lytle Water Solutions, LLC (LWS) is providing comments on the draft PEIS in the area of water resources and water rights. The resume of the undersigned, Bruce A. Lytle, P.E., of Lytle Water Solutions, LLC (LWS) is attached as Appendix A. I have worked continuously in the field of surface water and ground water resources, including involvement in all types of water rights, for over 30 years.

My comments are arranged in the following sections:

- Overview of Water Rights Issues
- Comments on the Use of Surface Water Resources
- Comments on the Use of Ground Water Resources
- Proposed Systematic Approach to Water Supply/Rights Evaluations

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OVERVIEW OF WATER RIGHTS ISSUES

As part of the draft PEIS, three alternatives were evaluated for both future development of oil shale and tar sand resources. ***Alternative A*** is the "no-action" alternative, in which no current land use plans would be amended. ***Alternatives B and C*** envision the BLM designating additional lands for commercial oil shale and/or tar sands development leasing. In Alternative B, 1,991,222 acres (ac) would be made available for oil shale leasing and an additional 431,224 ac would be made available for commercial tar sands leasing. In Alternative C, 830,296 ac would be made available for commercial oil shale leasing and an additional 229,038 ac would be made available for commercial tar sands leasing. The draft PEIS chose Alternative B as the preferred alternative.

The draft PEIS (Chapter 4) estimates that 2.6 to 4.0 barrels (bbl) of water could be required for each barrel of oil shale if the oil shale is extracted through a surface mine, while 1.0 to 3.0 bbl of water could be required for each barrel if the oil shale extraction is through in-situ means. For tar sands development, it is estimated that water use could be approximately 5.0 bbl of water for every barrel of crude oil for an in-situ process, while water demands could be as high as 14.2 bbl of water per barrel of crude oil for a surface mine with surface retort (Table 5.5.2-1). According to the draft PEIS, only surface mining related to tar sands development was considered.

While annual production rates that may be achieved are vague in the draft PEIS, it appears that future production could reach the range of 1,000,000 to 3,000,000 bbl per day (Bartis et al, 2005). Given these estimates of future production rates and estimated unit water demands for the various technologies, this could result in water supply needs ranging from 91,750 to 423,435 acre-feet per year (ac-ft/yr) for surface mining, 35,290 to 317,575 ac-ft/yr for in-situ operations, and approximately 50,100 ac-ft/yr for surface mining of tar sands (assuming 10,344 barrels of water per ac-ft). What is clear from this simple analysis is that there will be large quantities of water (up to approximately 425,000 ac-ft/yr) that will be necessary for either oil shale or tar sands development and that there is a very wide range of values, depending on which variables one chooses to use.

This analysis, then, raises the question as to whether these quantities of water are potentially available in northwestern Colorado, southwestern Wyoming, and eastern Utah, and whether these water supplies, even if they are available, are available at the locations where they are needed. Associated with the development of such a large volume of water resources (whether it be surface water resources or ground water resources) are the impacts related to the infrastructure needed to develop these water resources and the hydrologic and hydraulic impacts to the overall water resource system beyond the water that is being developed. These impacts will also vary based on whether surface water resources are developed or ground water resources are developed.

Overall, I believe that the draft PEIS is lacking in a number of areas related to water rights and water resources. These general inadequacies include:

- The draft PEIS overstates water availability for oil shale development, because it doesn't evaluate site-specific water supplies in the basins being developed.
- The draft PEIS may overstate Compact water supply availability based on erroneous assumptions regarding the Compact.
- The draft PEIS doesn't assess impacts related to water supply development for oil shale if the primary water supply has to come from the retirement of agricultural water rights and the dry-up of agricultural lands.
- The draft PEIS doesn't adequately address water rights issues related to:
    a) mitigation of impacts related either to surface water or ground water supply development;
    b) hydraulic interconnection of aquifers;
    c) permanent hydraulic changes to both ground water and surface water systems; and
    d) water quality.

52780-001

Based on this summary of issues, I have divided my comments to specifically address surface water resources and ground water resources issues that I believe either need to be described more fully or need to be identified because they were left out of the draft PEIS.

COMMENTS ON THE USE OF SURFACE WATER RESOURCES

As described above, the potential water demand for oil shale and tar sands development is very large (required water supplies of up to 425,000 ac-ft/yr) and, at this time, the locations for this water use are largely undefined. Therefore, it is difficult to provide specific comments regarding water rights issues and impacts from this water use. However, what is described in the draft PEIS are two potential sources to provide the necessary water under preferred Alternative B; namely, changes in senior agricultural water rights to industrial/mining use and the development of new rights under the unused state allocations in the Colorado River Compact (Compact). My comments on surface water rights issues in the draft PEIS are presented below.

52780-002

There are insufficient surface flows in most of the basins that could provide water to the oil shale industry, regardless of surpluses in the Compact entitlements. While the draft PEIS acknowledges that some basins may be water short, it assumes this situation can be overcome by

storage and pipelines. The major drainage basins where surface water supplies could potentially be developed in northwestern Colorado are the White River and the Piceance Creek tributary, as well as the Roan Creek and Parachute Creek tributaries to the main stem of the Colorado River. Based on the estimated demands shown above, instantaneous water demands could be in the range of 168 to 775 cubic feet per second (cfs). To evaluate these demands in the context of available river flows in the drainage basins in the potential oil shale development areas, we have obtained historic stream flow records for each of the river basins where potential water supply development could occur. These stream flow data are presented in Appendix B.

While the White River provides the highest stream flows, during base flow conditions it could not provide sufficient water for the full oil shale development under the preferred Alternative B. When similar stream flow data are reviewed for Piceance Creek, Parachute Creek, and Roan Creek, these stream systems cannot come close to providing the required water demands, with base flows ranging from less than 10 to 30 cfs (Appendix B). In addition, according to the Water Commissioners in these basins, they are all currently over-appropriated, so any proposed new water supply development would be unreliable (Bill Dunham, District 43 Water Commissioner, personal communication, March 4, 2008 and Jim Lemon, District 39 Water Commissioner, personal communication, March 5, 2008). Therefore, while the draft PEIS projects Colorado's future surplus under the Compact, it is not evaluating site-specific data, but is evaluating the Colorado River system as a whole. Surface water storage and local pipelines will not solve local water supply shortfalls if all the local streams are water short and over-appropriated.

52780-002 (cont.)

Providing water supplies through surface storage, pump stations, and pipelines can be very expensive. The draft PEIS does not address the issue of the cost to develop water supplies at remote locations from where the water supplies are needed, only a generic statement that it can be done. My experience indicates that, if significant surface water storage is built to provide carryover storage and that pump stations and pipelines are necessary to transport the water relatively long distances, the cost for these water supply systems can be in the range of $12,500 to $20,000 per acre-foot. Given the scale of oil shale development projected in the draft PEIS, just development of water supplies from distant sources could cost in the billions of dollars.

52780-003

Available surplus water under Colorado's Compact entitlement is not well defined, could be smaller than suggested in the draft PEIS, and administrative issues related to the Compact are not settled. The draft PEIS makes assumptions regarding the physical and legal availability of water that may be incorrect, or are unsettled at best. According to the draft PEIS, Colorado has an allocation of 3,079,125 ac-ft under the Compact, with a projected future water surplus of approximately 270,000 to 415,000 ac-ft (Table 3.4.1-2). However, this range of values of excess water is not currently accepted by Colorado state water officials. In fact, the Colorado Water Conservation Board (CWCB) is currently initiating a study in June 2008 to first evaluate the

52780-004

historic uses of Colorado's allocation under the Compact (Phase 1). Phase 1 of the study is expected to be completed by June 2009, with an expected range quantifying historic use under the Compact. Phase 2 is then expected to be initiated and completed by July 2010, and will evaluate future hydrologic conditions. Through this phased effort, the CWCB will determine Colorado's allocation under the Compact based on water availability, then evaluate what additional consumptive use water is available based on current consumptive uses. It is likely that this will result in a range of values and it is expected to take 2 to 3 years to establish these values.

52780-004 (cont.)

At the same time, the CWCB and the State Engineer's Office (SEO) are planning a study to evaluate administrative issues related to potential curtailment due to Compact calls if cumulative flows at Lee Ferry fall below 75,000,000 ac-ft over a ten-year running average. The reason this is an issue is that, if there is only 12,000,000 ac-ft of water on an average annual basis in the Colorado river system (pp. 3-60 in the draft PEIS) and 7,500,000 ac-ft/yr has to be delivered at Lee Ferry, this could further limit allocations to the Upper Basin States. The issues that will be evaluated in the CWCB/SEO study relate to when Colorado should start curtailing water use to preserve the necessary deliveries at Lee Ferry (as year-to-year, and future, hydrologic change may occur) and it is also likely that rules and regulations will be adopted by Colorado that will guide the administration of these water rights (Randy Seaholm, CWCB, personal communication on March 5, 2008). This study will be conducted in conjunction with the CWCB study to determine what is Colorado's allocation under the Compact. It is expected that this study could take two years to complete and possibly five years to promulgate rules and regulations. None of these facts is cited in the draft PEIS, but I believe it should be acknowledged that there is a significant amount of uncertainty regarding the excess allocation remaining in Colorado's allotment under the Compact. In fact, the PEIS needs to await the outcome of these studies to accurately assess impacts.

52780-005

Large-scale oil shale development, given its expected water demands, would greatly increase the possibility of a Compact call in the Upper Basin States. As described above, oil shale development of the magnitude described in the draft PEIS would produce annual water demands in the hundreds of thousands of acre-feet. Clearly, there is not this much water available under the Compact under virtually any interpretation of the water resources available to the Upper Basin States, the water currently allocated, and the future water commitments under the Compact which are, as yet, undeveloped. Therefore, this type of large-scale water supply development by the oil shale/tar sands industry threatens to greatly increase the chance of a Compact call. As described above, Colorado is already evaluating how to deal with potential future Compact calls, and is possibly going to provide rules and regulations regarding potential calls. I believe that the PEIS needs to identify this issue, as it could be a major impediment to large-scale oil shale development in the Upper Basin States.

52780-006

Even once excess Compact entitlements are quantified, this does not necessarily mean that water is physically available for oil shale development. While the draft PEIS takes a global approach to the Compact entitlement by state, not evaluating specific basin water supply availability produces potential erroneous conclusions. For example, the Colorado Supreme Court has indicated that there could be as much as 240,000 ac-ft of water available as a marketable pool yield from Blue Mesa Reservoir in the Gunnison River Basin, yet none of this water would be physically available for oil shale development, given its location. Given a projected water surplus in Colorado of 270,000 ac-ft in 2030 (assuming high consumptive use) in the draft PEIS (Table 3.4.1-2), the vast majority of this water surplus may be physically unavailable for oil shale development. This fact, coupled with the over-appropriated nature of local streams makes excess Compact entitlement a potentially moot point. Therefore, the draft PEIS fails to evaluate site-specific details of surface water supplies that are physically available in the oil shale development area. The global approach taken in the draft PEIS is not an accurate assessment of water supply availability. 52780-007

Utah does not currently believe there is excess water available under its Compact entitlement. In Utah, the draft PEIS indicates that Utah's allocation under the Compact is 1,358,500 ac-ft and that future surpluses could be in the range of 195,000 to 280,000 ac-ft (Table 3.4.1-3). However, according to the Utah Division of Water Rights, it is only approving small applications only (one residence, ten stock animals, and one acre of irrigation). The reason that Utah is approving only these small applications is that many water applications have been approved but are not currently in use (Mark Stilson, Utah Division of Water Rights, personal communication, March 4, 2008). In fact, in a recent water workshop on March 6, 2007, the Utah State Engineer, Mr. Jerry Olds, indicated that as much as much as 593,100 ac-ft is currently committed to approved water applications, which includes 155,000 to 255,000 ac-ft for the Ute and Navajo tribes in his PowerPoint presentation at the workshop (click on *Jerry Olds WLP conference,* http://www.waterrights.utah.gov/meetinfo/m20070306/default.htm). Therefore, based on these facts, Utah may already be out of any excess Compact entitlement and currently won't approve new large water use applications. None of these facts is included in the draft PEIS, but obviously if Utah believes it does not have any excess Compact entitlement and won't approve new large water use applications, this could dramatically change the water supply availability picture as depicted in the draft PEIS and potential impacts, as retirement of agricultural lands would be the only remaining surface water supply option. 52780-008

Tar sands development is proposed to be entirely in Utah; therefore, water rights will be a major issue, as Utah doesn't believe that there are currently any excess Compact entitlements. As described above, there are currently a number of approved applications for depletions in the Colorado River system in Utah that are undeveloped but, should they be developed, these approved applications would eliminate any excess water available under the Compact in Utah. The 52780-009

final PEIS needs to provide a more thorough evaluation of what constitutes excess Compact entitlements in its "Affected Environment" chapter so that a more realistic picture of potential excess entitlements is presented. Again, with no current ability to develop excess Compact entitlements in Utah, water supplies would have to come from either retirement of agricultural lands or ground water supplies (both of which have their own impacts which would have to be mitigated). 52780-009 (cont.)

Vested water rights users are entitled to a water quality that they have historically enjoyed. There is no discussion in the draft PEIS regarding protection for vested water rights. Not only are vested water rights users to be protected in terms of the quantity and timing of flows, but also are entitled to maintenance of a water quality similar to what they have had historically. There is significant discussion in the draft PEIS regarding chemical alterations of subsurface strata due to mining operations and the re-establishment of ground water levels and base flow to streams and springs after mining ceases. It needs to be pointed out in the PEIS that water quality conditions need to be maintained for the benefit of downstream water rights users or mitigation measures need to be implemented to preserve this water quality. 52780-010

The PEIS needs to recognize that there are also competing uses for any remaining excess Compact entitlements. There is significant growth in all three states and, while expected future water demands were estimated in the affected environment chapter, there are potentially other competing interests that were not identified. For example, in Table 3.4.1-2, which estimates Colorado's future water demand and consumptive use, it is estimated that export from the Yampa River Basin will be 1,800 ac-ft/yr into the future. The Northern Colorado Water Conservancy District has recently proposed a project whereby up to 300,000 ac-ft/yr of water could be diverted from the Yampa River to the Front Range of Colorado for municipal and industrial use. In addition, there are flow requirements for endangered fish in the Green, Colorado, and Gunnison Rivers, additional municipal and industrial water development needs on the western slope of Colorado, and potentially water needs for other forms of energy development. Therefore, the PEIS is not accurately depicting the potential competing uses for excess Compact entitlements. 52780-011

Changes of use related to historic irrigation water rights being converted to allow mining use, in and of themselves, do not provide an adequate, reliable water supply. In Colorado, any change of use has to go through Water Court, where it is necessary to prove the historic consumptive use associated with that water right. In Wyoming and Utah there is a similar process, although it is administrative in nature. One key component of the change of use proceeding, which applies in all three states, is that it is still subject to the Doctrine of Prior Appropriation and, therefore, the reliability of the water right is a significant issue. Not all water rights are equal, nor does the same water right priority provide equivalent reliability in different water basins. If the historic water rights are not reliable under all hydrologic conditions, both currently and under 52780-012

future conditions, then there would be a need to provide sufficient carryover storage to firm the rights to provide a reliable water supply. While this fact was cited in the draft PEIS, there was no analysis, or even recognition, that with small drainage basins with low base flow, e.g., Parachute, Roan, and Piceance Creeks, the storage requirements would be enormous and, even then, it is likely that sufficient water use could not be provided for large operations. Therefore, water will likely provide significant restrictions on overall oil shale development potential. 52780-012 (cont.)

Changes of use for existing rights need to provide adequate mitigation protection, both during mining and post-mining. In a change of use proceeding in Colorado, it is necessary to demonstrate that there is no injury to other water rights, including maintaining the return flow component to the stream so that there are no changes to hydrologic conditions that downstream vested water rights users have come to rely upon through the use of their water rights. All change of use proceedings that obtain a Water Court decree will be subject to the Court's retained jurisdiction to evaluate if any injury does occur once the change of use is put into operation. This becomes very important as it relates to potential in-situ oil shale technologies that likely could cause fracturing in the subsurface and thereby alter hydraulic interactions between surface water and ground water supplies. For example, while a change of use proceeding could identify the means by which injury would be prevented through a representative evaluation of historic consumptive use and return flow patterns, if the basin hydrologic regime is then subsequently altered due to mining, additional injury to downstream water rights could occur after implementation of the change of use. This likely would continue into the post-mining period as well, so it is important up front to understand and provide mitigation measures. This issue should be identified in the PEIS, as it could dramatically affect the ability simply to provide a change of use for existing water rights. It may be necessary to provide additional augmentation water to offset impacts to the hydrologic regime, which may result in the need for a perpetual source of water to mitigate permanent changes to the hydrologic system. 52780-013

If water related to excess Compact entitlements is not available for oil shale development, it is likely that the principal source of water will come from the dry-up of historically-irrigated agricultural lands. While this topic is discussed in the draft PEIS, the potential magnitude of the issue is not. Based on my experience with agricultural lands and the conversion factor in a change of use proceeding, irrigated land typically has an historic consumptive use of approximately 1.5 ac-ft/ac. Given the estimated water demands provided in my "Overview of Water Rights Issues" section, as much as 283,000 ac of agricultural land would need to be dried up to support oil shale surface mining, 212,000 ac to support in-situ operations for oil shale, and/or an additional 33,500 ac to support tar sands resource development if the water supply was to be provided solely from agricultural lands. To illustrate this issue, the District 43 Water Commissioner, Mr. Bill Dunham, has provided me a partial list (though it may not be totally up to date, by Mr. Dunham's own admission) which shows the ditch rights (including conditional rights) that have been purchased 52780-014

by oil and gas, and oil shale, interests. This list is presented in Appendix C. Also included in Appendix C is the Master Water Rights List from the Colorado SEO which includes the rights in Mr. Dunham's list. As these lists show, oil shale interests have already purchased large amounts of water and, in many cases, have the controlling interests of all rights in the basin (Roan, Piceance, and Parachute Creeks). 52780-014 (cont.)

The PEIS needs to identify the magnitude of agricultural rights that potentially are going to be transferred and assess whether there is even this much agricultural land that could be dried up. The PEIS also needs to provide an assessment of the impacts related to the drying of this much agricultural land. These impacts could be related to increased soil erosion which, in turn, creates increased sediment loads in streams, as well as environmental resource issues. The retirement of this much agricultural land runs counter to Colorado's Statewide Water Supply Initiative (2004), which estimated the retirement of only 8,000 to 16,000 ac of irrigated land in the Colorado River Basin to 2030 and the potential to increase agricultural production in the Yampa/White/ Green River Basin by as much as 39,000 ac by 2030. The PEIS needs to acknowledge the potential for oil shale development to run counter to some of Colorado's long-range water supply plans. 52780-015

COMMENTS ON THE USE OF GROUND WATER RESOURCES

While it likely that the principal water supply sources for both oil shale and tar sands development will be surface water supplies, there is the potential for development of ground water supplies and, moreover, impacts of mining can affect ground water resources and existing ground water rights even if ground water resources aren't being used for the mining operations. In addition, both mining activities and ground water supply development have the potential to impact surface water resources. Similar to the use of surface water resources, the draft PEIS lacks sufficient and specific data on which to comment, so my comments are of a more general nature regarding the potential for impacts to ground water resources and ground water rights, and are presented below.

Oil shale deposits are, in many cases, contained in zones which are bounded above and below by ground water aquifers, which will create hydraulic interconnections that previously did not exist, thereby creating potential water rights issues. In Chapter 3 of the draft PEIS, which describes the affected environment, the description of the ground water resources in the various basins (Piceance, Uinta, Green River, and Washakie) indicate generally low-permeability materials and the presence of hydraulically-connected ground water aquifers above and below oil shale zones. This could have significant impacts on both existing ground water rights and surface water rights that are not fully discussed in the draft PEIS. Since some in-situ technologies for oil shale include increasing both the hydraulic conductivity and the porosity of the host rock, there are implications to water rights as a result of these types of operations. For example, it is likely that increasing conductivity and porosity in the rock hosting the oil shale will create hydraulic 52780-016

connections between aquifers above and below the oil shale zone. Since Colorado and Wyoming require permitting of wells in only one aquifer and do not allow the cross-connection between two hydraulically-distinct aquifers, the proposed oil shale development technologies could run afoul of existing water law in those states. The PEIS needs to discuss how these hydraulic interconnections will be avoided. 52780-016 (cont.)

When the hydraulic conductivity and the porosity of the oil shale host rock is permanently increased, hydraulic changes in ground water flow will occur which could injure vested ground water rights. Permitting for ground water rights is based on a completion interval for the aquifer and an anticipated extraction rate. When the hydraulics of a specific ground water system are permanently altered, ground water flow patterns will change. When both porosity and hydraulic conductivity of a system are permanently changed, ground water flow patterns have to change, as well. This will result in injury to ground water rights permitted in the affected aquifers in the vicinity of any oil shale development projects. This injury can be in the form of quantity, quality, or both. This issue was not discussed in the draft PEIS, but should be identified as a potential injury issue to ground water rights and the need to mitigate this injury based on the type of oil shale projects developed. 52780-017

The presumption in the draft PEIS that surface water and ground water conditions would return to pre-mining levels after the cessation of mining is unsupported by any facts. Given that there are ground water aquifers generally overlying the oil shale deposits and the shallower aquifers are hydraulically connected to surface streams, I fail to see how the draft PEIS can come to the conclusion that pre-mining ground water levels and pre-mining surface water flows will be restored once mining ceases. With permanent changes that will occur to the hydraulics of the ground water systems, it is highly unlikely that pre-mining conditions can or will be re-established. The question then becomes whether the altered hydrologic conditions can or will cause injury to either surface water or ground water rights as a result of the mining operation. This issue should be identified in the PEIS, because it is likely to be a major issue from both quantity and quality perspectives. 52780-018

Either ground water supply development for mining use, or mining operations themselves, can cause hydraulic discontinuities in local ground water systems that were not present prior to the mining operation and/or the ground water supply development to support mining. Potential hydraulic impacts can occur due to mine dewatering, development of ground water resources for mine use, surface mining operations that eliminate portions of aquifers, and/or in-situ mining that alters pre-existing aquifer hydraulics. The impacts from these activities could range from minor to severe, depending on the location of adjacent water rights, the degree to which these hydraulic changes affect a specific water right, and the degree of change that occurs in the ground water system. Again, since these changes would be, for the most part, permanent, it is necessary 52780-019

to identify the need for potential replacement water supplies should these types of injurious depletions occur to vested ground water rights. 52780-019 (cont.)

Development of ground water resources can also affect stream flows through lagged depletions. When ground water resources are pumped (either for dewatering or for water use), or if ground water flow paths are altered due to mining techniques, impacts to surface water supplies are not typically observed either instantaneously or in a short period of time. Often, when the ground water is hydraulically connected to the stream systems there is a lagging effect, whereby the impacts from ground water changes to the stream systems may not be felt for months, or even years. This potential delayed effect on stream systems, which is not instantaneous but is, nevertheless, considered an injurious effect over time, needs to be fully described in the PEIS to identify the issue whenever ground water resources are being impacted. Ongoing mitigation of these impacts, even after mining ceases, will likely be required as a result. 52780-020

Changes in ground water levels may permanently hydraulically disconnect a previously connected stream/aquifer system. The draft PEIS implies that any hydraulic changes which occur due to oil shale mining would be of a temporary nature and that pre-existing conditions would be re-established upon the cessation of mining. This is actually highly unlikely, given that the underground geologic structure will be forever altered and the hydraulic movement of water through mine-affected areas will also be permanently altered. In areas where ground water may have been providing base flow to streams, and that condition is permanently altered, there could be significant injury to surface water rights that is the result of changes in ground water conditions. This concept needs to be fully developed in the PEIS. To that end, there are 172.5 miles of in-stream flow reaches in the White River Basin and 56.6 miles of in-stream flow reaches in the Parachute Creek/Roan Creek Basins, according to the CWCB's in-stream flow list. These flows need to be protected when new uses have the potential to injuriously affect stream flows. 52780-021

There is the implication that well injection as a means to dispose of low-quality water could be used at these sites. I believe that it needs to be made clear in the PEIS that well injection can only occur in deep, confined, non-potable aquifers and that a Class I permit will be required from the EPA's Underground Injection Control Program. There is the implication in the draft PEIS that some injected water could ultimately recharge surface water supplies, which would imply that a Class V UIC permit could be obtained for this type of operation. I disagree. I believe this reference in the PEIS should be deleted or modified to make it clear that a Class I permit would be required, as the purpose of the disposal of low-quality water is to inject it into a system that will control this low-quality water and not discharge it to a surface stream system. If injected, low-quality water does ultimately discharge to surface water supplies, there is then the issue related to downstream surface water rights users and the expectation that they continue to receive the water quality they 52780-022

are accustomed to receiving and are not having their water quality degraded to a point where the water is not suitable for its permitted uses. 52780-022 (cont.)

Some of the proposed ground water technologies for in-situ extraction of oil shale may infringe upon existing ground water rights. One of the technologies being developed by Shell is the "freeze well," which is designed to isolate a vertically-oriented column of the oil shale formation. While specific details of this technology were not provided in the draft PEIS, if the freeze well acts similar to a slurry wall, whereby ground water flow through a zone is prevented, there could be injury to existing ground water rights if ground water flow is disrupted. This issue should be described in the final PEIS. 52780-023

PROPOSED SYSTEMATIC APPROACH TO WATER SUPPLY/RIGHTS EVALUATIONS

While the draft PEIS identified some of the issues that I have discussed, it acknowledged that "[t]he inability to predict specific locations for potential future commercial development and a lack of information regarding the type of technology that might be employed make it impossible to predict the specific impacts on water resources that could occur with commercial development." This is a serious flaw at this stage with the PEIS and, because of this, I believe that a strict showing of a specific water supply plan, and its impacts, has to be required to do any revisions to any land management plans.

While I appreciate that the lack of specificity regarding mine development at this time makes it difficult to predict specific impacts, I believe that this makes it imperative that the PEIS establish a systematic approach to evaluating water supply and water rights when revisions to land management plans and/or lease applications are made to the BLM for either oil shale or tar sands resource development. By evaluating water supplies and water rights on a global scale, without understanding water issues on a more basin-by-basin scale, the PEIS has missed the fact that oil shale and tar sands resource development will likely be severely constrained by available water supplies. I believe that this is one of the major shortcomings of the draft PEIS, as water supply/water rights is one of the critical components to a "go / no-go" determination relative to approving a lease application. Therefore, I would recommend that the final PEIS include a systematic water supply/water rights evaluation strategy that would be required in all revisions in land management plans and/or lease applications prior to the BLM making a determination of whether an oil shale/tar sands lease should be approved. 52780-024

I believe that the following components should be part of this systematic/water rights evaluations strategy that is submitted as part of any lease application:

(1) Identify the specific water rights that are proposed to be used for the proposed oil shale/tar sands resource development.

(2) Identify the water demands for the project from startup through buildout of the project as a function of time. This needs to include all water demands, not just the mine demand. For example, it needs to include water demands for power at the time, municipal demands to support the labor at the mine, mitigation supplies to offset injurious effects to vested water rights, etc.

(3) Provide a specific analysis of how the identified water rights can be used to provide a reliable water supply throughout the mine life. If Compact water is to be used, there has to be a specific analysis of all impacts associated with its use, including hydrologic, aquatic, and environmental impacts. The analysis also has to evaluate the impact of a Compact call on the available water supply. This analysis should provide a factor of safety to allow for variability in hydrologic conditions that may not be accounted for in the historic record being used to evaluate the water supply reliability.

(4) Provide the permits/decrees for the water rights demonstrating the allowable uses.

52780-024 (cont.)

(5) Assess the reliability of the water rights under all foreseeable hydrologic conditions by identifying all components that will be necessary for the water supply system to make it reliable.

(6) Assess the hydrologic impacts to the affected stream systems related to the use of this water, both during mining and post-mining.

(7) Assess the impacts to aquatic and ecological resources related to each specific component of the water supply system.

(8) Assess necessary mitigation measures, such as augmentation requirements, maintenance of minimum stream flows, maintenance of downstream hydrologic conditions, and prevention of injury to all vested water rights.

(9) Provide the proposed water supply plan for public comment.

I believe that it is important to identify a process for evaluating the critical aspects of the water supply prior to granting a lease application because of the very real potential that water supplies, and their impacts to other water resources, will be the critical criterion with respect to whether

52780-025

specific oil shale developments can occur with "no impact to the environment." Therefore, I would encourage the BLM to include this type of systematic approach into the final PEIS. 52780-025 (cont.)

I appreciate the opportunity to provide comments on water rights issues related to the draft PEIS and would request your consideration to incorporate these comments into the final PEIS.

Yours truly,

Bruce A. Lytle, P.E.
President

BAL/pk
attachments

REFERENCES

Bartis, J.T., et al, *Oil Shale Development in the United States: Prospects and Policy Issues,* RAND Corporation, 2005.

Colorado Water Conservation Board, *The Statewide Water Supply Initiative,* November 2004.

Response for Document 52780

52780-001: This PEIS is programmatic in nature. Water supplies for oil shale development are site-specific and depend on very local conditions of surface water bodies and groundwater. Without knowing future project sites, it is inappropriate to address water supplies in this programmatic EIS. Instead, such issues should be handled at the project level when a project site's (1) location, (2) technologies to be implemented, (3) water requirements to meet the technologies, and (4) surface water and groundwater resources are identified. At that time, information on water storage, surface water, and groundwater rights that have been or plan to be secured would be available. A meaningful analysis could then be conducted. Another NEPA document would be required at the leasing stage.

The Colorado River Compact of 1922 assumed that 15 million ac-ft of water was allotted for the Upper and the Lower Colorado River Basins, assuming an average yearly flow of 17.5 million ac-ft. The flow was based on 18 years of measurement. After it was recognized that drought conditions could occur, the volume allotted was reduced to 12 million ac-ft by using longer historical data (see Section 3.4.1.1). The allotted amount is less than the originally assumed volume of 15 million ac-ft specified in the Colorado River Compact of 1922. Therefore, reductions in water availability in the western United States have been considered. It is possible that prolonged drought conditions may further reduce the water availability. However, it is difficult to justify additional reduction of water availability when future stream flows remain unknown.

Water use is likely to change in the future as a result of urbanization of irrigated land and purchase of water rights and transfer to municipal and industrial use (SWSI 2007). A discussion of the impacts of transferring water from agricultural uses to oil shale development on water quality has been added to Section 4.5.1 in the revised PEIS.

Additional impacts are caused by the use or recycling of wastewater at project sites. These impacts are described in Section 4.5.1.

The issue of water rights is not fully addressed in this PEIS because its nature is programmatic and its purpose is for making an allocation decision. This PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. Surface water bodies and groundwater conditions will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local,

and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

52780-002: Please see response to Comment 52780-001.

The distribution of surface water bodies and aquifers is not uniform in oil shale basins. Water availability is, therefore, not physically uniform. Development of oil shale would be restricted by physical water availability, such as stream flows and groundwater yields. Besides water availability, a developer has to secure enough water rights for its use and meet the state's instream flow water regulations to protect the environment.

The requirement of water for oil shale development plays an important role in oil shale development. It depends on the technologies being used, water conservation, and water reuses. It has been demonstrated in Canada that the efficiency of water use increases with time and with improved technologies in oil sands development.

With the above uncertainties, water availability and demand for oil shale development is going to change with time and will be site-specific. The issue would be more appropriately addressed at the project level.

52780-003: The cost analysis of developing the water supplies is not required by NEPA. The CEQ Guidelines for Implementation of the Procedural Provisions of the NEPA does not require preparation of a cost-benefit analysis for all EISs. The regulations state that "If (emphasis added) a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences" (40 CFR 1502.23, Cost-benefit analysis).

52780-004: The evaluation of water availability was conducted based on the most current information available. The studies by CWCB certainly will provide important information on historical Colorado water use and future hydrologic conditions. This information could be used when site-specific NEPA analyses are conducted prior to the issuance of commercial leases and the approval of specific plans of development.

52780-005: Future climate conditions have important implications on the flow of the Colorado River. While its importance in terms of future flows in the Colorado River cannot be denied, the uncertainty of future climate conditioning also restricts its adoption during our evaluations, especially in quantitative analyses. Therefore, we chose to use historical stream flow data (CWCB 2004) in our evaluation and acknowledged possible future conditions in Section 4.5.2.

The preparation of the PEIS is dictated by the Energy Policy Act of 2005, Public Law (P.L.) 109-58, Section 369, also known as the "Oil Shale, Tar Sands, and Other Strategic Unconventional Fuels Act of 2005.

52780-006: Please see responses to Comments 52780-002, 52780-004, and 52780-005.

52780-007: The scope of this PEIS is not site-specific. Please see response to Comment 52780-001.

The PEIS recognizes that water that is legally available is not necessarily physically available, as stated in Section 3.4.1.

52780-008: The projection of future water uses in Utah, as well as in Colorado and Wyoming, is based on information provided by the states' water plans (see footnotes of Tables 3.4.1-2 to 3.4.1-4 for references). In the last several years, many states in the Colorado River basin took measures to conserve water because of droughts.

New water rights application is one of several means to acquire water. However, this is unlikely to be used for oil shale development. The more likely scenario is to purchase surface water rights, groundwater water rights, and storage water rights from existing water rights owners in the agricultural sector (see response to Comment 52780-007). In addition, water right issues would be resolved at the project level.

The impacts of water use from agricultural to oil shale development have been added to Section 4.5.1 of the PEIS (see response to comment 52780-001).

52780-009: See response to Comment 52780-008.

52780-010: Under Colorado water law, water rights can be changed in the type, place, or timing of use as long as the change does not adversely affect other vested water rights ("No Harm Rule"). The "No Harm Rule" provides protection to downstream water right holders from injury (including water quantity and quality) when a water right is changed in Water Court.

As transfer of water rights is likely to happen before or during oil shale development, the vested water right users would be protected when the transfer occurs.

As the PEIS is programmatic in nature, water rights issues would be handled with a project-level NEPA document (see response to Comment 52780-001).

52780-011: Future water export from the Yampa/White/Green River Basin to other basins is an uncertainty. The Northern Colorado Water Conservation District is studying a plan to export water out of the Yampa River below Maybell and draw it east. However, there is no plan to build the infrastructure. Given the increasing future

water demand in the Yampa/White/Green River Basin, large export of water is difficult to justify.

The flow requirements for endangered fish are related to the instream flow water rights. Since 1973, Colorado has appropriated instream flow water rights covering over 8,500 mi of stream and 486 natural lakes. In addition, CWCB (Colorado Water Conservation Board) continues to use new appropriations, water acquisitions, and water rights protection to preserve or improve the natural environment. The CWCB provides physical protection for decreed instream flow rights by installing stream gages and monitoring stream flow on critical reaches of stream, and seeking administration by placing "calls" for rights entitled to receive water (SWSI 2005 and 2007). Based on the above situations, it is unreasonable to assume that the instream flow water rights are going to be taken away and/or violated because of the oil shale development.

52780-012: The PEIS is programmatic in nature. The water rights issue would be handled in project-specific NEPA documents. If an oil shale project is proposed, it is the responsibility of an oil shale developer to demonstrate that sufficient water is secured for developing the project site without harm to other water rights holders, regardless of the site location. It is correct to state that water availability will likely restrict oil shale development.

52780-013: Applicants have to demonstrate that there is no injury to other vested water rights holders in the change of use proceedings.

The general impacts caused by changes of water use for oil shale development are provided in Section 4.5.1; see also the response to Comment 52780-001. General mitigation measures are described in Section 4.5.3. At the time an oil shale development project is proposed, site-specific impacts and mitigation measures would be provided in future project-level NEPA documents.

52780-014: The potential magnitude of water transfer from agricultural use to oil shale development depends on the magnitude of oil shale development, which in turn relies on factors such as: future regional and national economies, world and U.S. energy demands, water availability, oil shale technologies, and others. Any prediction on the magnitude of oil shale development is more or less speculative and is outside the scope of the PEIS.

Energy companies have good reasons to acquire the water rights. They can be used for both oil shale development and future trades. It is inappropriate to assume that all the water rights purchased by the energy companies would be used for oil shale development. More reliable evaluation should be handled at the project levels when oil shale projects are proposed.

52780-015: The BLM is preparing a programmatic-level document analyzing land use allocation decisions. Information needed to support those decisions is general in

nature. The BLM has disclosed in the PEIS that solid information regarding the water needs for development of oil shale resources is not known but has suggested a range of water requirements based on currently available information. The BLM has also disclosed that it is likely (as has already occurred) that agricultural water rights would be acquired to support future development. At this time, however, there is no way to accurately project what those actual needs might be or the magnitude of those effects. Future NEPA analysis conducted prior to the issuance of commercial leases will require disclosure of the amounts and source(s) of water needed to support planned operations. At that time, assessment of impacts of the acquisition of this water will be possible.

Nevertheless, there is sufficient information at the programmatic level to make a reasoned choice among the alternatives when considering lands open or closed for consideration of commercial leasing. The PEIS analyzes the environmental consequences of this allocation decision in sufficient detail for the decision maker to choose which lands would be available for further consideration for leasing. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development nor do they create any development rights. When applications to lease are received and additional information becomes available, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and possible mitigation measures, as well as what level of development may be anticipated.

52780-016: The increase in permeability and the associated change in the groundwater flow regime is an important point and is described in Sections 4.5.1.2 and 4.5.1.4 of the PEIS. It is listed as a mitigation concern in Section 4.5.3. The PEIS, however, does not attempt to identify specific measures to avoid an impact. An issue such as this would be addressed in a site-specific NEPA analysis and through state-determined water rights.

52780-017: The issue of the effect on water rights has been added to Section 4.5.1.2.

52780-018: Please see response to Comment 52780-021.

52780-019: The issue of the effect on water rights has been added to Section 4.5.1.2.

52780-020: The time-delayed growth in a cone of depression has been added to the discussion in Section 4.5.1.2.

52780-021: Section 4.5.1.4 has been modified accordingly to account for potential permanent changes to the flow field and water rights.

52780-022: Section 5.5.1.3 has been modified to account for the presumed safe disposal of permitted deep-well injection.

52780-023: The freeze wall approach isolates a volume of the subsurface below a relatively small footprint. Groundwater extraction takes place within this volume, without an associated large cone of depression affecting the aquifers within the freeze wall. For this reason, the local effect on water resources is minimized, and the technology is not cited in the PEIS as a concern for the water rights of local groundwater users. However, this issue would need to be further evaluated at a site-specific level once more information on the technologies is available.

52780-024: The cited paragraph has been clarified and changed in response to the comment.

A specific water supply plan is impossible to develop because there are existing uncertainties in water supply such as: compacts between states within the Colorado River basin, extensive groundwater development, and future climates. In addition, future water demand is the most critical factor dictating whether water supply is sufficient. The future demand is also very dynamic, affected by the economics of the Nation, especially in the agricultural and energy sectors, regional population growth, water conservation measures, water rights trading, and irrigation and delivery system upgrade or retirement on agricultural lands. For the oil shale and tar sands, if they are developed, the water demand closely depends on the technologies proposed. For example, about 90% of water is claimed to be reused in extracting oil sands in Canada using the most current technology. Given these uncertainties and dynamic conditions, the reliability of a specific water supply plan is questionable. The potential impacts derived from this plan are going to be speculative at best.

As the PEIS is programmatic in nature, the water supply and demand issues are evaluated based on legally available water by states, physical and legal restraints imposed by stream flows, instream flow requirements, stream impairments of each basin, projected water demands as specified by the basins' water plans, and the range of possible water demands due to various oil shale and tar sands development technologies. Specific water rights are not appropriately addressed at this stage because the PEIS is a programmatic-level document that analyzes allocation decisions and not leasing or development decisions. By the time commercial leasing starts, it is likely to be at least 3–5 years later. Water rights ownerships would likely change on the basis of water rights trading and a changing economic landscape. To address specific water rights before any commercial leasing application is initiated, therefore, would be based on highly uncertain analytical assumptions, resulting in relatively unreliable conclusions.

The suggested list in the comment [components (1) to (9)] is appropriately addressed as part of any lease application. At that time, a project-level NEPA-document would be prepared by using more updated and site-specific information to support lease application.

52780-025: The BLM believes that analyzing an allocation decision, as is being done in the PEIS, provides the opportunity to build on scientific, governmental, or industry

research in order to analyze, in a general way, the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale exploration and development, further analysis will be carried out and documented in accordance with NEPA to support any decisions in this regard. That NEPA analysis will evaluate the environmental impacts of the oil shale or tar sands exploration and development, and develop specific mitigation measures to mitigate or eliminate the identified impacts. The BLM believes that such a phased approach will ensure that commercial oil shale development programs meet the intent of Congress and take advantage of the best available practices to minimize impacts and to offer opportunities for state, local communities, and the public to participate in the process. While uncertainty is an inherent part of planning in accordance with FLPMA's multiple-use mandate, and delays are possible in bringing any new resource into commercial development, the BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals.

References

CWCB (Colorado Conservation Board), 2004, *Statewide Water Supply Initiative*, Colorado Department of Natural Resources, Denver, Colo., Nov.

SWSI, 2005, *SWSI Phase 2 Technical Round Table, Prioritize and Quantify Recreation and Environmental Needs*. Available at: http://www.cipp.colostate.edu/conf/2006/pdf/SWSI%20II%20Rec%20&%20Environ%20Needs.pdf. Accessed July 2, 2008.

SWSI, 2007, *Colorado's Water Supply Future, Statewide Water Supply Initiative–Phase 2 (draft final).* Available at: http://cwcb.state.co.us/IWMD/SWSITechnicalResources/SWSIPhaseIIReport/SWSIPhaseIIReport.htm. Accessed July 2, 2008.

Thank you for your comment, Bruce Lytle.

The comment tracking number that has been assigned to your comment is OSTSD52782.

Comment Date: March 19, 2008 17:31:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD52782

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Attachment: Appendix B.pdf

Comment Submitted:

See Attachment.

APPENDIX B
FLOW RECORDS ON MAJOR STREAM IN OIL SHALE DEVELOPMENT AREAS

USGS 09306290 WHITE RIVER BELOW BOISE CREEK, NEAR RANGELY, CO.

Rio Blanco County, Colorado
Hydrologic Unit Code 14050007
Latitude 40°10'47", Longitude 108°33'53" NAD27
Drainage area 2,530 square miles
Gage datum 5,395 feet above sea level NGVD29

YEAR	00060, Discharge, cubic feet per second, Monthly mean in cfs (Calculation Period: 1982-10-01 -> 2007-09-30)											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1982										596.8	540.1	464.8
1983	372.3	420	583.7	597.9	1,735	4,010	2,020	882.4	609.7	687	611.4	541.7
1984	491.5	449.5	554.6	897.8	3,434	4,572	1,931	1,117	849.2	857.9	684.6	555.5
1985	455.5	482.9	741.7	1,512	3,320	2,891	1,135	711.8	634.4	765.9	709.7	662.9
1986	572.3	530.7	752	1,337	2,568	3,097	1,538	728.3	657.6	745.6	677.8	595.8
1987	519.5	498.2	652.3	1,032	1,791	1,031	561.4	524.4	363.3	458.5	532	445.4
1988	343.5	395.9	590.7	843.9	1,644	1,661	573	392.5	422	436	435.9	401.5
1989	384.1	369.5	589	839.3	1,083	866.2	358.9	383.1	260.2	363.9	391.1	394
1990	352.6	331.4	396.7	439.8	565.6	1,070	396.6	201.8	237	379.6	362.1	301
1991	259.7	268.4	355.5	454.3	1,367	1,617	615.3	433.3	347.3	385.5	446	336.5
1992	333.2	320.5	409.5	687.4	1,257	716.7	533.9	296.5	259	359.5	449.8	350
1993	356.9	347	522.1	688.5	2,276	2,629	926	475.1	460.4	537.6	495.3	395.3
1994	361.6	374.3	435	522.6	859.4	542.4	253.7	206.4	314.3	405.6	375.1	304.8
1995	282.6	310.2	324.2	370	1,353	3,134	2,175	569.7	491.2	582	500.7	423.4
1996	461.3	419.3	505.8	830.7	2,056	1,904	683.9	368.2	405.3	499.9	537.1	525.1
1997	456.1	428.9	558.7	730.6	2,317	2,896	911.1	738.4	944.4	819.5	661.6	533
1998	532.9	515.4	723.8	1,130	2,698	2,413	1,253	657.2	481.1	633.3	576.8	466
1999	426.9	485.2	547	681.3	1,600	2,028	696.7	565.8	455.5	478.3	473.7	440.2
2000	451.5	433.4	423.5	670.9	1,689	1,176	338.7	254.8	387.5	430.7	421.1	366.8
2001	348.1	373.2	432	599.2	1,595	1,021	400.2	283.7	262.8	375.9	385	405
2002	402	366.5	358	567.4	448.8	208.9	120.2	154.3	206.3	329.5	322	294.5
2003	291	271.5	349.5	462.2	1,438	1,762	393.3	196.7	320.6	316	368.9	338.7
2004	321.4	326.1	387.4	598.1	1,090	811.4	371.6	185	275.3	402.9	375.7	342.6
2005	361.4	343.5	345.9	578.8	1,464	2,094	717.2	387.1	308.4	464.7	398.9	380
2006	345	335.9	411.3	998	2,197	1,316	498.5	367.7	380.2	555.5	431.8	360.8
2007	346.5	355.9	563.3	713.4	1,307	749	331.2	278.4	312.1			
Mean of Monthly Discharge	393	390	501	751	1,730	1,850	789	454	426	515	487	425

** No Incomplete data have been used for statistical calculation

USGS 09306222 PICEANCE CREEK AT WHITE RIVER, CO

Rio Blanco County, Colorado
Hydrologic Unit Code 14050006
Latitude 40°04'41", Longitude 108°14'09" NAD27
Drainage area 652 square miles
Gage datum 5,730 feet above sea level NGVD29

YEAR	00060, Discharge, cubic feet per second, Monthly mean in cfs (Calculation Period: 1964-10-01 -> 2007-09-30)											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1964										1.6	10.1	16.3
1965	12.5	16.6	24.7	13.4	10.4	20.6	24.2	31.4	24.3	18.4	15.7	22
1966	21.1	20.6	75.9	11	2.41	1.64	2.36	3.08	2.03			
1970										24.2	25.9	23.9
1971	25.1	22.1	50.3	14.5	2.9	2.72	1.82	4.5	10.5	14.9	25.6	20
1972	22.6	38.5	17.2	3.54	2.27	2.86	1.56	5.1	4.29	8.32	20.9	13.9
1973	11.4	16.3	28.4	19.9	78.5	50	43.2	54.1	44.4	43.4	45	36.4
1974	34.6	33.5	52.5	56.7	24.5	11.7	17.6	34.6	19	21.5	37.8	31.4
1975	25.3	30.5	41.3	39.6	39.6	46.1	32	32.6	29.7	33.7	38.9	28.4
1976	24.4	37.9	41.5	38.2	13	10.8	14	24.8	18.7	23.2	25.6	21.5
1977	18.2	21.9	21.2	12.6	4.45	2.67	4.84	7.98	11.2	13.2	18.4	21.5
1978	20.5	21.3	29.5	46.3	13.7	7.66	5.1	6.75	7.41	10.6	24.7	25.1
1979	22.2	24.2	37.7	61	122.2	51.7	15.9	45	21.3	18.5	34.1	33
1980	33.7	40.9	37.1	54.7	135.2	28.2	22	32.3	23.2	29.5	47.2	41.5
1981	34.5	32.2	35	23.3	3.87	2.61	5.55	4.33	3.53	22.4	33.6	26.9
1982	24	35.8	35	21.1	5.54	1.89	5.87	19.4	34.4	29.5	27.7	22.4
1983	22.2	24.3	41.6	72.2	333.8	246.9	94.5	94.2	66.2	60.4	53.6	46.7
1984	41.7	24.8	65.1	115.7	268.6	184.7	124.8	109.1	75.4	76.1	61.6	47.3
1985	55.1	55.2	79.1	243.5	343.4	106.2	104.6	94.3	42.9	86.1	76.9	72
1986	64.9	86.6	123.2	245.2	194.7	61.2	90.9	89.6	60.5	65.5	50.2	37.1
1987	25.6	29.7	71.8	99.9	77.4	23.7	34.5	51.7	33.3	37.2	47.9	39.8
1988	30.8	38.5	61.3	67.9	29.9	8.07	12.2	25.8	20.1	24.4	32.2	30.9
1989	23.2	28.7	67.8	41.7	7.42	3.27	3.4	10.4	15.1	15.1	19.9	21.6
1990	16.3	21.9	28.6	7.63	5.54	2.96	3.5	1.67	6.36	10.7	15.2	13.5
1991	15.3	18.6	24.5	21.7	4.94	1.82	3.75	14.9	12.7	4.45	27.7	14.1
1992	21.4	22.1	28.6	14.3	7.91	1.99	10.6	19.5	6.09	8.67	26.2	22.5
1993	17	18.6	49.2	124	256.3	84.5	28.1	47.8	37	38.3	47.7	41.8
1994	34.1	39.6	41.5	26.7	5.26	1.4	4.13	5.11	4.16	10.6	17.8	19.5
1995	21.9	26.7	19.7	9.15	90.9	125.6	63.9	39.8	30.3	31.6	29.1	29.8
1996	20.9	30.7	58.5	72.4	40	3.74	12.2	24.7	15.9	30.3	36	32.3
1997	26.8	32.3	65	96.7	84.7	31.8	39.5	49.5	50.8	53.5	44.3	37
1998	34.7	38.6	100.3	284.3	369.3	104.3	85.3	71.5	49.8	51.6	51.3	38.2

1999	40.2	49.9	49	41.9	74.9	22.6	28.5	51.9	36	27.5	30.1	31.7
2000	31.9	30.7	32	25.7	6.69	3.96	4.38	6.63	5.3	6.47	26.1	20.2
2001	17.1	24.9	24.8	15.7	6.36	2.15	1.96	24.1	18.1	21.8	19.8	22.4
2002	12.3	16.6	17.8	11.9	4.2	3.46	3.83	4.47	6.35	4.91	5.66	5.65
2003	5.75	13	16.4	4.21	2.99	2.48	2.83	4.07	4.26	4.98	5.62	6.48
2004	8.93	14.5	12.7	4.25	3.08	3.4	3.5	4.97	6.45	8.42	12.5	28.1
2005	27.5	26	16.6	10	11.2	40.6	37	31.9	16.2	21.5	18.4	17.6
2006	15.8	17.9	31.1	37.4	11.8	3.04	3.65	8.09	13.4	19.8	18.3	21
2007	20.4	28.8	38.4	30.1	5.38	5.21	6.13	9.5	11.8			
Mean of Monthly Discharge	25	30	43	55	69	34	26	31	23	26	31	28

** No Incomplete data have been used for statistical calculation

USGS 09093500 PARACHUTE CREEK AT PARACHUTE, CO.

Garfield County, Colorado
Hydrologic Unit Code 14010006
Latitude 39°27'11", Longitude 108°03'33" NAD27
Drainage area 198 square miles
Gage datum 5,100.00 feet above sea level NGVD29

00060, Discharge, cubic feet per second,												
YEAR	Monthly mean in cfs (Calculation Period: 1921-04-01 -> 1982-09-30)											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1921				72.2	322	103.1	18	25.5	17.5	14.5	13.7	12
1922	12	14	26.4	83.2	513.6	98.9	18.8	16.5	6	14.1	14	12
1923	12	14	18.1	60.2	308.5	59.3	12.1	10	12.9	21.5	17.1	13
1924	12	15	16.6	96.9	67.3	21.9	1.93	0.852	6.76	11.2	12	9
1925	8	12	18.6	46.5	9.95	5.42	2.01	3.6	10.5	17	56.8	30
1926	25	24	23	112.7	59.7	12.2	1.9	2.19	2.03	18.8	14	12
1927	11	14	24.8	87.6	185	42.9	7.87	6.97	26.5			
1948										9.18	13.3	14.1
1949	8.61	13.3	20.4	73.1	186.7	57.3	7.6	4.31	3.43	13.5	14	13.2
1950	13.3	17.5	16.9	40.9	87.5	20.5	6.91	1.81	4.63	5.21	15	14
1951	10.5	10.9	17.5	17.4	4.34	1.3	1.89	3.06	2	5.63	11.4	9.25
1952	9.26	10.9	17.3	156.6	372.4	56.9	15.3	29	7.72	5.28	12	12
1953	12.2	11.8	13.7	13.3	39.8	12.7	1.03	8.37	2.04	5.99	8.94	7.59
1954	10.7	11.4	14.7	34	4.47	0.777	0.784	0.858	7.73			
1974										5.69	9.7	9.61
1975	10.1	8.69	11.9	27.6	262.5	77.6	17.7	4.99	2.07	3.08	8.14	10.4
1976	9.79	16.9	17	35.1	89.2	18.2	11.4	9.61	5.38	5.53	9.83	9.05
1977	9.97	8.36	7.49	6.81	0.56	0.456	0.157	9.27	0.177	3.33	5.47	5.66
1978	6.77	6.57	12.5	102.3	176.2	26.3	6.18	0.882	2.15	6.21	8.16	6.58
1979	10.1	9.08	14	100.5	385.4	70.3	34.8	11.3	5.83	8.44	13.9	13.9
1980	15.4	19.2	18.4	87.2	442.3	93.8	31.4	14.5	11.2	14.1	18.1	16
1981	15.5	14.2	15.8	18	12	11	6.45	5.14	5.63	13.1	12	12
1982	12.4	10.6	14.2	41.6	135.2	42.6	18.5	13.8	14.6			
Mean of Monthly Discharge	12	13	17	63	175	40	11	8.7	7.5	10	14	12
** No Incomplete data have been used for statistical calculation												

USGS 09094200 ROAN CREEK ABOVE CLEAR CREEK, NEAR DE BEQUE, CO.

Garfield County, Colorado
Hydrologic Unit Code 14010006
Latitude 39°29'28", Longitude 108°21'16" NAD27
Drainage area 151 square miles
Gage datum 5,560.00 feet above sea level NGVD29

00060, Discharge, cubic feet per second,												
YEAR	Monthly mean in cfs (Calculation Period: 1962-10-01 -> 1968-09-30)											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1962										7.99	10	8.83
1963	7.71	10.5	9.26	10.5	11.2	9.73	6.62	6.86	5.15	3.25	2.5	2.71
1964	3.35	3.8	5.93	8.48	13.7	14.2	8.46	6.49	4.43	3.69	4.87	6.4
1965	6.54	4.71	5.95	12.3	188.3	77.7	26	18.8	14.6	10.7	9.48	11.4
1966	8.29	9.03	23.8	23.7	46.5	25.4	13.1	7.22	6.89	4.98	5.46	5.77
1967	6.02	7.59	11.4	13.9	22.3	22.1	19.5	12.7	7.6	4.86	5.62	5.5
1968	6.04	8.08	9.82	16.8	149.4	80.2	26	25.9	9.81			
Mean of Monthly Discharge	6.3	7.3	11	14	72	38	17	13	8.1	5.9	6.3	6.8
** No Incomplete data have been used for statistical calculation												

USGS 09095000 ROAN CREEK NEAR DE BEQUE, CO.

Garfield County, Colorado
Hydrologic Unit Code 14010006
Latitude 39°27'12", Longitude 108°18'59" NAD27
Drainage area 321 square miles
Gage datum 5,380.00 feet above sea level NGVD29

00060, Discharge, cubic feet per second,												
YEAR	Monthly mean in cfs (Calculation Period: 1921-04-01 -> 1922-09-30) Calculation period restricted by USGS staff due to special conditions at/near site											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1921				68.3	438	156.6	54.2	37.5	36.1	29.7	24.9	20
1922	18	18	63	122	785.5	148.1	42.2	32	35.2			
Mean of Monthly Discharge	18	18	63	95	612	152	48	35	36	30	25	20
** No Incomplete data have been used for statistical calculation												

USGS 09235300 VERMILLION CREEK NEAR HIAWATHA COLO

Sweetwater County, Wyoming
Hydrologic Unit Code 14040109
Latitude 41°00'54", Longitude 108°38'39" NAD27
Drainage area 196.00 square miles

YEAR	00060, Discharge, cubic feet per second, Monthly mean in cfs (Calculation Period: 1975-10-01 -> 1981-09-30)											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1975										1.21	1.73	1.73
1976	1.59	2.39	8.83	4.96	5.6	1.27	0.372	3.68	1.12	1.23	1.37	0.396
1977	0.001	0.356	1.52	2.01	0.743	1.28	5.01	13.2	0.094	0.445	0.53	0.608
1978	0.679	0.786	5.09	1.54	3.51	2.88	0.067	0.808	6.29	0.391	0.301	0.244
1979	0.001	0.507	1.54	9.59	9.09	5.75	2.54	9.81	0.457	0.899	1.05	0.841
1980	0.699	1.1	1.05	32.3	25.5	10.9	4.44	2.74	1.77	1.93	1.81	1.48
1981	1.16	1.67	3.14	2.63	3.19	1.99	4.53	0.006	0.038			
Mean of Monthly Discharge	0.69	1.1	3.5	8.8	7.9	4	2.8	5	1.6	1	1.1	0.88

** No Incomplete data have been used for statistical calculation

USGS 09235450 VERMILLION CREEK AT INK SPRINGS RANCH, CO.

Moffat County, Colorado
Hydrologic Unit Code 14040109
Latitude 40°45'43", Longitude 108°43'33" NAD27
Drainage area 816 square miles
Gage datum 5,725.00 feet above sea level NGVD29

YEAR	00060, Discharge, cubic feet per second, Monthly mean in cfs (Calculation Period: 1977-07-01 -> 1981-09-30)											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1977							4.2	3.4	2.4	2.09	2.55	3.08
1978	4.44	9.55	18.5	7.44	8.68	4.06	2.17	1.89	8.44	2.24	2.86	3.84
1979	3.4	7.27	29.4	39.3	14.5	11.3	3.22	8.24	2.65	10.8	3.37	2.36
1980	8.98	32	30.6	52	83.2	18.2	4.25	9.21	5.33	3.65	4.05	5.87
1981	4.9	7.73	9.15	10.6	16.1	3.86	6.6	3.05	4.45			
Mean of Monthly Discharge	5.4	14	22	27	31	9.4	4.1	5.2	4.7	4.7	3.2	3.8

** No Incomplete data have been used for statistical calculation

USGS 09235490 VERMILLION CR. BLW. DOUGLAS DRAW NR. LODORE, CO

Moffat County, Colorado
Hydrologic Unit Code 14040109
Latitude 40°43'20", Longitude 108°45'26" NAD27
Contributing drainage area 918 square miles
Gage datum 5,610 feet above sea level NGVD29

00060, Discharge, cubic feet per second,												
YEAR	Monthly mean in cfs (Calculation Period: 1994-10-01 -> 1995-12-30)											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1994										6.59	2.33	2.55
1995	2.43	7.8	6.87	2.28	8.41	37.3	8.05	1.7	2.47	10.6	8.46	9.14
Mean of Monthly Discharge	2.4	7.8	6.9	2.3	8.4	37	8.1	1.7	2.5	8.6	5.4	5.8
** No Incomplete data have been used for statistical calculation												

Response for Document 52782

See Responses for Document 52780

Thank you for your comment, Bruce Lytle.

The comment tracking number that has been assigned to your comment is OSTSD52783.

Comment Date: March 19, 2008 17:31:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD52783

First Name: Bruce
Middle Initial:
Last Name: Lytle
Organization:
Address: 640 Plaza Drive, Suite 170
Address 2:
Address 3:
City: Highlands Ranch
State: CO
Zip: 80129
Country: USA
Email: bruce@lytlewater.com
Privacy Preference: Don't withhold name or address from public record
Attachment: Appendix C.pdf

Comment Submitted:

See Attachment.

APPENDIX C
AGRICULTURAL RIGHTS PURCHASED BY INDUSTRIAL INTERESTS

Ditches owned by Oil Companies

Puckett Land Co.

	%
Pat Reigan Spring	100
Robert McKee Ditch	16.67
Piceance Creek Ditch	24
Gardenheir Ditrch	24
Emily Ditch	24
Oldland Magor Ditch	16
Rye Grass Ditch	16
Oldland Ditch # 3	16
Oldland Ditch # 2	16
Oldland Ditch # 1	16
Leonard Ditch	16
Blue Grass Ditch	16
Jessup Ditch # 1	16
Jessup Ditch # 2	16
Florence Ditch	100
Piggott Ditch # 1	100
Piggott Ditch # 2	100
E. Stewart Ditch # 1	16
E. Stewart Ditch # 2	16
Last Chance Ditch	16
Watson Thompson Ditch	.2 CFS

Encana Oil & Gas, Inc.

Ryan Ditch	?
Dry Fork Ditch # 1	?
Dry Fork Ditch # 2	?

McMurry Oil & Gas (Subsidiary of Encana)

Ryan Ditch	?
Robert McKee Ditch	33.34
Oldland Magor	50.67
Jessup Reservoir	100
Oldland Ditch # 3	50.67
Oldland Ditch # 2	50.67
Oldland Ditch # 1	33.33
Dry Fork Ditch # 1	?
Dry Fork Ditch # 2	?
Blue Grass Ditch	33.33
Jessup Ditch # 1	33.33
Jessup Ditch # 2	33.33

West Stewart Res Ditch	76
West Stewart Gulch Res.	76
E. Stewart Gulch Dit # 1	33.33
E. Stewart Gulch Dit # 2	33.33
Watson Thompson Ditch	33.33
Last Chance Ditch	33.33
Greeno Ditch # 1	100
Greeno Ditch # 2	100
Greeno Ditch # 3	100
Greeno Ditch # 4	100
Taylor Resevoir	100
B.L. Taylor Ditch ! & 2	100

ExxonMobil Oil Corp

Exxon Love Ranch Res	100
MHM German Ditch	100 ?
PL Ditch	100
Exxon B & M Res	100
Belot Moffat Ditch	100 ?
Hunter Ditch	100
Gilmor Ditch	100
Ebler Ditch	100
Taylor Ditch	100
Willow Cr Ditch # 2	100
Willow Cr Ditch # 3	100
Milo Ditch	100
McKee Ditch	100
Boies Ditch	100
McGee Ditch	50
Bl. Eagle Ditch # 1	50
Bl. Eagle Ditch # 2	50
Bainbrick Mikkelson Ditch	50
J.W. Bainbrick Ditch	50
D. D. Taylor Ditch	50
Desert Ditch	50
Schweizer Ditch	50
Duckett Ditch	50
Hutchinson Spg Ditch	50
No Name Ditch	50
O I See Ditch	50
N & L Ditch	50

Oil Shale Corp(TOSCO)

Robert McKee Ditch	50.67

Gardenheir Ditch	76
Emily Ditch	76
Oldland Magor Ditch	33.37
Rye Grass Ditch	50.67
Oldland Ditch # 3	33.37
Oldland Ditch # 2	50.67
Oldland Ditch # 1	50.67
Leonard Ditch	50.67
Blue Grass Ditch	50.67
Jessup Ditch # 1	50.67
Jessup Ditch # 2	50.67
E. Stewart Ditch # 1	50.67
E. Stewart Ditch # 2	50.67
Last Chance Ditch	50.67
Piceance Creek Ditch	?

Shell Frontier Oil & Gas, Inc.

Rye Grass Ditch	33.33
Jones Reservoir	100
Leonard Ditch	33.33

Atlantic Richfield (ARCO)

W. Stewart Res Ditch	24
W. Stewart Reservoir	24
McGee Ditch	25
Bl. Eagle Ditch # 1	25
Bl. Eagle Ditch # 2	25
Bainbrick & Mikkelson	25
J.W. Bainbrick Ditch	25
D.D. Taylor Ditch	25
Desert Ditch	25
Schweizer Ditch	25
Duckett Ditch	25

Llewellyn Oil Shale Co.

Sawyer Ditch	100

Equity Oil Co.

McGee Ditch	25
Bl. Eagle Ditch # 1	25
Bl. Eagle Ditch # 2	25
Bainbrick Mikkelson	25

J.W. Bainbrick Ditch	25
D.D. Taylor Ditch	25
Desert Ditch	25
Schweizer Ditch	25
Duckett Ditch	25
Hutchinson Sprg Ditch	50
No Name Ditch	50
O I See Ditch	50
N & L Ditch	50

XTO Energy, Inc

McCarthy Spring Ditch
Piceance Ditch
Cow Creek Ditch

CONDITIONAL WATER RIGHTS

	PIPELINES	Adj Date	Apro Date	
2172	SOUTH FORK PICEANCE PL	11/26/58	05/29/55	70.00 CFS
2181	STILLWATER POWER PLANT	11/26/58	05/29/55	300.00
2235	YELLOW JACKET CANAL	11/21/66	11/09/53	500.00
2296	LOST PARK FEEDER CANAL	11/21/66	11/09/53	100.00
2297	LOST PARK FEEDER CANAL 2	11/21/66	11/09/53	100.00
2043	ERTL PIPELINE	11/21/66	5/26/57	30.00
2154	PICEANCE CANAL	11/21/66	7/10/61	50.00
2053	FLATTOPS TUNNEL	11/21/66	10/31/61	254.00
2146	PATTERSON CK COLLECTION	11/21/66	10/31/61	75.00
2152	PICEANCE BASIN PL COLLECT	11/21/66	10/31/61	60.00
2035	DOUGLAS CANAL	11/21/66	7/03/62	120.00
		12/31/75	7/25/74	500.00
2217	WHITE RIVER PUMPING PL	11/21/66	12/15/63	100.00
2218	WHITE RIVER 14 MI CR PL	11/21/66	9/12/64	200.00
2173	SOUTH FORK PIPELINE	11/21/66	9/14/64	100.00
2216	WHITE RIVER PL # 2	11/21/66	10/12/64	120.00
2188	SUPERIOR OIL PIPELINE	12/31/69	5/14/68	12.00
		12/31/70	5/14/68	12.00
2009	BLACKS GULCH PL	12/31/69	9/01/68	100.00
2030	CROOKED WASH PL	12/31/69	9/01/68	100.00
2098	KELLOG GULCH PL	12/31/69	9/01/68	100.00
2189	SUPERIOR PUMPBACK PL 1	12/31/69	10/05/68	12.00
2190	SUPERIOR PUMPBACK PL 2	12/31/69	10/05/68	12.00
2191	SUPERIOR PUMPBACK PL 3	12/31/69	10/05/68	12.00
2188	SUPERIOR OIL PL	12/31/69	5/14/68	12.00
		12/31/70	5/14/68	12.00
2046	WHITE RIVER FIG 4 PL	12/31/70	6/10/68	70.00
2228	WOLF RIDGE FEEDER PL	12/31/71	11/19/66	100.00
2144	OHIO ERTL PL	12/31/71	2/28/67	55.00
2219	WHITE R PICEANCE PL	12/31/70	8/5/66	100.00...
2182	STORY G PARACHUTE PL	12/31/71	2/28/67	55.00
2183	STRAWBERRY CREEK PL	12/31/73	6/16/72	400.00
2229	WRAY GULCH PL	12/31/73	7/19/72	450.00
2230	WRAY GULCH PL	12/31/69	9/1/68	100.00
2137	NORTH FORK FDR CONDUIT	12/31/76	10/7/76	500.00
2430	MILLER CREEK PUMPING PL	12/31/79	9/30/76	100.00
1392	COLO WHITE R HYDRO	12/31/82	11/17/81	500.00
1339	MOBIL PUMP STATION PL	12/31/84	5/4/84	200.00

STORAGE

4303	STILLWATER RES	11/26/58	5/29/55	12,548 AF
	ENLARGE	11/26/58	5/29/55	1,804
4296	RIPPLE CREEK RES	11/21/66	11/9/53	27,992
3648	LOST PARK RES	11/21/66	11/9/53	33,541
4295	RIO BLANCO RES	11/21/66	10/31/61	131,034
4313	WOLF CREEK RES	11/21/66	7/3/62	49,256
	ENLARGE	12/31/75	7/25/74	31,944
	ENLARGE	12/31/82	2/27/81	81,200
4263	FOURTEEN MILE RES 1	11/21/66	6/24/64	85,988
	ENLARGE	11/21/66	6/24/64	60,000
4302	SOUTH FORK RES	11/21/66	9/14/64	85,342
4306	SUPERIOR OIL TERM RES	12/31/69	5/14/68	800
4274	KELLOG GULCH RES	12/31/69	9/1/68	3,700
4248	CROOKED WASH RES	12/31/69	9/1/68	11,800
4316	WRAY GULCH RES	12/31/69	9/1/68	13,500
4244	BLACKS GULCH RERS	12/31/69	9/1/68	13,900
4288	POWELL PARK RES	12/31/70	8/5/66	75,970
4292	RALEY RES	12/31/70	4/3/70	23,649
4269	HENRY RES	12/31/70	4/3/70	37,116
4282	MILLER CREEK RES	12/31/71	7/18/68	22,600
	ENLARGE	12/31/79	9/30/76	23,300
3503	WOLF CREEK RES	12/31/72	9/30/71	35,000
4305	STRAWBERRY CREEK RES	12/31/73	6/16/72	75,957
4315	WRAY GULCH DAM & RES	12/31/73	7/19/72	29,374
4301	SAWMILL MOUNTAIN RES	12/31/76	10/7/76	80,000
3509	COLO WHITE R RES	12/31/82	11/17/81	105,000
4502	SMITH GULCH RES	12/31/83	8/9/82	415

DIV	WD	Water Right Name	Water Source	Sect	Twsh	Rang	Adj Date	Padj Date	Appr Date	Adj Type	Stru	Rate Amo	Volume Ar	Case No
6	43	B L TAYLOR D NO 1 & 2	HUNTER CK	17	3S	97W	1916-09-14	1916-09-13	1914-07-12	S	1	0.8000		CA0276
6	43	BELOT MOFFAT DITCH	PICEANCE CK	25	2S	97W	1889-05-10		1887-05-25	O,TT	1	2.0200		98CW0259
6	43	BELOT MOFFAT DITCH	PICEANCE CK	25	2S	97W	1889-05-10		1887-05-25	O,TT	1	3.6000		TD0333
6	43	BELOT MOFFAT DITCH	PICEANCE CK	25	2S	97W	1889-05-10		1887-05-25	O,TF	1	2.0200		98CW0259
6	43	BELOT MOFFAT DITCH	PICEANCE CK	25	2S	97W	1942-05-26	1938-01-31	1917-05-01	S,TF	1	3.6000		98CW0259
6	43	BELOT MOFFAT DITCH	PICEANCE CK	25	2S	97W	1942-05-26	1938-01-31	1917-05-01	S	1	8.0000		CA0624
6	43	BELOT MOFFAT DITCH	PICEANCE CK	25	2S	97W	1942-05-26	1938-01-31	1917-05-01	S,TT	1	3.6000		98CW0259
6	43	BLUE GRASS DITCH	STEWART GULCH	5	3S	96W	1889-05-10		1887-07-11	O	1	0.6000		CA0133
6	43	BOIES DITCH	BLACK SULPHUR CK	20	2S	97W	1890-10-22		1886-10-16	O,TF	1	2.0000		98CW0259
6	43	BOIES DITCH	BLACK SULPHUR CK	20	2S	97W	1890-10-22		1886-10-16	O,TT	1	2.0000		98CW0259
6	43	BOIES DITCH	BLACK SULPHUR CK	20	2S	97W	1890-10-22		1886-10-16	O	1	2.0000		10/22/189
6	43	COW CREEK DITCH	COW CK	1	4S	95W	1926-08-16	1925-08-17	1915-05-20	S	1	0.8000		CA0423
6	43	COW CREEK DITCH SYSTEM	COW CK	24	1N	92W	1942-05-26	1938-01-31	1930-07-22	S	1	6.1000		CA0624
6	43	COW CREEK DITCH SYSTEM	COW CK	24	1N	92W	1942-05-26	1938-01-31	1930-07-22	S,AB	1	6.1000		92CW0001
6	43	D D TAYLOR DITCH	BLACK SULPHUR CK	27	2S	98W	1889-05-10		1887-04-05	O	1	2.0000		CA0133
6	43	D D TAYLOR DITCH	BLACK SULPHUR CK	27	2S	98W	1889-05-10		1887-04-05	O	1	2.0000		CA0133
6	43	DESERT DITCH	BLACK SULPHUR CK	33	2S	98W	1942-05-26	1938-01-31	1914-06-12	S	1	0.4300		CA0624
6	43	DESERT DITCH	BLACK SULPHUR CK	33	2S	98W	1942-05-26	1938-01-31	1917-05-01	S	1	1.0000		CA0624
6	43	DRY FORK DITCH NO. 1	PICEANCE CK	36	1N	97W	1998-12-31	1997-12-31	1998-11-09	S	1	0.3500		98CW0251
6	43	DRY FORK DITCH NO. 1	PICEANCE CK	36	1N	97W	1998-12-31	1997-12-31	1998-11-09	S,C	1	4.1500		98CW0251
6	43	DRY FORK DITCH NO. 2	PICEANCE CK	35	1N	97W	1998-12-31	1997-12-31	1998-11-09	S,C	1	5.4500		98CW0251
6	43	DRY FORK DITCH NO. 2	PICEANCE CK	35	1N	97W	1998-12-31	1997-12-31	1998-11-09	S	1	0.5500		98CW0251
6	43	DUCKETT DITCH	BLACK SULPHUR CK	6	3S	98W	1932-08-15	1931-08-17	1918-06-10	S	1	1.2000		CA0534
6	43	E STEWART GULCH D NO 1	EAST STEWART GULCH	35	3S	96W	1913-09-04	1913-09-03	1899-11-01	S	1	0.4000		09/04/191
6	43	E STEWART GULCH D NO 1	EAST STEWART GULCH	35	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	0.2000		CA0624
6	43	E STEWART GULCH D NO 2	EAST STEWART GULCH	35	3S	96W	1913-09-04	1913-09-03	1899-11-01	S	1	0.4000		09/04/191
6	43	E STEWART GULCH D NO 2	EAST STEWART GULCH	35	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	0.2000		CA0624
6	43	EBLER DITCH	WILLOW CK of PICEANCE C	34	3S	97W	1889-05-10		1888-05-20	O	1	1.0000		CA0133
6	43	EBLER DITCH	WILLOW CK of PICEANCE C	34	3S	97W	1889-05-10		1888-05-20	O,TT	1	1.0000		98CW0259
6	43	EBLER DITCH	WILLOW CK of PICEANCE C	34	3S	97W	1889-05-10		1888-05-20	O,TF	1	1.0000		98CW0259
6	43	EMILY DITCH	PICEANCE CK	32	2S	96W	1889-05-10		1886-11-05	O	1	2.0000		CA0133
6	43	EMILY DITCH	PICEANCE CK	32	2S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	3.8500		CA0624
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31	1997-12-31	1998-12-14	S,C	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		29.0000	98CW0259

DIV	WD	Water Right Name	Water Source	Sect	Twsh	Rang	Adj Date	Padj Date	Appr Date	Adj Type	Stru	Rate Amo	Volume A	Case No
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	EXXON LOVE RANCH RESERV	PICEANCE CK	9	2S	97W	1998-12-31		1998-11-17	O,C,EX	3		30.0000	98CW0259
6	43	F M TAYLOR DITCH	NORTH FORK	3	1S	91W	1929-08-21	1929-08-20	1906-09-14	S	1	1.1300		CA0478
6	43	F M TAYLOR DITCH	NORTH FORK	3	1S	91W	1942-05-26	1938-01-31	1907-09-14	S	1	1.0000		CA0624
6	43	FLORENCE DITCH	MID FK STEWART GULCH	16	3S	96W	1889-05-10		1888-06-03	O	1	1.8000		CA0133
6	43	FLORENCE DITCH	MID FK STEWART GULCH	16	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	1.1000		CA0624
6	43	GARDENHEIR DITCH	PICEANCE CK	36	2S	97W	1942-05-26	1938-01-31	1895-03-05	S	1	0.6100		CA0624
6	43	GARDENHEIR DITCH	PICEANCE CK	36	2S	97W	1942-05-26	1938-01-31	1917-05-01	S	1	1.4300		CA0624
6	43	GERMAN DITCH	PICEANCE CK	21	2S	97W	1889-05-10		1889-03-25	O	1	1.6000		CA0133
6	43	GERMAN DITCH	PICEANCE CK	21	2S	97W	1889-05-10		1889-03-25	O,TF	1	1.6000		05/10/188
6	43	GILMOR DITCH	HUNTER CK	31	3S	97W	1889-05-10		1886-05-10	O,TT	1	1.5000		98CW0259
6	43	GILMOR DITCH	HUNTER CK	31	3S	97W	1889-05-10		1886-05-10	O	1	1.5000		CA0133
6	43	GILMOR DITCH	HUNTER CK	31	3S	97W	1889-05-10		1886-05-10	O,TF	1	1.5000		98CW0259
6	43	GREENO DITCH 1	HUNTER CK	8	3S	97W	1981-12-31	1980-12-31	1930-01-01	S	1	0.1700		81CW0400
6	43	GREENO DITCH 1	HUNTER CK	8	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,C	1	2.8300		81CW0400
6	43	GREENO DITCH 1	HUNTER CK	8	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,CA	1	1.5000		02CW0036
6	43	GREENO DITCH 1	HUNTER CK	8	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,CA	1	1.3300		95CW0080
6	43	GREENO DITCH 2	HUNTER CK	8	3S	97W	1981-12-31	1980-12-31	1930-01-01	S	1	0.3300		81CW0400
6	43	GREENO DITCH 2	HUNTER CK	8	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,CA	1	1.5000		02CW0036
6	43	GREENO DITCH 2	HUNTER CK	8	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,C	1	2.6700		81CW0400
6	43	GREENO DITCH 2	HUNTER CK	8	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,CA	1	1.1700		95CW0080
6	43	GREENO DITCH 3	HUNTER CK	9	3S	97W	1981-12-31	1980-12-31	1930-01-01	S	1	0.5000		81CW0401

DIV	WD	Water Right Name	Water Source	Sect	Twsh	Rang	Adj Date	Padj Date	Appr Date	Adj Type	Stru	Rate Amo	Volume A	Case No
6	43	GREENO DITCH 3	HUNTER CK	9	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,CA	1	1.0000		95CW0080
6	43	GREENO DITCH 3	HUNTER CK	9	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,C	1	2.5000		81CW0401
6	43	GREENO DITCH 3	HUNTER CK	9	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,CA	1	1.5000		02CW0036
6	43	GREENO DITCH 4	HUNTER CK	9	3S	97W	1981-12-31	1980-12-31	1930-01-01	S	1	0.5000		81CW0401
6	43	GREENO DITCH 4	HUNTER CK	9	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,C	1	2.5000		81CW0401
6	43	GREENO DITCH 4	HUNTER CK	9	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,CA	1	1.0000		95CW0080
6	43	GREENO DITCH 4	HUNTER CK	9	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,CA	1	1.5000		02CW0036
6	43	HUNTER DITCH	HUNTER CK	30	3S	97W	1889-05-10		1888-05-15	O,TF	1	1.0000		98CW0259
6	43	HUNTER DITCH	HUNTER CK	30	3S	97W	1889-05-10		1888-05-15	O	1	1.0000		CA0133
6	43	HUNTER DITCH	HUNTER CK	30	3S	97W	1889-05-10		1888-05-15	O,TT	1	1.0000		98CW0259
6	43	HUTCHINSON SPRING DITCH	FAWN CK	30	2S	97W	1889-05-10		1889-07-18	O	1	0.5000		CA0133
6	43	HUTCHINSON SPRING DITCH	FAWN CK	30	2S	97W	1981-12-31	1980-12-31	1980-12-22	S,C,AB	1	0.7720		81CW0028
6	43	HUTCHINSON SPRING DITCH	FAWN CK	30	2S	97W	1981-12-31	1980-12-31	1980-12-22	S,C	1	0.7720		81CW0028
6	43	JESSUP DITCH 1	STEWART GULCH	5	3S	96W	1889-05-10		1887-06-16	O	1	0.6000		CA0133
6	43	JESSUP DITCH 1	STEWART GULCH	5	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	0.6000		CA0624
6	43	JESSUP DITCH 2	STEWART GULCH	5	3S	96W	1889-05-10		1888-04-14	O	1	0.4000		CA0133
6	43	JESSUP DITCH 2	STEWART GULCH	5	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	0.2000		CA0624
6	43	JESSUP RESERVOIR	PICEANCE CK	3	3S	96W	1998-12-31	1997-12-31	1950-12-31	S	3		76.5000	98CW0267
6	43	JESSUP RESERVOIR DITCH	PICEANCE CK	3	3S	96W	1998-12-31	1997-12-31	1978-12-31	S	1	12.0000		98CW0267
6	43	JONES RESERVOIR	PICEANCE CK	11	3S	96W	1998-12-31	1997-12-31	1950-12-31	S	3		21.5000	98CW0267
6	43	LAST CHANCE DITCH	HUNTER CK	27	2S	97W	1890-10-22		1887-04-13	O	1	1.4000		10/22/189
6	43	LEONARD DITCH	FOURTEEN MILE CK	9	3S	94W	1890-10-22		1885-05-15	O	1	1.6000		10/22/189
6	43	LEONARD DITCH	FOURTEEN MILE CK	9	3S	94W	1942-05-26	1938-01-31	1917-05-01	S	1	2.1000		CA0624
6	43	MCCARTHY SPRING 1	MCCARTHY GULCH	27	4S	95W	1986-12-31	1985-12-31	1986-10-09	S	4	0.0100		86CW0355
6	43	MCCARTHY SPRING 2	MCCARTHY GULCH	22	4S	95W	1986-12-31	1985-12-31	1986-10-09	S	4	0.0330		86CW0344
6	43	MCCARTHY SPRING 3	MCCARTHY GULCH	27	4S	95W	1986-12-31	1985-12-31	1986-10-09	S	4	0.0330		86CW0347
6	43	MCCARTHY SPRING 4	MCCARTHY GULCH	27	4S	95W	1986-12-31	1985-12-31	1986-10-09	S	4	0.0330		86CW0345
6	43	MCCARTHY SPRING DITCH	PICEANCE CK	36	3S	95W	1926-08-16	1925-08-17	1905-05-11	S	1	0.6000		CA0423
6	43	MCGEE DITCH	FAWN CK	27	3S	98W	1942-05-26	1938-01-31	1890-05-01	S	1	0.3500		CA0624
6	43	MCGEE DITCH	FAWN CK	27	3S	98W	1942-05-26	1938-01-31	1917-05-01	S	1	0.8100		CA0624
6	43	MCKEE DITCH	BLACK SULPHUR CK	20	2S	97W	1942-05-26	1938-01-31	1917-05-01	S	1	3.0000		CA0624
6	43	MCKEE DITCH	BLACK SULPHUR CK	20	2S	97W	1942-05-26	1938-01-31	1917-05-01	S,TT	1	3.0000		98CW0259
6	43	MCKEE DITCH	BLACK SULPHUR CK	20	2S	97W	1890-10-22		1884-05-10	O	1	1.5000		10/22/189
6	43	MCKEE DITCH	BLACK SULPHUR CK	20	2S	97W	1890-10-22		1884-05-10	O,TF	1	1.5000		10/22/189
6	43	MCKEE DITCH	BLACK SULPHUR CK	20	2S	97W	1942-05-26	1938-01-31	1917-05-01	S,TF	1	3.0000		98CW0259
6	43	MIKKELSON DITCH	PICEANCE CK	36	3S	95W	1900-10-03	1899-10-03	1899-09-24	S	1	0.2000		10/03/190
6	43	MILO DITCH	BLACK SULPHUR CK	16	2S	97W	1924-08-25	1923-08-31	1911-05-01	S,TF	1	0.3000		98CW0259

DIV	WD	Water Right Name	Water Source	Sect	Twsh	Rang	Adj Date	Padj Date	Appr Date	Adj Type	Stru	Rate Amo	Volume Ar	Case No
6	43	MILO DITCH	BLACK SULPHUR CK	16	2S	97W	1924-08-25	1923-08-31	1911-05-01	S	1	0.3000		08/25/192
6	43	MILO DITCH	BLACK SULPHUR CK	16	2S	97W	1924-08-25	1923-08-31	1911-05-01	S,TT	1	0.3000		98CW0259
6	43	N & L DITCH	FAWN CK	36	2S	98W	1925-08-17	1924-08-25	1901-05-01	S,TF	1	1.0000		98CW0259
6	43	N & L DITCH	FAWN CK	36	2S	98W	1925-08-17	1924-08-25	1901-05-01	S,TT	1	1.0000		98CW0259
6	43	N & L DITCH	FAWN CK	36	2S	98W	1925-08-17	1924-08-25	1901-05-01	S	1	1.0000		CA0419
6	43	NO NAME DITCH	FAWN CK	30	2S	97W	1890-10-22		1887-05-01	O	1	0.4000		CA0340
6	43	O I SEE DITCH	FAWN CK	30	2S	97W	1890-10-22		1887-04-27	O	1	1.2000		10/22/189
6	43	O I SEE DITCH	FAWN CK	30	2S	97W	1889-05-10		1889-07-18	O,AP	1	0.5000		CA0133
6	43	OLDLAND DITCH 1	PICEANCE CK	12	3S	96W	1889-05-10		1887-04-27	O	1	4.0000		CA0133
6	43	OLDLAND DITCH 1	PICEANCE CK	12	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	2.9000		CA0624
6	43	OLDLAND DITCH 1	PICEANCE CK	12	3S	96W	1998-12-31	1997-12-31	1950-12-31	S	1	6.9000		98CW0267
6	43	OLDLAND DITCH 2	PICEANCE CK	11	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	9.4700		CA0624
6	43	OLDLAND DITCH 2	PICEANCE CK	11	3S	96W	1998-12-31	1997-12-31	1950-12-31	S	1	9.4700		98CW0267
6	43	OLDLAND DITCH 3	PICEANCE CK	3	3S	96W	1942-05-26	1938-01-31	1902-05-15	S	1	0.4200		CA0624
6	43	OLDLAND DITCH 3	PICEANCE CK	3	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	0.9800		CA0624
6	43	OLDLAND MAGOR DITCH	PICEANCE CK	32	2S	96W	1942-05-26	1938-01-31	1913-05-10	S	1	0.8600		CA0624
6	43	OLDLAND MAGOR DITCH	PICEANCE CK	32	2S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	2.0000		CA0624
6	43	PAT REIGAN SPG	TRIBUTARIES-PICEANCE CK	2	1S	97W	1978-12-31	1977-12-31	1978-05-22	S	4	1.5000		W3747-78
6	43	PICEANCE CREEK DITCH	PICEANCE CK	36	2S	97W	1889-05-10		1886-07-12	O	1	2.0000		CA0133
6	43	PICEANCE CREEK DITCH	PICEANCE CK	36	2S	97W	1942-05-26	1938-01-31	1917-05-01	S	1	1.6000		CA0624
6	43	PIGGOTT DITCH NO 1	MID FK STEWART GULCH	21	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	0.9000		CA0624
6	43	PIGGOTT DITCH NO 1	MID FK STEWART GULCH	21	3S	96W	1920-08-19	1920-08-17	1914-05-01	S,C,AB	1	0.2000		84CW0219
6	43	PIGGOTT DITCH NO 1	MID FK STEWART GULCH	21	3S	96W	1920-08-19	1920-08-17	1914-05-01	S	1	0.6000		CA0338
6	43	PIGGOTT DITCH NO 1	MID FK STEWART GULCH	21	3S	96W	1920-08-19	1920-08-17	1914-05-01	S,C	1	0.2000		CA0338
6	43	PIGGOTT DITCH NO 2	MID FK STEWART GULCH	28	3S	96W	1942-05-26	1938-01-31	1917-05-01	S,AP	1	0.9000		CA0624
6	43	PIGGOTT DITCH NO 2	MID FK STEWART GULCH	28	3S	96W	1920-08-19	1920-08-17	1917-06-01	S,C	1	0.2000		CA0338
6	43	PIGGOTT DITCH NO 2	MID FK STEWART GULCH	28	3S	96W	1920-08-19	1920-08-17	1917-06-01	S	1	0.4000		CA0338
6	43	PIGGOTT DITCH NO 2	MID FK STEWART GULCH	28	3S	96W	1920-08-19	1920-08-17	1917-06-01	S,C,AB	1	0.2000		84CW0219
6	43	ROBERT MCKEE DITCH	PICEANCE CK	27	2S	97W	1889-05-10		1887-04-18	O,TT	1	2.3300		TD0353
6	43	ROBERT MCKEE DITCH	PICEANCE CK	27	2S	97W	1889-05-10		1887-05-25	O,TT	1	1.0000		TD0353
6	43	ROBERT MCKEE DITCH	PICEANCE CK	27	2S	97W	1942-05-26	1938-01-31	1917-05-01	S	1	3.0000		CA0624
6	43	RYAN DITCH	PICEANCE CK	33	1S	97W	1889-05-10		1886-12-26	O,TT	1	3.0000		TD0319
6	43	RYAN DITCH	PICEANCE CK	33	1S	97W	1889-05-10		1886-12-26	O,TF	1	3.0000		98CW0048
6	43	RYAN DITCH	PICEANCE CK	32	1S	97W	1889-05-10		1884-06-01	O	1	2.5000		CA0133
6	43	RYAN DITCH	PICEANCE CK	32	1S	97W	1942-05-26	1938-01-31	1917-05-01	S	1	8.0000		CA0624
6	43	RYAN DITCH	PICEANCE CK	32	1S	97W	1942-05-26	1938-01-31	1917-05-01	S,AP	1	8.6000		CA0624
6	43	RYE GRASS DITCH	PICEANCE CK	4	3S	96W	1889-05-10		1888-06-05	O	1	2.4000		CA0133

DIV	WD	Water Right Name	Water Source	Sect	Twsh	Rang	Adj Date	Padj Date	Appr Date	Adj Type	Stru	Rate Amo	Volume A	Case No
6	43	RYE GRASS DITCH	PICEANCE CK	4	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	5.8000		CA0624
6	43	SAWYER DITCH	HUNTER CK	20	3S	97W	1889-05-10		1886-05-01	O,TT	1	2.0000		98CW0259
6	43	SAWYER DITCH	HUNTER CK	20	3S	97W	1889-05-10		1886-05-01	O,TF	1	2.0000		98CW0259
6	43	SAWYER DITCH	HUNTER CK	20	3S	97W	1889-05-10		1886-05-01	O	1	2.0000		CA0133
6	43	SAWYER DITCH NO 1	STAKE SPRINGS CK	12	2S	99W	1926-09-27	1926-08-31	1915-06-15	S	1	0.3300		CA0385
6	43	SAWYER DITCH NO 1	STAKE SPRINGS CK	12	2S	99W	1926-09-27	1926-08-31	1915-06-15	S,TF	1	0.3300		91CW0133
6	43	SAWYER DITCH NO 1 AND 2	STAKE SPRINGS CK	1	2S	99W	1926-09-27	1926-08-31	1915-06-15	S,TT	1	0.3300		91CW0133
6	43	SAWYER DITCH NO 1 AND 2	STAKE SPRINGS CK	1	2S	99W	1926-09-27	1926-08-31	1920-06-02	S,TT	1	0.0010		91CW0133
6	43	SAWYER DITCH NO 2	STAKE SPRINGS CK	12	2S	99W	1926-09-27	1926-08-31	1920-06-02	S,C	1	0.2800		CA0385
6	43	SAWYER DITCH NO 2	STAKE SPRINGS CK	12	2S	99W	1926-09-27	1926-08-31	1920-06-02	S,C,AB	1	0.2800		84CW0219
6	43	SAWYER DITCH NO 2	STAKE SPRINGS CK	1	2S	99W	1926-09-27	1926-08-31	1920-06-02	S	1	0.0010		CA0385
6	43	SAWYER DITCH NO 2	STAKE SPRINGS CK	12	2S	99W	1926-09-27	1926-08-31	1920-06-02	S,TF	1	0.0010		91CW0133
6	43	SCHWEIZER DITCH	BLACK SULPHUR CK	32	2S	98W	1890-10-22		1888-09-30	O	1	2.6000		CA0340
6	43	SCHWEIZER DITCH ALT PT	BLACK SULPHUR CK	33	2S	98W	1890-10-22		1888-09-30	O,AP	1	2.6000		94CW0262
6	43	SHERMAN TAYLOR DITCH	WHITE RIVER	9	1N	96W	1966-11-21	1958-11-26	1962-01-15	S,CA	1	5.0000		W0790
6	43	SHERMAN TAYLOR DITCH	WHITE RIVER	9	1N	96W	1966-11-21	1958-11-26	1962-01-15	S,C	1	5.0000		CA1269
6	43	TAYLOR DITCH	NORTH FORK	3	1S	91W	1958-11-26	1947-09-08	1956-07-27	S	1	2.5600		CA0999
6	43	TAYLOR DITCH	NORTH FORK	3	1S	91W	1958-11-26	1947-09-08	1956-07-27	S,AB	1	2.5600		92CW0145
6	43	TAYLOR DITCH	WILLOW CK of PICEANCE C	34	3S	97W	1889-05-10		1888-05-09	O	1	2.0000		CA0133
6	43	TAYLOR DITCH	WILLOW CK of PICEANCE C	34	3S	97W	1889-05-10		1888-05-09	O,TF	1	2.0000		98CW0259
6	43	TAYLOR DITCH	WILLOW CK of PICEANCE C	34	3S	97W	1889-05-10		1888-05-09	O,TT	1	2.0000		98CW0259
6	43	TAYLOR RES	HUNTER CK	8	3S	97W	1981-12-31	1980-12-31	1914-07-12	S	3		81.0000	81CW0404
6	43	TAYLOR RES	HUNTER CK	8	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,C	3		89.0000	81CW0404
6	43	TAYLOR RES	HUNTER CK	8	3S	97W	1981-12-31	1980-12-31	1966-05-27	S,C,AB	3		0	02CW0036
6	43	WATSON THOMPSON D NO 1	MID FK STEWART GULCH	33	3S	96W	1918-09-11	1917-09-11	1917-07-14	S	1	0.8000		CA0297
6	43	WATSON THOMPSON D NO 1	MID FK STEWART GULCH	33	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	0.7800		CA0624
6	43	WEST STEWART GULCH RES	WEST STEWART GULCH	30	3S	96W	1942-05-26	1938-01-31	1895-03-02	S	3		13.3000	CA0624
6	43	WEST STEWART RES DITCH	WEST STEWART GULCH	29	3S	96W	1942-05-26	1938-01-31	1895-03-01	S	1	0.7800		CA0624
6	43	WEST STEWART RES DITCH	WEST STEWART GULCH	29	3S	96W	1942-05-26	1938-01-31	1917-05-01	S	1	1.8200		CA0624
6	43	WEST STEWART RES SPG	WEST STEWART GULCH	30	3S	96W	1981-12-31	1980-12-31	1895-05-01	S	4	1.0000		81CW0306
6	43	WILLOW CREEK DITCH NO 2	EAST WILLOW CK	33	3S	97W	1889-05-10		1884-09-29	O	1	1.2000		CA0133
6	43	WILLOW CREEK DITCH NO 2	EAST WILLOW CK	33	3S	97W	1889-05-10		1884-09-29	O,TT	1	1.2000		98CW0259
6	43	WILLOW CREEK DITCH NO 2	EAST WILLOW CK	33	3S	97W	1889-05-10		1884-09-29	O,TF	1	1.2000		98CW0259
6	43	WILLOW CREEK DITCH NO 3	EAST WILLOW CK	33	4S	97W	1889-05-10		1884-09-29	O,TT	1	1.2000		98CW0259
6	43	WILLOW CREEK DITCH NO 3	EAST WILLOW CK	33	4S	97W	1889-05-10		1884-09-29	O,TF	1	1.2000		98CW0259
6	43	WILLOW CREEK DITCH NO 3	EAST WILLOW CK	33	4S	97W	1889-05-10		1884-09-29	O	1	1.2000		CA0133

Response for Document 52783

See Responses for Document 52780

Thank you for your comment, Deanna Walker.

The comment tracking number that has been assigned to your comment is OSTSD52785.

Comment Date: March 19, 2008 17:51:59PM
Oil Shale and Tar Sands
Comment ID: OSTSD52785

First Name: Deanna
Middle Initial: J
Last Name: Walker
Organization: ConocoPhillips Company
Address: P.O. Box 105
Address 2:
Address 3:
City: Livermore
State: CO
Zip: 80536
Country: USA
Email: Deanna.J.Walker@conocophillips.com
Privacy Preference: Don't withhold name or address from public record
Attachment: CoP Oil Shale PEIS Comments.Final.031908.doc

Comment Submitted:

ConocoPhillips Company respectfully submits the attached comments. A hard copy of these comments was sent by mail today to the appropriate address. Thank you for the opportunity to comment. See Attachment.

ConocoPhillips Company
Property Tax, Real Estate, Right of Way and Claims
P.O. Box 105
Livermore, Colorado 80536

March 19, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Avenue
Argonne, Illinois 60439

Dear Sir or Madam:

ConocoPhillips Company ("COPC") submits the attached comments to the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement ("PEIS") in response to The Bureau of Land Management's ("BLM's") requests published in the Federal Register on December 21, 2007. COPC appreciates BLM's consideration of the enclosed comments.

COPC recognizes the value of the PEIS as a technical document. Since it will be extensively referenced in future work, COPC has attempted to correct any factual errors presented in the text. In addition to factual corrections, COPC wishes to draw BLM's attention to comments on proposed mitigation measures. It's COPC's hope that BLM will recognize the need for performance based stipulations that protect the environment, public and worker safety, are adaptive, but do not duplicate existing regulations. 52785-001

If you have any questions, or require additional information, please contact Jason Charton, ConocoPhillips Company's Environmental Specialist, at 970.263.3126 or me.

Sincerely,

Deanna J. Walker
Phone: 970.498.9677
Fax: 970.498.9687
Email: Deanna.J.Walker@conocophillips.com

ConocoPhillips

ConocoPhillips Company's Comments to The Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement ("PEIS")

Detailed Comments on Factual Errors, Omissions or Concerns

Factual Errors in General Found Throughout PEIS Document:

Item 1: Volume 1. Units of Measure, page xxii [.pdf page 30] and repeated in Volumes 2 & 3

mm^2 = square micrometers should be = **square millimeters** 52785-002

Item 2: Volume 1. Units of Measure, page xxii [.pdf page 30]and repeated in Volumes 2 & 3

MMBTU = thousand BTU should be = **million BTU**

Item 3: Volume 2. Water Resources, page 4-40 [.pdf page 73], Table 4.5.2-1, footnote C

The PEIS states; 1 barrel water = 55 gal, 1 barrel oil = 42 gal."
This definition appears to be incorrect and inconsistent to its use elsewhere in the PEIS.

In the context of the PEIS; **1 bbl oil = 1 bbl water = 42 gallons** 52785-003

A common confusion exists between barrels and drums (55 gal). Documentation for this comment can be found in the NIST weights and measures publication. When talking about hydrocarbon production and refining operations, the 42-gallon barrel is the standard volume unit for both hydrocarbons and water.

Volume 1: ES.5 Second Paragraph, Page ES-3: BLM proposes to require applicants provide key development information as part of the lease application. ConocoPhillips Company ("COPC") notes that it may be difficult to provide detailed information at the time of leasing. Additionally, given the normal timeline for leasing and project specific National Environmental 52785-004

Policy Act ("NEPA") analysis, the project may undergo significant changes due to market influences, technology advances, etc. Evaluation of key development information is more appropriate at the project evaluation stage. This position is further supported in Section 2.5.1, Page 2-50. BLM was unable to construct detailed project development scenarios based on six pilot projects currently underway. 52785-004 (cont.)

Volume 1: ES.6 First Paragraph, Page ES-3: COPC commends BLM for identifying Alternative B as the preferred alternative. It makes the greatest amount of land available for leasing. 52785-005

Volume 1: Table ES-1, Page ES-4: BLM proposes to exclude segments of rivers eligible for Wild and Scenic River ("WSR") status. COPC believes the exclusion is premature and the referenced segments should be evaluated for leasing in the PEIS. Two additional NEPA evaluations will take place prior to development. Should the segments be designated as Wild and Scenic Rivers ("WSR's"), they can be excluded at that point. 52785-006

Volume 1: Section 2.2.1, Page 2-4: BLM states that project facilities will likely be classified as transient non-community water systems. COPC notes that most temporary living quarters constructed for oil and gas development in Colorado have been classified as non-transient, non-community water systems. 52785-007

Volume 1: Section 2.2.3, Page 2-9: BLM notes that it is policy to manage potentially eligible WSR's in a manner to prevent degradation until Congress or the Secretary can make a determination. Given the timeframe required for determinations and potential development, COPC believes it's premature to exclude the referenced locations from evaluation in the PEIS. 52785-008

Volume 1: Section 2.3.1, Page 2-15: BLM limits surface mining evaluations to overburden depths less than 500 feet. COPC believes that BLM should expand on the areas considered for surface mining. As overburden depth limitations are largely economically driven, larger areas should be considered to ensure the necessary flexibility available should prices increase. One 52785-009

area could include those lands managed by BLM's White River Field Office. The White River Land Management Plan currently considers surface mining operations. 52785-009 (cont.)

Volume 1: Section 2.3.2, Page 2-19: BLM proposes to exclude segments of rivers eligible for Wild and Scenic River ("WSR") status. COPC believes the exclusion is premature and the referenced segments should be evaluated for leasing in the PEIS. Two additional NEPA evaluations will take place prior to development. Should the segments be designated as WSR's, they can be excluded at that point. 52785-010

Volume 1: Section 2.4.3, Page 2-42: BLM proposes to exclude segments of rivers eligible for WSR. COPC believes the exclusion is premature and the referenced segments should be evaluated for leasing in the PEIS. Two additional NEPA evaluations will take place prior to development. Should the segments be designated as WSR's, they can be excluded at that point.

Volume 1: Section 2.4.3, Page 2-42: BLM proposes to require that applicants provide key development information as part of the lease application. COPC notes that it may be difficult to provide detailed information at the time of leasing. Additionally, given the normal timeline for leasing and project specific National Environmental Policy Act ("NEPA") analysis, the project may undergo significant changes due to market influences, technology advances, etc. Evaluation of key development information is more appropriate at the project evaluation stage. This position is further supported in Section 2.5.1, Page 2-50. BLM was unable to construct detailed project development scenarios from the operators of the six pilot projects currently underway. 52785-011

Volume 1: Section 2.5.8, Page 2-53: COPC believes the establishment and management of trust or impact funds is a governmental function. One example of a BLM supported impact fund is in Alaska, where the BLM has National Petroleum Reserve – Alaska ("NPR-A") impact funds. Local communities may apply for grants if they have projects related to mitigating perceived impacts of NPR-A exploration and development. 52785-012

Volume 1: Table 2.6-1, Page 2-57: When discussing paleontological resources, BLM could lead a reader to mistakenly believe that development would have only negative impacts. BLM 52785-013

does not discuss the potential for new finds and their preservation during project planning and development. 52785-013 (cont.)

Volume 1: Table 2.6-1, Page 2-58: When discussing water resources, BLM could lead a reader to mistakenly believe that development would have only negative impacts. Due to existing Clean Water Act ("CWA") regulations, it's possible for a project to release water cleaner than the receiving water body. 52785-014

Volume 1: Table 2.6-1, Page 2-59: When discussing air resources, BLM could lead a reader to mistakenly believe that oil shale development will significantly degrade air quality. While project and site specific information is not available, it's reasonable to assume maximum impacts based on the limitations imposed by the Clean Air Act ("CAA"). In general, air quality has improved since the passage of the CAA. 52785-015

Volume 1: Table 2.6-1, Page 2-61: When discussing ecological resource impacts, BLM could lead a reader to mistakenly believe that oil shale development will have only negative impacts. It's likely that some ecological resources will benefit from scientific studies conducted to support development, corporate donations, habitat restoration projects, reservoir creation, etc. 52785-016

Volume 1: Table 2.6-1, Page 2-61: When discussing aquatic resource impacts, BLM could lead a reader to mistakenly believe that oil shale development will have only negative impacts. It's likely that some aquatic resources will benefit from scientific studies conducted to support development, corporate donations, habitat restoration projects, reservoir creation, etc. 52785-017

Volume 1: Table 2.6-1, Page 2-62: When discussing plant resources, BLM could lead a reader to mistakenly believe that oil shale development will have only negative impacts. It's likely that some plant species will benefit from weed control in previously unmanaged areas, scientific studies conducted to support development, corporate donations, habitat restoration projects, etc. 52785-018

Volume 1: Table 2.6-1, Page 2-63: When discussing wildlife resources, BLM could lead a reader to mistakenly believe that oil shale development will have only negative impacts. It's 52785-019

likely that some wildlife species will benefit from scientific studies conducted to support development, corporate donations, habitat restoration projects, etc. 52785-019 (cont.)

Volume 1: Table 2.6-1, Page 2-66: When discussing cultural resources, BLM could lead a reader to mistakenly believe that oil shale development will have only negative impacts. BLM does not discuss the potential for new finds and their preservation during project planning and development. 52785-020

Volume 1: Table 2.6-1, Page 2-68: When discussing environmental justice, BLM could lead a reader to mistakenly believe that oil shale development will have only negative impacts. BLM does not discuss the potential for better schools through higher tax bases, increased wages, scholarships supported by industry, etc. 52785-021

Volume 1: Table 2.6-1, Page 2-70: When discussing health and safety impacts, BLM could lead a reader to mistakenly believe that oil shale development will have only negative impacts. BLM does not discuss the benefit of safety education and exposure to advanced health, safety and environmental cultures within the energy industry. It's common for workers to take workplace information and habits home with them. Examples could include using hearing protection while mowing the yard, using fall protection devices while working on the roof, etc. 52785-022

Volume 1: Table 2.6-2, Page 2-73: When discussing paleontological resources, BLM could lead a reader to mistakenly believe that development would have only negative impacts. BLM does not discuss the potential for new finds and their preservation during project planning and development. 52785-023

Volume 1: Table 2.6-2, Page 2-74: When discussing water resources, BLM could lead a reader to mistakenly believe that development would have only negative impacts. Due to existing Clean Water Act ("CWA") regulations, it's possible for a project to release water cleaner than the receiving water body. 52785-024

Volume 1: Table 2.6-2, Page 2-76: When discussing aquatic resource impacts, BLM could lead a reader to mistakenly believe that oil shale development will have only negative impacts. It's likely that some aquatic resources will benefit from scientific studies conducted to support development, corporate donations, habitat restoration projects, reservoir creation, etc. 52785-025

Volume 1: Table 2.6-2, Page 2-81: When discussing socioeconomic impacts, BLM could lead a reader to mistakenly believe that oil shale development will have only negative impacts. BLM does not discuss the potential for better schools through higher tax bases, increased wages, scholarships supported by industry, etc. 52785-026

Volume 1: Table 2.6-2, Page 2-82: When discussing environmental justice, BLM could lead a reader to mistakenly believe that oil shale development will have only negative impacts. BLM does not discuss the potential for better schools through higher tax bases, increased wages, scholarships supported by industry, etc. Additionally, BLM implies that notable air and water quality impacts will occur. Given existing rules, regulations and lack of project specific information, COPC believes that predicting notable impacts lacks sufficient scientific support. 52785-027

Volume 2: Section 4.1.1, Page 4-6: BLM assumes that spent shale management will consist solely of disposal options. COPC encourages BLM to evaluate the potential for reuse of the material since reusing spent shale can potentially reduce project footprint, eliminate hauling fill from offsite gravel pits, etc. It is conceivable that reuse options will be developed. As an example, water based drill cuttings are often reused in the oil and gas industry. Since the potential for contaminates exist, management plans are developed to ensure reused cuttings meet a specific criteria prior to reuse. 52785-028

Volume 2: Section 4.1.1, Page 4-7: BLM assumes that spent shale management will consist solely of disposal options. COPC encourages BLM to evaluate the potential for reuse of the material since reusing spent shale can potentially reduce project footprint, eliminate hauling fill from offsite gravel pits, etc. It is conceivable that reuse options will be developed. As an example, water based drill cuttings are often reused in the oil and gas industry. Since the 52785-029

potential for contaminates exist, management plans are developed to ensure reused cuttings meet a specific criteria prior to reuse. 52785-029 (cont.)

Volume 2: Section 4.1.1, Page 4-9: BLM should consider the reuse of temporary living quarters' treated waste water and reject water generated from reverse osmosis potable water treatment. 52785-030

Volume 2: Section 4.1.5, Page 4-13: BLM should also evaluate the potential for companies to build onsite housing only for workers on a rotational schedule. Once off-shift, workers would then either commute to other areas or purchase family housing in nearby communities through existing market processes. 52785-031

Volume 2: Section 4.2.1, Page 4-16: BLM assumes only negative private property impacts dues to nearby oil shale development impacts. The opposite may in fact occur. Corresponding water rights or oil shale support services located onsite may increase property values. 52785-032

Volume 2: Section 4.3.1.1, Page 4-24: In the next to last paragraph on the page, BLM assumes that spent shale management will consist solely of disposal options. COPC encourages BLM to evaluate the potential for reuse of the material since reusing spent shale can potentially reduce project footprint, eliminate hauling fill from offsite gravel pits, etc. It is conceivable that reuse options will be developed. As an example, water based drill cuttings are often reused in the oil and gas industry. Since the potential for contaminates exist, management plans are developed to ensure reused cuttings meet a specific criteria prior to reuse. 52785-033

Volume 2: Section 4.4.2, Page 4-28: COPC is concerned that BLM proposes a management plan and staff paleontologist as potential mitigation measures. BLM's existing guidance requires work to stop if resources are discovered during the course of normal activities. Workers are required to be trained on this requirement. COPC believes that the existing measures are adequate, and that additional plans or staffing should be at the discretion of lessees to minimize the potential for downtime associated with a discovery. 52785-034

Volume 2: Section 4.5.1, Page 4-30: In the second bullet, BLM lists only potential negative impacts associated with surface reservoirs. Waterfowl and other water dependant wildlife will benefit from additional reservoirs. 52785-035

Volume 2: Section 4.5.1.2, Page 4-32: COPC believes that the estimate of water necessary for shale oil production is overly conservative. 1.5 bbl of water per bbl of shale oil may be a more accurate estimate. Water source and reuse options continue to evolve. It's likely the volume may continue to drop over time. 52785-036

Volume 2: Section 4.5.1.2, Page 4-32: BLM should consider the reuse of temporary living quarters' treated waste water and reject water generated from reverse osmosis potable water treatment. 52785-037

Volume 2: Section 4.5.1.2, Page 4-33: In the second paragraph, BLM lists only potential negative impacts associated with surface reservoirs. Waterfowl and other water dependant wildlife will benefit from additional reservoirs. 52785-038

Volume 2: Table 4.5.2-1, Page 4-37: COPC believes the daily per capita water consumption of 135 gallons is conservative. Current Colorado temporary living quarters projects have used between 50 and 100 gallons per capita per day as a planning value. 52785-039

Volume 2: Section 4.5.3, Page 4-44: The term *swale*, located in the sixth bullet, needs further definition. Assuming a *swale* does not meet the criteria for wetlands or waters of the United States, it may present with the best storage alternative in some cases. A potential benefit could include reduced visual impact of piles. 52785-040

Volume 2: Section 4.5.3, Page 4-45: The fifth and sixth bullets recommend siting and management stipulations for fuel and chemical storage. There are currently numerous federal, state and local regulations that pertain to the referenced activities. NEPA document mitigation measures are slow, if not impossible, to adapt. Current regulations, for the referenced activities, are based on best management practices that routinely change with technological advances. It's 52785-041

likely that NEPA stipulations, in this area, will slow the adoption of best management practices over the life of potential oil shale development. 52785-041 (cont.)

Volume 2: Section 4.6.1, Page 4-46: BLM states that local and regional air impacts *would* occur with oil shale development. COPC believes the term *could* is more appropriate, since CAA regulations are in place to prevent significant deterioration of air quality. 52785-042

Volume 2: Section 4.6.2, Page 4-50: BLM proposes a number of potential air stipulations. The proposed stipulations largely duplicate existing federal and state requirements. NEPA document stipulations are less flexible to change and could create regulatory conflict or slow best practice adoption as agencies, with primacy, change their regulations. 52785-043

Volume 2: Section 4.7.2.1, Page 4-59: BLM proposes a noise management plan. COPC believes the plan would be less effective than engineering solutions in the design phase. 52785-044

Volume 2: Section 4.7.2.2, Page 4-60: BLM proposes recordkeeping requirements for construction equipment sound control devices. COPC believes this represents a significant administrative burden for lessees with little sound reduction benefit. 52785-045

Volume 2: Table 4.8.1-1, Page 4-67: The table does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-046

Volume 2: Section 4.8.1.3.1, Pages 4-68 through 4-73: The section does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-047

Volume 2: Section 4.8.2.3, Page 4-104: The third bullet seems to indicate that BLM will discourage augmentation ponds and require netting. COPC suggests clarification that water augmentation ponds are not of concern. 52785-048

Volume 2: Section 4.8.2.4, Page 4-107: The last bullet discusses the use of check valves. COPC encourages BLM to consider other technology alternatives such as vertical expansion loops if proposed. 52785-049 (cont.)

Volume 2: Section 4.9.1.1, Page 4-113: BLM should also consider on-lease housing for shift workers only. 52785-050

Volume 2: Section 4.9.1.2.2, Page 4-121: BLM should consider the potential for spent shale reuse. In time, technologies may be introduced that will allow spent shale's reuse as a construction material. 52785-051

Volume 2: Section 4.9.1.4.3, Page 4-126: BLM should consider a scenario where workers are on a rotational shift, housed onsite and their families live offsite nearby, elsewhere in state or out of state. 52785-052

Volume 2: Section 4.9.2, Page 4-130: COPC assumes the second bullet refers to open burning. Onsite incineration of suitable non-hazardous solid waste, using commercially produced units, is commonly practiced in sensitive areas such as Alaska's North Slope. Reduced truck traffic and landfill volume are two immediate benefits. 52785-053

Volume 2: Section 4.10.1, Page 4-131: BLM does not discuss potential beneficial impacts associated with pre-development surveys, etc. 52785-054

Volume 2: Section 4.11, Pages 4-134 and 4-135: BLM should consider a scenario where workers are on a rotational shift, housed onsite and their families live offsite nearby, elsewhere in state or out of state. 52785-055

Volume 2: Section 4.11.1.5, Page 4-145: The IMPLAN estimate does not appear to take into account the recreation activities of workers and their families. 52785-056

Volume 2, Section 4.11.2, Page 4-148: It's likely that many projects will include worker housing, but lessees should not be required to provide housing for workers or their families. If housing is provided for families, it's likely that more people will move to the area than would have otherwise. 52785-057

Volume 2: Section 4.13.1, Page 4-154: BLM should also consider incineration of suitable non-hazardous solid wastes. 52785-058

Volume 2: Section 4.13.1, Page 4-155: BLM should consider the potential for spent shale reuse. 52785-059

Volume 2: Section 4.13.1.1, Page 156: BLM should consider incineration of suitable non-hazardous solid wastes. 52785-060

Volume 2: Section 4.13.1.1, Page 156: BLM should consider the potential for spent shale reuse. 52785-061

Volume 2: Section 4.123.2, Page 4-161: BLM proposes a number of potential hazardous waste stipulations. The proposed stipulations largely duplicate existing federal and state requirements. NEPA document stipulations are less flexible to change and could create regulatory conflict or slow best practice adoption as agencies, with primacy, change their regulations. 52785-062

Volume 2: Section 4.14, Pages 4-164 and 4-165: BLM uses dated references. Current research associated either with the current RD&D projects or Canadian activities should be available for use. 52785-063

Volume 2: Section 4.14.1.2, Pages 4-167 and 4-168: BLM uses dated references. Current research associated either with the current RD&D projects or Canadian activities should be available for use. 52785-064

Volume 2: Section 4.14.2, Pages 4-171 and 4-172: The first bullet item proposes activities that could best be managed through an impact fund program managed by the BLM or respective states. The remainder of the bullets outlines potential worker health and safety stipulations. The proposed stipulations largely duplicate existing federal and state requirements. NEPA document stipulations are less flexible to change and could create regulatory conflict or slow best practice adoption as agencies, with primacy, change their regulations. 52785-065

Volume 2: Section 5.1.4, Page 5-10: BLM should consider a scenario where workers are on a rotational shift, housed onsite and their families live offsite nearby, elsewhere in state or out of state. 52785-066

Volume 2: Section 5.4.1, Page 5-22: BLM does not discuss beneficial impacts such as early identification and preservation of previously unknown resources. 52785-067

Volume 2: Section 5.4.2, Page 5-23: COPC is concerned that BLM proposes a management plan and staff paleontologist as potential mitigation measures. BLM's existing guidance requires work to stop if resources are discovered during the course of normal activities. Workers are required to be trained on this requirement. COPC believes that the existing measures are adequate, and that additional plans or staffing should be at the discretion of lessees to minimize the potential for downtime associated with a discovery. 52785-068

Volume 2: Section 5.5.1, Page 5-24: In the next to last bullet, BLM does not consider potential beneficial impacts such as creation of waterfowl habitat. 52785-069

Volume 2: Section 5.5.1, Page 5-24: In the last bullet, BLM does not consider the potential for discharged water to be of better quality than the receiving waterbody. 52785-070

Volume 2: Section 5.5.2.2, Page 5-32: In the next to last paragraph, BLM uses 135 gallons per day per person. COPC believes 135 gallons is a conservative estimate. Using between 50 and 100 gallons per person may more accurately reflect work camp conditions. 52785-071

Volume 2: Section 5.5.3, Page 5-37: The term *swale*, located in the third bullet, needs further definition. Assuming a *swale* does not meet the criteria for wetlands or waters of the United States, it may present with the best storage alternative in some cases. A potential benefit could include reduced visual impact of piles. 52785-072

Volume 2: Section 5.5.3, Page 5-38: The second and third bullets recommend siting and management stipulations for fuel and chemical storage. There are currently numerous federal, state and local regulations that pertain to the referenced activities. NEPA document mitigation measures are slow, if not impossible, to adapt. Current regulations, for the referenced activities, are based on best management practices that routinely change with technological advances. It's likely that NEPA stipulations, in this area, will slow the adoption of best management practices over the life of potential oil shale development. 52785-073

Volume 2: Section 5.5.3, Page 5-38: BLM states that local and regional air impacts *would* occur with oil shale development. COPC believes the term *could* is more appropriate, since CAA regulations are in place to prevent significant deterioration of air quality. 52785-074

Volume 2: Section 5.6.2, Page 5-42: BLM proposes a number of potential air stipulations. The proposed stipulations largely duplicate existing federal and state requirements. NEPA document stipulations are less flexible to change and could create regulatory conflict or slow best practice adoption as agencies, with primacy, change their regulations. 52785-075

Volume 2: Section 5.8.1.3, Page 5-58: The section does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-076

Volume 2: Section 5.8.2.3, Page 5-91: The second bullet seems to indicate that BLM will discourage augmentation ponds and require netting. COPC suggests clarification that water augmentation ponds are not of concern. 52785-077

Volume 2: Section 5.8.2.4, Page 5-95: The last bullet discusses the use of check valves. COPC encourages BLM to consider other technology alternatives such as vertical expansion loops if proposed. 52785-078

Volume 2: Section 5.9.1.5.2, Page 5-102: BLM should consider a scenario where workers are on a rotational shift, housed onsite and their families live offsite nearby, elsewhere in state or out of state. 52785-079

Volume 2: Section 5.9.2, Page 5-105: COPC assumes the second bullet refers to open burning. Onsite incineration of suitable non-hazardous solid waste, using commercially produced units, is commonly practiced in sensitive areas such as Alaska's North Slope. Reduced truck traffic and landfill volume are two immediate benefits. 52785-080

Volume 2: Section 5.11.2, Page 5-113: It's likely that many projects will include worker housing, but lessees should not be required to provide housing for workers or their families. If housing is provided for families, it's likely that more people will move to the area than would have otherwise. 52785-081

Volume 2: Section 5.13.1, Page 5-119: BLM should consider incineration of suitable non-hazardous solid wastes. 52785-082

Volume 2: Section 5.13.2, Page 5-123: BLM proposes a number of potential hazardous waste stipulations. The proposed stipulations largely duplicate existing federal and state requirements. NEPA document stipulations are less flexible to change and could create regulatory conflict or slow best practice adoption as agencies, with primacy, change their regulations. 52785-083

Volume 2: Section 5.14.1.2, Page 5-127: BLM uses dated references. Current research associated either with the current RD&D projects or Canadian activities should be available for use. 52785-084

Volume 2: Section 5.14.1.3, Page 5-129: BLM uses dated references. Current research associated either with the current RD&D projects or Canadian activities should be available for use. 52785-085

Volume 2: Section 6.1.2.3, Page 6-43: BLM does not discuss potential beneficial impacts such as identification and preservation of previously unknown sites. 52785-086

Volume 2: Section 6.1.2.4, Page 6-44: In the first bullet, BLM does not discuss potential beneficial impacts such as waterfowl habitat creation. 52785-087

Volume 2: Section 6.1.2.7, Page 6-47: The section does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-088

Volume 2: Section 6.1.2.7.2, Page 6-48: The section does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-089

Volume 2: Section 6.1.2.7.3, Page 6-52: The section does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-090

Volume 2: Section 6.1.2.10, Page 6-63: In the next to last bullet, the referenced job loses do not appear to take into account the recreational use of workers and their families. 52785-091

Volume 2: Section 6.1.2.13, Page 6-66: BLM states that oil shale development *would* expose the public to air and water contamination. COPC believes the term *could* is more appropriate, since CWA and CAA regulations are in place to prevent significant deterioration of water and air quality. 52785-092

Volume 2: Section 6.1.3.3, Page 6-70: BLM does not discuss the potential beneficial impacts of identification and preservation of previously unknown resources. 52785-093

Volume 2: Section 6.1.3.7.1, Page 6-73: The section does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-094

Volume 2: Section 6.1.3.7.2, Page 6-74: The section does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-095

Volume 2: Section 6.1.3.7.3, Page 6-78: The section does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-096

Volume 2: Section 6.1.3.9, Page 6-86: BLM does not discuss the potential beneficial impacts of identification and preservation of previously unknown resources. 52785-097

Volume 2: Section 6.1.3.13, Page 6-88: BLM states that oil shale development *would* expose the public to air and water contamination. COPC believes the term *could* is more appropriate, since CWA and CAA regulations are in place to prevent significant deterioration of water and air quality. 52785-098

Volume 2: Section 6.1.3.13, Page 6-88: BLM proposes a worker health and safety plan submission. COPC believes this is an unneeded administrative burden because it largely duplicates existing regulations. 52785-099

Volume 2: Section 6.1.5.3.12, Page 6-164: BLM does not discuss reuse of drill cuttings. It is a commonly used practice in many parts of the United States. It reduces truck traffic and the amount of fill that must be mined from an outside source. 52785-100

Volume 2: Section 6.2.2.3, Page 6-183: BLM does not discuss the potential beneficial impacts of identification and preservation of previously unknown resources. 52785-101

Volume 2: Section 6.2.2.4, Page 6-184: In the fourth bullet from the end, BLM does not discuss the potential for discharged water being of higher quality than the receiving water. 52785-102

Volume 2: Section 6.2.2.7.1, Page 6-187: The section does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-103

Volume 2: Section 6.2.2.7.2, Page 6-188: The section does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-104

Volume 2: Section 6.2.2.7.3, Page 6-189: The section does not include potential beneficial impacts such as increased scientific study, corporate donations, habitat improvement projects, etc. 52785-105

Volume 2: Section 6.2.2.9, Page 6-202: BLM does not discuss the potential beneficial impacts of identification and preservation of previously unknown resources. 52785-106

Volume 2: Section 6.2.2.10, Page 6-203: In the next to last bullet, the referenced job loses do not appear to take into account the recreational use of workers and their families. 52785-107

Volume 2: Section 6.2.5.3.12, Page 6-280: BLM does not discuss reuse of drill cuttings. It is a commonly used practice in many parts of the United States. It reduces truck traffic and the amount of fill that must be mined from an outside source. 52785-108

Volume 3: Section A.2.1, Page A-15: COPC understands that the last three large retorts constructed at Logan Wash were 7, 8 and 8x versus 5 and 6 as stated. Retorts 7 and 8 were fired and successfully produced shale oil. 52785-109

Volume 3: Section A.2.1, Page A-19: COPC understands that the North Clear Creek location was to be an underground mine initially, targeting the Mahogany Zone, followed by a larger surface mine versus an underground mine only as currently stated. 52785-110

Volume 3: Section A.3.1.1, Page A-22: BLM states that surface mining is not an available option in Colorado. COPC believes that the limiting overburden depth is economically driven, and the PEIS is premature to disregard surface mining potential in Colorado. In fact, the current White River Management Plan considers surface mining options. 52785-111

Volume 3: Section A.3.1.2, Page A-28: Schlumberger recently acquired Raytheon's radio frequency heating technology. 52785-112

Volume 3: Section A.3.2, Page A-31: BLM incorrectly states that char has limited energy value. The Chevron STB, Lurgi-Ruhrgas process, the paraho direct process and ATP retort all burn char as their primary heat source. 52785-113

Volume 3: Section A.3.2.1, Page 32: COPC recommends that BLM reconsider the content and presentation of the first paragraph. 52785-114

Volume 3: Section A.3.2.1, Page 32: BLM states that AGR pioneering work was initiated in the 1960's is incorrect. Continuous solids flow retort work began in the 1940s with the BuMines gas combustion retort at Anvil Points and Armand Hammer's patent for the shale upflow retort that evolved into the Union B. 52785-115

Volume 3: Section A.3.2.1.2, Page A-34: COPC notes that the TOSCO II Retort is not the only solid to solid heat transfer process. Others include the Chevron STB retort in Salt Lake City and the Lawrence Livermore National Laboratory HRS Retort. 52785-116

Volume 3: Section A.3.2.1.2, Page A-34: COPC notes that the TOSCO II Retort is not the only retort to have its raw shale further upgraded. Other examples include the Union B Retort near Parachute, the Chevron STB retort and the offsite upgrading for Paraho product oil. 52785-117

Volume 3: Section A.3.2.1.3, Page A-34: COPC notes that externally heated fuel gas is used to heat the retort versus air as stated. 52785-118

Volume 3: Section A.3.2.1.3, Page A-34: COPC notes that the unit can also be operated in a hybrid direct/indirect mode by injecting air. 52785-119

Volume 3: Section A.3.2.1.6, Page A-37: COPC notes that gas clean-up can be attached to most retorts. 52785-120

Volume 3: Section A.4, Page A-48: COPC notes that the largest retorted shale pile in the United States is along the North bank of East Parachute Creek. It contains the shale produced by the Union B retort. Satellite and aerial photographs exist. 52785-121

Volume 3: Section A.4, Page A-48: BLM discusses an increase in shale volume due to a "popcorn effect". COPC believes this misconception should not be perpetuated. As with any monolithic solid that is crushed, the apparent increase in volume is due to air spaces. The actual material volume does not increase. 52785-122

Volume 3: Section A.4, Page A-48: BLM assumes that spent shale management will consist solely of disposal options. COPC encourages BLM to evaluate the potential for reuse of the material since reusing spent shale can potentially reduce project footprint, eliminate hauling fill from offsite gravel pits, etc. It is conceivable that reuse options will be developed. As an example, water based drill cuttings are often reused in the oil and gas industry. Since the potential for contaminates exist, management plans are developed to ensure reused cuttings meet a specific criteria prior to reuse. 52785-123

Volume 3: Appendix F, Page F-4: COPC is concerned that Measure 3 recommends avoidance of construction activities for six months of each year within critical habitat areas to prevent sedimentation. COPC believes adequate measures, pursuant to storm water requirements, will prevent said sedimentation. 52785-124

Volume 3: Appendix F, Page F-4: COPC is concerned that automatic shut-off valves are specified in Measure 6d. The prescriptive recommendation eliminates the potential for alternative control measures such as vertical expansion loops that, in some cases, may be more effective. 52785-125

Volume 3: Appendix F, Page F-5: A distinction is not drawn between augmentation ponds or surface water drawn from private lands in Measure 8. 52785-126

Volume 3: Appendix F, Page F-5: COPC is concerned that eliminating water withdrawals from some sections of the Colorado River may constitute a "take" of legal water rights. 52785-127

Responses for Document 52785

52785-001: Subsequent NEPA analysis will be used to develop site-specific stipulations to protect the resources and values found in individual lease and development areas. Performance-based standards are one of the potential mitigation measures that could be considered.

52785-002: Thank you for your comments. The errors are being corrected.

52785-003: The corrected conversion factor of 1 barrel = 42 gallons has been used in the revised text and tables.

52785-004: The BLM recognizes that all information regarding plans of development may not be available to the applicant at the time of lease application. Additional NEPA evaluations would be required prior to approval of the plan of development submitted to the BLM.

52785-005: The BLM acknowledges the commentor's preference for Alternative B.

52785-006: Thank you for your comment. Although the BLM considered the request to not exclude segments of rivers eligible for Wild and Scenic River status, we have decided to retain that exclusion in the PEIS to ensure protection of those resources.

52785-007: The BLM appreciates your review and comment on the nature of the temporary living quarters for prior oil and gas development projects. The text in Section 2.2.1 has been changed.

52785-008: See response to Comment 52785-006.

52785-009: The BLM limited its evaluation of the impacts of surface mining to those areas within the most geologically prospective oil shale areas where the overburden ranges in thickness from 0 to 500 ft. As indicated in the comment, this limitation was based, in large part, on the assumption that 500 ft is about the maximum amount of overburden where surface mining can occur economically, using today's technologies. However, there are also environmental considerations for considering areas where greater amounts of overburden would need to be removed.

52785-010: See response to Comment 52785-006.

52785-011: See response to Comment 52785-004.

52785-012: The BLM does not have authority to set up such a fund. The referenced Alaska fund was established by an Act of Congress that directed that a portion of the

funds collected on lands leased by the BLM for oil and gas development be transferred into the fund.

52785-013: It is acknowledged in Section 4.4 that the discovery of previously unidentified paleontological resources would be a possible benefit of development of oil shale resources. Section 4.4 discloses the general situation across the various alternatives, so it is not repeated in multiple locations in the document, including the tables in Chapter 2 and the text in Chapter 6.

52785-014: Under the arid and semi-arid environments and great needs of water from oil shale developments, it is unlikely that relatively good-quality water is released to the receiving water body. Also, water quality in this region is generally worse in groundwater than in surface water. Releases of unwanted groundwater to surface water bodies would degrade surface water resources.

52785-015: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52785-016: Potential benefits of oil shale development to ecological resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-017: Potential benefits of oil shale development to aquatic resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-018: Potential benefits of oil shale development to plants or other species are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the NEPA analyses required at the leasing and/or plan of development phases.

52785-019: Potential benefits of oil shale development to wildlife resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-020: It is acknowledged in Section 4.10 that the discovery of previously unidentified cultural resources would be a possible benefit of development of oil shale resources. Section 4.10 discloses the general situation across the various alternatives, so it is not repeated in multiple locations in the document, including the tables in Chapter 2 and the text in Chapter 6.

52785-021: Text in Sections 4.12 and 5.12 of the PEIS has been changed to reflect information provided in the comment.

52785-022: The extent of health benefits from access to good health, safety, and environmental cultures within the energy industry is somewhat speculative, and is not discussed in the PEIS.

52785-023: It is acknowledged in Section 5.4 that the discovery of previously unidentified paleontological resources would be a possible benefit of development of tar sands resources. Section 5.4 discloses the general situation across the various alternatives, so it is not repeated in multiple locations in the document, including the tables in Chapter 2 and the text in Chapter 6.

52785-024: See response to Comment 52785-014.

52785-025: Potential benefits of oil shale development to aquatic resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-026: Text in Sections 4.12 and 5.12 of the PEIS has been changed to reflect information provided in the comment.

52785-027: Text in Sections 4.12 and 5.12 of the PEIS has been changed to reflect information provided in the comment.

52785-028: The assumptions concerning disposal options are based on currently known technologies. As technology advances and alternative options to disposal become viable and environmentally acceptable, they will be considered.

52785-029: Section A.4 introduces the potential for beneficial uses of spent shale.

52785-030: Thank you for your comment. There is nothing in the PEIS that prohibits these options from being considered by the operators in the future. Footnotes have been added to discussions in Sections 4.1.1 and 4.1.2 to acknowledge these additional recycled water sources.

52785-031: Currently, the BLM does not have the authority, nor is it policy to permit nongovernmental housing (i.e., mancamps or compounds) on public lands.

52785-032: Thank you for your comment. The Final PEIS has been modified to recognize there may be some impact on real estate values associated with the proposed land allocation decisions.

52785-033: The assumptions concerning disposal options are based on currently known technologies. As technology advances and alternative options to disposal become viable and environmentally acceptable, they will be considered.

52785-034: As stated on in Sections 4.1 and 5.1 of the Draft PEIS, the PEIS provides examples of mitigation measures that the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final or comprehensive list of required stipulations or management prescriptions.

The BLM already has a process in place to consider paleontological resources. Paleontologists are on staff with the BLM supporting the BLM policies in the management of these resources.

52785-035: Positive impacts caused by transferring water for agricultural use to oil shale developments have been added in Section 4.5.1.

52785-036: Estimates of water requirements will be refined further as results from RD&D operations progress. Without additional information supporting other values, there is no basis for using the provided estimate.

52785-037: There is nothing in the PEIS that prohibits these options from being considered by the operators in the future.

52785-038: See response to Comment 52785-035.

52785-039: The consumption of 135 gallons per day per capita is not only for living quarters but also for worker family members. The number is not conservative as compared to 275 gallons per day per capita for water use in Grand Junction, Colorado.

52785-040: The term "swale" is a general topographic feature and may or may not be a storage alternative depending on site-specific conditions. This would be evaluated at the project-specific level.

52785-041: Thank you for your comment. The bullets have been deleted from the text.

52785-042: It is likely that industrial development of the size and scope of potential oil shale and tar sands development would cause air quality impacts, however, if a decision is ultimately made to make oil shale and/or tar sands available for future leasing, detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) would be conducted in order to determine if such air quality impacts would be "significant."

See also the response to Comment 52785-015.

52785-043: The BLM recognizes the authority and responsibility of local, state, and Tribal air quality regulatory agencies to implement the federal Clean Air Act, with EPA oversight. The BLM also recognizes these agencies' ability to establish air quality requirements that are more stringent than the federal standards. All BLM actions (either direct or by use authorization) must comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, and implementation plans. However, the Federal Land Policy and Management Act (FLPMA) directs that "the public lands be managed in a manner that will protect the quality of … air and atmospheric … values" and that "in managing the public lands the Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." Therefore, the BLM has the legal authority to limit potential air quality impacts from activities it conducts or approves, subject to its management discretion.

The BLM will not conduct or authorize activities which would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans. Speculation about project locations and how

development might occur would require many assumptions that are premature at this stage in the process.

52785-044: The potential need for engineering solutions is recognized in the PEIS. They are discussed in Section 4.7.2.2 for Construction and Reclamation and Section 4.7.2.3 for Operation. No text change was made.

52785-045: As discussed on the introduction of Sections 4 and 5 of the Draft PEIS, the PEIS provides examples of mitigation measures that the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final or a comprehensive list of required stipulations or management prescriptions.

52785-046: See response to Comment 52785-019.

52785-047: See response to Comment 52785-019.

52785-048: The text of the mitigation measure in Section 4.8.2.3 has been changed to reflect that water bodies created for an oil shale project may be utilized to the benefit of wildlife; however, netting and fencing may be required when water chemistry demonstrates a need to prevent use by wildlife.

52785-049: The list of mitigation measures presented in Section 4.8.2.4 shows possible actions that could be made to reduce or eliminate the potential for impact. Other mitigation measures could be applied that achieve the same level of protection. These project-specific measures would be developed by lease applications in consultation with the BLM.

52785-050: Currently, the BLM does not have the authority, nor is it policy to permit nongovernmental housing (i.e., mancamps or compounds) on public lands.

52785-051: The consideration of the impacts of spent shale reuse is a project- or site-specific detail that would be assessed, if appropriate, at the lease or development stage during future NEPA analyses.

See also response to Comment 52785-050.

52785-052: Currently, the BLM does not have the authority, nor is it policy to permit nongovernmental housing (i.e., mancamps or compounds) on public lands.

The consideration of the impacts of a scenario where workers are on a rotational shift, housed on-site and their families live off-site nearby, elsewhere in state, or out of state is a project- or site-specific detail that would be assessed, if appropriate, at the lease or development stage during future NEPA analyses.

52785-053: The consideration of the impacts of a scenario where housed on-site incineration is conducted of suitable nonhazardous solid waste is a project-specific detail that

would be assessed, if appropriate, at the lease or development stage during future NEPA analyses.

The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and they provide an effective analytical foundation for subsequent project-specific NEPA documents. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

52785-054: It is acknowledged in Section 4.10 that the discovery of previously unidentified cultural resources would be a possible benefit of development of oil shale resources. The requirement for pre-development surveys and evaluations in order to properly protect significant historic properties, whether previously recorded or newly discovered, is discussed in Section 4.10.2.

52785-055: Currently, the BLM does not have the authority, nor is it policy to permit nongovernmental housing (i.e., mancamps or compounds) on public lands.

52785-056: Recreational spending by oil shale and tar sands workers and their families is included in the personal consumption multipliers produced by the IMPLAN model, and consequently is included in the estimated employment and income impacts of oil shale and tar sands developments in each ROI.

52785-057: Currently, the BLM does not have the authority, nor is it policy to permit nongovernmental housing (i.e., mancamps or compounds) on public lands.

52785-058: The amount and type of solid waste generated during oil shale extraction and processing will be dependent on the specific technology selected. It is reasonable to anticipate that in situ retorting will produce very little solid waste (although solid wastes of nonindustrial origins will be produced as a result of support of the workforce and various administrative functions). As for aboveground retorting, the major solid waste stream that will be produced will be spent shale. Incineration would not be expected to be an appropriate treatment technology for such materials. Applicants for a BLM lease will be required to submit a detailed plan of operation that will include strategies for the management and disposal of all wastes. It is likely that nonhazardous solid wastes from administrative

functions will present some recycling opportunities, but for the majority of solid wastes generated, landfill disposal is expected to be the most appropriate disposal mechanism for the majority of nonhazardous solid wastes. (However, the applicants will be encouraged to identify recycling opportunities for high-volume wastes such as spent shale from aboveground retorting. For example, spent shale could be effectively used in road construction or in restoration of the mine from which it was removed.)

52785-059: Thank you for your comment. The BLM will consider the potential for spent shale reuse when those uses have been identified and proven to be environmentally acceptable.

52785-060: The nature and volume of solid waste produced will be dependent on the oil shale extraction and processing technologies selected. For in situ retorting, very little industrial solid wastes are expected to be produced. Some nonhazardous solid wastes from administrative functions will be produced, some of which will be candidates for recycling (e.g. office paper wastes). For aboveground retorting, the major solid waste stream will be spent shale. Incineration would not be an appropriate disposal mechanism for such waste, which may also have recycle/reuse potential as road building or bank stabilization materials. Applicants for BLM leases will be required to submit a detailed plan of operation that will include descriptions of expected wastes and management and disposal strategies for each waste that will be generated.

52785-061: Thank you for your comment. The BLM will consider the potential for spent shale reuse when those uses have been identified and proven to be environmentally acceptable.

52785-062: The proposed controls referred to in the comment are not intended to be viewed as stipulations or conditions for approval (of future lease applications) at this point in time, but rather as potentially necessary mitigation measures that applicants should consider for incorporation into their lease applications and detailed plans of operation. Indeed, some of these may ultimately be identified as lease stipulations or as conditions of approval as a result of subsequent lease application-specific analysis. Because this PEIS grants no rights, the mitigation presented in the PEIS is not required. The experimental state of the oil shale and tar sands industries does not allow this PEIS for land use plan amendments to include sufficient site-specific information or cumulative impact analysis to support issuance of a lease. The results of such future analyses conducted for lease applications will be used to identify necessary controls to mitigate environmental impacts that may be applied as stipulations to the lease. Additional mitigation could be applied after the third round of NEPA at the Plan of Operation stage, when again impacts will be identified based on a very site-specific analysis, and mitigation developed and applied as Conditions of Approval.

52785-063: As stated in Section 5.1, the data available from ongoing oil sands development in Canada are not applicable to Utah tar sands because of the different chemical characteristics of the tar sands (i.e., the Canadian oil sands have an aqueous layer between the sand and the bitumen, making separation easier). The data used in the PEIS are from the most recent U.S. tar sands development efforts.

52785-064: Data from the current RD&D projects are not yet available. As stated in Section 5.1, the data available from ongoing oil sands development in Canada are not applicable to Utah tar sands because of the different chemical characteristics of the tar sands.

52785-065: As discussed in the introductions to Sections 4 and 5 of the Draft PEIS, the PEIS provides examples of mitigation measures that the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final or a comprehensive list of required stipulations or management prescriptions.

The first bulleted item in Section 4.14.2 regarding traffic safety includes examples of possible mitigation measures; the management mechanism of such measures is not addressed and would be identified during future leasing and plan of development stages.

52785-066: Currently, the BLM does not have the authority, nor is it policy to permit nongovernmental housing (i.e., mancamps or compounds) on public lands.

52785-067: The PEIS states, “Data recovery and resource removal are ways in which at least some information can be salvaged should a paleontological site be developed, but certain contextual data are invariably lost. The discovery of otherwise unknown fossils would be beneficial to the scientific community, even if such occurrences were ultimately lost, but only if sufficient data were recorded prior to destruction or loss.” Early identification and preservation of previously unknown resources could be a potential benefit of early studies prior to leasing or development, but not likely for the leasing and development stages themselves, unless the adverse effects are mitigated through avoidance and available for future study. These scenarios would be determined as a result of project-specific studies.

52785-068: As stated in Sections 4.1 and 5.1 of the Draft PEIS, the PEIS provides examples of mitigation measures that the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final or comprehensive list of required stipulations or management prescriptions.

The BLM already has a process in place to consider paleontological resources. Paleontologists are on staff with the BLM supporting the BLM policies in the management of these resources.

52785-069: Positive impacts caused by transferring water for agricultural use to oil shale developments have been added in Section 4.5.1. Potential benefits of oil shale

and/or tar sands development to wildlife resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-070: See response to Comment 52785-014.

52785-071: The consumption of 135 gallons per day per capita is not only for living quarters but also for worker family members. The number is not conservative as compared to 275 gallons per day per capita for water use in Grand Junction, Colorado.

52785-072: See response to Comment 52785-040.

52785-073: Thank you for your Comment. The bullets have been deleted.

52785-074: See response to Comment 52785-015.

It is likely that industrial development of the size and scope of potential oil shale and tar sands development would cause air quality impacts; however, if a decision is ultimately made to make oil shale and/or tar sands available for future leasing, detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) would be conducted in order to determine if such air quality impacts would be "significant."

52785-075: See response to Comment 52785-015.

The BLM recognizes the authority and responsibility of local, state, and Tribal air quality regulatory agencies to implement the federal Clean Air Act, with EPA oversight. The BLM also recognizes these agencies' ability to establish air quality requirements that are more stringent than the federal standards. All BLM actions (either direct or by use authorization) must comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, and implementation plans. However, the FLPMA directs that "the public lands be managed in a manner that will protect the quality of … air and atmospheric … values" and that "in managing the public lands the Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." Therefore, the BLM has the legal authority to limit potential air quality impacts from activities it conducts or approves, subject to its management discretion. The BLM will not conduct or authorize activities which would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process.

52785-076: Potential benefits of tar sands development to wildlife resources are considered speculative and are not addressed in the PEIS. Project-specific plans of

development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-077: The text of the mitigation measure in Section 5.8.2.3 has been changed to reflect that water bodies created for a tar sands project may be utilized to the benefit of wildlife; however, netting and fencing may be required when water chemistry demonstrates a need to prevent use by wildlife.

52785-078: The list of mitigation measures presented in Section 5.8.2.4 shows possible actions that could be made to reduce or eliminate the potential for impact. Other mitigation measures could be applied that achieve the same level of protection. These project-specific measures would be developed by lease applications in consultation with the BLM.

52785-079: Same response as comment 52785-052.

52785-080: Same response as comment 52785-053.

52785-081: Currently, the BLM does not have the authority, nor is it policy to permit nongovernmental housing (i.e., mancamps or compounds) on public lands. The measures in Section 5.11.2 are potential mitigation measures that could address socioeconomic impacts. Once additional NEPA analyses are completed, mitigation will be developed to address significant impacts identified in the NEPA document that could include requiring operators to provide housing and basic services for certain employees.

52785-082: The nature and volume of solid waste produced will be dependent on the oil shale extraction and processing technologies selected. For in-situ retorting, very little industrial solid wastes are expected to be produced. Some nonhazardous solid wastes from administrative functions will be produced, some of which will be candidates for recycling (e.g., office paper wastes). For aboveground retorting, the major solid waste stream will be spent shale. Incineration would not be an appropriate disposal mechanism for such waste, which may also have recycle/reuse potential as road building or bank stabilization materials. Applicants for BLM leases will be required to submit a detailed plan of operation that will include descriptions of expected wastes and management and disposal strategies for each waste that will be generated.

52785-083: The proposed controls referred to in the comment are not intended to be viewed as stipulations or conditions for approval (of future lease applications) at this point in time. Instead, applicants should consider incorporation of such controls or mitigations in their lease applications and detailed plans of operation when they are relevant and appropriate. Indeed, some of these may ultimately be identified as lease stipulations or as conditions of approval as a result of subsequent lease application-specific analysis. Because this PEIS grants no rights, the mitigation

measures presented in the PEIS are not automatically required. The experimental state of the oil shale and tar sands industries does not allow this PEIS for land use plan amendments to include sufficient site-specific information or cumulative impact analysis to support issuance of a lease. Instead, the results of the application-specific analyses that will be conducted will identify necessary controls to mitigate environmental impacts that may be applied as stipulations to the lease. Additional mitigation requirements could be introduced after the third round of NEPA analysis, at the plan of development stage, when again impacts will be identified based on a very site-specific analysis, and mitigation developed and applied as Conditions of Approval.

52785-084: Data from the current RD&D projects are not yet available. As stated in Section 5.1, the data available from ongoing oil sands development in Canada are not applicable to Utah tar sands because of the different chemical characteristics of the tar sands.

52785-085: See response to Comment 52785-084.

52785-086: It is acknowledged in Section 4.4 that the discovery of previously unidentified paleontological resources would be a possible benefit of development of oil shale resources. Section 4.4 discloses the general situation across the various alternatives, so it is not repeated in multiple locations in the document, including the tables in Chapter 2 and the text in Chapter 6.

52785-087: Positive impacts caused by transferring water for agricultural use to oil shale developments have been added in Section 4.5.1. Potential benefits of oil shale and/or tar sands development to wildlife resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-088: Potential benefits of oil shale development to ecological resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-089: Potential benefits of oil shale development to plants or other species are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-090: Potential benefits of oil shale development to wildlife resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and

those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-091: Please see response to Comment 52785-056.

52785-092: The text in Section 6.1.2.13 does not state that oil shale development would expose the public to air and water contamination. It states: "However, the health and safety impacts on the general public from emissions from these facilities would depend both on the specific characteristics and level of emissions, and on the distance of the emissions source from population centers. The level of air and water emissions would be regulated under required permits. Potential impacts on the general public from emissions would be assessed in future site-specific NEPA and permitting documentation." This text seems to be in general agreement with the point made in the comment.

52785-093: It is acknowledged in Section 4.4 that the discovery of previously unidentified paleontological resources would be a possible benefit of development of oil shale resources. Section 4.4 discloses the general situation across the various alternatives, so it is not repeated in multiple locations in the document, including the tables in Chapter 2 and the text in Chapter 6.

52785-094: Potential benefits of oil shale development to aquatic resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-095: Potential benefits of oil shale development to plants or other species are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-096: Potential benefits of oil shale development to wildlife resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-097: It is acknowledged in Section 4.10 that the discovery of previously unidentified cultural resources would be a possible benefit of development of oil shale resources. Section 4.10 discloses the general situation across the various alternatives, so it is not repeated in multiple locations in the document, including the tables in Chapter 2 and the text in Chapter 6.

52785-098: See response to Comment 52785-092.

52785-099: As discussed in the introductions to Sections 4 and 5 of the Draft PEIS, the PEIS provides examples of mitigation measures that the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final or a comprehensive list of required stipulations or management prescriptions.

The text in Section 6.1.3.13 and other similar text has been revised to state, "As a measure to decrease worker injuries, a comprehensive facility health and safety plan and worker safety training would be recommended to be included in the Plans of Development for proposed commercial oil shale projects."

52785-100: Any wells developed on BLM lands will be subject to the requirements and BMPs contained in the BLM's "Gold Book" for oil exploration and development activities. That guidance also addresses the proper management of drill cuttings. Although it is common practice to recover well development fluids and sealants for reuse, drill cuttings are typically disposed of in the immediate vicinity of the well from which they were generated, presuming, of course, that they are not contaminated. This disposal practice does not typically qualify as a reuse, although it does eliminate the impacts of transporting large volumes of drill cuttings to remote disposal facilities.

52785-101: It is acknowledged in Section 5.4 that the discovery of previously unidentified cultural resources would be a possible benefit of development of tar sands resources. Section 5.4 discloses the general situation across the various alternatives, so it is not repeated in multiple locations in the document, including the tables in Chapter 2 and the text in Chapter 6.

52785-102: See response to Comment 52785-014.

52785-103: Potential benefits of oil shale development to aquatic resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-104: Potential benefits of oil shale development to plants or other species are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-105: Potential benefits of tar sands development to wildlife resources are considered speculative and are not addressed in the PEIS. Project-specific plans of development could include activities that prove beneficial to some species, and those activities would be evaluated in the subsequent NEPA analyses conducted prior to leasing.

52785-106: It is acknowledged in Section 5.10 that the discovery of previously unidentified cultural resources would be a possible benefit of development of tar sand resources. Section 5.10 discloses the general situation across the various alternatives, so it is not repeated in multiple locations in the document, including the tables in Chapter 2 and the text in Chapter 6.

52785-107: Please see response to Comment 52785-056.

52785-108: See response to Comment 52785-100.

52785-109: Thank you for your comment. The document was changed to reflect the information in the comment.

52785-110: Comment noted.

52785-111: The BLM agrees that economics is the limiting factor in determining most of the parameters associated with any mining operation. The BLM did factor economics and technology into its analysis. Development of a surface oil shale operation would most likely resemble an open pit operation with far greater material handling and storage issues than a strip mine operation. Within Colorado's geologically prospective area, the determination was that there was not enough developable acreage with less than 500 ft of overburden to support surface mining operations. Other factors affecting the PEIS assumptions were projected economics, material rehandle and equipment capabilities.

52785-112: Thank you for your comment. Raytheon's website still promotes its radio frequency heating technology, now combined with critical fluid (carbon dioxide) flushing, but makes no mention of its sale. We have introduced this new information on this technology combination in a footnote.

52785-113: The discussion was attempting to make the point that char is of limited value for additional processing to make raw shale oil that could be further processed into distillate fuels. The discussion also acknowledges the heating value still represented in the char and correctly notes those AGRs that use combustion of char as a primary source of heat.

52785-114: Thank you for your comment. Unfortunately, the comment did not specify whether the text contained errors or misrepresentations that needed to be corrected. It is therefore difficult to understand what changes are being suggested.

52785-115: The text was intended to focus on government-sponsored AGR development. A change was made in the text to clarify this.

52785-116: Appropriate changes were made to the text.

52785-117: An appropriate change has been made to the text.

52785-118: A correction has been made to the text.

52785-119: The text has been modified to reflect your comment.

52785-120: Thank you for your comment. The discussion focused on the ATP processor's ability to capture and treat coincident air contaminants because the ATP processor was proposed to be used in the RD&D project operated by OSEC. A footnote has been added to acknowledge your comment.

52785-121: Thank you for your comment.

52785-122: The BLM agrees that the bulk density of oil shale will decrease upon crushing and sizing in preparation for retorting. However, there are also conflicting data in the open literature as to whether additional volume and density changes occur during retorting. Nevertheless, the text in Section A.4 has been modified to remove the term "popcorn effect." From an environmental perspective, the volumetric increase, together with the accompanying reduction in bulk density, may increase the potential both for erosion and for leaching of hazardous constituents and thus is an important consideration in the design of disposal strategies for spent shale from technologies employing AGR.

52785-123: The assumptions concerning disposal options are based on currently known technologies. As technology advances and alternative options to disposal become viable and environmentally acceptable, they will be considered.

52785-124: The list of conservation measures presented in Appendix F was developed in consultation between the USFWS and the BLM specifically for the oil shale and tar sands program. As stated in the text, these measures are not meant to be the final list of measures to be employed and would be subject to modification on the basis of consultation with the USFWS at the project-specific lease and development stages.

52785-125: The list of conservation measures presented in Appendix F was developed in consultation between the USFWS and the BLM specifically for the oil shale and tar sands program. As stated in the text, these measures are not meant to be the final list of measures to be employed and would be subject to modification on the basis of consultation with the USFWS at the project-specific lease and development stages. Alternative methods that would accomplish the same goals as (or be more effective than) those addressed in the conservation measures could also be considered during the consultation between the BLM and the USFWS.

52785-126: This conservation measure relates to water withdrawal from any surface water source (including augmentation ponds or surface water withdrawn from private lands). As stated in the text, the BLM will require that all water withdrawals undergo appropriate Section 7 consultation in accordance with procedures existing at the time of the proposed action.

52785-127: The conservation measures related to water withdrawals listed in Appendix F do not address eliminating water withdrawals but instead relate to the need to consult with the USFWS if any withdrawals that could affect surface water flow are anticipated.

Thank you for your comment, David Atkins.

The comment tracking number that has been assigned to your comment is OSTSD52786.

Comment Date: March 19, 2008 18:06:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52786

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Comment Submitted:

See Attachment.

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March 19, 2008
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

RE: **Comments on Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement**

To Whom It May Concern,

I am writing to submit comments on the December 2007 **Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement** (Draft PEIS). My comments pertain to the water quantity and quality impacts analysis in this document.

The majority of the information provided in the Draft PEIS is too speculative to draw any reasonable conclusions regarding the potential environmental impacts on water resources of commercial-scale oil shale and/or tar sands development. The analysis presented in the Draft PEIS fails to support the BLM's decision to open nearly 2 million acres of public land to commercial oil shale development, and nearly 430,000 acres to commercial tar sands development.

According to my review, the analysis presented in the Draft PEIS shows that water requirements for commercial leasing could be substantial, especially when considered in the context of other current and anticipated activities in the basin, and I do not agree with the BLM determination of no significant impacts. My independent evaluation was hampered by the lack of specific information in the Draft PEIS that would be necessary to determine potential water quality or quantity impacts of commercial oil shale and tar sands production. Baseline conditions are described in only a very general way, and monitoring measures are not discussed. 52786-001

In general, the Draft PEIS fails to analyze the water-related impacts of both oil shale and tar sands development. Although I acknowledge the uncertainties in locating future commercial development, this uncertainty should not limit the BLM's ability to analyze the scale of the potential impacts that are likely to occur.

Of the three alternatives considered in the Draft PEIS, the BLM has selected Alternative B as the Preferred Alternative. The BLM has determined that there are no direct environmental impacts associated with the amendment of the 12 land use plans, but it provides a programmatic-level analysis of the potential impacts of oil shale and tar sands development technologies that is used to support the establishment of a commercial leasing program. Neither the water quality nor the

water availability analysis in the Draft PEIS is adequate to determine the potential programmatic-level environmental impacts. Further, the incomplete information and analysis of potential adverse impacts on water resources does not support the BLM's selection of Alternative B as the Preferred Alternative. 52786-001 (cont.)

In particular, the BLM's water availability analysis in the Draft PEIS is flawed. The Draft PEIS fails to take into account realistic water requirements for future municipal development, future municipal power production, in-stream flows for endangered fish, and other types of energy development. The Draft PEIS also does not provide a realistic assessment of the tri-state's 1922 Compact entitlements. This is a very complicated issue, and the State of Colorado is just beginning a Water Availability Study to answer how much water is left for it to develop. In order to have the most accurate possible projections, the BLM should wait on the outcome of Colorado's study before determining whether or not there is sufficient water available for commercial oil shale development. 52786-002

Despite the fact that much higher future production levels have been forecast by the industry, the BLM has chosen in the Draft PEIS to examine the potential impacts for just one very unrealistic scenario: three small hypothetical facilities (one for each general technology considered), developed over a period of only 20 years. The BLM projects a total hypothetical production capacity of 350,000 bbl/day (one 50,000 bbl/day surface retort, one 200,000 bbl/day in situ retort, and one 100,000 bbl/day tar sands facility). Given that 6 RD&D projects have already been permitted, and that comments by the Director of the Office of Naval Petroleum and Oil Shale Reserves that western Colorado alone could be pumping 2.5 million barrels/day to U.S. refineries under an accelerated schedule (Harmon, 2007), the scenarios put forth in the Draft PEIS demonstrate how the BLM has failed to fully explore the cumulative impacts and the connected actions as required by NEPA. 52786-003

The BLM's characterization of water demands related to electricity generation uses incorrect numbers and grossly underestimates water requirements for power generation required for in situ oil shale production, as well as for supplying a growing population. In addition, the Draft PEIS does not discuss water requirements to generate power for other oil shale and tar sands technologies such as surface mining. 52786-004

Thirty years after the last oil shale boom, the critical water-related concerns identified then are not adequately addressed in this Draft PEIS:

- Limits on water supply
- Degradation of surface and groundwater quality
- Risks to ecological and human health.

Because technology and conditions in the Colorado River Basin have change markedly since the last time large-scale oil shale development was proposed, the Draft PEIS should address the following additional concerns as well:

- The development of new, untested in-situ retort technology and its effects on water resources

52786-005

- An evolving understanding of water supply and demand, particularly in the Colorado River Basin
- An emerging appreciation for the interdependence of energy and water resources
- A growing awareness of the scope of impacts that elevated levels of greenhouse gases – especially carbon dioxide – can have on everything from global climate to regional water supplies, and the feedback that could occur from carbon dioxide releases due to large-scale oil shale development

52786-005 (cont.)

I have over 15 years of experience evaluating water quality and quantity impacts from extractive resource projects. My curriculum vitae is enclosed for further information regarding my experience and expertise. The following text presents a summary of water resource information presented in the Draft PEIS and details my specific comments on the water resource impacts analysis in this document.

Sincerely,

David Atkins
Watershed Environmental, LLC

Summary of Draft PEIS Alternatives

In the **Comments on Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement** (Draft PEIS), the Bureau of Land Management (BLM) proposes amending 12 land use plans to describe the most geologically prospective areas where oil shale and tar sands resources are present, and to designate which of the agency-administered areas will be opened for commercial lease application, exploration, and development. The Draft PEIS was developed to analyze the direct, indirect, and cumulative environmental, cultural, and socioeconomic impacts of three separate alternatives.

The oil shale basins and Special Tar Sands Areas (STSAs) covered in the Draft PEIS are all located within the Upper Colorado River Basin. The White River hydrologic basin in Colorado, the Uinta Basin in Utah, and the Green River basin in Wyoming contain the oil shale resources, and the tar sands are located in Utah's Uinta and West Colorado River basins (Draft PEIS, p. 3-59).

Of the three alternatives considered, the BLM has selected Alternative B as the Preferred Alternative. The Preferred Alternative would make 1,991,222 million acres of land (out of the approximately 2.3 million acres of BLM-administered lands that are the subject of the PEIS document) available for application for commercial leasing, and 431,224 acres available for tar sands commercial leasing Under Alternative B, three of the Resource Management Plans would be amended for both oil shale and tar sands resource development, but it is unclear in the Draft PEIS whether some of the acreage used to develop these two resources overlaps. The BLM identified Alternative B as the Preferred Alternative for both oil shale and tar sands "because it would make the largest amount of potential oil resources available for application for leasing, while still providing for an environmentally sound program, and would provide the greatest flexibility in locating future development" (Draft PEIS, p. ES-3). 52786-006

Lands made available for application for leasing under Alternative B overlap with sensitive hydrologic areas identified by the BLM, including about 7,900 acres of identified riparian areas and wetlands in Colorado; about 6,100 acres of watershed, floodplain, and other sensitive water resources in Utah; and about 31,000 acres of floodplain, wetland, and riparian areas in Wyoming (Draft PEIS, p. 6-44).

In contrast, Alternative A, the No Action Alternative, would not amend the land use plans to identify lands as available for application for lease. It would only include the development allowed in the 6 existing RD&D leases, 5 of which are in Colorado and 1 of which is located in Utah, which together encompass 960 acres of land. It is unclear whether the contiguous 4,960-acre preference lease areas already identified in the RD&D EAs would be excluded under Alternative A, or what additional NEPA analysis might be required. 52786-007

Alternative C would amend land use plans to identify areas available for application for lease, but would make fewer acres available for application -- 830,296 acres for oil shale resources, and 229,038 acres for tar sands (58% and 47% fewer acres, respectively, than the Preferred Alternative). Under both Alternative B and C, Wilderness Areas, Wilderness Study Areas, other lands within the National Landscape Conservation System (including National Monuments, National Conservation Areas, Wild and Scenic Rivers, and National Historic and Scenic Trails), river segments eligible for Wild and Scenic River status, and existing Areas of Critical Environmental Concern (ACECs) currently closed to mineral development would not be considered for commercial oil shale leasing (Draft PEIS, p. 1-7, 2-52).

The large difference in available acreage is due to the fact that Alternative C would exclude all existing ACECs, as well as all lands where surface disturbance restrictions or seasonal limitations are in place in the existing land use plans in order to protect known sensitive resources, from commercial oil shale leasing. However, the BLM should also exclude the portion of the Roan Plateau included in the Citizens' Wilderness Proposal, as recently proposed in Congress by representatives Diana DeGette and Mark Udall. 52786-008

The BLM has determined that it is not possible to analyze all hypothetical development scenarios; instead, the Draft PEIS considers the components of current technologies that could be implemented in order to analyze the range of potential impacts. In the Draft PEIS, the BLM limited its evaluation of the impacts of surface mining to the most geologically prospective areas where the overburden is less than 500 feet thick – essentially the maximum thickness of overburden where surface mining can occur economically using current technology. Such areas are very limited in Colorado, so the Draft PEIS considers making land available for surface mining only in Utah and Wyoming.

The Draft PEIS analyzes the oil shale and tar sands development technologies that the BLM believes may be commercially viable in the next 20 years. The BLM chose a 20-year time frame because it is the customary time frame used in resource management planning cycles.

Oils shale development technologies include:

- Surface and underground mining with surface retort
- In situ technologies, including an In situ Conversion Process (ICP), and electric resistance heating.

Tar sands development scenarios include:

- In situ steam injection
- In situ combustion
- Surface mine with surface retort
- Surface mine with solvent extraction.

The BLM does not consider underground tar sand mining technology to be commercially viable.

Despite the fact that future production levels are unknown, the BLM has chosen to examine the potential impacts from three hypothetical facilities (with no particular location or timing of development):

- One *oil shale* scenario with a production rate of 50,000 bbl/day of oil from *surface and underground mining*;
- A second *oil shale* scenario with a production rate of 200,000 bbl/day of oil from *in situ facilities*;
- An additional *tar sands surface mining* operation with surface retorting or solvent extraction supporting the production of 100,000 bbl/day (Draft PEIS, p. 5-2) of oil.

The BLM has determined that the amendment of the 12 land use plans will not result in environmental impacts. However, since both alternatives B and C are intended to facilitate the establishment of a long-term commercial leasing program, the Draft PEIS analyzes the potential for future impacts on the environment from oil shale and tar sand development technologies (as they are currently known) at the programmatic level, "with the understanding that future leasing and development will require site-specific NEPA evaluation" (Draft PEIS, p. ES-5).

The BLM has elected not to attempt to issue leases for commercial development of oil shale on the basis of this Draft PEIS, as it had initially planned. The BLM initially intended the final

version of this document to provide the NEPA analysis and documentation not only for the amendment of the land use plans, but also for the issuance of leases for the commercial development of oil shale. The BLM circulated a 15-project development scenario to the cooperating agencies for review and comment. The BLM developed the scenario assuming that all 6 of the RD&D leases would convert to commercial oil shale production and that there would be several additional leases issued in each of the 3 states. The cooperating agencies commented that the BLM's analysis "would be too speculative at this point to support a decision to issue any leases on the basis of this 15-project scenario" (Draft PEIS, p. 2-16). In addition, the BLM considered whether or not to present a development scenario of six projects. However, the BLM concluded that trying to undertake this analysis at this time would also be too speculative.

Specific Comments

Following are my specific comments on the Draft PEIS, grouped into several broad categories: Alternatives Analysis, Cumulative Impacts, Water Quantity, Water Quality, Endangered Species, Baseline and Monitoring, and Data Gaps and Future Analysis.

Alternatives Analysis

1. ***Selection of Preferred Alternative not justified.***

   Alternatives A and C were not seriously considered. On page ES-3 of the Draft PEIS, the BLM explains that it selected Alternative B as the Preferred Alternative because it made the largest amount of oil shale and tar sands resources available and also provided the greatest flexibility in locating future development. While the Draft PEIS provides minimum estimates of the potential shale oil resources present under Alternatives B and C (Draft PEIS, p. ES-4), it does not provide any analysis supporting the conclusion that Alternative B provides the greatest flexibility for locating the development, particularly in light of the 2005 Energy Policy Act, which prioritized land exchanges (Draft PEIS, p. 1-2).

   In addition to applying the criteria of maximizing resource availability and providing flexibility, the Draft PEIS should provide an analysis of which alternative(s) best fulfills the BLM's other mandates, such as management "based upon the principles of… sustained yield", taking "into account the long-term needs of future generations for renewable and nonrenewable resources" (Draft PEIS vol. 1, no page #), protecting ACECs, protecting sensitive resources, and protecting endangered species and their habitats. 52786-009

   The Draft PEIS should include a discussion of which alternative(s) best fulfill the BLM's responsibility regarding the Federal Land Policy and Management Act (1976), which "directs the BLM to give priority to the designation of ACECs. Designated ACECs include public lands where special management attention and direction are needed to protect and prevent irreparable damage to important historic, cultural, and scenic values, fish, or wildlife resources or other natural systems or processes…" (Draft PEIS, p. 2-7). Alternative B fails to meet the obligation of the BLM to protect and to prevent damage to ACECs; it only excludes ACECs that are already closed to mineral development. The BLM's legal obligation to give priority to ACECs is not met by Alternative B.

2. ***Unrealistic development scenarios.***

   The Draft PEIS does not provide an adequate hypothetical scenario for assessing the potential impacts of commercial oil shale and tar sands technologies on water resources. The Draft PEIS should evaluate a more realistic hypothetical scenario involving multiple facilities scattered across the richest oil shale and tar sands-producing regions. Despite the fact that "Future production levels are unknown at this time" (Draft PEIS, p. 4-2), for the purposes of analysis, the Draft PEIS assumes without justification that there will be just three facilities in total over the tri-state region operating over the 20-year time frame assessed in 52786-010

the document:

- A 50,000 bbl/day facility producing shale oil via surface or underground mining with surface retort (Draft PEIS, p. 4-2)
- A single in situ facility producing 200,000 bbl/day of shale oil (Draft PEIS, p. 4-2)
- A single tar sands facility producing 100,000 bbl/day (Draft PEIS, p. 5-2).

This selected scenario of just three commercial plants (one for each general technology considered) operating at a production level far below current projections is unrealistic, especially in the context of comments made by Tony Dammer, Director of the Office of Naval Petroleum and Oil Shale Reserves, who recently said that shale oil could be commercially produced from northwestern Colorado by as soon as 2015. He stated that under an accelerated schedule, western Colorado could be pumping 2.5 million barrels/day to U.S. refineries (Harmon, 2007). The discrepancy between the production capacity of these facilities – 350,000 bbl/day -- compared to the government's own projections of 2.5 million bbl/day is nearly an order of magnitude, and demonstrates that the Draft PEIS is inadequate for analyzing the cumulative impacts of developing these energy resources. 52786-010 (cont.)

Especially in consideration of the 6 RD&D projects already permitted by the BLM (Draft PEIS, p. 1-10), and their preference right lease areas, the Draft PEIS should be revised to analyze a more realistic hypothetical scenario to assess the potential impacts of commercial oil shale and tar sands development on local, regional, and basin water resources.

Cumulative Impacts

3. ***Inadequate analysis of cumulative impacts.***

The Draft PEIS analysis of cumulative impacts is insufficient with respect to water resources. The Draft PEIS must use a realistic approach in evaluating impacts of oil shale and tar sands development on water resources in the context of other major predicted activities that would also consume water in the same areas, including oil and gas development, coal mining and preparation, development of other minerals, development of energy infrastructure, and "other" (Draft PEIS, p. 6-107 *et seq*).

The Draft PEIS states that the "inability to predict specific locations for potential future commercial development and the lack of information regarding the type of technology that might be employed make it impossible to predict the specific impacts on water resources that could occur with commercial development" (Draft PEIS, p. 6-43). The lack of analysis of specific locations where the impacts will occur is important because it makes it impossible to adequately analyze impacts to precise locations given that it is uncertain which basin will even be developed. While the locations of potential impacts can't be pinpointed exactly, existing information should be sufficient to narrow down the regions where projects will be developed most intensively and impacts will be greatest. In addition, the type and the scale of impacts can and should be analyzed in the Draft PEIS, using realistic development scenarios. 52786-011

Several of the analyses presented in these tables (Draft PEIS, p. 6-153 *et seq*) are inaccurate or insufficient:

a. The Draft PEIS must use realistic legal and scientific assumptions to constrain potential water availability. The possible range of net available water presented in these tables is huge: 80,000 to 1,140,000 ac-ft/yr, with the high end of the range very unlikely. The Draft PEIS implies that this water is available for oil shale development, but it's really available for *any* tri-state development, including the 4 other sectors listed in the tables, as well as proposed and authorized municipal water development projects, fulfilling in-stream flow requirements, protecting endangered species and their habitats, and providing water and power for the area's exploding population.
b. The annual volume of consumptive uses presented in the tables assumes that consumption and exports from the Colorado River Basin remain at 1970-2004 levels, but consumptive use must also take population growth through 2027 into account. Future water demands due to population growth in the Colorado River Basin could easily exceed the range of water available given in Table 6.1.5-10. For example, Colorado's Statewide Water Supply Investigation predicted that another 630,000 a-f/year would be needed to meet the state's Municipal and Industrial demands by 2030 (Colorado Water Conservation Board, 2004). Arizona is predicted to experience a doubling (96%) in municipal and industrial water demand between 1990 and 2040, thus requiring an additional 1.3 maf/yr (NAS, 2007, p. 43)
c. The Draft PEIS commercial tar sands development scenario is for a production of 100,000 bbl/day, but for some unexplained reason the water requirements on in Table 6.1.5-10 (p. 6-153) are only given for a 20,000 bbl/day facility, so the annual volume should be five times greater than that listed in Table 6.1.5-10. 52786-011 (cont.)
d. In tables 6.1.5-10 and 6.2.5-7, the range of water use estimates for commercial in situ oil shale development appears to be too low. The Draft PEIS presents a range of 21,000-41,000 a-f/year of water to produce 200,000 bbl/day of shale oil. However, we estimate that the water required to produce the power alone for this process is approximately 32,000 a-f/year (see section 7c below). An additional 12,000 to 25,000 a-f of water would be required to produce the oil, suggesting that 40,000 to 60,000 a-f/year would be a more realistic range for water requirements to produce 200,000 bbl/day using in situ methods.
e. The Draft PEIS must provide consistent and realistic water use numbers for power production. Water use for other development includes an annual volume of 53,000 ac-ft/yr for power plant development. This number is based on 9,940 MW new production from coal-fired plants, and a water consumption rate of 8,000 ac-ft/yr per 1,500 MW (Draft PEIS, p. 6-153). This consumption rate for coal-fired plant production is a factor of 2 lower than Energy Information Agency data for coal plant water use. The referenced section for this information in Table 6.1.5-10 is incorrect.
f. The referenced section for Table 6.1.5-10, footnote e, is incorrect. The referenced section for Table 6.2.5-7, footnote d, is incorrect.
g. In tables 6.1.5-10 and 6.2.5-7, the annual volume of water used for coal mining (under the 'Water use for other development' category) does not appear to be correct using the assumptions provided. 55 million gallons of water are required per million tons of coal mined (Draft PEIS, p. 6-153), so producing 82 million

tons of coal per year would require requiring a total of 4.5 billion gallons of water per year (calculated from data in Table 6.1.5-10). When converted to acre-feet, this is 13,840 ac-ft/yr, or 95% more than the 700 ac-ft/yr listed in Table 6.1.5-10. 52786-011 (cont.)

4. ***Analysis timeframe too short.***

The twenty-year time frame analyzed in the Draft PEIS is inadequate to examine the impacts of an industry that isn't expected to reach full production for 30 or more years. The Draft PEIS must analyze a longer and more realistic time frame for commercial oil shale and tar sands development. The RAND report (Bartis et al., 2005) envisioned that under high growth assumptions, one million bbl/day is likely 20+ years in the future (2025), and 3 million bbl/day is probably 30+ years away (2035). According to Shell's Chief Scientist for In-Situ Conversion Processes, additional testing is still needed before the company even makes the go/no go decision for commercial-scale operations (Vinegar, 2006), further indicating that a 20-year time frame is too short. 52786-012

Water Quantity

5. ***Outstanding legal issues surrounding Colorado River Basin water availability not evaluated.***

The Draft PEIS did not analyze the effects of commercial oil shale and tar sands development on water resources within the context of an evolving legal understanding of water supply and demand within the Colorado River Basin. In section 3.4.1, the Draft PEIS provides a broad legal framework of the Upper Colorado River Basin's water resources, but this section dramatically overestimates the states' potential water surpluses listed in tables 3.4.1-2, 3.4.1-3, and 3.1.4-4. To realistically evaluate how much additional Colorado River Basin water could be developed in Colorado, Utah, and Wyoming, the Draft PEIS must analyze both the Upper and the Lower basins' outstanding legal issues, the implications of the most recent legal agreements, the scientific assumptions behind estimates, any authorized and/or proposed municipal or industrial water projects, flows to recover federally endangered fish in the Yampa and Green Rivers, and the predicted effects of climate change on Colorado River flows. The Colorado Water Conservation Board of the Colorado Department of Natural Resources is currently conducting a Colorado River Water Availability Study. The outcome of this study should help provide the data necessary to make decisions, and incorporating these finding when they are available would add credibility to the PEIS. 52786-013

Following is a brief summary of a few of the outstanding issues that would need to be presented and evaluated in the Draft PEIS prior to calculating how much "surplus" water would be available to the commercial oil shale and tar sands industry:

a. Quantification of the Upper Basin's apportionment of the Colorado River. The Draft PEIS assumes that there are 6 million ac-ft (maf) of Colorado River Basin water available to the Upper Basin (5.28 maf for the tri states, Draft PEIS, p.6-153 et seq.), but this number is unsupported and contradicts outstanding issues and the 52786-014

considerable legal uncertainty in the Law of the River: 52786-014 (cont.)

- What is a realistic average annual flow for the Colorado River? Negotiators of the Colorado River Compact (1922) assumed that the river's natural flow was 17-18 maf/yr at Lees Ferry (Kuhn, 2007b). However, more recent studies indicate that the long-term average is much lower. A series of paleohydrologic studies have calculated mean long-term natural flows at Lees Ferry in the 13.0 to 14.7 maf/year range (Kuhn, 2007b). The DPEIS notes that a recent Bureau of Reclamation study uses a value of 12 maf/yr, and this is the value assumed in the Draft PEIS (Draft PEIS, p. 3-60). 52786-015

- The Upper Basin will probably need to forego some of its apportionment to meet its delivery obligations in the 1922 Compact. The Compact apportions 7.5 maf/year to the Upper Basin. However, the compact also stipulates that the Upper Basin states cannot cause the flow at Lees Ferry to be less than 75 maf every consecutive 10 years (not including the Upper Basin's share of the delivery to Mexico, as discussed below). Therefore, one of the major unresolved issues is whether the Upper Basin might have to forgo a portion of its supply to meet its delivery obligations. According to Eric Kuhn, General Manager of the CRWCD, the answer appears to be yes, but the courts have not conclusively addressed this issue (Kuhn, 2007b). If, as the Draft PEIS assumes, the Colorado River's average flow is 12 maf/year, and as the federal representative to the compact negotiations believes, the Lower Basin has "senior rights on the water up to the use of 75 maf each ten years" (Kuhn, 2007b), then that leaves just 4.5 maf/year for the Upper Basin, a significant shortfall from the 6 maf/year assumed in the Draft PEIS (p. 6-153 et seq.), with corresponding adjustments for each Upper Basin state's allocation. 52786-016

- Is evaporation on the Lower Basin's mainstem reservoirs considered a beneficial consumptive use under the 1922 Compact and therefore charged against the Lower Basin's apportionment? In the Upper Basin, evaporation on the CRSP reservoirs is considered a beneficial consumptive use and is charged to individual states. In the Lower Basin, however, this issue is not resolved. This is a big issue, as the consumptive uses and losses reports for 1971 – 2000 estimate lower mainstem evaporation losses as 900,000 to 1,200,000 maf/year (Kuhn, 2007b).

- Are the consumptive uses and losses reports accurate? Do these reports overstate Colorado irrigation, as some experts claim? Or understate Upper Basin irrigation? And what are the consequences? 52786-017

- Is the 1988 Hydrologic Determination a reasonable basis for assuming the Upper Basin has 6 maf/year of "reasonably available" water? The 1988 Determination was based on a "number of other critical, and possibly controversial consumptions" (Kuhn, 2007b), including the "critical hydrologic period" of 1953-1977. Revisions in 2007 are just as controversial (Kuhn, 52786-018

2007b).

52786-018 (cont.)

- When is an Upper Basin delivery to Mexico required?
  The 1922 Compact indicates that the Mexican Treaty obligation of 1.5 maf/year is to be initially met with surplus waters above 16 maf/year (7.5 maf/year for the Upper Basin and 8.5 maf/year for the Lower Basin). If the surplus is not sufficient, then the Upper and Lower basins are to share the deficiency equally. This would require the Upper Basin to deliver its half of the deficiency in addition to the required 75 maf over 10 years. Again, it appears that the Upper Basin's delivery obligations at Lees Ferry trump their 7.5 maf/year allotment (Kuhn, 2007b).

52786-019

- If there is a deficiency, is the Upper Basin obligated to make up for the losses during conveyance from the Lees Ferry point of delivery to the Mexican border?

b. What are the implications of the new seven-state Colorado River drought agreement? The new agreement, signed on December 13, 2007, is based on an EIS evaluating several alternatives for managing Colorado River water. It established rules for water shortages, including who will take reductions and when they will take them, and changes how the two largest reservoirs, Lake Powell and Lake Mead, are operated. Although this agreement has for now postponed a prolonged legal battle and has not changed the fundamentals of the 1922 Compact, continued shortages are likely to result in future legal battles.

c. Which tribal water rights remain unclaimed, and where will these ultimately come from? Among many others, the water rights of the Navajo, Hopi, and Zuni tribes remain mostly unquantified, but may be huge based on their Practicable Irrigable Acreage.

d. What additional water projects have been authorized or proposed that might compete for any remaining water? For example, the $4 billion Yampa Diversion project is proposed to take an additional 300,000 ac-ft/yr. In addition, Aaron Million has proposed a $4 billion pipeline that would divert 250,000 or more a-f/yr be diverted from the Green River at Flaming Gorge to Colorado's Front Range (Best, 2006).

52786-020

e. Could outstanding legal issues regarding the Virgin and Gila rivers affect the Upper Basin's apportionment? There is no formal agreement dividing the Virgin's waters, but there is disagreement due to approximately 100,000 ac-ft/yr of Virgin water used for irrigation in Nevada that is not currently counted against Nevada's 300,000 ac-ft/yr allotment (Kuhn, 2007b). The Gila is considered the most politically sensitive of all the Colorado's tributaries and is likely the most in jeopardy due to climate change. At issue is the question of whether consumptive uses are measured at the point of use, or as depletions to the river at the Mexican border. For the Gila, there is approximately 1 maf/year difference (Kuhn, 2007b). In addition, is the Gila included or excluded within the Lower Basin apportionment?

6. ***Predicted changes in climate, population, and land use both within and outside (in areas such as Colorado's Front Range) the Colorado River Basin were not evaluated, rendering the Draft PEIS's water availability analysis incomplete and likely inaccurate.***

   a. *Climate and drought.* **The Draft PEIS must analyze the effects of commercial oil shale and tar sands development on water resources within the context of climate change and its potential effects on western water resources.**

   In sections 3.4.1 and 4.5.2, the Draft PEIS estimates the potentially available volumes of Colorado River water for energy development and other uses in the states of Colorado, Utah, and Wyoming. However, as the Draft PEIS acknowledges, two factors that could reduce availability were not analyzed:

   - Recurrence of severe drought conditions. "Recurrence of severe drought conditions and higher temperatures are likely to occur in the Colorado Basin. The latter would increase evaporation and, therefore, reduce runoff and streamflows, which would reduce the water availability…" (Draft PEIS, p. 4-41)
   - In-stream flow recommendations for the Recovery Program for endangered Colorado River fishes. The Recovery Program "has identified flow recommendations for major rivers in the Colorado River Basin" (Draft PEIS, p. 4-41), but they were not listed or analyzed in the Draft PEIS. Flow recommendations have already been implemented in the Green River (BOR, 2008a, Muth et al., 2000) and are scheduled to be completed in the Gunnison River in 2008 (BOR, 2008b). 52786-021

   Despite the severity of the ongoing eight-year drought, now considered the "worst drought in the century-long historic record of the Colorado River" (Boxall and Powers, 2007), the Draft PEIS fails to analyze the impacts of drought on western water supplies. Further, the Draft PEIS offers no analysis of the effects of climate change on western water supplies, despite the fact that Interior Secretary Dirk Kempthorne recently said that "runoff in five of the seven Colorado River basin states is projected to decline by more than 15% during the 21st century" (Boxall and Powers, 2007).

   While exact modeling predictions vary, the majority of climate scientists agree that the Colorado River Basin will continue to experience cyclical variations in precipitation (NAS, 2007), and that the river's flows will continue to decrease (Magill, 2007). One study has estimated that by 2050, Colorado River flows could decline by 18%, and average Colorado River basin storage could decline by 32% (Kuhn, 2007; Kuhn, 2007b; Magill, 2007). Another study projects that annual runoff from the spring snowmelt in the Colorado River Basin could decrease by 35% (Gray, 2007).

   b. *Population growth.* **The Draft PEIS analysis of the effects of an increased population drawing or relying on water from the Colorado River Basin and the relation to commercial oil shale and tar sands development water requirements is insufficient.** 52786-022

Population growth is another important constraint on how much water might be available for energy development. The Draft PEIS should analyze these demands using realistic scenarios (see section 7 below) and include them in the state water demand and consumptive use tables (Section 3.4.1).

The population of all seven Colorado River Basin states has been soaring. Four states within the basin were, by percentage, the nation's fastest-growing states in the 1990s. From 1995 to 2005, the population of the seven basin states grew by 25%, together adding nearly 11 million people (NAS, 2007, p. 38). Each additional person equals an increased demand of 140 or more gallons of water per day (NAS, 2007, p. 40), plus water for power generation, industry, etc., and there is every indication that the population in the Colorado Basin and its consequent water demand will continue to explode. For example, from 1990 to 2040, Arizona is predicted to experience a doubling (96%) in municipal and industrial water demand, thus requiring an additional 1.3 maf/yr (NAS, 2007, p. 43). A recent state water supply initiative found that by 2030 Colorado will need more than 600,000 acre-feet of new water supplies (Gray, 2007). These predictions must be included in the Draft PEIS to generate a realistic vision of the availability of surplus water in all three states. 52786-022 (cont.)

c. ***Water transfers (agriculture to oil conversion)***. Much of the water requirement for energy and other development in the tri-state region will likely be met by water transfers from agriculture to other sectors. The Draft PEIS should analyze the potential magnitude and effects of such transfers in the context of water resources, land use, and socioeconomic and environmental justice. 52786-023

7. ***Water use data presented in tables not justified.***

a. ***Surplus water tables inaccurate.*** **The "State Water Demand and Consumptive Use" tables (Section 3.4.1), which the Draft PEIS uses to evaluate the availability of "surplus" water in each of the three oil shale and tar sands states, are misleading and based on incomplete or undescribed assumptions.**

- The surplus water tables (Tables 3.4.1-2 through 3.4.1-4) are misleading because they do not include instream uses or any water requirements for listed endangered fishes (Draft PEIS, p. 3-65), despite the fact that the Recovery Program "has identified flow recommendations for major rivers in the Colorado River Basin" (Draft PEIS, p. 4-41). 52786-024
- Assumptions and calculations presented in these tables are not provided:
  - The document states that projected future water use for all 3 states takes into account "population and industrial growth and changes in the agricultural landscape", but no further details are provided.
  - The Wyoming table's low vs. moderate vs. high projections for 2030 consumptive use are based on cattle (or foliage) prices as well as population and industrial growth, the details of which are not provided.
  - The tables do not explain how evaporation from reservoirs, a large portion of consumptive use in the Upper Basin, is estimated.
- The tables are misleading because numbers presented are not comparable and

therefore cannot simply be tallied. For example:

- The Wyoming table (3.4.1-4) only includes consumptive use and not demand.
- The consumptive use factors for Colorado and Utah (Tables 3.4.1-2 and 3.4.1-3) have a broad range, from 33 up to 64%, with no explanation as to why.
- The Colorado and Wyoming tables base future water demand on 2030, versus Utah, which uses 2020 and 2050.
- It is unclear if water removed from shallow alluvial tributary water is considered a consumptive use in all three states (Draft PEIS, p. 3-72).

- The "low" and "high" water-use scenarios used in these tables are unrealistic:
  - The "low" water use projection assumes, among other things, a 5% reduction in population, whereas the "high" assumes a 5% increase in population. Both estimates are unrealistic; in percentage terms, four of the Colorado River Basin states (NV, AZ, CO, and UT) were the fastest-growing states in the country during the 1990s (NAS, 2007, pp. 37-8).

U.S. Population Growth, 1990-2000

State	Population Change (%)
Nevada	66.3
Arizona	40
Colorado	30.6
Utah	29.6
New Mexico	20.1
California	13.8
Wyoming	8.9

Source: NAS, 2007

  - More recent data, comparing the decade 1995-2005, indicates that the population of the seven Colorado River Basin states continues to grow rapidly, together adding nearly 11 million people, an increase of approximately 25% (NAS, 2007, p. 38).
  - More realistic "low" and "high" scenarios should be based on the states' own demographic projections. In Colorado, for example, the SWSI predicts a 65% increase in population from 2000 to 2030, suggesting that a "low" of 20-40%, and a "high" of 60-80%, would be much more realistic.

- There is much disagreement about these water use projections; the Bureau of Reclamation's projections of water consumption are much higher than what is projected by the states (Table 3.4.1-5, Draft PEIS, p. 3-74), and would be a better source of information for the Draft PEIS.

- No climate change predictions were included, despite the fact that recent reports show that the Colorado River Basin is a "bull's eye" for warming (NAS, 2007, pp. 61-2) and for the decline of stream flows (Magill, 2007).

52786-024 (cont.)

b. ***Project water budget tables incomplete.*** **The tables detailing water budgets for individual oil shale/tar sands projects (Draft PEIS sections 4.5.2 and 5.5.2) are misleading and based on incomplete or undescribed assumptions.**

The Draft PEIS uses the water budget tables to evaluate the water demand and consumptive use for individual oil shale and tar sands projects, and to estimate potentially available Colorado River water for use in oil shale, tar sands, and other development. While practical tools, these tables need to be re-evaluated to address the following concerns and questions:

Oil Shale tables (Draft PEIS section 4.5.2):

- Why is the range for the in situ projects in Table 4.5.2-1 150,000-200,000 bbl/day when it is listed as 200,000 in the text (Draft PEIS, p. 4-2)?
- The water used for refining is not included (Draft PEIS, p. 4-40) but should be.
- Different conversion factors used for sanitary/potable water use to convert demand to consumption should be justified or recalculated (0.35 for Colorado, 0.53 for Utah).
- The assumption that underground or surface mining with surface retort operations could obtain power from existing facilities is unlikely, especially given the predicted increases in generating capacity that is expected to be necessary to support regional population growth. The power requirements of these operations should be included and analyzed in the Draft PEIS.
- Recurrence of drought is mentioned (Draft PEIS, p. 4-41) but not analyzed, nor are the potential impacts of global warming on the Colorado River Basin (Boxall and Powers, 2007; NAS, 2007; Kuhn, 2007; Kuhn, 2007b; Magill, 2007; Gray, 2007). The Draft PEIS should analyze both. 52786-025
- The flow recommendations identified by the Recovery Program identified for the endangered Colorado River fishes (Draft PEIS, p. 4-41), which are likely to reduce the amount of water available for development, should be listed and discussed.
- The Draft PEIS needs to provide more details regarding the water budgets for individual oil shale projects, including:
  a. An explanation of water conservation measures, which are assumed, but not described (Draft PEIS, p. 4-41).
  b. A justification of why a 200,000 bbl/day in situ project would require 20,000 to 41,000 ac-ft/yr (including a new power plant) when 32,000 a-f/year would be required just for power production, and many other factors, such as water consumption for extraction, processing, storage, and transport are not included.
  c. An analysis of the assumption that available water will be stored and/or transported to the oil shale areas from other water basins. Water transportation is very expensive, and there will be considerable losses in the storage and transport, plus additional, unanalyzed environmental impacts.
  d. The assumption that there could be an additional 35,000 ac-ft/yr available from natural groundwater recharge in the Piceance Basin needs to be discussed, especially considering that about 80% of surface water originates from groundwater discharge (Robson & Saulnier, 1980). There have already been water rights calls on Piceance Creek (Draft PEIS, p. 3-79), and this number is based on an out-of-date study from 1982.

e. The Draft PEIS assumes that Shell's freeze wall technology could contain the extent of the cone of depression to within the freeze wall zone (Draft PEIS, p. 4-42), but this is not a valid assumption, given that the technology is untested and unreported.

f. It's misleading to represent the water requirements for individual projects as a percentage of the currently available, and projected available, water because the Draft PEIS does not present any analysis of other water rights claims, such as from Native American tribes, competing urban or agricultural water development projects, and diminishments due to in-stream flow requirements (state and federal), global warming projections, ongoing negotiations in the Law of the River, etc.

52786-025 (cont.)

Tar Sands tables (Draft PEIS section 5.5.2):

- The tar sands water budget table (Table 5.5.2-1) should include water use for access roads and/or support facilities, e.g., dust suppression.
- Water use for upgrading solvent-extracted tar sands should also be included in Table 5.5.2-1.
- The net water requirement depends greatly on which tar sands development technology is used. The Draft PEIS must first identify the technologies, and then assess the potential impacts on water resources in each of the 11 STSAs.

52786-026

c. ***Power generation***. **Based on other references, the Draft PEIS grossly underestimates water requirements for power generation, both for in situ oil shale production and for supplying a growing population. In addition, the Draft PEIS omits water usage for power required for other oil shale and tar sands technologies**.

The Draft PEIS states that "Additional power generation capacity would need to be developed in the region to support commercial oil shale development; however, at this time, definitive information about the power requirements of commercial oil shale development is not available…" (Draft EIS, p. 4-13). Therefore, the Draft PEIS makes the assumption, based on the RAND report (Bartis et al., 2005), that the Shell in situ technologies will require about 1,200 MW of additional generation capacity for every 100,000 bbl shale oil produced (Draft PEIS, p. 4-14). Colorado's largest power plant, located in Craig, CO, is a 1,200 MW plant. The BLM is assuming that this new capacity would come from conventional, coal-fired power plants (Draft PEIS, p. 4-14). In addition:

52786-027

- The Draft PEIS is not consistent between sections when it presents water requirements. For example, the Draft PEIS indicates that a 2,400-MW conventional coal-fired electric power plant (sufficient to produce in situ 200,000 bbl/day) would require **13,000** ac-ft/yr of water (Draft PEIS, p.4-14). In contrast, the Draft PEIS states elsewhere that the same size coal-fired power plant could require approximately **13,800** ac-ft of water per year (Draft PEIS, p. 4-32).
- More importantly, water consumption numbers are inaccurate, as they differ greatly from other references. According to the federal Energy Information

Administration (EIA), the net generation of the 1200-MW plant in Craig, CO was 10,116,196 MWh in 2005 (http://www.eia.doe.gov/neic/rankings/rankbyplantgeneration.htm). If power for in situ oil shale development is produced using the current technology (closed-loop-cooling, coal-fired plants), we can assume a water consumption factor of 0.518 gal/kWh (Forbes, 2006, p. D-1; see below), the water necessary to generate enough power to sustain an in situ oil shale production level of one million barrels per day would be about 150,000 ac-ft/yr (or **30,000** ac-ft/yr for 200,000 bbl/day, 57% more than the 13,000 ac-ft/yr the Draft PEIS states).

  - The Draft PEIS does not describe which type of coal-fired plant will be built. But using standard assumptions, it is likely that any new pulverized, freshwater, coal-fired plant will be built with a supercritical boiler, with a wet flue gas desulfurization system, and a closed-loop (recirculating) cooling system, which consumes 0.518 gal/kWh (Forbes, 2006, p. D-1).

- The Draft PEIS further underestimates the water consumption of power plants in its Major Water Uses tables, as discussed in 3d above (Draft PEIS, p. 6-153 and p. 6-269).
  - Under the assumption used in the Draft PEIS that power plants operate at 60% efficiency, so that a 1,500-MW plant generates about 7,900 GWh/yr (Draft PEIS, p. 6-114), a series of 9,940 MW plants would produce 52,316 GWh/yr, requiring just over 83,000 ac-ft/yr of water. This is 36% more than the 53,000 ac-ft/yr listed in tables 6.1.5-10 and 6.2.5-7.

52786-027 (cont.)

- The Draft PEIS does not appear to provide any analysis of the increase in water requirements for power generation that will be required to meet the needs of the tri-state area's burgeoning population. For example, the Western Electricity Coordinating Council Rocky Mountain (WECC/RM) region, which includes Arizona, New Mexico, and Southern Nevada, is predicted to require a 100% increase in coal-fired capacity (from about 18 to 36 GW) by 2030 (Forbes, 2006, p. 16).
- The Draft PEIS assumes that power needs for surface and underground mining operations would be met by expanding existing power plants, but does not provide estimates for water requirements for these expanded capacities.

8. ***Lack of specificity on water required for technologies applied.***

The Draft PEIS does not present adequate water use data for new, untested technologies and their potential impacts on water resources. The Draft PEIS does not analyze the effects of the various in-situ retort technologies, or the proposed isolation techniques, on water resources.

52786-028

The Draft PEIS gives a wide range of water requirements for each technology:

- 2.6 to 4 bbl water/bbl shale oil using surface mining/surface retort techniques, totaling 6,100-9,400 ac-ft/yr for a 50,000 bbl/day facility (Draft PEIS, p. 4-3 and 4-4)
- The same range is given for underground mining/surface retort (Draft PEIS, p. 4-8)
- 1 to 3 bbl water/bbl shale oil using in situ techniques, totaling 9,400 to 28,200 ac-ft/yr for

a 200,000 bbl/day facility (Draft PEIS, p. 4-10 and 4-11).

However, the Draft PEIS does not state what steps of the process are included in the water-use estimates provided in chapters 4 and 5. In addition, it should be noted that despite decades of research, and the application for hundreds of patents for the process, companies such as Shell have still not disclosed or even narrowed down the water requirements for these in situ processes; the source given in the Draft PEIS for this information is the RAND report (Bartis et al., 2005). The Draft PEIS needs more specific data to adequately evaluate the impacts of these various oil shale technologies on water resources. 52786-028 (cont.)

The Draft PEIS needs to provide the assumptions and calculations inherent in these water-use numbers, and indicate what is included in these ranges of water requirements. In addition, given the lack of new information and uncertainty in existing information, it would be prudent to use estimates from the high end of the ranges provided when evaluating potential impacts.

9. ***Inadequate analysis of water storage and delivery infrastructure.***

The Draft PEIS should analyze the physical availability of water and necessary infrastructure for commercial-scale development of oil shale and tar sands industries. The environmental and socioeconomic impacts of making sufficient quantities of water physically available to the oil shale and tar sands industries (Draft PEIS, p. 3-72), along with other potential users, could be enormous and should be analyzed in the Draft PEIS.

Even before the legal availability of water in the tri-state region becomes an issue, the physical availability may be the limiting factor. The RAND report states that the most constraining factor appears to be the water supply infrastructure (reservoirs, pipelines, groundwater development, etc.). In the early 1980s, local water supply systems were expected to act as a limitation once production reached 200,000 to 400,000 bbl/day (Bartis et al., 2005, p. 50; OTA, 1980). The council also reported that the water supply infrastructure was inadequate. In 1980, the OTA estimated that for a one-million-bbl/day industry, new storage requirements could range from 180,000 ac-ft in the White River Basin, to about 230,000 ac-ft for storage in both the White River and the Colorado River basins. The maximum storage would be necessary if high-altitude reservoirs were built; less storage would be required if most of the water were obtained by direct diversions from the mainstem rivers (OTA, 1980, p. 387). 52786-029

The RAND report states that it is unclear if these analyses are still valid (Bartis et al., 2005). In addition to reservoirs, new pipelines, pumping stations, and other infrastructure would be required to transport water from the rivers and storage facilities to the actual oil shale development tracts. However, given the current lack of enthusiasm for constructing new reservoirs, and the host of legal and environmental challenges that such projects would invite, there is little evidence that such projects would happen quickly. The current Animas-La Plata project, which is expected to be complete and full by 2011, was authorized in 1968 (NAS, 2007, p. 85).

Water Quality

10. ***Salinity not adequately addressed.***

The Draft PEIS did not adequately analyze the effects of salinity from commercial oil shale and tar sands development on the quality of water resources locally, regionally, or Colorado River Basin-wide. Despite the fact that salinity "has long been recognized as one of the major problems" of the Colorado River (Draft PEIS, p. 3-61), the Draft PEIS did not study the effects of salinity from commercial-scale oil shale and tar sands development at any scale. The salinity added to the Colorado River system from a commercial-scale oil shale and/or tar sands industry could represent a significant setback to the gains made by the federally mandated salinity control projects, as outlined in Draft PEIS section 3.4.1.2 (p. 3-60 *et seq.*). Current costs for salinity management in the Colorado River Basin are approximately $45 million per year (Southwest Hydrology, 2008), excluding capital expenditure for infrastructure such as the desalination plant in Yuma, Arizona. Future NEPA analyses of individual oil shale or tar sands projects will not be sufficient to determine the potential basin-wide effects of salinity from commercial-scale development. 52786-030

Excessive salinity is already a huge issue in the Colorado River Basin, causing an estimated $500 to $750 million in damages each year in the U.S. alone. If future increases are not controlled, the Colorado River Basin Salinity Control Project (CRBSCP) estimates that damages could exceed $1.5 billion per year (CRBSCP, 2005; Reclamation, undated).

The Draft PEIS states that the BLM's efforts to reduce salt loading from activities on BLM-administered land would apply to future oil shale and tar sands development, and that the agency has developed a strategy to be implemented through its Resource Management Plans that rely on best management practices (BMPs; Draft PEIS, p. 3-62). However, in a basin where about half of the salinity comes from natural sources (Draft PEIS, p. 3-61), relying on BMPs may not produce sufficient results.

A critical concern of in-situ oil shale development that should be analyzed in the Draft PEIS is that the basin-wide fracturing associated with the in-situ recovery of shale oil could dramatically increase porosity and conductivity in the target zones, resulting in a long-term flow of brine from the more saline zones into the basin's surface water, increasing the salinity of groundwater discharge and eventually the receiving waters of the Colorado River.

Other aspects of commercial oil shale development that were not analyzed in the Draft PEIS but that could also dramatically increase salt concentrations in surface water include: 52786-031

- Re-introduction of groundwater to spent shale and subsequent leaching. The leachate from spent shale is considered to be the primary threat to water quality. Spent shale contains significantly more leachable salt than raw shale (Bartis et al., 2005).
- Impacts of soil erosion. Many soils in the Colorado River Basin are saline, so a key concern is the effect of soil erosion from disturbed land contributing to the salinity of runoff reaching surface water bodies.

- Large-scale dewatering. Both Shell and EGL are proposing to dewater test zones prior to in-situ retorting. Dewatering is predicted to reduce the mixing and dilution of saline groundwater and to increase surface water salinity.
- Reduction in streamflows. One study found that reducing streamflows could increase TDS by 300 mg/L in Piceance Creek (Robson and Saulnier, 1980).

52786-031 (cont.)

11. ***Analysis of potential for toxic substances to degrade water quality inadequate.***

The Draft PEIS did not adequately analyze the effects of toxic substances that may be released from commercial oil shale and tar sands development and the consequent impacts on water resources. A primary concern regarding commercial-scale oil shale development is its potential to significantly degrade surface and groundwater quality. The Draft PEIS should provide an analysis of potential contaminants, especially the potential for increased groundwater flow – and the associated leaching of salts and mobile forms of toxic substances– to occur in the retorted zones as a potential source of long-term water contamination. "Many oil shales contain significant amounts of arsenic" (Draft PEIS, p. 4-169), and "Formation waters and pyrolysis waters recovered from in situ retorting are likely to contain contaminants such as chlorine, carbonates, sulfates, mercury, selenium, arsenic, and various organic compounds such as phenols and carboxylic acids" (Draft PEIS, p. 4-171).

52786-032

Leachate from spent shale contains mobile forms of toxic substances, including arsenic and selenium (Bartis et al., 2005, p. 41). Trace elements liberated by the retort process (e.g., arsenic, selenium, boron, fluoride; Freerer et. al., 1986), and soluble organic carbon could also be leached from retorted shale (Leenheer and Stubner, 1981; Bartis et al., 2005; Robson and Saulnier, 1980).

Because all of the Green River Formation oil shale lies within the Colorado River drainage basin, increases in salinity and other toxic compounds stemming from oil shale development could adversely affect Colorado River Basin ecosystems, endangered fish species, and downstream municipal, industrial, agricultural, and recreational uses (Bartis et al., 2005) and therefore must be analyzed in the Draft PEIS.

12. ***Inadequate water quality control strategy analysis.***

The Draft PEIS did not analyze the potential effects of the proposed in situ development water quality control strategies on water resources. Containing contaminated groundwater in the Piceance Basin is complicated by the fact that groundwater movement is restricted almost entirely to secondary porosity features, such as fractures, joints, and rubble zones, identified in rock outcroppings where they form springs and seeps (Day and Perry, 1985). Because of their size and discontinuity, these features are hard to locate, making it difficult to control contaminant movement and remediate polluted groundwater.

52786-033

Each of the three companies assigned RD&D leases in Colorado will use a different technology to control and protect groundwater resources:

- Shell is planning to use a "freeze wall", both to keep groundwater out of the retort area (once it has been dewatered) and to keep hydrocarbons trapped within. Shell also plans to flush the retorted zone with water, then pump and treat the water (possibly using bioremediation methods) before thawing the freeze wall (BLM, 2006).
- Chevron is planning to use the surrounding (presumably low-permeability) rock to isolate and protect the groundwater. The company may also undertake measures to flush out or to reduce groundwater flow through the retorted rock.
- EGL will also attempt to isolate the retort area by leaving a zone of unreacted shale around it, but will in addition dewater and, when groundwater flows back into the retort zone, pump and treat if necessary.

The Draft PEIS should evaluate whether some or all of these techniques will effectively protect groundwater. Even if these 'traps' are successful during production, the spent shale – with roughly 25% more void space – will likely have greater volumes of groundwater flowing through it after the kerogen has been extracted. 52786-033 (cont.)

While each of these control technologies may be feasible, none has been shown to be permanently effective. Permanent isolation of the retort zone by encasing or surrounding the zone with injected grout is being considered as a mitigation strategy, but the long-term stability of such subsurface barrier has not been demonstrated.

To accurately estimate the potential for oil shale development to produce dramatic and long-term increases in the amount of salts and contaminants in ground and surface waters, the Draft PEIS needs to present a much more detailed understanding of the flow of groundwater, its connection to surface waters, and its potential to leach and transport salts and toxins in each basin. Newly proposed and longer-standing control and remediation technologies must also be evaluated on a site-specific basis.

Endangered Species

13. ***Effects on endangered fish were not evaluated.***

Basin-wide impacts on the four species of endangered Colorado River fish were not adequately analyzed in the Draft PEIS. The Draft PEIS acknowledges the potential for commercial oil shale development projects to adversely affect most of the threatened, endangered, and sensitive species that occur in the counties where development could occur, but does not adequately analyze this potential. 52786-034

Oil shale development in Utah, along the Green and White rivers (Draft PEIS, p. 4-98), and tar sands development in Utah, especially where the Green and White rivers flow thru tar sands areas (Draft PEIS, p. 5-77) present the largest threat to endangered fish populations and critical habitat. In addition, tributaries of the White and the Yampa rivers flow through potential lease areas based on a visual review of maps in the Draft PEIS (Draft PEIS, p. 4-100).

The lack of specificity on the locations of lease areas, lack of project specificity, and incomplete information on the species' distribution make it impossible to evaluate the potential for adverse affects on endangered species (Draft PEIS, p. 6-52). Regardless of the actual lease locations, there could be significant impacts on flows in the Green and Yampa rivers that the BLM must quantify in the Draft PEIS.

In addition, water depletions and salinity increases throughout the Colorado River Basin could result in adverse impacts. Such impacts, including predictions of the effects of global warming on Colorado River flows, should be analyzed and modeled basin wide. 52786-034 (cont.)

Finally, the Draft PEIS must adequately analyze the differences in impact to endangered species between the various alternatives. For example, the discussion of Alternative B describes about 99 miles of critical habitat for Colorado River endangered fish in Colorado and Utah included in the lease area (Draft PEIS, p. 6-54). There is not comparable discussion for Alternatives A and C.

Baseline and Monitoring

14. ***Lack of baseline characterization.***

Existing groundwater and surface water conditions need to be characterized in the Draft PEIS. The information presented in sections 3.4.2 through 3.4.5 is minimal. We would expect at a minimum that the Draft PEIS would include statistical summary tables of flow and water quality in surface streams as well as a summary of well information (completion depths, permitted yield, etc.) for each basin. 52786-035

15. ***Monitoring measures not discussed.***
Reasonable and appropriate monitoring measures should be discussed in the Draft PEIS. There is currently no monitoring information in the Draft PEIS. Because of the critical importance of the Colorado River, the Draft PEIS should analyze, at a programmatic level, what appropriate mitigation measures need to be implemented to protect the basin's water resources and all the downstream users. Who will be responsible for monitoring, and what components should be monitored? 52786-036

Data Gaps and Future Analysis

16. ***No plan for filling data gaps.***

The "published data" on oil shale and tar sands development on which the Draft PEIS is based is generally outdated and inadequate. Very little recent information has been published by the oil shale industry since the 1980s, especially on the new technologies, which the Draft PEIS is supposed to evaluate. Recent, sufficient and credible data evaluating the proposed oil shale and tar sands technologies, as well as the proposed control strategies, published in peer-reviewed scientific journals is necessary to adequately evaluate environmental impacts. 52786-037

According to the Draft PEIS, "Information presented…regarding technologies that could be used is taken from the best available published data. Because commercial oil shale development technologies are still largely in an RD&D phase, many details regarding the specific technologies that would be used in the future to produce oil from oil shale are unknown. In the absence of complete and definitive information about the technologies that may be deployed, a number of assumptions have been made"… Sect. 4.1 (Draft PEIS, p. 2-12). 52786-037 (cont.)

17. ***The work that would need to be completed to fill gaps in the Draft PEIS is substantial.***

There remains great uncertainty regarding impacts of commercial-scale oil shale development. Previous studies from the 1970s and 1980s that identified and analyzed many of the major environmental effects are out of date and generally evaluated impacts from older technologies. More broadly, the affected natural resources—water, air, and land—are under greater pressure today than they were 25 years ago, with expanding population increasing the demand for water and land even as predicted climate change threatens to reduce the quality of both. To support the best possible management decisions for the use of public land, the following studies should be undertaken to quantify environmental impacts from, and evaluate alternatives to, full-scale development of US oil-shale deposits:

- Develop a comprehensive baseline flow and water quality data and monitoring network for Colorado River tributaries that will be affected by oil shale and tar sands development. 52786-038
- Develop realistic estimates for the volume of water required for all phases of in-situ oil shale development and production.
- Evaluate options for treatment and discharge of water recovered from in-situ retort zones
- Quantify impacts on the quality of groundwater and surface water from oil-shale development.
- Evaluate sources for potential water supply and the legal implications for availability of water.
- Evaluate infrastructure needs.
- Evaluate the interdependence between energy and water supplies in the Colorado River Basin, and the impact of oil shale operations on water supply.

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Responses for Document 52786

52786-001: This PEIS is a programmatic-level document that analyzes land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and they provide an effective analytical foundation for subsequent project-specific NEPA documents. Any specific impacts to water and watershed resources from oil shale and tar sands leasing and development would be addressed in the project- specific NEPA documents prior to leasing.

It is important to note that land use allocations do not authorize the immediate leasing of the lands for commercial development. No significant impacts, other than possible impacts to property values, are concluded because the ROD of the PEIS will not commit any resource or grant any lease rights. Prior to leasing, activities as described in plans of development would be evaluated. Impacts on water resources could happen if commercial development proceeds. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis may include mitigation measures, such as best management practices, specific protections, or avoidance to mitigate or eliminate impacts on sensitive resources.

Alternative B is selected as the Proposed Plan Amendment (Preferred Alternative) because it would give the BLM the greatest flexibility for consideration if future oil shale development is adopted. Meanwhile, good resource protection is an important factor in making a decision for the development.

52786-002: Tables 3.4.1-2 to 3.4.1-4 focus on the water demand and consumptive uses of water. As instream flows are not considered as consumptive uses, they are not included in the tables. Instream flow are water rights. CWCB has the exclusive authority to protect instream flows. A list of stream segments with current instream flow requirements in Water Divisions 5 and 6 has been added to the PEIS and is presented in Appendix I. Protection of endangered species fishes is described in Section 3.7.4.

Water depletion due to oil shale development depends on many factors, including project sites, technologies to be used, and various activities involved in the development. The depletion issue would be handled at the project- level when these factors are better defined. Impacts of water depletion would be addressed in subsequent project-specific NEPA documents.

The PEIS uses the best available information. Estimates for water availability were derived primarily based on the Hydrologic Determination of 1988, states' water plans, various compacts of the Colorado River Basin, and the Colorado

Statewide Water Supply Initiative (CWCB 2004, 2007). Specific water demands in oil shale and/or tar sands development depend on many factors, including project site conditions, scale of projects, technologies to be used, and various activities involved in the development. The demands would be evaluated in subsequent project-specific NEPA documents.

The PEIS discloses the fact that the BLM will consider new information, such as that emerging from the RD&D leases, during subsequent NEPA analysis performed as the basis for making any leasing decisions. The proposed action is a land use allocation and does not commit any resources for leasing of oil shale and tar sands development.

52786-003: There is considerable uncertainty regarding projected levels of commercial oil shale and tar sands development, and a number of estimates of future production exist. To evaluate the impacts of a fully developed oil shale and tar sands program as suggested in the comment would require development of an RFDS and using assumptions of impacts based on existing technology. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. In addition, development of such an analysis at this time would not take advantage of the information that will be gained as a result of the ongoing RD&D program. Instead, the BLM intends to evaluate future leasing and development proposals on a project-specific basis. These project-specific evaluations would include evaluations of cumulative impacts, and it is expected that at that time, a more realistic estimate of likely development will be possible.

52786-004: The degree of uncertainty that still exists regarding what technologies would likely be employed for future commercial development of oil shale is still considerable. Thus, precise calculations of resource needs are not possible at this time. The discussion on water demands was based on what the BLM considers at this time to be a reasonable development scenario, but the BLM offers this only as a reference point from which to conduct an analysis of impacts and recognizes that future lease applications may involve other technologies that have vastly different water demands than historic technologies or even those now under development. The PEIS serves only as a basis for land allocations, not leases. Resource demands for future operations (as well as for concomitant cumulative activities) must be calculated and their impacts assessed on a project-specific basis when future applications are received.

52786-005: See response to Comment 52786-001.

The PEIS provides a programmatic-level analysis of water supply in the Upper Colorado River Basin, based upon the Colorado River Compact, Upper Colorado River Basin Compact, and historical flows of major streams, as presented in

Section 3.4. The impacts on the water resources, including the potential degradation of surface and groundwater quality, are described in Sections 4.5.1 and 5.5.1 of the PEIS. A discussion of the possible impacts on ecological resources is presented in Sections 4.8.1 and 5.8.1, while the health and safety issues are described in Sections 4.14 and 5.14.

In-situ retorting technologies are still evolving. The BLM used the best available information to develop an estimated range of water requirements if oil shale and/or tar sands are developed and to describe the potential impacts on the water resources. They are described in Section 4.5.1 and 5.5.1.

The water demand in the Upper Colorado River Basin, where the oil basins and Special Tar Sand Areas are located, is changing. This is reflected in many studies sponsored by BOR and states that are reported in various water plans in Utah and Wyoming and in Colorado's statewide water supply initiative (see footnote "g" of Table 4.5.2 for references). These studies provide projected water demand in the Upper Colorado River Basin in the next 20 to 40 years, with consideration of economic and population changes. The results of the studies form the basis of our evaluation of water demand.

The BLM recognizes that water resources are critical for all development in the western states, including energy development and mining. However, the quantity of water to be needed for oil shale development remains unclear and depends on many factors, such as scale of development, technologies to be used, and the locations and hydrologic conditions of project sites. Therefore, it would be more appropriate to address specific impacts on water resources at the leasing and plan of development stages when the technology and location factors are better defined.

Because this PEIS supports a land use allocation decision, only the general impacts on air quality, including greenhouse gases and climate change, are described (see Sections 4.6.1 and 5.6.1 of the PEIS). Specific impacts would be addressed in project-specific NEPA documents.

The potential impacts of projected climate change on water resources are based on modeling results. Different models may use different assumptions and mathematical algorithms and produce different, and sometimes contradictory, results. Therefore, the analysis presented in the PEIS does not speculate on the impact of projected global or regional climates on water resources.

52786-006: There are some areas of overlap between oil shale and tar sands areas that would be made available for lease application under Alternative B. The Hill Creek and P.R. Spring STSAs overlap with portions of the Uinta oil shale basin.

52786-007: Alternative A (the No Action Alternative) includes all lands that have already been leased (e.g., the RD&D sites) or identified as available for leasing (the

preference right lease areas and areas that are identified as available for leasing in existing RMPs). Thus, Alternative A includes about 353,000 acres of land. The PEIS has been revised to clarify the lands included under Alternative A.

52786-008: The BLM does not manage public land based on pending draft or proposed legislation.

52786-009: None of the alternatives considered in the PEIS preclude management "based on the principles of sustained yield" or ignore "the long-term needs of future generations for renewable and nonrenewable resources." The alternative identifies lands that analysis could be available for application for leasing in the future—an allocation decision. Therefore, subsequent NEPA analysis will be required prior to a leasing decision. If and when applications are received, an interdisciplinary team of resource specialists, with on-the-ground knowledge of the planning area, will analyze the current management situation, desired conditions, and existing uses, activities, and management prescriptions to create a framework to resolve the issues raised through the development of the leasing alternatives. A balanced approach consistent with the FLPMA principles of "multiple use" will be a key component of the analysis.

52786-010: See response to Comment 52786-003.

52786-011: Internal inconsistencies in stated water demands have been addressed. This PEIS supports land allocations for future oil shale development but does not support leasing for such developments. Engineering calculations of the types mentioned in your comment will be required at a project-specific level when applications for oil shale leases are received. Such calculations will be part of a full project-specific NEPA analysis that must be completed before any leasing decision is made.
Responses for individual items:
a. The text in Section 6.1.5.3.3 has been modified to acknowledge the water needs resulting from regional population growth, potential water exports, and instream flow water rights for protecting endangered species.
b. Same as a.
c. The text stating that the production level for the modeled tar sands facility is 100,000 bbl/day was in error and has been deleted; the modeled production level was actually 20,000 bbl/day.
d. The estimated water use for in situ oil shale development presented in Tables 6.1.5.10 and 6.2.5-7 include an estimate of 13,000 ac-ft/yr for power production (see Table 4.5.2-1 for a breakdown of in situ water use estimates). This estimate is based on the best information available at this preliminary stage of development. The water requirements associated with a power plant could change drastically depending on the type of technology (coal-fired, nuclear, hydro). The amount and type of power that will be used for oil shale and tar sands development is not known at this time.
e. The reference for water use by coal-fired power plants is from a proposal for a coal-fired power plant on BLM lands. Water use for power generation is

technology-specific. This variable would be revisited in future site- and project-specific environmental analyses as appropriate.
f. The section and table references in the footnotes have been corrected.
g. The annual water use for coal mining has been corrected.

52786-012: There is considerable uncertainty regarding the trajectory of oil shale and tar sands development. The actual time frame over which development will occur and the rate at which facilities come on line will depend, at least in part, on the information gathered from ongoing RD&D projects. A 20-year time frame was used for our cumulative impact analysis because there is increasing uncertainty in the baseline environment (e.g., population growth, climate change) and the reasonably foreseeable future developments beyond a 20-year period.

52786-013: The PEIS uses the best available information for its evaluation. It fulfills the requirements of the Energy Policy Act of 2005. Evolving outstanding legal issues are not evaluated because their outcomes are uncertain. Using speculative outcomes or assumptions in our evaluation would reduce the credibility of this PEIS.

The potential water surpluses listed in Tables 3.4.1-2, 3.4.1-3, and 3.1.4-4 are derived from the water flow of the Colorado River, various Colorado River compacts, and projected water uses of individual states. Long-term historical data on the flow of the Colorado River are used in the evaluation.

This PEIS assumes that 6,000 thousand ac-ft/yr are available for use in the Upper Colorado River Basin. This amount is based on long-term historical hydrologic data with a mean undepleted flow at Lees Ferry of about 15,000 thousand ac-ft/year. The data were collected from 1906 to 1995, within which wet and drought years existed. Some studies (Kuhn 2005; Tipton 1965) suggested that a mean undepleted flow of 13,500 thousand ac-ft/year be used. That flow is based on historical data from 1930 to 1964. A tree-ring study supported the 13,500 thousand ac-ft/year figure (Kuhn 2005).

To evaluate the water supply of the Colorado River Basin, we prefer long-term to relatively short-term historical data. We learned that short-term historical data fluctuate and are less reliable than long-term data, resulting in biased assumptions. That happened in the Colorado River Compact of 1922 that assumed a mean flow of 16,400 thousand ac-ft/year (Smerdon et al. 2007). Similarly, if we select data from the drought years of the early 2000s for our evaluation, we would likely produce another kind of biased results.

The use of tree-ring data to reconstruct past river flows is not a direct measurement of stream flow and must rely on interpretation. The credibility of the interpreted results is less than that of the historical hydrologic data. Therefore, the long-term historical data are used in our evaluation. However, we are aware of

possible prolonged or severe drought that can affect water availability in our evaluation (see Section 4.5.2).

52786-014: Please see response to Comment 52786-013.

52786-015: Please see response to Comment 52786-013.

52786-016: Under the Record of Decision of the "Colorado River Interim Guidelines for Lower Basin Shortages and the Coordinated Operations for Lake Powell and Lake Mead" of 2007, the Lower Basin states would get 7,000 thousand ac-ft/year consumptive water under shortage conditions of the river which is defined by the level of Lake Mead below 1,025 ft on January 1.

The evaluation of the PEIS is based on long-time hydrologic data rather than data under prolonged drought conditions (or shortage conditions) for the programmatic scope of the EIS. Analysis of the water needs for project-specific oil shale and/or tar sands development would consider and plan for various water conditions in its life time of its operation. This would be evaluated in project-level NEPA documents.

The term "consumptive use" generally means the amount of water that is equal to the diversion less the return flow. See also the response to Comment 52786-013.

52786-017: The Consumptive Uses and Losses Reports reflect the Department of the Interior's best estimate of actual consumptive uses and losses within the Colorado River Basin. They are prepared pursuant to the Colorado River Basin Project Act of 1968, Public Law 90-537.

52786-018: Besides the 2007 Hydrologic Determination, the 1988 Hydrologic Determination is a study using the longest term of historical data from 1906 to 1986. At the time the PEIS was prepared, the 2007 Hydrologic Determination was not available.

52786-019: See response to Comment 52786-016.

52786-020: See response to Comment 52786-016.

Proposed water projects could be accepted, modified, and rejected and would take time to resolve. So will the pending legal issues and unclaimed Tribal water rights. The outcomes of all these issues are uncertainties that are difficult to speculate about. Instead, this PEIS uses the latest data available and avoids making speculative assumptions for its evaluation to enhance the reliability of its conclusions.

52786-021: The evaluation in the PEIS is built on results recognized by the states, such as state water plans and statewide water supply initiatives. These results have considered projected changes in population and land use. Projected river flows

based on predicted climate changes are from climate models. The results may contradict each other (Smerdon et al. 2007). Therefore, historical river flow data are used in the evaluation, and severe drought conditions are recognized.

Existing instream flow water rights information has been added in Appendix I.

See also response to Comment 52786-013.

52786-022: Text has been added to Section 3.10 and 4.11.1.4 of the PEIS to include information provided in the comments. It is recognized that potential restrictions on water use by existing users, including agriculture, and the transfer of water rights to oil shale and tar sands developers may be significant with the development of oil shale and tar sands resources in each ROI. However, the location, technology, and magnitude of oil shale and tar sands development and consequently, the extent to which existing regional surface and groundwater source, and the interregional transfer of water into each oil shale and tar sands resource area, and the associated legal costs, cannot be determined at this time. Consequently, the PEIS assesses potential impacts qualitatively, to provide a general determination of the magnitude of potential impacts from reductions in agriculture on the economy of each ROI. If oil shale and tar sands facility development were to occur, additional NEPA analyses would be undertaken, where project locations, production levels, water demand, and any transfers from other uses would be known, and a more detailed analysis of the impact on agriculture would be undertaken.

52786-023: Please see response to Comment 52786-022.

52786-024: The tables were prepared by using Colorado, Utah, and Wyoming state water plans and the Department of the Interior's Consumptive Uses and Losses Reports. These reports are recognized by state and federal governments.

Water used for instream flows and recreation is not a consumptive water use, and the tables treat such uses accordingly. Instream flows are water rights that CWCB acquires and administrates to protect endangered fishes of the Upper Colorado River Basin. This kind of water right is protected in the same way as other water rights and would be used to maintain stream flows but would not cause consumption of water.

The assumptions and calculations used in projecting water uses are detailed in the states' water plans and would not be repeated in the PEIS. The water plans are referenced and shown in the footnotes near the bottom of the tables. The methodology used in estimating evaporation from reservoirs is described in the Consumptive Uses and Losses Reports.

The data in the tables are from different sources. These sources may collect different datasets and present their data in different ways. They are the best data available for our evaluation.

The consumptive use factor is derived by dividing quantity of water for consumptive use by the quantity of water demanded.

In Colorado, groundwater withdrawn from a shallow alluvial aquifer is considered as tributary groundwater and as part of the surface water connected to the aquifer. Tributary groundwater is a kind of groundwater classification and is different from the consumptive water uses shown in the tables.

The water use scenarios in the tables are the scenarios used by the states' water plans.

The water use projections by the Bureau of Reclamation differ from those by the Upper Colorado River Basin states. They are presented in the PEIS for comparison. It would be speculative to conclude whether the BOR's projections are better, since future projections contain uncertainties.

Climate change predictions are modeling results and rely on data, assumptions, and methodologies. Model results vary and sometimes contradict each other. This PEIS avoids speculating.

52786-025: The tables were prepared by using Colorado, Utah, and Wyoming state water plans and the Department of the Interior's Consumptive Uses and Losses Reports. These reports are recognized by state and federal governments.

An in situ project generally has a capacity between 150,000 and 200,000 bbl/day. We used 200,000 bbl/day in estimating the water need. The results are presented in Table 4.5.2 -1 and the text.

The products from oil shale development are likely to be transported outside the oil shale basins for refinery. Therefore, the water need for refining is not included.

Different conversion factors to convert demand to consumption were used by different states because the consumption of water varies among water use sectors and states, reflecting many factors, including the nature of the sectors, water use practices, and conservation. We derived the factors from data for different sectors and states.

Mining and surface retort operations primarily use fuels (such as diesel for trucks and mining equipment and diesel fuel and/or natural gas for retorting) for their energy sources and use a relatively small amount of electricity for their operations. Therefore, no new power plants are assumed to be needed (see Appendix A for more information) for the operations.

Droughts occurred periodically in the Colorado River Basin according to historical records. We used the results of the 1988 Hydrologic Determination study of the Colorado River to evaluate water availability. The study was based on long-term historical data from 1906 to 1986 that cover both dry and wet years. The effects of global warming on regional climate are based on models, which, in turn, rely on assumptions. The assumptions could differ among different models. The modeling results vary and are sometimes contradictory. Therefore, it would be speculative to use the modeling results in evaluating global warming impacts on water resources.

Instream flow requirements in the CWCB's Recovery Program are water rights that CWCB has acquired and administers to protect endangered fishes of the Upper Colorado River Basin. This kind of water right is protected in the same way as are other water rights and would be used to maintain stream flows. Water rights and water availability are related but different issues. They are unlikely to affect water availability for oil shale development.

Water conservation measures are practices to conserve water consumption. It is a general statement, and general water conservation measures are practiced in the region. The measures would be specified in project-specific NEPA documents.

The 1 to 3 barrels of water needed for each barrel of oil produced include all kinds of water consumption to produce the oil. A 150,000-bbl/day plant requires 54,750,000 to 164,250,000 bbl/year of water (or 7,050 to 21,160 ac-ft/yr), while a 200,000-bbl/day plant requires 9,400 to 28,200 ac-ft/yr of water. The range of the water need for a 150,000- to 200,000-bbl/day plant then would be between 7,050 and 28,200 ac-ft/yr of water. The water need is converted to water consumption by multiplying a conversion factor of 0.76 for self-supplied industries in Colorado, resulting in 5,400 and 21,400 ac-ft/year. The total water consumption (18,600 and 34,600 ac-ft/yr) would be the sum of the above number (5,400 or 21,400 ac-ft/yr) plus the water used by in-migrants (230 ac-ft/yr) plus the water used by a power plant (13,000 ac-ft/yr) when the in situ technology is adopted. A similar methodology is used to calculate the water need for other technologies.

No analyses are provided regarding the storage and transport of available water because leasing is uncertain and not committed and locations of potential sites are not identified. Such analyses would be conducted at the project level and reported on in project-specific NEPA documents.

The natural groundwater recharge in the Piceance Basin is a general statement. The majority of the water is discharged to surface water bodies through seepages and springs. The water's availability for oil shale development depends on locations of potential sites that are not defined because leasing is uncertain and not committed. Any uses of groundwater for oil shale development would be addressed at the project level and reported on in project-specific NEPA documents.

Without field data, it is unknown whether the cone of depression would be confined within the freeze walls in Shell's freeze wall technology. If the freezing is successful, groundwater flow would be cut off by the freeze walls. The cone of depression is likely to be confined within the walls.

Any water rights are based on water availability both physically and legally dictated by the various compacts of the Colorado River. As this PEIS is programmatic in scope, water rights are not evaluated. They would be evaluated at the project level and documented in project-specific NEPA documents. See also other responses regarding instream flows, global warming, and ongoing investigation to this comment and Comment 52780-004.

52786-026: The PEIS is a programmatic-level document that analyzes land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs. The statements lay down an effective analytical foundation for subsequent project-specific NEPA documents.

Tar sands development requires associated infrastructure and facility supports, such as access roads and pipelines, which would need water for their construction. These support facilities would be identified in each tar sands development project. After they are identified, the amount of water need would be able to be evaluated. The results would be presented in project-specific NEPA documents.

The solvent extracted tar sands technology is relatively new. The water use for upgrading the tar sands product is still unclear. It is also possible that the upgrading could be done outside the tar sands resource areas. Therefore, the water use for upgrading is better addressed at the project level.

Most of the data regarding water use in developing tar sands are from Canadian experience. The oil sands in Canada differ from the tar sands in the United States. The technologies used to develop tar sands in the United States are still to be developed. The water need is better addressed at the project level.

52786-027: Thank you for your comments. Internal inconsistencies in stated water demands have been addressed. This PEIS supports land allocations for future oil shale development but does not support leasing for such developments. Engineering calculations of the type mentioned in your comment will be required at a project-specific level when applications for oil shale leases are received. Such calculations will be part of a full project-specific NEPA analysis that must be completed before any leasing decision is made.

52786-028: This PEIS supports land allocation decisions for future oil shale leasing and development but does not support decisions to offer for lease specific parcels of land. Engineering calculations of the type mentioned in your comment will be required at a project-specific level when applications for oil shale leases are

received. Such calculations will be part of a full project-specific NEPA analysis that must be completed before any leasing decision is made.

52786-029: This PEIS is programmatic in nature. It analyzes the environmental consequences of proposed allocation decisions in sufficient detail for the decision maker to choose which lands would be available for further consideration for leasing. The proposed allocations do not authorize the immediate leasing of lands for commercial development, nor do they create any development rights. Any impacts caused by water supply infrastructures and salinity for commercial-scale development of oil shale and/or tar sands would be evaluated in subsequent project-specific NEPA documents.

52786-030: See response to Comment 52786-029

52786-031: The commentor has identified a number of important concerns and has called for analysis of these issues. The proposed action is primarily a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on water resources. The impact analysis provided in the PEIS is presented to the extent possible. Future leasing and site-specific project NEPA analyses will analyze these issues in more detail. The PEIS also does include the issues listed by the commentor, because these issues are potential concerns regarding possible future operations. Specifically, the text includes discussion of increased permeability (Section 4.5.1.2), leaching of spent shale (4.5.1), increased surface water salinity due to soil erosion (4.5.1.1, 4.5.3, 4.3.1), increased discharge of saline groundwater to surface water (4.5.1, 4.5.1.3), and increased salinity due to reduction of stream flow (4.5.1). State- and local-level regulations would determine limits of the salinity impact at any future operations.

52786-032: Leachate concerns were included in the Draft PEIS in the locations cited by the reviewer and elsewhere, including Sections 4.5.1.3 and 4.8.1. The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands within Colorado without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA processes.

52786-033: Evaluation of the operations and results from RD&D leases will indicate the relative success of various technologies. The concerns of the commentor in general were included in the Draft PEIS as potential issues. Site-specific issues

may dictate whether a particular technology would be effective, and these would be addressed in site-specific NEPA analyses.

52786-034: Direct and indirect impacts on endangered Colorado River fishes are discussed in Sections 4.8.1.4 and 5.8.1.4 of the PEIS. Cumulative impacts on these species are discussed in Sections 6.1.5.3.7 and 6.2.5.3.7. Because the number and specific characteristics of potential projects are not known at this time, the PEIS evaluates impacts in a relatively generic fashion appropriate for a programmatic EIS and sufficient to make decisions regarding land use allocations. As stated in Sections 4.8.1.4 and 5.8.1.4, oil shale and tar sands development could affect endangered Colorado River fishes through the alteration of topography, changes in drainage patterns, erosion, sedimentation from runoff, and oil and contaminant spills. In addition, any water depletions from the upper Colorado River Basin that could result from oil shale and tar sands development would have potentially significant adverse effects on endangered Colorado River fishes. The impacts associated with oil shale Alternative A are discussed in Section 6.1.1.7.4; those associated with Alternative B are discussed in Section 6.1.2.7.4; and those associated with Alternative C are discussed in Section 6.1.3.7.4. The impacts of alternatives on threatened and endangered species are compared in Section 6.1.4.7.4.

52786-035: As the PEIS is programmatic and is for land use allocation, the groundwater and surface water condition information is provided in a general manner, including the average and range of stream flows and well yields. More specific information would be provided in subsequent project- or site-specific NEPA documents.

52786-036: Monitoring measures are discussed together with mitigation measures in Chapters 4 and 5 of the PEIS. These measures are presented for each resource and are suggested for consideration. Project-specific mitigation and monitoring would be developed by applicants in consultation with the BLM and other federal and state agencies as part of the lease application.

52786-037: Thank you for your comments. As your comment points out, the BLM has acknowledged the relative scarcity of relevant data on which to base future leasing decisions. As a consequence of the great deal of uncertainty that surrounds future oil shale development technologies, the BLM has determined that this PEIS cannot support leasing decisions but instead provides the basis for land allocations only. Future lease application-specific NEPA analyses will be required before the environmental impacts can be fully appreciated and before appropriate controls can be established as lease stipulations.

52786-038: The PEIS uses the latest information available. We derived the estimates for water availability primarily based on the Hydrologic Determination of 1988, states' water plans, various compacts of Colorado River Basin, and Colorado's Statewide Water Supply Initiative (CWCB 2004, 2007). Specific water demands in oil shale and/or tar sands development depend on many factors, including project site

conditions, scale of projects, technologies to be used, and various activities involved in the development. The demands would be evaluated in subsequent project-specific NEPA documents. Depending on the type and level of development, regional water impacts may limit oil shale and tar sands development (Section 6.1.5.3.4).

Still, there are many uncertainties regarding the amount of development that is reasonably foreseeable, the types of technologies that might be deployed, and the locations of potential projects. This PEIS does not decide the pace, timing, or intensity of any future commercial leasing program. Rather, this PEIS merely allocates certain lands for future consideration of applications for commercial development of oil shale and tar sands resources. Additional site-specific NEPA analyses will be performed as the basis for making any leasing decisions.

References

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SWSI 2005, SWSI Phase 2 Technical Round Table, Prioritize and Quantify Recreation and Environmental Needs.

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Thank you for your comment, Kathy Lynch.

The comment tracking number that has been assigned to your comment is OSTSD52787.

Comment Date: March 19, 2008 18:09:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52787

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Attachment: TU Comments Draft PEIS (FINAL 031908).pdf

Comment Submitted:

Please see attached comments. See Attachment.

TROUT UNLIMITED
Katherine E. Lynch
Rocky Mountain Energy Counsel

March 19, 2008

VIA EMAIL AND CERTIFIED MAIL, RETURN RECEIPT REQUESTED

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Re: Comments on Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement

Argonne National Laboratory:

Trout Unlimited (TU) respectfully submits, pursuant to 40 C.F.R. § 1503.1(a)(4), the following comments on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement, dated December 2007 (PEIS).

While TU appreciates the efforts of the Bureau of Land Management (BLM), PEIS drafters, and cooperating agencies to explore the range of potential impacts from oil shale and tar sands (OSTS) development, because so little information is currently available regarding OSTS development, the PEIS inherently contains little, if any, meaningful analysis regarding the actual environmental consequences of amending land use plans to open up over 2 million acres of public lands to commercial-scale development. The BLM apparently has sought to avoid any real impacts analysis by crafting the action alternatives in the PEIS to involve only the amendment of Resource Management Plans (RMPs) to allow for commercial leasing. This approach is flawed, however, for two primary reasons. First, by deferring impacts analysis to future individual lease application, the PEIS avoids any meaningful basin-wide impacts analysis, and it is probable that the agency will never perform a landscape-level environmental consequences review. Further, the proposed RMP amendments would be done without review of the local consequences of such amendments. For the BLM to unilaterally amend these documents without any site-specific analysis, thereby undoing the resource-specific protections put in place under

52787-001

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each RMP, violates the fundamental purpose of NEPA. For these reasons, along with the paucity of information regarding the technical and commercial viability and impacts of OSTS development, TU believes it would be premature, arbitrary and capricious for the BLM to choose any alternative but the no action alternative. 52787-001 (cont.)

In particular, TU is concerned with the unknown, yet potentially far-reaching, impacts to water quantity, water quality, aquatic life, and recreational users of public lands. Moreover, TU believes the BLM's proposal to identify lands available for leasing before drafting, let alone finalizing, regulations that would govern the leasing and development is illogical and goes against BLM's previously stated position to approach OSTS development with a cautious, phased approach. As explained in greater detail below, TU urges the BLM to select Alternative A, the no action alternative, in the final PEIS. 52787-002

I. Interests of the Commenting Party.

TU is a private, non-profit conservation organization that has more than 155,000 members nationwide dedicated to conserving, protecting and restoring North America's trout and salmon fisheries and their watersheds. Since 1959, TU has dedicated staff and volunteers toward the protection of sensitive ecological systems necessary to support robust native and wild trout and salmon populations in their respective range. TU recognizes that the value of public lands is unparallel in providing habitat to coldwater fisheries, drinking water and wildlife habitat. TU's expanding conservation program includes a public lands initiative that recognizes the importance of protecting public lands for the survival and restoration of wildlife and fisheries. TU's public lands initiative is not limited to anglers; TU recognizes that many people who fish also utilize public lands for hunting or wildlife viewing opportunities. TU believes that actions taken on public lands are ultimately reflected in the quality of fish and wildlife habitat and populations.

In the tri-state region where OSTS development would occur, TU has over 11,600 members who actively utilize and enjoy the resources of the Upper Colorado River basin, including the White River hydrologic basin in Colorado, the Uinta basin in Utah, and the Green River basin in Wyoming. TU believes the impacts from the development and production of OSTS would adversely affect our members, as well as other non-members, who hunt, fish, recreate, and do business in and around the Upper Colorado River basin.

II. The BLM Should Select Alternative A Because the PEIS is Inherently Flawed.

Throughout the PEIS, the BLM acknowledges that too little information is known to accurately assess the environmental consequences of commercial oil shale and tar sands development. Despite the lack of essential data, however, the BLM has not only gone forward with the PEIS process, but it also has indicated its intention to 52787-003

select the alternative which would amend RMPs to open up the greatest number of acres to leasing, and it has done so even without first promulgating regulations governing the leasing process.

Further, the National Environmental Policy Act (NEPA) requires that agencies gather information essential to a decision-making process when the cost of doing so would not be exorbitant. With respect to OSTS development, the BLM need only to wait for the results of the currently ongoing research, development and demonstration (RD&D) projects to proceed with the PEIS process with critical information in hand – at no real cost to the agency. Moreover, the BLM has deferred any real analysis of the environmental consequences of commercial OSTS development until specific lease applications are submitted. This approach, too, is flawed because it will result in a series of small, isolated decisions that do not take into account the basin-wide impacts of commercial oil shale and tar sands development in the tri-state region. Although TU supports the notion of performing additional NEPA analyses prior to any leasing, the time for the agency to perform a meaningful landscape-level impacts analysis is in the PEIS. But, as already noted, the agency cannot do so at this time because it does not have the information essential to doing so, making the PEIS is essentially meaningless. Because of this, TU strenuously objects to selection of any alternative except for a no action alternative in the PEIS. 52787-003 (cont.)

A. The BLM Should Await Significant Completion of the Ongoing Research, Development, and Demonstration Projects Prior to Selecting an Action Alternative.

As noted in the PEIS, Section 369 of the Energy Policy Act of 2005 (EPAct) directed the Secretary of Interior to complete a programmatic environmental impact statement for a commercial leasing program for oil shale and tar sands resources on public lands in Colorado, Utah, and Wyoming. *See* Energy Policy Act, Pub. L. No. 109-58, § 369, 119 Stat. 594, 728 (2005). In addition to declaring that oil shale resources are strategically important, the EPAct also stated that oil shale development "should be conducted in an environmentally sound manner, using practices that minimize impacts." *Id.* Unfortunately, though, the practices and techniques that would be used to commercially extract and process oil shale are unknown, making it impossible to project in the PEIS how development could be – or *if* development could be – conducted in an environmentally sound manner. Even though Congress directed the BLM to prepare the PEIS, it has unfortunately proven to be nothing more than an academic exercise, because actual analysis of the environmental consequences is not possible at this time. 52787-004

In 2005, the BLM solicited nominations for small oil shale research and development leases in an effort to "enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale." *See* Bureau of Land Management, Potential for Oil Shale Development; Call for

Nominations – Oil Shale Research, Development and Demonstration (R, D & D Program), 50 Fed. Reg. 33753, 33754 (June 9, 2005). The BLM stated the RD&D projects were necessary because of a lack of available information regarding the technical and economic feasibility of commercial oil shale development. Moreover, the BLM recognized that additional information was necessary to avoid the disastrous outcome of the oil shale prototype program in Western Colorado in the 1970's. In order to facilitate its goals of gathering necessary data first *before* allowing commercial oil shale development to occur, the BLM announced that it would initiate a phased approach to oil shale development. *See id.* The agency stated that the first step in a phased program was the RD&D phase, to be followed by the BLM's development of a regulatory framework for a commercial oil shale leasing program that "is both environmentally and fiscally responsible." *Id.*

While the BLM did adhere to its initial plan to begin a careful approach to oil shale development through RD&D program, the agency is now digressing from the careful, phased approach it announced just three years ago. The agency is also digressing from its Congressional mandate in the Energy Policy Act. The Act directed the BLM to prepare a PEIS for a *leasing* program, not for the amendment of local Resource Management Plans (RMPs) to allow for commercial leasing. While TU believes the BLM has been judicious in not commencing a commercial leasing program at this time based on the unavailability of detailed information regarding the processes and techniques, and therefore resulting impacts, of a commercial program, TU also believes that based on this lack of information, the BLM likewise should defer taking action to amend the affected RMPs until it can first perform a reasoned analysis of the impacts of commercial OSTS development. The agency also should wait until the RD&D results are available before promulgating regulations. To do otherwise would likely render the regulations obsolete as soon as the RD&D projects are complete. 52787-005

As reiterated throughout these comments, TU believes the BLM's selection of any alternative except a no-action alternative under these circumstances would be inconsistent with the BLM's previous position, and would amount to poor judgment and land management.

B. The BLM Should Not Commit Lands to Potential Leasing Prior to Finalization of Leasing Regulations.

The stated purpose of the PEIS is to evaluate the potential effects of amending 12 RMPs to designate public lands as being available for application for commercial leasing. PEIS, at 1-1. According to the PEIS, should the BLM select an action alternative, the only action under consideration would be amendment of the RMPs – no leasing would occur without further review under NEPA. *See id.* Under this proposed scheme, the PEIS states that the simple act of amending RMPs to allow for

later leasing would not have direct, indirect or cumulative impacts. *See, e.g.,* PEIS at ES-3, 2-20, 4-2, 6-107, 6-174.

Because the BLM has not developed or finalized regulations governing OSTS leasing, however, the assertions that designating lands as available for leasing will not have impacts, and that meaningful NEPA analysis will take place prior to leasing, are not supported. Without any regulations currently in place, and knowing that the regulations will undoubtedly undergo great revision during the public process associated with their promulgation, the BLM simply cannot assure the public that the future NEPA processes, along with the yet-to-be-drafted, unknown regulations, will adequately provide a forum for informed decision making with meaningful public participation.

Moreover, under traditional oil and gas leasing principals, once a RMP identifies lands as available for leasing, the lands are committed for leasing with no further NEPA review or public input, with the only exception being a protest to the leases. Without having publicly vetted and finalized regulations in place that will govern the OSTS leasing process, the BLM's assurances that the public will have further opportunity to comment prior to leasing cannot be wholly accepted. The unanswered question is whether there could be a meaningful "no action" alternative in subsequent NEPA analyses because the lands would essentially already be committed to leasing. Proponents of specific leasing applications could argue, using the conventional fluid minerals program as precedent, that once the RMPs have been amended to allow commercial oil shale leasing, those lands are committed to leasing, subject only to lease stipulations – but not subject to a "no leasing" alternative. TU understands that this argument is speculative, but unfortunately, the entire PEIS process and OSTS development is speculative. That such an irretrievable commitment of resources is even a hypothetical possibility only underscores the reality that it is premature for the BLM to select an action alternative without first completing lease program regulations for commercial oil shale development. And, as noted above, the BLM cannot develop meaningful regulations until more information about commercial-scale OSTS development is known. 52787-006

C. NEPA's Implementing Regulations Require that the BLM Gather Unavailable or Incomplete Information Essential to the Decision-Making Process.

The Council on Environmental Quality's implementing regulations under NEPA state that when an agency is evaluating impacts in an EIS and there is incomplete or unavailable information, if the incomplete information "is essential to a reasoned choice among alternatives and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement." 40 C.F.R. § 1502.22(a). Here, the amount of incomplete or presently unavailable information that is absolutely essential to a reasoned decision is 52787-007

staggering, including but not limited to a lack of data on the specific development techniques, water usage demands, water quality impacts, and fish and wildlife impacts of commercial-scale oil shale development.

52787-007 (cont.)

The PEIS perhaps acknowledges this problem most succinctly in its discussion of alternatives considered but eliminated from analysis, where the document states:

> "[U]ltimately, the BLM concluded that critical information on which to assess potential impacts, define required mitigation measures, and approve commercial leasing is not available at this time. Specifically, the BLM determined that it does not have, at this time, adequate information on the (1) magnitude of commercial development and pace of that development, (2) potential locations for commercial leases, (3) technologies that will be employed, (4) size or production level of individual commercial projects, and (5) development time lines for individual projects to support decisions about lease issuance.
>
> "Published information defining both oil shale and tar sands commercial development is dated (i.e., mostly dating back to the mid-1980s or earlier) and unlikely to accurately describe future commercial technologies…. [C]onversations with the companies holding the RD&D leases provided little definitive information about future commercial development beyond the locations of the preference right lease areas. For example, the companies are uncertain exactly what processes commercial development will involve, what the power requirements are for individual components of their technologies, whether there are ways to generate needed power on-site via the commercial process itself, how much water will be required per barrel of shale oil produced, how many employees will be required during the construction and operations phases, and how much land will be disturbed during different phases of development. Without this information, it is not possible to define what related impacts will be, such as how power needs will be met, where water resources will come from, and where employees will be housed."

PEIS at 2-50 to 2-51.

However, current RD&D projects are in place that will significantly enhance the collective knowledge regarding the viability of technologies for development, as well as the environmentally and fiscally responsible means to develop oil shale. The costs to BLM to wait for this information prior to finalizing a PEIS for commercial-level oil shale development would not be exorbitant. Rather, it would cost the agency nothing but time, and it would afford the BLM an opportunity to review, analyze, and fully consider the environmental impacts of commercial oil shale development. In fact, the CEQ's NEPA regulations require that the BLM first obtain the presently

52787-007 (cont.)

incomplete and unavailable – yet essential – information prior to completing the PEIS for commercial-scale oil shale development. Because this information it not yet available, the BLM must select Alternative A. 52787-007 (cont.)

D. The BLM Should Not Defer Analysis of Broad Environmental Consequences to Future, Site-Specific NEPA Analyses.

The BLM cannot avoid its obligation to analyze the broad environmental consequences of commercial oil shale development merely by stating the consequences are unclear and will be analyzed later in other NEPA documents. Taken to the logical extreme, if a federal agency were able to defer analysis of environmental consequences in an EIS based on a promise to perform the analysis in connection with later site-specific or smaller projects, no environmental impacts would ever need to be addressed in an EIS. This would render the EIS process meaningless.

Here, the BLM has deferred analysis of environmental impacts to future lease-specific NEPA processes. While TU does support further NEPA analysis prior to the government's issuance of commercial leases, doing so in the absence a meaningful, existing basin-wide impacts analysis will result in a tyranny of small decisions that will not take into account the large, landscape-level consequences of a commercial oil shale program. The vast water, wildlife, and fisheries resources in the tri-state OSTS region would be made subject to a death of a thousand cuts. 52787-008

The inability of the BLM to perform a meaningful impacts analysis at this time, though, only underscores the flawed nature of this PEIS process. On one hand, the BLM should perform its analysis of landscape-level environmental consequences now, because to defer such analysis would allow for broad impacts to escape review. On the other hand, the BLM simply does not have the information essential to making a reasoned decision about the broad-based impacts. Despite the Congress' best intention to facilitate OSTS development by directing the BLM to perform this analysis, the BLM is caught in a Catch-22. The only responsible land-management decision on behalf of the public would be to select Alternative A and defer the decision on whether to make available certain lands for commercial leasing until both the RD&D projects are significantly complete and analyzed, and the BLM's commercial leasing regulations are finalized.

E. The BLM Should Not Amend Resource Management Plans Based Only on the General Findings in the PEIS

Although the BLM originally began the PEIS process with the intent of performing a programmatic review of the environmental consequences of developing a commercial leasing program for oil shale and tar sands, the agency realized that too little information is currently available to perform a well-informed analysis on a

commercial leasing program. In an apparent effort to take some type of action despite the lack of relevant information, and perhaps to assuage Congress, the BLM shifted the focus of the PEIS to purportedly consider the environmental impacts of amending 12 RMPs to allow for commercial leasing. The agency has concluded that such amendments will not have any impact on the environment. *See* PEIS, at ES-5. TU disagrees with this conclusion.

Although the simple act of administratively amending land use plans to allow for potential leasing may not at first blush appear to have environmental consequences, upon a thorough and thoughtful review, TU believes the agency's proposed course of action will adversely affect the environment. First, the actual environmental impacts of amending 12 RMPs are not considered in a meaningful way in the PEIS. Rather, the document merely catalogues potential consequences of OSTS development in a very general manner under unknown development scenarios. It does not contain any detailed analysis of the particular impacts to particular areas within the 12 affected Resource Areas that could be adversely impacted by plan amendments, especially areas of special concerns or with special management designations. 52787-009

An example of the environmental impacts that would result from the BLM's selection of either Alternative B or C can be demonstrated by the proposed amendments to the White River RMP. The White River RMP was most recently updated in 1997. The RMP limits activities, such as mineral development, in the Resource Area by pre-established carrying capacity thresholds. A table summarizing the carrying capacities can be found in Appendix D to the White River Record of Decision and Approved Resource Management Plan, dated July 1997 (the ROD). They include limits for air quality, big game habitat, water quality, and socio-economic growth. The ROD states that all oil shale development in the White River Resource Area will be subject to the carrying capacity concept and limitations cited in Appendix D. The White River RMP also places the Piceance Dome area off limits for oil shale development, as well as six Wilderness Study Areas. *See* ROD, p. 2-5. These carrying capacity limitation and non-discretionary resource protection areas were established only after site-specific NEPA review and a meaningful opportunity for the public to comment and participate in the process. 52787-010

Without any site-specific review or analysis, though, the PEIS proposes to amend these protective provisions right out of the RMP. The PEIS is extremely broad, and while it does provide a catalogue of potential, general OSTS development impacts in the tri-state region, it does not contain any specific analysis or reasoning to support the erasure of protective provisions originally enacted pursuant to detailed, local NEPA analysis. A response by the BLM that these provisions may be enacted again once individual lease-specific NEPA analyses are performed rings hollow. The proposed amendment would indeed have an environmental impact on the White River Resource Area.

The White River RMP is only example of the 12 RMPs the BLM is proposing to amend. Because of the limited nature and scope of analysis in the PEIS, the BLM should not rely on the PEIS to justify the amendment of the 12 RMPs. 52787-010 (cont.)

III. The BLM Should Select Alternative A Because Potentially Significant Water Supply Impacts Have Not Been Quantified.

The PEIS does not provide an assessment of the impact of commercial OSTS development on regional water resources, nor does the document contain sufficient data to make such a determination because the alternatives evaluated in the PEIS have not been described at the level of detail necessary to identify the water resources impacts, or related consequences, of their implementation. Further, although the PEIS includes a bibliographic review, the data obtained is not adequate to allow the BLM to evaluate the impact of commercial oil shale and tar sands development on regional water resources because sufficient information regarding the processes to be used in the exploitation of the resource does not exist.

52787-011

Some of the relevant information on water demand and project impacts associated with various oil shale exploitation techniques will be developed in the near future under the recently initiated RD&D program. As the point of the RD&D program is to learn more about the potential, requirements, and impacts of the extraction and development processes, it would be not only appropriate, but also necessary to a meaningful analysis, for the BLM to include the information collected in the RD&D efforts in the PEIS – even if this results in a delay of the PEIS timetable. To do otherwise would be to render the PEIS outdated and/or irrelevant as soon as results from the RD&D program become available.

Moreover, although the PEIS provides a basic overview of water resources at the individual state level, as well as some estimates of the potential water demand on these resources as a function of the level of oil shale or tar sands extraction, the PEIS contains no description or analysis of resulting impacts at the state or regional level. Such an analysis would require the BLM to perform a thorough review of the water available for development and consumption under the entitlements of each of the affected states according to each state's laws and the set of regulatory, administrative and legal arrangements commonly known as the Law of the (Colorado) River. Further, for the PEIS to attain its objectives of analyzing the environmental impacts of making more than 2 million acres of public land available for commercial leasing, the analysis must also consider the potential changes in water demand from other social, commercial and economic developments in the region, as well as the impacts of climate change. Although these issues are briefly mentioned, they are not addressed quantitatively or dealt with in a manner which allows them to be incorporated in the PEIS considerations. 52787-012

With respect to climate change, the PEIS acknowledges that the Intergovernmental Panel on Climate Change concluded that global warming is occurring, and that it is "very likely" due to an increase in man-made greenhouse gas concentrations. *See* PEIS, at 3-97. In its discussion of the effects of commercial oil shale and tar sands development, however, the PEIS contains no mention or analysis of the impacts to water resources in light of climate change. Rather, the document identifies only the emission of greenhouse gases from oil shale and tar sands development facilities as an impact with a climate-change nexus. *See id.* at 4-48. A number of credible climate change models predict that water availability will decrease in a warming climate. The BLM has failed to analyze the impacts of commercial OSTS development on water resources in light of the anticipated effects of climate change to those water resources. NEPA requires that the agency perform an analysis of the possible range of outcomes (from low to high probability) of water supply demands from commercial OSTS development in a warming climate. Climate change also poses significant challenges to fisheries, as discussed in Section VI, below. 52787-013

The PEIS has not sufficiently described the options for water supply to satisfy the demands associated with oil shale and tar sands development to enable the BLM to identify or recommend appropriate sources, as well as to identify water sources that are inappropriate for development in conjunction with OSTS. Because of the potential magnitude of the direct and indirect water demands associated with oil shale and tar sands development, it is essential for the alternative options for water supply to be explicitly addressed in the PEIS. Among the potential sources of supply are:

- Development of surface water supplies by original appropriation or purchase of conditional water rights;
- Purchase of uncommitted water from Bureau of Reclamation reservoirs;
- Purchase and transfer of surface water rights from existing users (agricultural users are the most probable source); 52787-014
- Development of nontributary groundwater;
- Changes in cropping patterns, improved efficiency of existing water uses, and transfer of associated water savings;
- Weather modification;
- Natural vegetation management; or
- Water made available by improved efficiency of water use by exporters of water from the Colorado River basin.

The PEIS has not addressed the impacts of large-scale oil shale development on existing water uses and users in the affected region in a manner which is useful for any decision-making purposes. The impacts of water transfers from agricultural uses to oil shale-related uses can lead to major dislocations and environmental alterations in the affected regions, due to changes in:

- Location of water use;
- Location, timing and water quality of flows/return flows to surface rivers;
- Land use and vegetation, including irrigated lands and riparian areas;
- Inundation of large areas as a consequence of the development of new storage facilities;
- Impacts of alterations in river flows on endangered species. This is of particular concern with respect the Endangered Fish Recovery Implementation Program, for which major efforts and expenses have already been incurred in the Colorado River basin;
- Opportunity costs to other existing or potential water users. The environmental implications of allotting a substantial portion of (if not all) remaining allocable water to energy production would mean that water would not be available for other consumptive and non-consumptive needs. Other users would either be required to give up those needs, or alternatively, be forced to prioritize among needs, such was agriculture, municipal supply, or stream flow; and
- Regional economic and social character.

52787-015

The PEIS does not address these issues in sufficient detail for the BLM to develop conclusions about the water resources-related regional consequences of commercial oil shale and tar sands development. Because the existing demand for water (excluding oil shale and tar sands requirements) may already be nearing the available reliable supply, the PEIS should include a thorough analysis of the water available for additional demands. The PEIS acknowledges this situation in its Chapter 3 discussion of the affected environment. For example, the document notes that generally, water demand in the Upper Colorado River basin cannot be met because the availability of water is limited by physical conditions and water rights complications. *See* PEIS at 3-72. The PEIS also notes that although a certain amount of water in Wyoming and Utah is "available" on paper, such water may not be readily or physically available for development. *See id.* at 3-73.

52787-016

Despite this recognition that adequate water supplies may not be available for commercial OSTS development, however, the PEIS does not account for the potential, if not likely, water shortage in its discussion of project impacts. Rather, the PEIS limits its discussion of water supply issues to only a single producing facility. *See id.* at 4-41 By limiting the analysis to only one producing plant, the PEIS does not provide any reasonable range of impacts across the region for multiple industrial sites if a significant portion of the 2 million acres being made available for leasing were leased and developed for OSTS. The document does not even contain a reasonable range of total water demands that could be experienced by a programmatic leasing and development effort. Further, future lease-specific NEPA analyses will not provide this analysis, as it is unlikely that the cumulative impacts analysis for individual projects would contain a basin-wide analysis of total water demand impacts. The appropriate time for the BLM to consider water supply issues for the entire Upper Colorado River basin is in the PEIS, and until and unless the BLM is able to do so, it would be prudent for the agency to select Alternative A. 52787-017

IV. The BLM Should Select Alternative A Because Potentially Significant Water Quality Impacts Have Not Been Quantified.

The PEIS acknowledges that the potential impacts of oil shale and tar sands development on the quality of regional water resources are potentially significant, but the document presents no analysis, recommendations or conclusions sufficiently specific to be of value in determining environmental impact. The PEIS does recognize that commercial OSTS development could dewater groundwater aquifers, thereby reducing well yield and stream flows. *See* PEIS, at 4-33. Further, reduced streamflow would alter stream morphology and reduce the channel's capacity for carrying sediment, increasing in-channel sediment deposition. *See id.* In situ mining processes could increase aquitard permeability through rock fracturing, and result in groundwater leaching of residual hydrocarbons, salts, and trace metals. *See id.*

Despite this recognition that the environmental impacts of OSTS development on water quality could be significant and long-lasting, however, the BLM fails to perform any meaningful or specific analysis regarding the realistic effects likely to be experienced throughout the tri-state region. Rather, the agency defers any real environmental analysis until future, specific leasing applications are considered. As discussed already, this is a flawed approach for two reasons. First, the BLM's inability to accurately assess the environmental impacts now due to a lack of available information underscores the impropriety of selecting any action alternative at this time. Moreover, the agency's deferral of impact analysis to future individual lease applications is very like to result in the tri-state-region, basin-wide impacts of commercial-scale development on water quality never being comprehensively addressed in a NEPA document. 52787-018

Water quality impacts could result from a variety of aspects directly linked to oil shale and tar sands development, including:

- Major alteration of aquifer hydraulic characteristics, flow patterns and subsurface water quality over large areas, due to extraction mining and/or in-situ processing aspects of resource extraction techniques. Included in these impacts are the drilling, de-watering, isolation, reclamation, waste disposal and excavation activities associated with the resource extraction and processing. Because the processes associated with in situ techniques, which will affect the geological formations, including aquifers, may be thermal, chemical and physical, a detailed analysis is required to identify the impacts and suitable mitigation procedures. The PEIS has not dealt with these issues in a manner which can lead to a credible recommendation or conclusion. 52787-019

- Impacts of alterations in river water quality on endangered species. This is of particular concern with respect to the Endangered Fish Recovery Implementation Program, for which major efforts and expenses have already been incurred in the Colorado River Basin. 52787-020

- Impacts of waste discharges from oil shale processing facilities, power generation, and other processes associated with the exploitation of the oil shale and tar sands resources. The PEIS should explicitly describe and evaluate the quantity and quality of leachate water and runoff from spent tar sands/oil shale spoils and tailings, and all areas altered by the process, so that appropriate mitigation measures can be identified and implemented. 52787-021

- Impacts resulting in increased concentrations and loadings of selenium and salinity in the Colorado River and its tributaries. Such impacts are particularly troubling because they have long been identified as special concerns under existing conditions, which could be greatly exacerbated by the proposed actions. 52787-022

- Impacts to regional and local air quality associated with oil shale and tar sands exploitation. This is of particular concern with respect to fisheries because of the potential associated declines in water quality that could result in areas with excellent coldwater fish resources, including wilderness areas and other location with intensive recreational use. The PEIS has not specified either the nature or the extent of this impact or the mitigation actions that are necessary to deal with it. 52787-023

V. The BLM Should Select Alternative A Because Potentially Significant Fisheries Impacts Have Not Been Quantified.

The PEIS identifies a number of potential impacts to aquatic resources from commercial OSTS development. Among the impacts identified are habitat disturbance, sedimentation, water pollution, and water supply reductions. *See* PEIS at 4-61. The document does not analyze with any specificity, though, native or wild fish populations that could be affected, and what the likely range of impacts to such species would be. With the exception of a sentence noting that fishing pressure in other areas not adversely impacted by OSTS development might increase, the PEIS does not consider the consequences of decreased or extirpated fish populations on recreational users and local communities. 52787-024

Nor does the PEIS provide a comprehensive analysis of cumulative impacts to aquatic life resources. The BLM's analysis, in fact, is limited to the potential impacts of a single oil shale facility – not basin-wide commercial development, which is contemplated in the PEIS. *See* PEIS at 6-107. The reasoning provided for such a limited analysis is – not surprisingly – that enough information is not known about the specific level of commercial OSTS development that will be experienced to allow the BLM to perform a more detailed analysis. As reiterated throughout these comments, the BLM does not have sufficient information to make a reasoned decision about the impacts likely to result from its proposed action, and accordingly, it should select the no action alternative. 52787-025

A. Native and Wild Fish Populations Would Be Adversely Impacted by Commercial Oil Shale Development.

The Upper Colorado River basin above Lake Powell supports remaining populations of native Colorado River cutthroat trout (CRCT), a sensitive species, as well as a vibrant sport fishery based on wild populations of rainbow, brown, and brook trout and introduced populations of cutthroat. The proposed oil shale lease areas are predominantly located in the Green River basin at the top of Colorado River drainage although several watersheds in the upper tributaries of the Colorado River are also affected (Figure 1). Given the position of the Green River at the upper end of the Colorado River system, changes in water quality and quantity there can have ramifications for reaches of the Colorado River well below the affected site. 52787-026

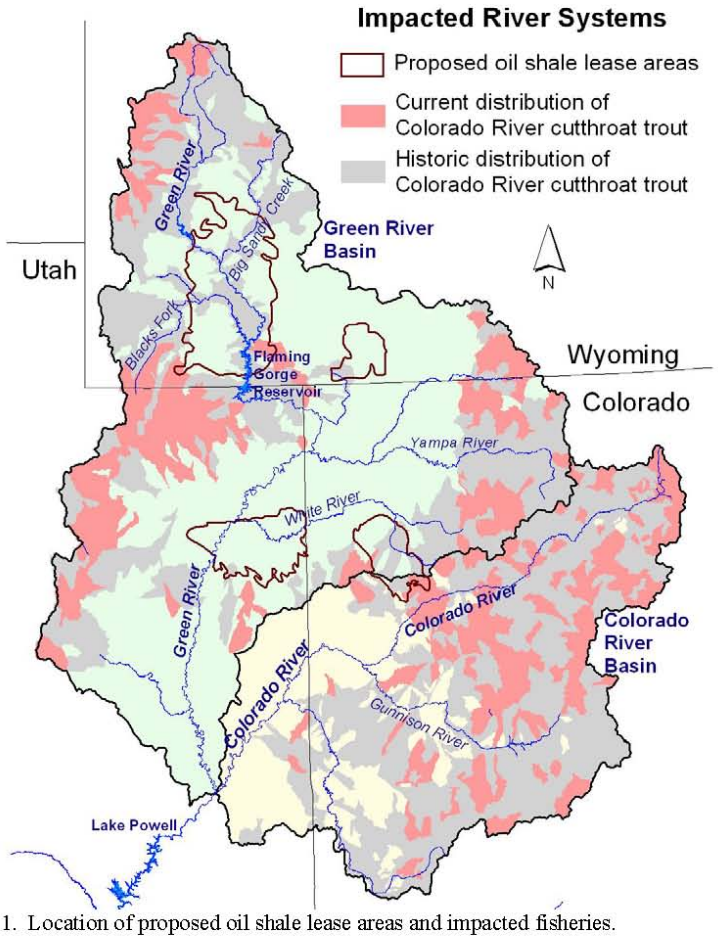

Figure 1. Location of proposed oil shale lease areas and impacted fisheries.

Colorado River cutthroat trout historically occupied the coldwater tributaries of the Colorado River in the upper basin. Today competition with non-native species, habitat destruction and fragmentation has contributed to their extirpation throughout much of the historic range. A recent status assessment of CRCT (Hirsch et al. 2006) found they currently occupy just 13% of the historic range while genetically pure, conservation populations, are found in only 8% of the historic range. The vast majority of these populations are resident life history forms, living in small, isolated patches of headwater tributaries. While this isolation has protected them from genetic hybridization, it leaves them highly vulnerable to environmental change and habitat

degradation. An analysis done by TU found that only 55% of the conservation populations met minimum criteria for persistence based on occupied habitat and population abundance (Williams et al. 2008). The proposed lease areas encompass five conservation populations; one is in a tributary to the Green River just above Flaming Gorge Reservoir, while the other four are located across the divide in headwater tributaries to the Colorado River. Insuring the future viability of these populations is critical given the extent of extirpation that has already occurred and the tenuous nature of the remaining populations.

Moreover, the BLM is a member of the Colorado River Cutthroat Trout Conservation Team, which was formed in 1999 and consists of fisheries and other resource professionals from Colorado, Wyoming, Utah, the Departments of Agriculture and Interior, and the Ute Indian Tribe. The BLM has recognized CRCT as a sensitive species. *See* CRCT Conservation Team, *Conservation Agreement and Strategy for Colorado River Cutthroat trout [Oncorhynchus clarkii pleuriticus] in the States of Colorado, Utah and Wyoming*, p. 3 (June 2006) (the "Conservation Agreement"). The BLM, through its Colorado State Director, is a participant in the CRCT Conservation Team and a signatory to the Team's Conservation Agreement, which obligates the BLM to ensure implementation of CRCT conservation actions detailed in the Team's Conservation Strategy.

The Team's Conservation Strategy, most recently updated in 2006, presents several different strategies for ensuring the long-term viability of the CRCT throughout their historic range, including recognition of the need to manage entire watersheds, rather than individual parcels of land, for CRCT conservation. "Impacts outside the riparian zone should be considered as part of CRCT management. Land management agencies should work to mitigate adverse impacts of watershed activities on water quality, instream habitat, channel morphology, riparian areas, and population stability." *Id.* at 18. Further, "[l]and management decisions likely to affect CRCT populations will include both pre- and post-project evaluation and monitoring to ensure that the habitat elements for CRCT are protected. Timber management, road construction, mineral development, and their associated impacts should be analyzed and mitigated prior to implementation…. This amounts to administrative restoration, where adverse impacts are mitigated at the plan level." *Id.* at 20. In other words, the importance of landscape-level planning to the conservation of the CRCT has been highlighted in the Conservation Strategy – a type of planning in which the BLM must engage at the PEIS level, not during review of individual lease applications at some unknown future time. Despite the BLM's prior recognition of the importance of plan-level analysis to best protect the CRCT, as well as the importance of preserving conservation populations of the fish, the PEIS fails to take these considerations into account in its impact analysis. 52787-027

Many of the introduced species, particularly rainbow, brown, and brook trout, that have contributed to the demise of native cutthroat trout populations have created

a booming wild trout fishing industry in habitat formerly occupied by native cutthroat. The greater thermal tolerances of these non-natives, as well as the cool tailwaters emerging from below Flaming Gorge Reservoir, have expanded the coldwater fishery to the mainstem of the lower Green River, a reach not historically occupied by native cutthroat. Today, the entire Green River system, is world renowned for fly fishing, and was identified as one of America's 100 Best Trout Streams, (Ross, 2005). The Green River can be broken into four sections: the upper end coming out of the Wind River Mountains and extending to Fontenelle Reservoir; the mainstem between the two reservoirs; the tailwaters below Flaming Gorge; and Flaming Gorge Reservoir. The sections above Flaming Gorge are managed by Wyoming Game and Fish Department as a trout fishery with rainbow, introduced cutthroat and brook trout in the upper tributaries and larger browns and rainbows in the mainstem below Fontenelle Reservoir. The tailwaters below Flaming Gorge are famous for the opportunity to catch large rainbows and browns. Flaming Gorge Reservoir is also popular with anglers for the huge browns, lake trout, and Kokanee salmon it supports.

As Figure 1 shows, the proposed oil shale lease areas encompass the entire 155 kilometer (km) section of the Green River between Fontenelle and Flaming Gorge Reservoirs as well as a significant portion of Flaming Gorge. Major tributaries like Blacks Fork and Big Sandy Creek are also within the impact area and any impacts to the water quality or quantity in these reaches will be experienced downstream on the Green River as well. Below the reservoir another 55 km of the Green River is within a proposed lease area as well as over 100 km of the White River, a major tributary to the Green and a popular trout stream. Piceance Creek, a significant tributary to the White River that also offers coldwater fishing, is nearly completely contained within a proposed lease area.

Though not a salmonid, given the plethora of non-native species in the rivers of the Colorado River basin, the native bluehead sucker and roundtail chub deserve mention. Habitat alteration and non-native species threaten the survival of these species in Wyoming and through-out their range. In 2003 and 2004 Wyoming Game and Fish surveyed 160 reaches in ten drainages of the Green River to gather information on the distribution and abundance of these two species as well as the flannelmouth sucker. The bluehead sucker was only found in about 6% of the reaches sampled. The nine occurrences were in upper Big Sandy Creek, just above the lease area boundary, and at its confluence with the Green River and the lower Blacks Fork (Wyoming Game and Fish Department, http://gf.state.wy.us/fish/AAC/CurrentProjects/GRNative/). The Blacks Fork and Green River occurrences are within the proposed lease area. The roundtail chub was found in 11% (17) of the reaches sampled, all of which were in the Blacks Fork drainage, many within the lease area. Given the already severely diminished range of these species, commercial oil shale and tar sands development would result in

52787-028

additional stressors from increased habitat degradation and water supply and quality issues that could lead to further declines in distribution and abundance. 52787-028 (cont.)

Although the agency intends to analyze impacts to CRCT, wild fish populations, and other aquatic life in additional NEPA analyses at the time of leasing, TU believes the appropriate time for consideration of impacts to these basin-wide resources is at the PEIS planning level. Unfortunately, the BLM does not have adequate data on the level or type of commercial OSTS development to perform this necessary analysis at this time, and accordingly, it should refrain from selecting an action alternative until it can make a well-reasoned decision regarding basin-wide impacts to fisheries and aquatic life 52787-029

B. Cumulative Impacts to Fisheries Have Not Been Adequately Quantified.

In addition to the likely adverse direct and indirect impacts to aquatic life from commercial OSTS development, the BLM must also consider cumulative impacts, including other past, present, and reasonably foreseeable future actions. While the PEIS does account for some level of reasonably foreseeable impacts from oil and gas development, coal mining, other minerals development, energy corridor development, power generation plants, grazing, fire management, forestry, and recreation, the cumulative impacts analysis for fisheries falls short.

One of the most glaring omissions from the PEIS' cumulative impacts analysis is any consideration of existing impacts from current road density, oil and gas development, and other man-made dams or barriers to fish passage. Figures 2 and 3, below, identify existing cumulative impacts to aquatic life from these sources. These figures provide a summary of only existing impacts, however, and do not include a reasonable range of impacts that could be experienced should commercial OSTS development occur on over 2 million acres of public lands. The BLM should consider a range of potential outcomes, though, in the PEIS. 52787-030

Native and wild trout populations in the upper Colorado River basin already face a range of challenges from human-caused habitat degradation and fragmentation. Although the majority of the basin is in public ownership, it contains an extensive road network that contributes sediment and other pollutants into the stream system as well as destabilizing hillsides leaving them more vulnerable to surface erosion and mass-wasting that adversely impact the drainage network. Poorly designed culverts and stream crossings associated with sub-standard roads may block fish passage, thereby fragmenting habitat and leaving isolated populations vulnerable to local stochastic events (Figure 2).

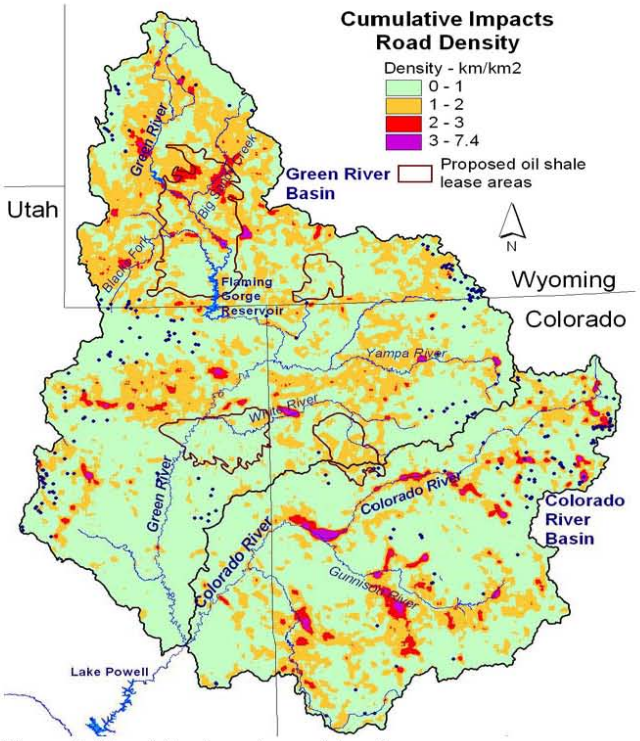

Figure 2. Cumulative impacts: road density.

52787-030 (cont.)

Much of the private land in the basin has been converted to agriculture or urban development. These land uses are also potential sources of pollutants and frequently contribute to habitat fragmentation from roads as well as dams and diversions that may obstruct fish passage or dewater a stream. Over the past decade, energy development has also exploded in the basin so that oil and gas wells have sprung up with their associated network of roads, infrastructure, and further demands on the local water supply (Figure 3).

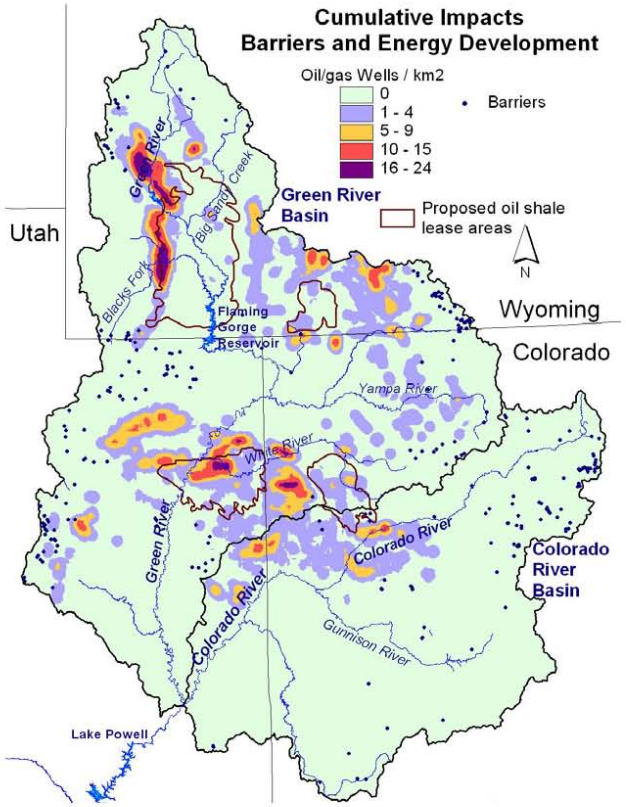

Figure 3. Cumulative impacts: barriers and producing oil and gas wells.

52787-030 (cont.)

Until such time as the BLM has adequate information to perform a meaningful cumulative impacts analysis on a programmatic level, it should not adopt any action alternative under the PEIS.

VI. The PEIS Does Not Adequately Consider Impact Associated with Climate Change.

As already highlighted above in TU's discussion of its water supply concerns, the PEIS acknowledges the Intergovernmental Panel on Climate Change's findings, but the document does not contain an informed analysis of the reasonably foreseeable impacts from climate change, and how they relate to commercial OSTS development. While the PEIS does note that greenhouse gas emissions would result from OSTS

52787-031

production facilities, the BLM has not analyzed the impacts to water resources and aquatic life likely to result from large-scale OSTS development in a warming climate.

In addition to a history of anthropogenic habitat alterations, trout in the Colorado River basin must now also deal with rapid environmental change brought on by climate change. This includes warmer water, changes in stream flows, and increasing frequency and intensity of disturbances such as floods and wild fire. TU has examined how three of these factors – increased summer temperatures, uncharacteristic winter flooding, and increased wildfires – are likely to affect the persistence of native cutthroat trout populations (Williams et al. 2008). Although the persistence of rainbow and brown trout is not threatened at the species level, environmental changes brought on by global warming are likely to have deleterious effects on wild stocks with ecological, as well as economic ramifications. Climate change will compound the problems associated with existing habitat degradation with a resultant loss in suitable habitat for coldwater fishes.

52787-031 (cont.)

In TU's analysis of thermal suitability, we used mean July air temperature as a surrogate for water temperature. For Colorado River cutthroat we established 19°C as the optimal thermal limit based on their historic distribution. However, recognizing the greater thermal tolerances of brown and rainbow trout, we based our analysis for this assessment on the findings of Keleher and Rahel (1996). They established a mean July air temperature of 22°C as the thermal limit for a coldwater fish guild in Wyoming's North Platte River drainage that included brown, rainbow and brook trout. Figure 4 shows the extent of thermally suitable habitat after a 3°C temperature increase is applied. Nearly half of the drainage area is at moderate or high risk (i.e., mean July air temperatures are 22°C or greater) for unsuitable summer temperatures, including virtually all of the Green River below Fontenelle Reservoir. This situation will be compounded by low summer flows that climate models have also forecast for the Colorado basin.

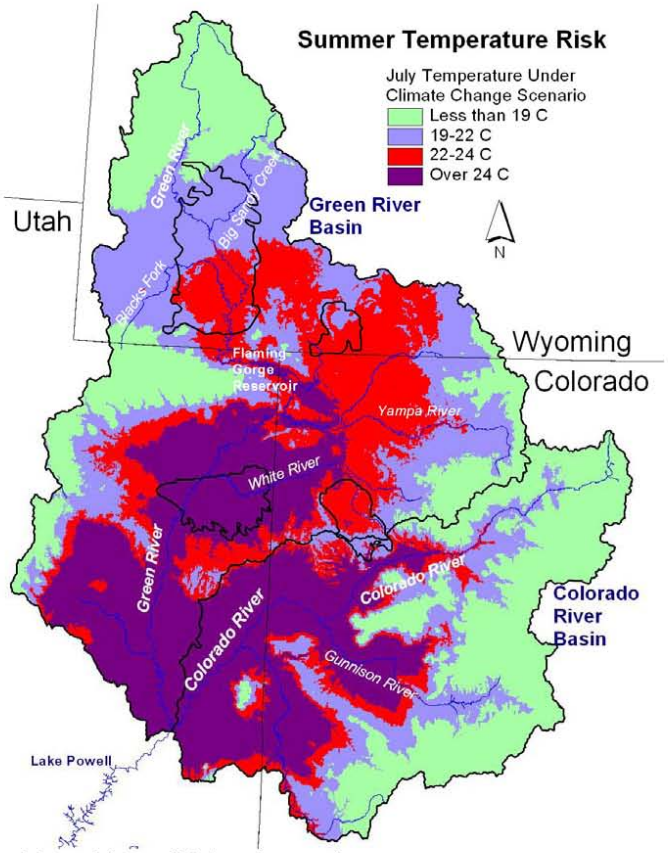

Figure 4. Risk to coldwater fish from increased summer temperatures.

The results of TU's analysis related to uncharacteristic winter flooding due to increased rain on snow events driven by the occurrence of mid-winter warm air masses associated with global warming are shown graphically on Figure 5. Depending on the antecedent snow pack and the intensity of the storm system, these events have the potential to significantly rearrange stream channels, particularly in degraded and altered watersheds. In addition to the local habitat affects of scouring and debris flows, these events also impact downstream water quality and reduce the amount of snow pack available for sustained spring and summer flows. The mid-elevation watersheds are the most vulnerable to these events and our analysis found that 45% of the Green and Upper Colorado basins are at moderate or high risk for winter flooding.

52787-031
(cont.)

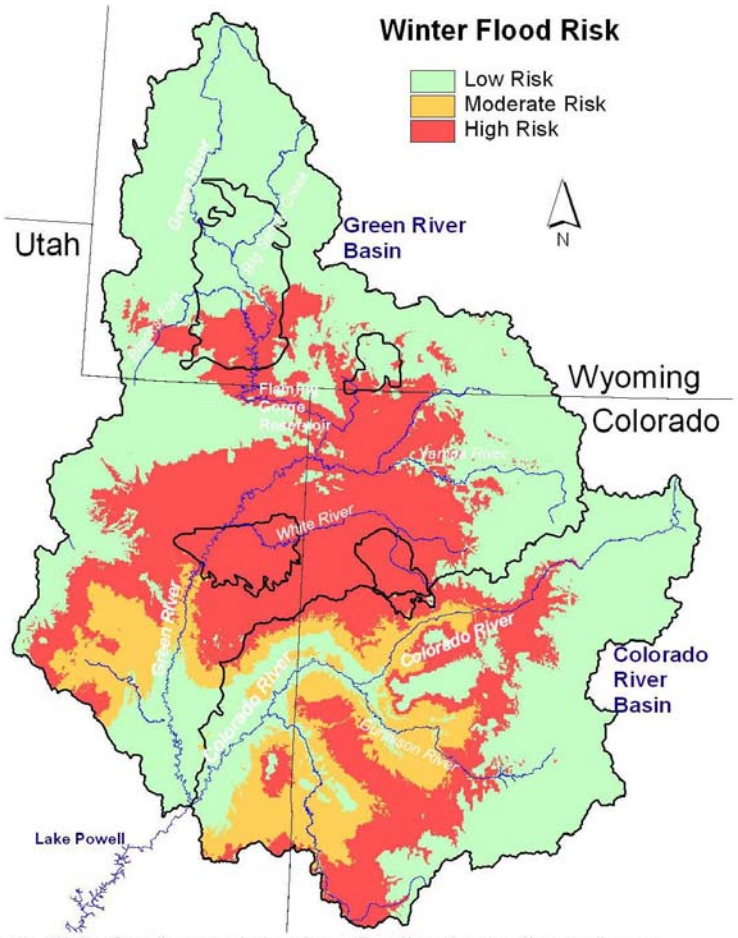

Figure 5. Risk of uncharacteristic winter flooding due to climate change.

The third climate change factor TU has analyzed is the risk of uncharacteristic wild fires. Wildfires can impact fish through direct mortality and habitat alteration from subsequent mass wasting events as well as thermal changes due to the loss of riparian vegetation. TU's analysis is based on the findings of Westerling et al. (2006), which study correlated the amount of area burned in a fire season with the timing of snowmelt and runoff for areas in the Rocky Mountain region. The study identified a mid-elevation zone (1680 – 2690 meters) in which earlier snowmelt led to a longer fire season with more fires starting earlier in the spring and burning later in the fall, thus leading to a greater total area burned than was typical for this region in

52787-032

the past. TU combined the results of the Westerling et al. study with data on fuel types across the basins and found that 40% of the area is at moderate or high risk for uncharacteristic wild fires (Figure 6).

52787-032 (cont.)

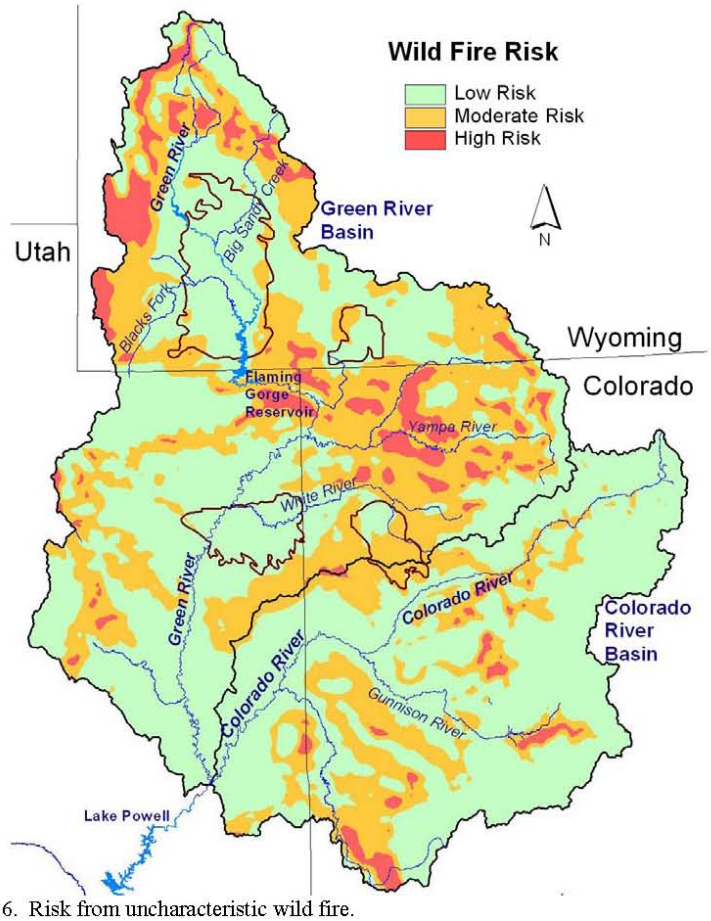

Figure 6. Risk from uncharacteristic wild fire.

In a recent publication by TU, 'Healing Troubled Waters' (Williams et al. 2007), TU argues for a pro-active, landscape approach to protecting, reconnecting, and restoring native and wild trout populations and their habitats so they can build resistance and resilience to the rapidly changing environmental conditions associated with global warming. A key part of this strategy is to reduce external stressors associated with degraded and fragmented habitats. Populations that are already pushed to their limits by water extraction, land use changes, barriers, and road

densities will not be able to withstand the additional stress brought on by a changing climate. Native and wild trout in the Green and Upper Colorado River basins have already been subjected to extensive physical habitat alterations as well as biological manipulation of populations through the introduction of non-native species. Additional stressors from commercial oil shale and tar sands development is counter to the maintenance of these watersheds as productive and viable fisheries, particularly in light of the environmental changes that have already begun due to global warming.

Until and unless the BLM has sufficiently analyzed the impacts of OSTS in light of reasonably foreseeable climate change consequences and can make a reasoned, well-supported decision regarding impacts to water resources, fisheries, and aquatic life from OSTS development in a warming climate, the agency should not select any alternative that amends existing RMPs to allow for OSTS leasing. TU urges the BLM to select Alternative A. 52787-031 (cont.)

VII. Conclusion

As discussed throughout these comments, too little information presently exists for the BLM to go forward with commercial leasing and development of OSTS resources. Although the proposed action under the PEIS is only to amend 12 RMPs to allow for the potential of commercial leasing, the BLM's proposal to do so is premature and not based on meaningful or reasonable analysis specific to the individual plans. If the BLM were to amend the RMPs as proposed, these public lands would be subject to individual project analyses that likely would not – and realistically could not – include a basin-wide impacts review. The resulting series of isolated decisions would have tremendous impacts to the environment, but would escape comprehensive review. 52787-033

Further, until additional progress is made on the RD&D projects, the true impacts of commercial OSTS development remain unknown. The BLM's selection of any alternative except a no-action alternative would be premature, arbitrary, capricious, and would amount to uninformed management of public lands. TU urges the BLM to adopt the no-action alternative and to decline to take further action on a commercial OSTS program until such time as sufficient information is available to make a reasoned decision. Thank you for the opportunity to comment on the PEIS. 52787-034

Sincerely,

Katherine E. Lynch
Rocky Mountain Energy Counsel

Responses for Document 52787

52787-001: The PEIS is in full compliance with the requirements of the NEPA. A programmatic EIS is an appropriate method to amend multiple land use plans. It provides a means of analyzing common proposed actions, or similar subject matter or implementation methods. As required by NEPA, the nature and scope of the PEIS (an allocation decision) determines the level of detail that is sufficient for the decision maker to make an informed decision. The PEIS takes a hard look at the environmental consequence of the allocation decision, but it notes that further NEPA analysis will be required to study the specific circumstances associated with a leasing or plan of development decisions. Therefore, it is not arbitrary or capricious for the BLM to analyze for consideration the alternatives in the PEIS, which would amend multiple RMPs.

52787-002: Water issues are some of the more complex and difficult identified in the PEIS and will be a major focus in future NEPA actions. The PEIS is only making land allocation decisions; leasing and development will require additional NEPA analysis.

52787-003: See response to Comment 52787-001. The prerequisite level of information necessary to make a reasoned choice among the alternatives is based on the scope and nature of the proposed action. An allocation decision is very limited in scope.

The BLM recognizes the merits of the oil shale RD&D program to provide information, not only about technologies but also about possible impacts to resources, to ensure that oil shale technologies operate at economically and environmentally acceptable levels. The BLM believes this effort will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. Data will be collected, as appropriate, to ensure that operations are in compliance with state and federal statutes and regulations.

If there is incomplete or unavailable information regarding any particular decision, the BLM will comply with CEQ regulations (40 CFR 1502.22) and make it clear that such information is lacking. If the incomplete information relevant to reasonably foreseeable significant adverse impacts is essential to a reasoned choice among alternatives and the overall costs of obtaining it are not exorbitant, the BLM will obtain the information. If overall costs of obtaining the information are exorbitant or the means to obtain it are not known, the BLM will provide the appropriate statements on the relevance of the information and a summary of any existing information.

52787-004: The BLM initiated a phased or staged approach to oil shale development. In the first step of a multi-step environmental impact assessment process, the PEIS is assessing RMP amendments to allow the BLM to consider applications for

leasing. This may be followed by the subsequent steps of assessment for leasing and plans of development. These later steps are too speculative at this point, however, to be reasonably analyzed and will require their own distinct decision-making process. The BLM believes this phased or staged approach ensures that a commercial oil shale development program meets the intent of Congress to make areas available for oil shale and tar sands development.

52787-005: Pursuant to Congress's mandate in Section 369 of the Energy Policy Act of 2005, the original intent of the PEIS was to amend 12 existing BLM land use plans to support commercial oil shale and tar sands leasing. As preparation of the PEIS proceeded, and in consultation with the 14 cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. To still be responsive to Congress's direction, the focus of the PEIS was changed to only identify public lands to be opened or closed to application for commercial oil shale and tar sands leasing.

Nevertheless, there is sufficient information at the programmatic level to make a reasoned choice among the alternatives when considering lands open or closed to consideration of commercial leasing. The PEIS analyzes the environmental consequences of this allocation decision in sufficient detail for the decision maker to choose which lands would be available for further consideration for leasing. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development nor do they create any development rights. When applications to lease are received and additional information becomes available, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

52787-006: The descriptions of the reports used to identify the most geologically prospective area are listed in footnote 2 on page 1-6 of the Draft PEIS. The descriptions are adequate for the purposes of establishing the boundary of the area considered in this PEIS. The legal description of potential lease boundaries will be identified in the future. Future lease purchasers will purchase at their own risk, but it is assumed that they will be prudent and assemble adequate information on which to base their lease bids.

The BLM rulemaking process is separate and apart from the drafting of the PEIS. The PEIS is analyzing the environmental consequences of an allocation decision; therefore, any comment concerning the regulatory process is outside the scope of the PEIS.

As a result of the maturity of the oil and gas industry, the BLM is usually able to include sufficient site-specific analysis in its NEPA documentation for

amendments to RMPs, so that an additional NEPA analysis is not required prior to issuing an oil an gas lease in conformance with the RMP. In contrast, the present experimental state of the oil shale and tar sands industries does not provide sufficient site-specific information to support the issuance of a lease.

The CEQ regulations (40 CFR 1502.1) require BLM to consider the "No Action Alternative" and other reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the nature of the proposal and facts in the case. CEQ also explains that there are two distinct interpretations of "no action" that must be considered, depending on the nature of the proposal being evaluated. "The first situation might involve an action such as updating a land management plan where ongoing programs initiated under existing legislation and regulations will continue, even as new plans are developed. In these cases 'no action' is 'no change' from current management direction or level of management intensity. To construct an alternative that is based on no management at all would be a useless academic exercise. Therefore, the 'no action' alternative may be thought of in terms of continuing with the present course of action until that action is changed." The "No-Leasing Alternative" in an RMP revision is actually an action alternative and should not be confused with the "No Action Alternative" for purposes of NEPA compliance.

This decision being analyzed in the PEIS does not authorize ground-disturbing activities and is not an irreversible or irretrievable commitment of resources.

52787-007: The CEQ regulations at 40 CFR 1502.22 require an agency to disclose whether there is "incomplete or unavailable information" and to acquire that information if it is "relevant to reasonably foreseeable significant adverse impacts" and is "essential to a reasoned choice among alternatives." The purpose of the provision is to advance decision making even in the absence of complete information regarding environmental effects. Agencies are required to comply with this provision when evaluating "reasonably foreseeable significant adverse effects."

The PEIS proposed action is to amend land use plans, thereby allowing certain lands to be considered for future leasing. The decision does nothing more than remove the administrative barrier to BLM considering any application for leasing. The amendment does not commit any resources or grant any lease rights. For that reason and coupled with the requirement for subsequent site-specific NEPA analysis prior to leasing and development, the BLM has determined there will be no impact on the environment, with the possible exception of socioeconomic impacts on property values, as a result of these allocation decisions and therefore does not trigger the 40 CFR 1502.22. As the basis for analysis, the PEIS uses information based on other types of mineral development with comparable surface-disturbing activities to disclose the potential adverse impact of oil shale and tar sands development. This type and level of information are sufficient to make a reasoned choice among the allocation alternatives. Therefore, the PEIS

need not assess the relevance of the missing information needed to make an oil shale leasing or development decision. The PEIS, however, does disclose the fact that new information, such as that being gathered on the RD&D leases, will be taken into consideration during subsequent NEPA analysis.

Also, see the response to Comment 52787-004 that describes the "staged" or "phased" approach that is expected to facilitate development of necessary additional information to support actual leasing and development activities.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands. This analysis will balance any conflicting uses, as required by FLPMA.

52787-008: With the passage of the Energy Policy Act of 2005, Congress declared it is the policy of the United States to consider "oil shale, tar sands, and other unconventional fuels are strategically important domestic resources that should be developed …." Congress also required the Secretary of the Interior to prepare a PEIS for oil shale and tar sands. The FLPMA, the Mineral Leasing Act, and the Energy Policy Act of 2005 authorize use of some BLM land for commercial oil shale leasing and development. The amendments to the RMPs will only close certain areas and will open other areas to consideration for future leasing of oil shale and tar sand. The Secretary of the Interior retains discretion over leasing decisions. The NEPA analysis for future leasing decisions will analyze resource use compatibilities and conflicts.

As explained in the document itself, this PEIS analyzes the environmental consequences of allocating certain lands for the possible commercial exploration and development of these resources. The allocation decisions to be made do not commit any resources or grant any lease rights. Therefore, in addition to the analysis of direct and indirect effects of these land allocation decisions, including consideration of alternative ways of making these decisions, the PEIS presents a cumulative impact assessment based on the nature and scope of this proposed action and on available nonspeculative information. Programmatic EISs such as this one are considered adequate without site-specific analysis when the federal action proposed, as here, does not involve a site-specific or critical decision. As explained in the document itself, as well as in responses to other comments (see, e.g., response to Comment 52837-018), prior to any commercial leasing, additional NEPA analysis will take place. Because it is still a matter of speculation as to whether leasing and development will ever take place, and because there will be additional environmental analysis prior to leasing, a

cumulative analysis associated with the effects of the land use allocation decision contemplated here need not analyze the impacts of leasing and development.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands.

The BLM is committed to preparing the appropriate level of analysis prior to the issuance of any oil shale or tar sands lease. Whether it is a statewide, regional, basinwide, or site-specific impact analysis is dependent on the scope of the action.

52787-009: As required by NEPA, the PEIS contains an analysis of the impacts of the proposed action, which is amending land use plans, an allocation decision. Under this allocation decision, there is no irreversible or irretrievable commitment of resources, and the decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Wyoming, Utah, or Colorado. The finding of the PEIS is that with the exception of the potential impact on property values, there is no impact associated with the proposed action. It will be necessary to conduct further site-specific NEPA analysis prior to making leasing decisions. When that additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, local communities, and the likely landscape level effects associated with the proposed action, all placed in the context of other reasonably foreseeable actions.

The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures that any commercial oil shale program meets the intent of Congress, is consistent with the requirements of NEPA and FLPMA, takes advantage of the best available information and practices to minimize impacts and offers opportunities for states, Tribes, local communities, and the public to be involved at each decision point. At future stages of environmental evaluation (i.e., leasing and/or plan of development), a landscape-level analysis will be performed if appropriate. This analysis would consider effects from reasonably foreseeable future actions, including other oil shale/tar sands leases/projects, oil and gas development, and other ongoing activities on both public and private lands.

Through this planning effort, the BLM is managing the public lands in compliance with FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public

lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . ." [FLPMA, Section 103(c) (43 U.S.C. §1702(c)).] The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

52787-010: The affected environment of the PEIS covers portions of three states and nine separate land use plans. It is important to note that the carrying capacity thresholds included in the WRFO RMP are unique to that plan. There are no comparable management prescriptions in the other eight land use plans. These thresholds are based on existing statutory requirements or site-specific analysis and are only applicable to oil shale. Prior to changing the proposed action to an allocation decision, the intent was to review and subsequently revise or remove the thresholds based on new information since 1989 when the thresholds were first established. However, after the purpose of the PEIS was changed from providing opportunities for commercial leasing to making only land use allocations, the revision or removal of the thresholds was no longer applicable. The PEIS does not modify or eliminate the carrying capacity thresholds for the protection of communities, the environment, and wildlife resources contained in the WRFO RMP. The statement that the WRFO RMP land use plan amendment would remove the thresholds as described on page C-9 of the Draft PEIS should have been deleted prior to the release of the draft. Any decisions concerning the application of thresholds will be made at the site-specific level, where detailed information relevant to that determination can be made and where interagency consultation can be accomplished.

The removal of the prohibition on oil shale leasing in the Piceance Dome area is included in the Final PEIS. Both oil and gas leasing are discretionary activities, and BLM has the current authority to determine how this area will be managed.

52787-011: As preparation of the PEIS proceeded, and in consultation with all the cooperating agencies, it was determined that to complete the analysis to support leasing decisions would have required making too many speculative assumptions, among them those regarding potential, unproven technologies. Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. Among the speculative assumptions would have been assumptions regarding the water requirements to support the technologies and the impact the technologies would have on surface water and groundwater resources. Since the

PEIS's allocation decision now would do nothing more than remove an administrative barrier preventing the BLM from accepting applications, subsequent NEPA analysis will be required prior to future leasing and any development activities. As required by NEPA, the BLM will prepare the appropriate level of NEPA analysis based on the nature and scope of subsequent leasing and development actions. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences.

52787-012: In the PEIS, the BLM analyzes the environmental consequences of proposed allocation decisions in sufficient detail for the decision maker to choose which lands would be available for further consideration for leasing. The proposed allocations do not authorize the immediate leasing of lands for commercial development nor do they create any development rights. The level of analysis described in the comment is more appropriate for future project-specific NEPA analyses at the leasing and plan of development stage.

To develop oil shale, it is possible that water could be transferred from agricultural use to the development. In the revised PEIS, the impacts of the transfer on water resources have been added. Specific impacts due to changes in water demands in different water users would be evaluated in the project-specific NEPA documents.

52787-013: Section 3.5.1.2 indicates "The assessment of GHG emissions and climate change is in its formative phase, and it is not yet possible to know with confidence the net impact on climate." In addition, the Final PEIS has been modified to include additional text regarding the lack of scientific tools designed to predict climate change on regional or local scales and the limitation this places on the ability to quantify potential future impacts. While global climate change may well have local effects on water resources and related fisheries, the ability to predict them at this time is minimal, and additional speculation regarding the impact of an undetermined amount of oil shale development utilizing unknown technologies on climate change is be beyond our current level of information. However, the PEIS would not approve any actions that will produce pollutants or greenhouse gases. Commercial leasing, which might produce those pollutants or gases, will not be approved until additional NEPA analysis is done that would assess, to the extent feasible, the impact of the leasing decision on this and many other resource concerns.

52787-014: This PEIS is a programmatic document that analyzes land use allocation decisions and provides an effective analytical foundation for subsequent project-specific NEPA documents. Decisions in the PEIS will not create any rights or commitments for future development of oil shale. The BLM is not committing to any level of development at this stage. Therefore, identifying specific water supplies, project locations, or water needs for oil shale development projects in the PEIS would be inappropriate.

52787-015: The impacts of transferring water from agricultural uses to oil shale development on water quality and stream flow have been added in the revised PEIS. The impacts may result from changes in locations for water use, potential buildup of water delivery systems, modification of return flows, evaporation, percolation, and surface runoff. Potential development of new storage facilities is not addressed because they may not be needed. The additional text can be found in Section 4.5.1.

It is undesirable to evaluate new appropriations from remaining allocable water as the evaluation would require making many speculative assumptions regarding future activities. Such an evaluation would be provided in subsequent project-specific NEPA documents that address commercial leasing of oil shale and/or tar sands. Potential impacts on threatened and endangered species and on the Endangered Fish Recovery Program would be analyzed in subsequent documents as well when more information on water requirements is available.

The social and economic impacts caused by transferring water from agricultural use to oil shale-related use are described in the Socioeconomics Section, 4.11.

52787-016: Internal inconsistencies in stated water demands have been addressed. This PEIS supports land allocations for future oil shale development but does not support leasing for such development. Engineering calculations of the types mentioned in your comment will be required at a project-specific level when applications for oil shale leases are received. Such calculations will be part of a full project-specific NEPA analysis that must be completed before any leasing decision is made. Responses for individual items:

a. The text in Section 6.1.5.3.3 has been modified to acknowledge the water needs resulting from regional population growth, potential water exports, and instream flow water rights for protecting endangered species.

b. Same as a.

c. The text stating that the production level for the modeled tar sands facility is 100,000 bbl/day was in error and has been deleted; the modeled production level was actually 20,000 bbl/day.

d. The estimated water use for in situ oil shale development presented in Tables 6.1.5–6.1.5-10 and 6.2.5-7 include an estimate of 13,000 ac-ft/yr for power production. This estimate is based on the best information available at this preliminary stage of development. The water requirements associated with a power plant could change drastically depending on the type of technology (coal-fired, nuclear, hydro); the amount and type of power that will be used for oil shale and tar sands development are not known at this time. The water use values for oil shale development have also been revised from those presented in the draft to correct an error in the assumed value of gallons per barrel.

e. The reference for water use by coal-fired power plants is from a proposal for a coal-fired power plant on BLM lands. Water use for power generation is technology-specific. This variable would be revisited in future site- and project-specific environmental analyses as appropriate.

f. The section and table references in the footnotes have been corrected.

g. The annual water use for coal mining has been corrected.

52787-017: The BLM is committed to preparing the appropriate level of analysis prior to the issuance of any oil shale or tar sands lease, including the appropriate level of cumulative effects analysis. The level of analysis for a defined leasing program would be based upon the number of applications received, the location(s) referenced in the application(s), and the type and size of operations proposed by the applicant(s). This impact analysis level could be statewide, regional, basinwide, or site-specific. With a more focused scope at the leasing decision stage, the consequences and implications (direct, indirect, and cumulative), water resources and water demand, and other resources can be better defined. This will result in a more informed leasing decision, as well as aid in the development of potential mitigation measures to minimize or eliminate any adverse impacts.

When commercially viable technologies are identified and better understood, the BLM will be better able to analyze impacts of leasing decisions. The scale of the leasing will be subject to the Secretary's discretion to offer leases for sale and the industry's interest in bidding for tracts. The exercise of this discretion, and the level of interest expressed by industry, will be informed by the increased amount of information regarding technologies and effects.

52787-018: Consideration was given to whether specific information was lacking on the effects of oil shale and tar sands leasing and development relevant to making an allocation decision. By using comparable data, as a result of BLM's experience with surface-disturbing activities from other types of mineral development, BLM determined that sufficient information on the nature of the effects for an allocation decision was known, but not the extent of the effect necessary to make a leasing decision. Therefore, BLM decided to limit the scope of the PEIS to an allocation decision and to provide an analysis of potential impacts associated with oil shale and tar sands development in Chapters 4, 5, and 6 in order to disclose the potential impacts from leasing and development.

The BLM also concluded that subsequent NEPA analysis at the leasing stage will be required to determine the extent of the effect of oil shale and tar sands development when more specific information is known about the technology and associated environmental consequences. The BLM is committed to doing the appropriate level of analysis at the leasing stage, including a cumulative analysis covering the appropriate geologic extent of the direct and indirect impacts or other induced effects on the water quality of the area.

52787-019: This PEIS is a programmatic-level document that analyzes land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and they provide an effective analytical foundation for subsequent project-specific NEPA documents.

At the project level, technologies used in oil shale or tar sands development would be defined. The locations of project sites and their local geologic and hydrogeologic conditions would be known. Impacts on the surface water and groundwater resources could be more reliably evaluated; the results would be documented in the project-specific NEPA documents.

52787-020: Impacts of alterations in river water quality on endangered species are discussed in Section 4.8.1.4 of the PEIS. This section has been revised to include more discussion of direct and indirect effects on endangered species.

52787-021: As is suggested by the comment, a variety of aspects of oil shale and tar sands processing can result in the generation of wastewaters. At this point in time, detailed predictions of the amounts and types of wastewaters that will be generated are not possible. However, the PEIS discusses the general quality of these leachates and wastewaters in Sections 4.5.1.3 and 5.5.1.3, stating that they may contain elevated levels of metals, hydrocarbons, and salts. Sections 4.5.3 and 5.5.3 provide some potential mitigation measures, although not all inclusive, that the BLM could consider if warranted, by the lease-stage or plan of operations-stage NEPA analyses. The experiences of the ongoing RD&D efforts will also provide some preliminary insights. Any applicant for commercial development will be required to provide a detailed plan of development that includes estimates of the volumes and characteristics of leachates and wastewaters that will be produced, as well as detailed management strategies. Necessary permits for storage, treatment, or disposal of wastes will also be required to be secured by the applicant.

52787-022: Selenium and salinity loadings in streams are important and part of the water quality issues in the oil shale and tar sands areas. This PEIS describes various activities in oil shale and/or tar sands development that could degrade surface water quality (including salinity and selenium) and possible mitigation measures. Because the magnitudes of the salinity and selenium impacts are site- and project-specific, their evaluation would be provided in subsequent project-specific NEPA documents.

52787-023: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of

land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52787-024: Text has been added to Sections 4.8.1.1 and 5.8.1.1 identifying the potential for impacts to fishing opportunities in nearby reservoirs if water storage is altered by oil shale development or if populations of targeted species are reduced due to effects on water quality or quantity. Because the number and specific characteristics of potential projects are not known at this time, the PEIS evaluates potential impacts from these and other factors in a relatively generic fashion appropriate for a programmatic EIS and sufficient to make decisions regarding land use allocations. In addition to the discussion of the types of impacts that would be common to all the oil shale alternatives (Section 4.8.1.1), the level of impacts associated with oil shale alternative A are discussed in Section 6.1.1.7.1; those associated with Alternative B are discussed in Section 6.1.2.7.1; and those associated with Alternative C are discussed in Section 6.1.3.7.1.

52787-025: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on migratory or other wildlife species.

The PEIS cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS. Cumulative impacts to aquatic resources are discussed qualitatively in Sections 6.1.5.3.7 and 6.2.5.3.7 of the PEIS. At this time, it is not possible to provide a quantitative evaluation of cumulative effects as requested in the comment because there are many uncertainties regarding the amount of development that is reasonably foreseeable, the types of technologies that might be deployed, and the locations of potential projects. These details would be needed to perform the type of analysis requested in the comment. Cumulative impacts will be evaluated in greater detail in project-specific NEPA assessments and consultations conducted prior to leasing and development. These cumulative impact analyses will take into consideration other reasonably foreseeable oil shale and tar sands developments.

52787-026: The text in Section 4.8.1.1 and 5.8.1.1 has been modified to clarify that effects of changes in water quality and quantity from oil shale and tar sands development activities have a potential to extend downstream beyond the areas open for oil shale or tar sands development under each of the alternatives.

52787-027: Text has been added to Section 3.7.1 to identify that the Colorado River cutthroat trout is managed under an interagency conservation agreement, and references to the conservation agreement have been added. Appendix F of the PEIS identifies conservation measures that would be applied to listed and sensitive species, including Colorado River cutthroat trout.

52787-028: Additional information pertaining to the occurrence and distribution of fish species (especially sensitive native fish species) within the Green River Oil Shale Basin has been added to Sections 3.7.1 and 3.7.1.1.1 of the PEIS, including information about roundtail chub, bluehead sucker, and flannelmouth sucker.

The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and they provide an effective analytical foundation for subsequent project-specific NEPA documents. With the noted additions, there is currently sufficient information pertaining to the occurrence of aquatic resources in the oil shale basins on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to evaluate specific occurrences of species of concern, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be

anticipated. This specific analysis, if fish and other aquatic species of concern are present, may include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts on sensitive resources.

52787-029: As discussed previously, a new NEPA analysis will be performed at the lease sale stage. This analysis will cover any new information or circumstances relevant to the technology, the affected environment, and any associated environmental consequences. As required by NEPA, all subsequent analysis will analyze the cumulative effects of the proposed action over the appropriate geographic extent of the analysis and will be bounded only by locations where fisheries and aquatic life do not experience a direct or indirect impact as a result of the proposed action. Based on the nature and scope of the proposed action, the analysis could cover a statewide, regional, basinwide, or site-specific area.

52787-030: The potential for poorly designed stream crossings associated with roads, culverts, and other structures placed in aquatic habitats to affect the ability of populations of aquatic organisms to move upstream and downstream is described in Sections 4.8.1.1 and 5.8.1.1. Text has been added to Sections 6.1.5.3.7 and 6.2.5.3.7 to identify that existing development activities (e.g., oil and gas development and roadway construction) already contribute to fragmentation of aquatic habitats and that future development, including the potential addition of oil shale or tar sands development, would likely contribute further to such habitat fragmentation.

However, this PEIS is a programmatic-level document that analyzes land use allocation decisions and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on aquatic resources. The BLM believes there currently is sufficient information at the programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing.

As described in the proposed action in the PEIS, the BLM is committed to performing NEPA analyses prior to leasing and development. However, until the scope of the potential leasing and/or development is known, we cannot commit to the scope of the NEPA analysis (regional, planning area, or local) that will be required. The proposed action will drive what analysis must be done to comply with the requirements of NEPA.

52787-031: Please see the response to 52787-013.

52787-032: We agree that wildfires can affect the water quality in aquatic habitats located downstream of burned areas. However, the potential change in wildfire frequency due to climate change remains speculative, and the contribution of currently unknown levels of oil shale and tar sands development to climate change is speculative as well. As stated in Section 3.5.1.2 of the PEIS, “The assessment of

GHG emissions and climate change is in its formative phase, and it is not yet possible to know with confidence the net impact on climate." In addition, the Final PEIS has been modified to include the following text: "The lack of scientific tools designed to predict climate change on regional or local scales limits the ability to quantify potential future impacts. However, potential impacts to air quality due to climate change are likely to be varied. For example, if global climate change results in a warmer and drier climate, increased particulate matter impacts could occur due to increased wind blown dust from drier and less stable soils. Cool season plant species' spatial ranges are predicted to move north and to higher elevations, and extinction of endemic threatened/endangered plants may be accelerated. Due to loss of habitat, or due to competition from other species whose ranges may shift northward, the population of some animal species may be reduced. Less snow at lower elevations would be likely to impact the timing and quantity of snowmelt, which, in turn, could impact aquatic species."

In this PEIS, the BLM does not authorize any action that would have a direct, indirect, or cumulative impact on aquatic resources. Subsequent project- or site-specific NEPA documents will be prepared to evaluate specific occurrences of species of concern, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

52787-033: As articulated in the responses to Comments 52787-003 and -018, the BLM has determined that the PEIS contains adequate information to support the proposed land allocation decisions. Additionally, the BLM believes that an analysis of cumulative effects can be accomplished at whatever level is deemed necessary at the leasing stage.

52787-034: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52788.

Comment Date: March 19, 2008 18:26:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD52788

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

No Action!!!

52788-001

Response for Document 52788

52788-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52789.

Comment Date: March 19, 2008 18:59:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52789

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment: March 19 2008 PEIS.doc

Comment Submitted:

See Attachment.

I have read through the three volumes of the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS).

I attended the December 2005 "Open House" briefings in Price Utah which were general in nature and the February 26, 2008 "Open House" which provided more details, but still did not provide mapping to show existing roads in the San Rafael Swell or details of the terrain to be affected by potential leasing development.

Although I live near the San Rafael Swell, I was not able to field check the locations identified on Figure 2.4.3-1, "Lands Proposed To Be Available under Alternative B for Application for Leasing for Commercial Tar Sands Development within the STSA's in Utah," due to heavy snow accumulation that made the Special Tar Sands Area (STSA) inaccessible during the 90 day comment period. 52789-001

The driving force behind this PEIS is the 2005 Energy Policy Act, which requires that the BLM take some action on leasing tar sands. The PEIS states that there has been no interest by industry and that there is no technology available for extraction. There is no demand for leasing. During the February 2008 "Open House," the BLM and Argonne National Laboratory representatives confirmed these facts.

I am concerned about what opening the San Rafael to tar sands development will do to the visibility and air quality and noise levels in the country. What organic solvents will be used in the refining process? How will the refining process contribute to ozone and particulate pollution in the area? Section 3.8.3.7 of the PEIS is correct in concluding that San Rafael contains outstanding scenic qualities. On a normal day, the visibility in the San Rafael is about 100 miles; you can see the twists and turns of the Reef from the Wedge overlook and you can see the snow covered La Sal mountains off in the distance. The sky is a robins egg blue, without a cloud, without any haze. The night sky is filled with constellations. Section 5.9.1 concludes that in large part, visual impacts associated with tar sands projects can not be effectively mitigated. 52789-002

Statements made in Section 5.6.2 suggest that because the BLM must comply with all applicable air quality laws, it is unlikely that future tar sands leasing and development would cause significant adverse air quality impacts. This statement can not be accurate. Each new facility generates pollution which is regulated but not eliminated. When was the last time that an ozone evaluation was done for the Carbon/Emery County area to ascertain whether or not the air quality is degrading? 52789-003

On most days, there is absolute quiet, even along the Buckhorn Wash road of the San Rafael. Section 5.7 states that the characteristics of the area around a noise source influence the impacts caused by the source. The sheer cliffs of the San Rafael may serve to amplify blast noise and operational noise. Sec. 5.7 states that an increase from background noise levels in rural communities of 40 dBA during the day and 30 dBA at 52789-004

night to 55 dBA would be "noticeable and annoying to both people and wildife." Section 5.8.1.3.3 describes a threshold effect sound level of 47 dBA for all species of animals at which level reduction in habitat quality affects population density. 52789-004 (cont.)

I am also concerned that the San Rafael desert is too fragile for tar sands development. The San Rafael tar sands are under deep cover, with steep slopes and erosive soils. Saline and sodic soils along with limited precipitation (approximately six inches annually) are harsh conditions for reclamation. Section 5.8.2.2 describes mitigation of plant communities and habitats by seeding and revegetating using applicable BLM requirements and native plant species. A "reclaimed" gypsum mine along the Wedge Overlook road illustrates the difficulty in getting seeds to germinate and grow. 52789-005

The BLM has recommended Alternative B as the preferred alternative to protect the outstanding scenic qualities of the San Rafael and the harsh desert environment. Even Alternative C that allows leasing of 54,492 acres in the San Rafael (Table 2.4.3-2) would not protect the viewsheds along the I-70 corridor and from Mexican Mountain Wilderness Area and Sids Mountain Wilderness Area. I think that Alternative A (Section 2.4.2) should be the preferred alternative for the San Rafael and the Price Resource Management Plan. 52789-006

Thank you for this opportunity to comment.

Responses for Document 52789

52789-001: Thank you for your comment and for attending the Open House sessions. The BLM did extend the comment period for the Draft PEIS for an additional period from March 20 until April 21, 2008.

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. The limited action of amending the RMPs does not necessarily approve project development in or near the San Rafael Swell. Prior to a decision on development on BLM-administered lands in the San Rafael Swell area, project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct and indirect effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

52789-002: The solvents that have been historically used to process tar sands are addressed throughout Appendix B (see Section B.5.3). Importantly, the experiences discussed occurred on tar sand deposits outside the United States and differences in the inherent character of United States tar sand deposits may dictate different technological approaches. To date, BLM has received no applications for leases for development of tar sands, so it is unknown what solvents might be proposed for development of United States tar sand deposits. Visibility issues in the San Rafael area will be addressed as part of site-specific NEPA evaluation should development be proposed there. The current PEIS contains a discussion of the potential impacts of dust and emissions impacts from potential development in the STSAs in Section 5.9.1.

52789-003: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of

commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans.

52789-004: The text in Sections 4.7 and 5.7 has been revised to reflect the comment.

52789-005: The difficulties associated with the restoration of native plant communities in arid regions are acknowledged and discussed in Section 5.8.1.2.

52789-006: The BLM acknowledges the commentor’s preference for Alternative A.

Thank you for your comment, Charles Kerr.

The comment tracking number that has been assigned to your comment is OSTSD52790.

Comment Date: March 19, 2008 19:40:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52790

First Name: Charles
Middle Initial:
Last Name: Kerr
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Thank you for this opportunity to comment. After studying the Draft PEIS, I am surprised by the lack of support in the draft for the Preferred Alternative B. While the draft is a valuable compendium of critically important information, it consistently notes the speculative nature of its analysis due to a lack of specific information regarding oil shale technologies. Until industry has developed an economically viable method that is environmentally sustainable for extracting the oil, it is unreasonable and unwise to begin commercial oil shale leasing. I, therefore, urge the BLM to support Alternative A, the No Action, No Land Use Plans Amended Alternative. 52790-001 52790-002

BLM's current RD&D program needs time to succeed before the BLM enters into commercial leasing. The RD&D program is an excellent first step and as the draft makes clear, no one at this time knows how or when commercial oil shale production will occur. To enter into commercial leasing or even commercial rule making at this time is premature. 52790-001 (cont.)

Response for Document 52790

52790-001: The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on non-federal lands.

52790-002: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, David Holt.

The comment tracking number that has been assigned to your comment is OSTSD52791.

Comment Date: March 19, 2008 19:49:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD52791

First Name: David
Middle Initial:
Last Name: Holt
Organization: Consumer Energy Alliance
Address: 2211 Norfolk
Address 2: Suite 614
Address 3:
City: Houston
State: TX
Zip: 77098
Country: USA
Email: dholt@consumerenergyalliance.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Consumer Energy Alliance (CEA) is pleased to submit the following comments expressing our strong support for the development of our national oil shale and tar sands resources, including the leasing in Utah, Colorado and Wyoming as proposed by the Bureau of Land Management (BLM) in its Draft Oil Shale and Tar Sands Programmatic EIS (PEIS). From the options given, it appears that Alternative B of the PEIS will allow for an active oil shale program that can be conducted in an environmentally responsible manner. CEA is a non-partisan organization formed to support the thoughtful utilization and development of all domestic energy resources to help ensure domestic energy security and reduce prices for consumers. Our mission is to help improve consumer understanding of our nation's energy security, including the need to reduce reliance on imported oil and natural gas, maintain reasonable energy prices for consumers, properly balance our energy needs with environmental and conservation goals, and continue efforts to diversify our energy resources. 52791-001

Given today's rising energy prices and increased reliance on imports, the consuming public keeps paying more than we can afford to power our vehicles and run our homes. United States citizens need secure domestically-produced oil to ensure our future energy security and maintain reasonable energy prices.

According to government estimates, oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil. No nation has more oil shale resources than the United States. Present U.S. demand for petroleum products is approximately 20 million barrels per day. If we used oil shale to meet a quarter of that demand, these resources would last more than 400 years. The portions of Utah, Colorado and Wyoming included in the BLM leasing contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil.

Further, production of domestic unconventional fuels will positively impact our national energy security. For example:

• In spite of significant conservation efforts, world energy demand is projected to increase by 50% during the next 20 years and could double in 50 years. • Business and industry struggle with rising energy prices. The airline industry, for example, paid $9.6 billion more for energy in 2005 than previous years. • The United States military currently uses approximately 500,000 barrels of oil daily – over 75% of which is imported. According to the Department of Defense, such reliance on imported oil constitutes a national security threat to the U.S. With today's technology, this proposed development can be conducted while taking the necessary mitigation measures to address potential environmental impacts. Moreover, development of these unconventional fuels will produce a strong workforce and have a positive impact on the local and regional economies of Utah, Colorado and Wyoming. We believe that the BLM will be able to develop these vital national energy resources while protecting other resources found on these lands and minimizing the impacts on local communities. In particular, Alternative B successfully promotes energy production by balancing a robust and active oil shale program with comprehensive environmental protections. CEA is committed to working cooperatively with the Bureau of Land Management, affected stakeholders and consumers to ensure U.S. energy policy accurately reflects our growing need to enhance U.S. energy security, properly protect our environment, expand our domestic resource base and work toward the thoughtful, utilization of all domestic energy resources.

52791-001 (cont.)

If you have any questions, or if CEA can provide additional information, please feel free to contact me directly at 713-524-2622.

Very sincerely yours, David E. Holt Executive Director

Response for Document 52791

52791-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52793.

Comment Date: March 19, 2008 20:13:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD52793

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Foreign energy dependence must end - oil shale can help

March 19, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We are strongly in favor of an alternate and renewable energy future, but it is obvious that our country's reliance on traditional liquid fuels (oil and gas) will remain and grow into the foreseeable future. We need to develop all of the energy resources at our disposal, including oil shale and tar sands.

Oil shale is an energy resource that is both vast and able to be utilized with minimal disturbance to American citizens. Over 70% of the land in which the rich oil shale resources lie (exceeding a trillion barrels of oil) is owned by the federal government. The benefits far exceed the disadvantages when it comes to oil shale development, and thus the time to act is now to develop oil shale and establish American energy independence. 52793-001

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence.

Sincerely,

Response for Document 52793

52793-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52794.

Comment Date: March 19, 2008 20:40:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52794

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

With global demand for energy on the rise, it is vital that the U.S. government allow thoughtful and appropriate use of our nation's natural energy resources, such as oil shale and tar sands, in order to reduce our reliance on foreign energy imports. The Draft Programmatic EIS (PEIS) proposed by the Bureau of Land Management (BLM) offers a plan for exploration and development of these unconventional fuels in an environmentally-conscious manner. Development of these resources will offer significant benefits to local, state and national economies and will strengthen national energy security. Government estimates conclude that portions of Colorado, Utah, and Wyoming, contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil. Development of these resources would help meet our nation's growing energy needs and relieve the high cost of energy for consumers. I support the BLM's PEIS proposing the exploration and development of our nation's oil shale and tar sands resources.

52794-001

Response for Document 52794

52794-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52795.

Comment Date: March 19, 2008 20:41:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52795

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I support the expansion of exploring the oil shale and tar sands | 52795-001

Response for Document 52795

52795-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, TJ Radtke.

The comment tracking number that has been assigned to your comment is OSTSD52796.

Comment Date: March 19, 2008 20:42:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD52796

First Name: TJ
Middle Initial:
Last Name: Radtke
Organization:
Address: 1282 Auburn Grove Lane
Address 2:
Address 3:
City: Reston
State: VA
Zip: 20194
Country: USA
Email: tj@newcommander.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

With global demand for energy on the rise, it is vital that the U.S. government allow thoughtful and appropriate use of our nation's natural energy resources, such as oil shale and tar sands, in order to reduce our reliance on foreign energy imports. The Draft Programmatic EIS (PEIS) proposed by the Bureau of Land Management (BLM) offers a plan for exploration and development of these unconventional fuels in an environmentally-conscious manner. Development of these resources will offer significant benefits to local, state and national economies and will strengthen national energy security. Government estimates conclude that portions of Colorado, Utah, and Wyoming, contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil. Development of these resources would help meet our nation's growing energy needs and relieve the high cost of energy for consumers. I support the BLM's PEIS proposing the exploration and development of our nation's oil shale and tar sands resources.

52796-001

Response for Document 52796

52796-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52797.

Comment Date: March 19, 2008 20:43:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52797

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Dear Sherri. Thompson: With global demand for energy on the rise, it is vital that the U.S. government allow thoughtful and appropriate use of our nation's natural energy resources, such as oil shale and tar sands, in order to reduce our reliance on foreign energy imports. The Draft Programmatic EIS (PEIS) proposed by the Bureau of Land Management (BLM) offers a plan for exploration and development of these unconventional fuels in an environmentally-conscious manner. Development of these resources will offer significant benefits to local, state and national economies and will strengthen national energy security. Government estimates conclude that portions of Colorado, Utah, and Wyoming, contain at least 800 billion barrels of recoverable oil from oil shale and 12 to 19 billion barrels of tar sands oil. Development of these resources would help meet our nation's growing energy needs and relieve the high cost of energy for consumers. I support the BLM's PEIS proposing the exploration and development of our nation's oil shale and tar sands resources

52797-001

Response for Document 52797

52797-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52798.

Comment Date: March 19, 2008 20:44:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD52798

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I support the development of our nation's oil shale and tar sands resources as outlined in the Draft Programmatic EIS proposed by the Bureau of Land Management. Consumers and businesses can no longer afford the high cost of energy, and our nation's dependence on foreign sources of oil is a threat to domestic security. We must allow access to energy sources, such as oil shale and tar sands, found here in the United States. The government estimates that the Green River Formation, which covers portions of Colorado, Utah, and Wyoming, contains at least 800 billion barrels of recoverable oil from oil shale. Present U.S. demand for petroleum products is about 20 million barrels per day. If we used oil shale to meet a quarter of that demand, these resources would last for more than 400 years. Development of these resources and access to the 12 to 19 billion barrels of tar sands oil located in Eastern Utah would help meet our nation's growing energy needs and relieve the high cost of energy for consumers. Access to oil shale and tar sands from these leasing areas will offer significant benefits to the local, state and national economies and will strengthen national energy security. I support environmentally-conscious access to these important energy sources

52798-001

Response for Document 52798

52798-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52799.

Comment Date: March 19, 2008 21:12:08PM
Oil Shale and Tar Sands
Comment ID: OSTSD52799

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

There are new technologies emerging that:

1. DO NOT USE WATER. 2. HAVE FAR LOWER EMISSIONS. 3. RECLAIM THE SURFACE DISTURBANCE. 4. WILL NOT IMPACT WILDLIFE. 5. CAN RECOVER OIL ECONOMICALLY

The BLM should take the cliche and old concerns of "too much water", "Black Sunday", "popcorn effect", "tailings", "emissions", and "community infrastructure" and recognize the source of such self perpetuating fears. They are old and outdated and do not reflect responsible new efforts to provide environmental extraction.

The Canadians are now proving that mitigating environmental impact is possible in their oil sands industry. For all the time wasting in America and getting around to making these minerals available, our oil prices are skyrocketing. Canada has been laughing at us for quite some time. It is an embarrasment that we have oil sands and yet no access to these minerals. Nevermind the fact that Utah imports 35% of its oil from Canada OIL SANDS!!!!!!!!!!!!!!!!! 52799-001

Lets get a dose of reality here. OPEN UP OUR AMERICAN MINERAL RESOURCES!!!!!!!!!!

LET THE "FREE MARKET" BACK INTO AMERICA'S FREE COUNTRY.

ETHANOL AND ELECTRIC VEHICLES CANNOT SUSTAIN US.

OBSTRUCTIONISTS OF OIL SHALE WILL GO DOWN IN HISTORY AS THE ROOT OF OUR ENERGY / ECONOMIC COLLAPSE. WE CANNOT ALLOW THIS.

OPEN UP THESE LANDS NOW.

please.

Response for Document 52799

52799-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Roger Peirce.

The comment tracking number that has been assigned to your comment is OSTSD52800.

Comment Date: March 19, 2008 21:20:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD52800

First Name: Roger
Middle Initial: j
Last Name: Peirce
Organization:
Address: 1127 Eagle Way
Address 2:
Address 3:
City: Lyons
State: CO
Zip: 805408450
Country: USA
Email: speirce@prodigy.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil shale production is among the dirtiest and most environmentally degrading land uses that the West has ever seen. It involves either massive strip mining or bulldozing the entire landscape where extraction occurs. It requires huge amounts of electricity to wring petroleum products from the rock, which will likely mean major increases in polluting coal-fired power plants, with heavy impacts to global warming. 52800-001

In addition, BLM predicts that full-scale oil shale operations would use up 2 to 15 percent of the flow of the Colorado River system, a waterway that is already badly overused. Left behind is slag that leaches heavy metals and other toxic compounds into surface and groundwater supplies. 52800-002

The BLM is proposing to sell the rights to dig for oil shale on millions of acres of public land without adequately considering impacts to sensitive wildlife and treasured landscapes. 52800-003

At risk are key habitats for sage grouse and desert elk as well as spectacular places like the Adobe Town and the Kinney Rim proposed wilderness areas in the Red Desert. 52800-004

I am against the destruction of western public lands in the name of oil shale!

A full-scale commitment to oil shale production should wait until after the oil industry proves that oil shale can be produced without unacceptable impacts to our lands, waters, and air quality. Adopt the No Action alternative and do not move forward with commercial-scale oil shale leasing until results from the experimental Research and Development oil shale pilot projects become available. 52800-003 (cont.)

Responses for Document 52800

52800-001: Thank you for your comment.

52800-002: The PEIS is a programmatic-level document that analyzes allocation decisions. The statements provide an effective analytical foundation for subsequent project-specific NEPA documents.

The amount of water needed for oil shale and tar sands development depends on many factors, including scale of development, technologies used in the development, national agricultural economy, and the locations and hydrologic conditions of project sites. The BLM is not currently committing to development in this PEIS. At this early stage, the amount of water that would be needed is still not clear. The water needs would be more appropriately evaluated at the leasing- and project-specific stages of development when many currently unknown factors would be better defined. The results would be presented in project-specific NEPA documents.

The area for spent shale disposal eventually would be reclaimed to reduce erosion and infiltration. Specific activities would be specified in project development plans if the policy of oil sand and/or tar sands development is adopted. The impacts on the water resources would be analyzed and reported in subsequent NEPA documents.

52800-003: The BLM acknowledges the commentor's preference for Alternative A.

52800-004: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Thus, land use allocation would not result in impacts to key wildlife habitats or wilderness areas. The impact analyses provided in the PEIS qualitatively indicates the types of impacts that could occur to these resources based on the BLM's experience with other types of mineral development.

Quantitative analyses of potential impacts to wildlife and wilderness areas would be conducted for specific projects. Policies and BMPs that would be implemented at the project-specific level are expected to avoid impacts to key wildlife habitats and wilderness areas or, where not possible, minimize and mitigate impacts to the extent practicable. The need for mitigation measures would be determined on a project-by-project basis in conjunction with input from federal, state, and local agencies and interested stakeholders.

Thank you for your comment, Stephen Cole.

The comment tracking number that has been assigned to your comment is OSTSD52801.

Comment Date: March 19, 2008 21:29:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD52801

First Name: Stephen
Middle Initial: R
Last Name: Cole
Organization:
Address: 5833 Lupine Ave
Address 2:
Address 3:
City: Twentynine Palms
State: CA
Zip: 922771461
Country: USA
Email: geo.w.hayduke@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment: Oil Shale and Tar Sands Draft Programmatic EIS.doc

Comment Submitted:

I strongly oppose Alternative B, the "Preferred Alternative" and support Alternative A, the "No Action" alternative in the PEIS. | 52801-001

See attachment for complete comments.

Thank you, Stephen R. Cole 5833 Lupine Ave Twentynine Palms, CA 92277-1461See Attachment.

Sherry Thompson, Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Dear Ms. Thompson,

I am writing to comment on the Bureau of Land Management's Oil Shale and Tar Sands Draft Programmatic EIS. I strongly oppose Alternative B, the "Preferred Alternative" and support Alternative A, the "No Action" alternative in the PEIS.

The BLM's "Preferred Alternative" B is almost certain to cause massive, irreversible damage to large areas of Utah, Colorado, and Wyoming. Excavation of tar sands resources is known to have been environmentally devastating in Canada and there is no reason to believe that the result will be any different in this case. Furthermore, it seems unconscionable to me that the BLM would sacrifice millions of acres of public land to help increase the profits of the major oil companies. 52801-002

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale and tar sands development will displace every other public use of public land to benefit a few private companies. This plan could seal the fate of more than one million acres of some of the best hunting, fishing and recreation areas in Colorado, Utah, and Wyoming. Over the past 17 years I have been visiting many of these areas including the Circle Cliffs in Grand Staircase-Escalante National Monument, the Orange Cliffs Unit of Glen Canyon National Recreation Area, the Maze District of Canyonlands National Park, the San Rafael Swell, the Book Cliffs and numerous other nearby areas. If this development of oil shale and tar sands is allowed to proceed in these areas then I would not likely visit them again. They would essentially be ruined for recreation purposes for the duration of my lifetime. 52801-003

I urge the BLM to choose the "No Action" alternative A, and to halt efforts to develop oil shale and tar sands on public lands. Thank you for the opportunity to comment on the Oil Shale and Tar Sands Draft Programmatic EIS.

Sincerely,

Stephen R. Cole

5833 Lupine Ave

Twentynine Palms, CA 92277

Responses for Document 52801

52801-001: The BLM acknowledges the commentor's preference for Alternative A.

52801-002: Oil shale has a tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated in the Energy Policy Act of 2005 that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

In consultation with our cooperating agencies, the scope of the PEIS was changed from a leasing decision to an allocation decision. The PEIS's analysis provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

52801-003: The BLM is managing the public lands in compliance with the Federal Land Policy Management Act principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public lands through its land use planning process to achieve a balance among variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be accommodated on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

Thank you for your comment, Brad Klafehn.

The comment tracking number that has been assigned to your comment is OSTSD52803.

Comment Date: March 19, 2008 21:41:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52803

First Name: Brad
Middle Initial:
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Organization:
Address: 2725 S. Utica St.
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Address 3:
City: Denver
State: CO
Zip: 80236
Country: USA
Email: brad@bradk.org
Privacy Preference: Don't withhold name or address from public record
Attachment: KlafehnComments.doc

Comment Submitted:

See Attachment.

Comments of Brad Klafehn on Draft Programmatic Oil Shale Environmental Impact Statement, March 20, 2008

My name is Brad Klafehn and I reside in Denver, Colorado. During the late 1970's, I was one of several individuals and organizations, among them the Colorado Open Space Council, for which I worked, who sued the federal government and the oil companies in order to force the preparation of a new programmatic EIS on BLM's plan for further oil shale leasing and commercialization.

The case was heard by Judge Sherman Finesilver, the one member of the 10th District Court bench at the time who had no oil company stock holdings. He therefore was the oil shale judge, the one jurist who had no apparent conflict of interest, even though – oddly enough - his rulings tended to favor oil shale development. As part of the lawsuit, the oil companies took depositions from the plaintiffs, including myself. Their theory of the case was quite entertaining: they tried to prove that we were being financed by the Saudis in order to hinder oil shale development, thereby preserving value for Saudi light crude. My integrity might have been for sale at the right price, but our average salary working for citizen environmental groups then was about $300 a month. Certainly, the Saudis would have paid better than that if they had been in the market!

As part of the discovery process of the lawsuit, however, we uncovered some dynamite information from water samples of retort water that had been released from in situ work at Anvil Points. In fact, the evidence was so explosive that Judge Finesilver made us put the data under seal. We could not even mention the specifics in our brief, other than to ask him to kindly refer to the evidence sealed under Exhibit X.

What made this water sample data so important was that it showed that this in situ retort water contained arsenic at 1,000 times the concentration allowable. In situ retort water, once it is released into the aquifer, is essentially uncontrollable. This from a facility which was only a mile or so from the Colorado River. The BLM's EIS on oil shale at the time did not anticipate anywhere near that level of arsenic contamination, yet we wound up losing the lawsuit, based on a bench ruling from the judge that BLM had agency discretion not to deal with the evidence (science be damned). No programmatic EIS was written, but within a few years, all oil shale development stopped antway, as a result of 'Black Sunday', May 2, 1982, an event which threw the economy of Colorado, and especially Western Colorado, into a tailspin for several years.

52803-001

So, a quarter of a century later, here we are again, facing an apparent revival of oil shale commercial leasing. The technology has not progressed much; only slightly more is known about oil shale's environmental impacts; but the pressure is on again to lease maximum amounts of public land for private gain, to facilitate the **commercial** development of an industry which has barely performed at the **pilot-test** stage. And true to the environmental legacy of President George W. Bush, the Department of Interior stands ready to facilitate this land grab, its preferred alternative in the EIS being to lease nearly 2 million acres of minerals – an area the size of the State of Delaware – for oil shale commercialization.

To paraphrase Karl Marx quoting Hegel: the first time, leasing for commercialized oil shale appeared as a tragedy. This time, it appears as a farce.

This process is a farce because an action of this magnitude is taking place this time without one public hearing. The first time around, BLM gave the appearance of caring what the public and the experts thought by holding extensive public hearings on the issue. That was so 1970's, when – in the aftershocks of the first Earth Day - the government had to look like they cared what the people thought. Instead, this time, the public gets a series of informal open–house 'workshops', without transcripts or records. Local governments appealing for more time to examine the 3 volume EIS are told there is no time for extended comment. What is the big rush, anyway? Does January 20, 2009 have anything to do with it? This lack of hearings and sufficient comment periods should by itself be enough to invalidate this process. 52803-002

It is a farce because while a large number of data sources are listed in the EIS, the inconvenient data they contain are tucked away several layers deep in those reports and are never mentioned in this EIS. For example, the EIS does mention the 1990 USGS Lindner-Lunsford study of the effects of in situ development by DOE's Laramie Technology Center on water quality near Rock Springs (Draft PEIS, p. 4-35). The EIS says: "One in situ retorting experiment produced organic groundwater contaminants, including aromatic hydrocarbons, phenols, azaarenes, and aliphatic ketones." While that is essential information, no conclusions are drawn from that statement, and no mention is made of a few other salient points. For one, the Wyoming Department of Environmental Quality issued a notice of violation against this site in 1988 for polluting ground water. That fact might have been useful for the DPEIS reader to know. Likewise, the fact that one of the wells showed arsenic concentrations of 75 micrograms per liter and two other wells were at 25 micrograms per liter might have been useful to convey (Lindner-Lunsford 1990, p. 57), especially since these are from 2 to 7 times higher than the current EPA standard of 10 ppb (see DPEIS, p. 3-77). Instead, the EIS never once mentions arsenic in connection with the Rock Springs site, and rarely, as a potential problem with any in situ development. The Final EIS should contain a discussion of the Rock Springs data. Likewise, I urge the DPEIS writers to visit the 10th Circuit Court archives, unearth the sealed exhibit from our prior lawsuit, and include an analysis of that data in the Final EIS. 52803-003

This process is a farce because developers can as little jump from bench-testing to commercial development now as they could in 1975, yet there seems to be the same urgency to transfer as much public resource to private hands as possible, as quickly as possible. It would make the most sense, economically and environmentally, to adopt Alternative A, waiting for results from the six current RD&D plots, before further leasing occurs. But that's not the Bush way – instead, the feds want to pursue the maximum leasing option now (Alternative B). The DPEIS contains little to justify this choice, however. What exactly is the rationale for leasing an area the size of Delaware?. 52803-004

This process is a farce because the DPEIS's discussion of the greenhouse gas effects of oil shale development has so transparently been written by the Administration's political hacks, rather than the federal government's scientists. If this level of scientific understanding and honesty characterizes that put forth in the entire EIS, the effort is more of a sham than even I had thought: "The assessment of GHG emissions and climate change is in its formative phase, and it is not yet possible to know with confidence the net impact on climate. Observed climactic changes may be caused by GHG emissions or may reflect natural fluctuations…" (DPEIS, p. 3-97). This statement and analysis is transparently bogus, and the Bureau's professional career employees must be mortified to have this statement included, since they will now be burdened with having to justify it. Indeed, greenhouse gas emissions associated with oil shale development, retorting, and processing may likely be as much of an Achilles' heel for the industry as the low resource recovery rates and high use of water and electricity have been in the past. For example, a March 10, 2008 article in the Toronto Globe and Mail indicates that Canada may well have to cut back on tar sand production or sequester the carbon dioxide produced in order to meet their national CO2 goals. Not an issue for America, says the DPEIS. But it may be for the Governor of at least one of the affected states. Why does the DPEIS not reveal what discussions the BLM has had with state governments on this issue?

52803-005

Finally, this document is a farce because while it claims to "analyze the direct, indirect, and cumulative environmental, cultural, and socioeconomic impacts of the proposed action and its alternatives" (DPEIS, p. ES-1), nowhere does it actually do that. Instead, at the point where it should be discussing cumulative effects of the recommended leasing and development program, it punts the whole question: "In general, impacts on specific resources located within the 1,991,222 acres cannot be quantified at this time because key information about the location of commercial projects, the technologies that will be employed, the project size or production level, and development time lines are unknown" (DPEIS, p. 6-36). In fact, rather than justifying and setting carrying-capacity limits, which might be expected from a programmatic consideration of cumulative impacts, Table C-1 shows that in the White River RMP, at least, existing "carrying-capacity thresholds for air quality, socio-economic impacts, big game, and water quality would be removed" (DPEIS, p. C-9) in favor of leasing 343,000 acres for development. That is unacceptable.

52803-006

This is a so-called programmatic EIS, but there is no program being offered. Will the issuance of leases be phased? How will that be managed? Will a diversity of technologies be encouraged? What are the limits on environmental impacts that BLM will tolerate, and what will happen when they are reached? How will local governments be involved in the post-leasing decisionmaking? Until BLM presents a real plan, and not just a document consisting of a recitation of white-washed "impacts", the public can only assume that this document will be used primarily as a legalistic attempt to justify turning northwest Colorado, eastern Utah, and southwest Wyoming into National Sacrifice Areas, rather than as the controlling document to rationally manage the cumulative environmental impacts of a dirty, polluting industry whose time for commercialization will likely never come.

52803-007

Responses for Document 52803

52803-001: Thank you for your comment. Appendix A discusses the potential for groundwater contamination from in situ retorting (see Section A.3.2.2). Future lease applications proposing such activities must include detailed plans of operation that address groundwater issues. When necessary, mitigation measures will be placed on leases and/or plans of development.

52803-002: The BLM held a series of open-house meetings on the Draft PEIS in February 2008. Although transcripts of the meetings were not taken, extensive information on how to comment was provided. The opportunity to provide written comments on laptops was available at each meeting, as well as directions on how to provide written comments or electronic comments via the project public information Web site at www.ostseis.anl.gov. The BLM has received over 100,000 comments on this PEIS and is providing responses to all comments. Additionally, the comment period for the Draft PEIS was extended for an additional period from March 20 until April 21.

52803-003: The purpose of the PEIS is to analyze allocation decisions. While the cited study provides an example of one case study, it does not represent the situation to be expected at any future in situ lease location being developed with a particular technology and pursuing specific mitigation measures. Background concentrations are also expected to vary at different locations and at different depths.

52803-004: As is pointed out in the introduction to the PEIS, the action being considered is the amendment of land use plans to allow for future application for commercial leases. The BLM is conducting a phased decision-making process—proceeding from land use planning, to leasing, to operational permitting. The current land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Subsequent NEPA analysis will be required prior to the leasing and development phases. The BLM also initiated the RD&D leasing process to provide important information that can be used as the BLM works with communities, states, and other federal agencies to develop strategies for managing any environmental effects, including those of water requirements and the technical aspect of the technologies.

52803-005: The Draft PEIS analyzed and disclosed potential air quality and climate impacts from the Proposed Action and Alternatives as required under CEQ regulations for implementing NEPA.

As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally,

the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 of the Draft PEIS describes the existing state of knowledge regarding climate change. However, no climate-change related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

52803-006: This PEIS is a programmatic-level document that analyzes land use allocation decisions. The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on aquatic resources. Programmatic environmental impact statements are used to evaluate broad policies, plans and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. The BLM believes there currently is sufficient information at the programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing. A more detailed assessment of the cumulative effects of oil shale and tar sands development together with the other

factors mentioned in the comment will also be included in subsequent project- or site-specific NEPA documents rather than in the PEIS.

The PEIS presents a cumulative analysis based on the nature and scope of the proposed action and on available non-speculative information. It provides a summary of the extensive ongoing activities in the vicinity of the oil shale and tar sands areas and considers these in its overview of potential cumulative impacts if future leasing and development occurs (see Sections 6.1.5 and 6.2.5). For example, Table 6.1.5-4 shows that over 30,000 oil and natural gas wells are planned for installation over the 20-year study period in the affected field offices.

The thresholds in the White River RMP are being left in place, and the text in Appendix C has been revised to reflect this. The issue of whether this kind of approach is workable and should be extended throughout the study area or be modified or deleted will be made in the individual land use plans when specific conditions are known and the utility of the thresholds analyzed.

52803-007: Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sands resources among other unconventional fuels, if it can be done in an environmentally sound manner. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives when considering whether lands should be opened or closed for application for commercial oil shale or tar sand leasing. The PEIS analyzes the environmental consequences of this allocation decision. The PEIS also describes the requirement for additional site-specific NEPA analysis prior to both issuance of commercial leases and approval of proposed exploration or development projects

This phased or staged approach will ensure that commercial oil shale and tar sands development programs meet the intent of Congress and make areas available for oil shale and tar sands development while taking advantage of the best available practices to minimize impacts and offer opportunities for states, local communities, and the public to participate in the process.

Thank you for your comment, David Olsen.

The comment tracking number that has been assigned to your comment is OSTSD52805.

Comment Date: March 19, 2008 22:31:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD52805

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Privacy Preference: Withhold address from public record
Attachment: Objections to BLM Draft PEIS of December 2007.doc

Comment Submitted:

Attachments: Oil Shale Tar Sands See Attachment.

Points of objection to BLM Draft (December 2007 DES07-60) Programmatic Environmental Impact Statement (PEIS) for Oil Shale and Tar Sands

Background: Energy Policy Act of 2005 (EPACT) states in Section 369d(1): "Not later than 18 months after the date of enactment of the act … the Secretary (of the Interior) shall complete a PEIS for a commercial leasing program for oil shale and tar sands resource on public lands, with an emphasis on the most geographically prospective lands within each of the States of Colorado, Utah, and Wyoming." This is followed by Section 369d(2) which states" "Not later than six months after the completion of the PEIS … the Secretary shall publish a final regulation establishing such a program." In compliance with this directive, the BLM published a draft PEIS for oil shale and tar sands on December 21, 2007. The BLM is accepting comments on their PEIS for a period of 90 days. Section 369c of EPACT also directed the Secretary to lease government land in Colorado, Utah, and Wyoming for industry to conduct oil shale research and development activities. As a consequence, the (BLM issued six RD&D leases (five in Colorado for *in-situ* retorting and one in Utah for underground mining and surface retorting). When adopted, the PEIS will establish for the next 20 years how the oil shale and tar sand resource will be managed.

Discussion: EPACT clearly directs the BLM to prepare a PEIS and then begin the process of issuing commercial leases. However, the BLM has taken a different path. In the introduction to the PEIS, BLM states that the PEIS evaluates the potential effects of amending 12 resource management plans in Colorado, Utah, and Wyoming for areas that would be made available for commercial leasing for oil shale and tar sands development. But it also offers that "Prior to issuance of any commercial leases on lands that may be designated as available for these uses, ***additional environmental analysis will be required to analyze the impacts of the proposed technology and any reasonable known alterative technology for development of the oil shale or tar sands resources***."

The PEIS does not fulfill the role Congress envisioned. The reason that BLM gives for this change in course is rooted in the lack of up-to-date information with respect to oil shale technology and environmental impacts. The BLM circulated to a number of cooperating agencies a 15-project development scenario that assumed that all six of the RD&D leases would convert to commercial oil production and that there would be 3 additional commercial oil shale leases issued in each of CO, UT, WY. The cooperating agencies commented that the BLM's analysis was too speculative at this point to support a decision to issue any leases on the basis of this 15-project scenario. As a result, the BLM elected not to attempt to issue leases for commercial development of oil shale on the basis of this PEIS.

In the PEIS, the BLM goes on to write: "Therefore, this PEIS includes descriptions and analysis not of particular levels of development, but of the possible impacts of each type of technology currently under consideration and research, so far as this information is available to the BLM at this time." BLM further states: "Information from the BLM's ongoing oil shale RD&D projects that involve *in situ* processes is the primary source for defining the potential *in situ* technologies that may be used in the future." BLM sums up its argument for not complying with EPACT on page 2-50: ***"Specifically, the BLM determined that it does not have adequate information on the (1) magnitude of commercial development and pace of that development, (2) potential locations for commercial leases, (3) technologies that will be employed, (4) size or production level of individual commercial projects, and (5) development times for individual projects, to support decisions about lease issuance."*** BLM further notes that "Published information

defining both oil shale and tar sands commercial development is dated (i.e., mostly dating back to the mid-1980s or earlier) and unlikely to accurately describe future commercial technologies." Many times within the document BLM laments the lack of definitive information about the technologies that will be employed in commercial operations. For example, in Section 4 (Effects of Oil Shale Technologies), in the absence of detailed information on all current technologies, BLM selected the technology option that offered ***the greatest potential environmental impacts***. Thus, all of the impacts given in Section 4 (Effects of Oil Shale Technology) are maximized so as "not to inadvertently understate these impacts."

Specific Suggestions: Clearly, accurate, historical and current information on particular technologies is needed to provide a realistic picture of environmental impacts or at least a better bracketing of the potential range of impacts, based on sound science. In Section 6 (Impact Assessment for Oil Shale and Tar Sands Alternatives) the main theme of the PEIS is the lack of information. The lack of information needs addressed before adoption of a management plan that impacts the nation for generations to come. Research conducted in the following areas could be very helpful to correcting this problem and accurately estimating the impact of an oil shale and or oil sands (Utah) industry. The draft PEIS nearly closes the doors for the nation developing the resource and forces the U.S. to continue importing ever growing volumes of liquid hydrocarbons from outside the U.S. to meet demand (even with higher efficiency vehicles and biofuels). With current U.S. petroleum products demand at 20.5 million barrels per day and U.S. production of crude oil at 5.1 million barrels per day and natural gas liquids at 2.3 million barrels per day and biofuels (ethanol and biodiesel contributing a few hundred thousand barrels per day), the U.S. imports huge volumes of crude and refined product to meet demand, demand that will increase in future years. A million barrels per day oil shale industry would be equivalent to nearly 20% of the total U.S. crude production industry. Thus the PEIS should reflect as accurately as possible the impact and it does not. 52805-001

Need to Perform Analyses to Bracket Impact Estimates: In Section 4: (Effects of Oil Shale Technologies), BLM utilizes the limited information on oil shale technologies in a way that in effect maximizes potential environmental impacts so as "not to inadvertently understate these impacts." The lack of data is evident in the unknown water requirements for both past processes (many of them operated on zero discharge water permits) and future processes (where some information may be available within companies within the next decade or earlier). Air emissions; water and energy requirements and emissions; footprint; manpower needs; as well as infrastructure and socio-economic needs are estimated at upper limits and not bracketed as to their range or probability. Many of the PEIS assumptions for water and energy requirements are based on early 1970's references (e.g. DOI 1973a) which were not in fact the actual requirements in play when the early oil shale projects were shut down (c.1980s), as process optimization had improved for many projects. Research (by BLM or others) could help to bracket the range of potential air emissions, water consumption, surface impact, energy use, etc. and thus better quantify the range of potential environmental impacts. Thus the draft PEIS is not an accurate assessment of the impact of an oil shale industry. 52805-002

In the draft PEIS, BLM indicates that estimates could over estimate environmental impact, but states that: "A detailed definition of each possible permutation and a subsequent analysis of its impacts would be impractical and speculative, because there is no way to identify the precise development schemes that may be proposed by future developers. This PEIS therefore does not analyze specific facility configurations or technology combinations. Efficiencies and economies that would be realized from integrated systems or centralized services are not considered. As a

result, outcomes from this analysis could inadvertently overstate some impacts especially if the resulting impacts are added together to accommodate multiple projects." Thus the draft PEIS is not an accurate assessment of the impact of an oil shale industry. 52805-002 (cont.)

Reanalyze Previous Projects Needed: Reanalysis of the operating constraints that the 1970-80's projects were operating under (from state and company files) may show why water and fuel use was high (e.g. fuel used to boil off process water to comply with the zero discharge permit that the pilot project operated under); why the estimated employment numbers in the Draft 2007 PEIS are so high (the numbers for employees per barrel of oil produced are extremely high), etc. 52805-003

Need for Thorough Water Consumption and Quality Impact Analysis: Water consumption and water quality issues are a dominant issue in the draft PEIS. In the summary under Section 4.2.1.2 Conversion or Transfer of Water Rights, the PEIS states "Demand for reliable, long-term water supplies to support oil shale development could lead to the conversion of existing water rights from current uses. In the Piceance Basin, there has already been acquisition of agricultural water rights by oil shale development companies. Depending on the locations and magnitude of such acquisitions, there could be a noticeable reduction in local agricultural production and land use." The PEIS does not quantify water ownership and estimates on high side the volume required per barrel of synthetic crude produced. The PEIS does not address water recycle nor import of water from energy production – coal bed methane produced water (which is very low total dissolved solids) in Wyoming and Montana, or Northwest Colorado that could be used for oil shale operation or to offset withdrawal of Colorado River Basin water used in oil shale operations. 52805-004

In addition, Section 3-76 highlights the sparse data on the chemistry of the White River alluvial aquifers, but the PEIS makes estimates of impact without firm scientific foundation from either previous operations or estimates on unproven processes. 52805-005

The PEIS does specifically analyze the possibility of locating new high efficiency electrical generation plants that could: 1. Supply at least some of the power required by Green River oil shale production, 2. Capture their CO_2 for injection into either the Rangely oil field (the site of a current CO_2 flood) or fields in Eastern Utah such as Red Wash, and 3. Operate their cooling towers on produced water rather than surface water.

Need to Expand Regional Air Modeling: The PEIS does not provide guidance on how NCAR, EPA, BLM and state and local governments, could develop a plan to expand air sampling and modeling to provide baseline information for the areas covered by the PEIS. Oil Shale is an energy intensive asset and the air quality estimates within are based on poor foundations to estimate the impact of an industry. 52805-006

Need for Spent Shale Utilization: The PEIS does not look at developing consumer or industrial products from retorted spent shale as a way to reduce surface impact and generate a revenue source. 52805-007

Oil Shale:

When adopted, the PEIS will establish for the foreseeable future, probably the next 20 years, how U.S. oil shale and tar sand resource will be managed and developed in Colorado, Utah and Wyoming.

1. BLM not following the specific mandate of Energy Policy Act of 2005 (EPACT) which states in Section 369d(1): "Not later than 18 months after the date of enactment of the act … the Secretary (of the Interior) shall complete a PEIS for a commercial leasing program for oil shale and tar sands resource on public lands, with an emphasis on the most geographically prospective lands within each of the States of Colorado, Utah, and Wyoming."

This is followed by Section 369d(2) which states" "Not later than six months after the completion of the PEIS … the Secretary shall publish a final regulation establishing such a program." The PEIS makes no provision for such regulations and infact limits by omission opportunities for other developers to test their technology for extraction (surface retorting, insitu or mining technologies either surface or underground). It seems the management plan wants a very limited number of developers and they have been previously chosen. New opportunities for companies seem limited by design. 52805-008

2. Speculative extrapolation from initial data submitted in as part of filings for RD&D leases. BLM writes **"**Therefore, this PEIS includes descriptions and analysis not of particular levels of development, but of the possible impacts of each type of technology currently under consideration and research, so far as this information is available to the BLM at this time." BLM further states: "Information from the BLM's ongoing oil shale RD&D projects that involve *in situ* processes is the primary source for defining the potential *in situ* technologies that may be used in the future." The filings for the RD&D leases were based on what companies knew and wanted to include in their filings and each had tasks that would undertake additional study of both process and environmental issues on the lease. These are field research projects, where processes will be modified, optimized or may not work at all. Basing a PEIS and the future of the industry on this information is poor science and analysis. 52805-009

3. BLM prepared this PEIS based on incomplete information. BLM sums up its argument for not complying with EPACT on page 2-50: *"Specifically, the BLM determined that it does not have adequate information on the (1) magnitude of commercial development and pace of that development, (2) potential locations for commercial leases, (3) technologies that will be employed, (4) size or production level of individual commercial projects, and (5) development times for individual projects, to support decisions about lease issuance."* The PEIS should spell out how BLM will acquire this information to make better assessment within a given time period, like 5 years, at which time the PEIS will be reanalyzed and the management plan adjusted to accommodate new findings. 52805-010

4. BLM uses outdated information for basis for describing future impact. BLM notes that "Published information defining both oil shale and tar sands commercial development is dated (i.e., mostly dating back to the mid-1980s or earlier) and unlikely to accurately describe future commercial technologies." But water use and emissions from the 1970-80's are widely used in the tables within the PEIS to estimate future impact. However, underground mining (except the Utah RD&D lease) is prohibited as much of the Green River oil shale is deeper than 500 feet. Underground mining and surface retorting are proven technologies and formed the basis of most of the U.S. oil shale industry of the 1970 -80's. Development of oil shale in the Roan Plateau 52805-011

managed by the Glenwood Springs BLM office has already been withdrawn from development and it was some of the most accessible – most minable oil shale in the deposit. 52805-011 (cont.)

5. The PEIS does not fulfill the role Congress apparently envisioned. The reason that BLM gives for this change in course from what is written in 2005 EPACT is rooted in the lack of up-to-date information with respect to oil shale technology and environmental impacts. Neglecting or explaining why BLM did not address does not remove the mandate that it needs to be addressed and the PEIS does not address how BLM will come to be compliant. 52805-012

6. BLM's decision effectively limits oil shale to the six current RD&D lease sites. BLM issued six RD&D leases (five in Colorado for *in-situ* retorting and one in Utah for underground mining and surface retorting. Essentially excluding other companies and new technologies the opportunity to compete for leases. The PEIS does not explain how BLM will provide a level playing field for other developers and entrepreneurs who bring other development technologies forward. 52805-013

Tar Sands:

Second attachment.

Responses for Document 52805

52805-001: Given that the development technologies for in situ production of oil shale are just emerging, there is a lack of information regarding resource use and subsequent impacts. Leasing at this stage would require making many speculative assumptions regarding potential, unproven technologies. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or as a result of industry performing research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects; reasonable alternatives; and possible mitigation measures, as well as what level of development may be anticipated. This phased or staged approach will ensure that a commercial oil shale development program meets the intent of Congress to reduce the growing U.S. dependence on unstable sources of foreign oil imports.

52805-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52805-003: The BLM used information from publicly available sources to form its analysis, and believes that the numbers used are adequate for programmatic analysis. As more experience is gained with the technologies, the BLM expects that the understanding of the impacts associated with the technologies will improve.

52805-004: The PEIS is a programmatic-level document that analyzes land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and they provide an effective analytical foundation for subsequent project-specific NEPA documents.

Water ownership is tradable and is going to change with time. By the time an application for leasing is submitted, the water rights landscape would differ from how it is today. Currently, the BLM is not committing to any level of oil shale development. It would be more appropriate to address the water ownership issue at the project level.

The use of water produced from other energy production, such as coal bed methane, would be too speculative and is not included in this PEIS as a water source.

52805-005: The Draft PEIS considers general impacts that could arise from the various technologies under consideration, and the sparse, regional data are sufficient for descriptive purposes. Evaluation of the operations and results from RD&D leases will indicate whether these technologies would be effective.

52805-006: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.3 of the Draft PEIS (Table 3.5.3-2) provides a detailed list of representative criteria air pollutant concentrations. All values are cleaner than the ambient air quality standards applicable when the analysis was prepared, although, as indicated in Table 3.5.3-2, certain ozone and particulate matter values were greater than 50% of the applicable standard (up to 93% of the 8-hour ozone standard based on CASNET monitoring at the Mesa Verde, Canyonlands, and Gothic stations). The EPA has recently lowered the ambient ozone standards and will make formal determinations as to whether or not the study area continues to achieve the applicable National Ambient Air Quality Standards. The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans. However, speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process.

52805-007: The assumptions concerning disposal options are based on currently known technologies. As technology advances and alternative options to disposal become viable and environmentally acceptable, they will be considered.

52805-008: It is true that the BLM has not met the congressionally mandated timeframes for the PEIS.

It is important to recognize that there is no existing program for leasing federal oil shale resources. Unlike oil and gas or other mineral development, most of the baseline data necessary to support the NEPA analysis was not readily available and had to be assembled from many different sources, much of it outside of the BLM. A good portion of time was spent collecting and/or developing these data.

In August of 2007, after review and discussion of an internal preliminary Draft PEIS by our 14 cooperating agencies and internal BLM staff, the intent of the document was changed from a leasing to a resource allocation document that identifies the BLM-managed lands for which applications for commercial leasing would be accepted in the future. The BLM had to revise the PEIS to accommodate this change.

Working cooperatively with 14 other federal, state, and local governments, while extremely worthwhile, also takes time. While the BLM recognizes this unusually specific timetable, we also remain committed to working closely with the states and local governments to achieve a proper balance in land use allocation and environmental protection.

The BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedures to implement a commercial leasing program. The BLM published a proposed rule for the management of a commercial oil shale leasing program in the *Federal Register* on July 23, 2008. The BLM rulemaking process is separate and apart from the drafting of the PEIS.

52805-009: The BLM did not rely solely on information from the RD&D lessees. Appendix A and Sections 4.1 and 5.1 provide some background on potential impacts from technologies. The in situ technologies mentioned in the comment exhibit many traits of oil and gas, including surface disturbance, drilling, sequential development and reclamation, and injection technologies that are already known and about which the BLM has some operational knowledge. This knowledge has also been applied.

The BLM also concluded that subsequent NEPA analysis at the leasing stage and plan of development stages and will be required to determine the extent of the effect of oil shale and tar sands development when more specific information is known about the technology and associated environmental consequences. The BLM is committed to doing the appropriate level of analysis at the leasing stage.

52805-010: The CEQ regulations at 40 CFR 1502.22 require an agency to disclose whether there is "incomplete or unavailable information," and to acquire that information if it is "relevant to reasonably foreseeable significant adverse impacts" and is "essential to a reasoned choice among alternatives." The purpose of the provision is to advance decision making even in the absence of complete information regarding environmental effects associated with the proposed action. Agencies are required to comply with this provision when evaluating "reasonably foreseeable significant adverse effects."

The PEIS proposed action is to amend land use plans thereby allowing certain lands to be considered for future leasing. The decision does nothing more than remove the administrative barrier to the BLM considering any application for leasing for some lands, while leaving other lands unavailable for leasing. The amendment does not commit any resources or grant any lease rights. For that reason and because there will be subsequent site-specific NEPA analysis prior to leasing and development, the BLM has determined there will be no impact on the environment as a result of these allocation decisions and therefore does not trigger the requirements of 40 CFR 1502.22.

For the purposes of analysis, in the absence of more specific information on the technology and environmental consequences of commercial development of oil shale and tar sands, this PEIS employs information derived from other types of mineral development (oil and gas, underground and surface mining of coal). The BLM has taken this approach, because it anticipates, to the best of its knowledge, that the surface-disturbing activities involved with these other types of mineral development are comparable to those that may result from oil shale and tar sands development. There is a wealth of information concerning the consequences of oil and gas and underground and surface mining activities, and projecting on the basis of this information, to the extent that it is applicable, permits a decision maker to decide whether to open areas to future application for leasing or to protect the specific resources by closing areas. Therefore, it is not a case of information missing that is needed to make a land use allocation decision such as that contemplated here; rather, the BLM is engaged in a projection based on these anticipated similarities. To the extent that additional information will be required in order to analyze alternatives to a leasing or development decision, that is not a matter of information missing with respect to the land use allocation decision under consideration here, but a matter of information that will be developed in its proper place—during the NEPA analysis for these later decisions. Therefore, the PEIS need not assess the relevance of the missing information needed to make an oil shale leasing or development decision. The PEIS, however, does disclose the fact that the BLM will consider new information, such as that emerging from the RD&D leases, during subsequent NEPA analysis performed as the basis for making any leasing decisions.

52805-011: In developing the PEIS, the BLM used the best available information regarding existing oil shale and tar sands technologies and environmental resource

characteristics in the most geologically prospective portions of oil shale basins and STSAs. It is expected that the existing RD&D program will provide additional information on the impacts of different technologies and the effectiveness of different mitigation strategies, as well as the information needed to improve extraction and refinement processes. A full evaluation of future development impacts will be conducted on a project-specific basis using, among other things, the information gained in the RD&D program.

The PEIS will amend the Roan Plateau Plan for oil shale resources. Alternative B does identify areas that would be open for application for oil shale leasing. Leasing and development in the area would require further NEPA and land use plan amendment that would ensure that a commercial oil shale program meets the intent of Congress to make areas available for oil shale development while taking advantage of the best available practices to minimize impacts and to offer opportunities for states, local communities, and the public to participate in the process.

52805-012: The BLM is complying with the intent of Congress. Congress in the Energy Policy Act of 2005 mandates the Secretary to complete the PEIS for oil shale and tar sands resources with emphasis on the most geologically prospective lands within Colorado, Utah, and Wyoming, which encompasses the acreage under Alternative B. Alternative C excludes lands based on existing land use plan decisions that require surface-disturbance restrictions or seasonal limitations on activities to protect a specific resource.

In addition, the BLM is taking a measured approach to oil shale development. The BLM believes that analyzing an allocation decision provides the opportunity to build on the scientific, governmental, or industry research in order to analyze, in a general way, the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale exploration and development, further analysis will be carried out and documented in accordance with NEPA to support any decisions made in this regard. That NEPA analysis will evaluate the environmental impacts of the oil shale exploration and development and develop specific mitigation measures to mitigate or eliminate the identified impacts. The BLM believes that such a phased approach will ensure that commercial oil shale development programs will be based on the best available practices to minimize impacts and will offer opportunities for the states, local communities, and the public to participate in the process.

52805-013: RD&D leases were issued consistent with the program described in the *Federal Register* of June 9, 2005 (Volume 70, Number 110). No decision has been made whether there will be additional opportunities to compete for RD&D leases on federal lands. There is also no reason that development of additional technologies cannot proceed on either private or state lands.

Thank you for your comment, Tom Wright.

The comment tracking number that has been assigned to your comment is OSTSD52806.

Comment Date: March 20, 2008 00:03:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD52806

First Name: Tom
Middle Initial:
Last Name: Wright
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I oppose the proposed action and I support Alternative A (no action). The proposed action would have severe, long-term environmental impacts that have been glossed over in the BLM's rush to implement a lame duck President's discredited energy policy. Our energy needs can be better addressed through the development of renewable power sources. Approval of the oil shale project would merely prolong the inevitable at a tremendous cost to the public's lands, resources, and wallets. 52806-001

Response for Document 52806

52806-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Jane Bowman.

The comment tracking number that has been assigned to your comment is OSTSD52807.

Comment Date: March 20, 2008 00:04:50AM
Oil Shale and Tar Sands
Comment ID: OSTSD52807

First Name: Jane
Middle Initial: C
Last Name: Bowman
Organization:
Address: 5770 S 250 E
Address 2: #G80
Address 3:
City: Salt Lake City
State: UT
Zip: 84107
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I oppose "preferred alternative" B and support alternative A (no action). 52807-001

Response for Document 52807

52807-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Christa Romanowski.

The comment tracking number that has been assigned to your comment is OSTSD52808.

Comment Date: March 20, 2008 00:05:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD52808

First Name: Christa
Middle Initial:
Last Name: Romanowski
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

To: Sherry Thompson, Project manager BLM Oil Shale and Tar Sands Draft Programatic EIS, Argonne National Laboratory

Dear Ms. Thompson:

I write to urge you to reject Alternative B, the "preferred alternative" in the BLM Oil Shale and Tar Sands Draft Programmatic EIS, and wish to express my support for Alternative A, the "No Action" alternative in the PEIS. 52808-001

"Preferred alternative" B would permit the destruction of vast, priceless, irreplaceable parts of the West, for the sake of obtaining more fossil fuels for a world that must learn to live with less of them sooner or later. Land, water, human and animal communities will never recover from such brutal mining techniques. The greenhouse gas emissions from such mining projects will exacerbate a problem whose magnitude we are only beginning to understand. I believe the PEIS does not address these issues; nor does it give adequate consideration to alternatives. To approve Alternative B goes against the true best interests of this nation, and barters away an irreplaceable treasure for a short-term gain. I urge the BLM to act as stewards of OUR public lands; please choose the "No Action" alternative A, and stop the efforts to develop oil shale and tar sands on public lands. 52808-002 52808-003 52808-001 (cont.)

Thank you for allowing me to comment.

Christa Romanowski

Responses for Document 52808

52808-001: The BLM acknowledges the commentor's preference for Alternative A.

52808-002: Thank you for your comments.

52808-003: The alternatives in the PEIS focus on amending land use plans and identifying public lands that would be available or would not be available for application for the potential leasing of oil shale or tar sands in the future. While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. It was determined that the three alternatives provided a reasonable range because the allocation decisions, as proposed in the PEIS, had a very narrow and limited scope: to allow certain lands to be considered for future leasing. This approach is in full compliance with NEPA since the purpose and need of the PEIS serves as the basis to determine the reasonable range of alternatives in a NEPA document. A broad "statement of need" may necessitate a wider range of alternatives, while a more limited and narrow scope would have a limited number of alternatives.

Thank you for your comment, Elaine Cloninger.

The comment tracking number that has been assigned to your comment is OSTSD52810.

Comment Date: March 20, 2008 00:53:43AM
Oil Shale and Tar Sands
Comment ID: OSTSD52810

First Name: Elaine
Middle Initial:
Last Name: Cloninger
Organization:
Address: 5485 County Road 309
Address 2:
Address 3:
City: Parachute
State: CO
Zip: 81635
Country: USA
Email: ecloninger@willowwisp.net
Privacy Preference: Don't withhold name or address from public record
Attachment: Oil Shale PEIS Mar2008.pdf

Comment Submitted:

See Attachment.

Elaine Cloninger
5485 County Road 309
Parachute, CO 81635

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

March 20, 2008

Re: Draft Programmatic Oil Shale & Tar Sand Environmental Impact Statement

My story: Our family has been involved in the Parachute, Colorado area since the summer of 1980. My husband was a young engineer who was involved with the design of the water and wastewater infrastructure at Battlement Mesa. Our family used all our resources to purchase a home here in the height of the "boom" -- when conventional loans were 15-1/2% interest. Like everyone else who lived in the area at that time, we know exactly where we were at the time of the announcement of the "bust" of oil shale and the pull-out of Exxon. Like most people, it took everything we had to move in under boom conditions and after the bust we could not have sold our property for half of what we owed on it. There were no buyers. We decided to stick it out. It took many years for us to recover our loss of property value. We will never recover lost wages. Many lost everything they had, claimed bankruptcy, and moved on. It was devastating to local governments, school systems, health care providers, and others.

Our county and communities have recently had a "shot in the arm" so to speak from the gas industry – as far as sales tax increases. However, property prices have risen to a level where we could not afford to buy our own property if we didn't already own it. Also, our roads are being decimated by large trucks that will eventually cost millions (possibly billions) to replace.

My concerns regarding the PEIS:

First, the time period allowed for review and comment on over 1400 pages is not adequate for digesting and appropriately commenting on specifics.

Second, I feel the Administration, Department of Interior, and the BLM have put the cart before the horse. We do not need another scenario like Project Rulison and Project Rio Blanco (underground nuclear explosions used to free the gas from tight sands). Apparently, the "scientists" and politicians involved in those projects were so eager to find a peace time use for nuclear power that they were more concerned about following through with their projects than accessing the potential outcome --- contaminated gas! It appears the same thing is happening in regards to political influence and insufficient science in planning for oil shale. Remember: it is impossible to put the genie back in the bottle.

52810-001

Why is there no mention in the PEIS of Project Rio Blanco in the Piceance Basin? What protections are planned to assure there is no contact with nuclear contaminated areas? 52810-002

Further, I do not see an accounting for the amount of water that will be needed for these projects on a yearly basis. The surrounding area is very dry and thirsty most years. How will this impact the other uses of water: agriculture, domestic, recreational? 52810-003

What is the expected impact on air quality? What mitigation practices will be in place to prevent detrimental impacts from mercury and other bi-products of coal-fired plants used for energy to produce the oil? 52810-004

I see no plan for handling the next "bust"; no protection for the people who loose jobs and homes, for schools that are built and no longer needed, for government facilities that are built to take care of social problems related to increased population then suddenly moves from the area due to the bust. 52810-005

Oil shale development cannot be viewed from the same perspective as the gas industry. The gas industry is here to stay because the gas is readily available. However, the profit versus cost of oil shale is not proven. The technology is not proven. It is not a reliable industry. It has always been a boom/bust scenario and there have been no changes adequate to believe that it will be any different in the future. Thus, developers of oil shale must be prepared to front the cost to the areas impacted. 52810-006

The cost of oil shale development to the environment will be immeasurable. This will be a national sacrifice zone -- this place that most everyone calls "God's country".

If oil shale becomes a viable industry in Colorado, it should not take place until 52810-007

1. the research and development phase is complete and a viable method of extraction is determined, and
2. after all gas industry drilling has been completed. The two industries should not co-exist.

It is my belief that the energy companies would find both cost effective and environmentally friendly results by investing their monies in alternative energy using renewable resources. I could support my tax dollars being used for incentives for developing alternative energy. Oil shale is a long-shot; a high risk; more like putting money down a rat hole! Let's be wise for a change.

Most sincerely,

Elaine Cloninger

Responses for Document 52810

52810-001: Thank you for your comments. The BLM has worked closely with its cooperating agencies throughout the PEIS process. There also have been numerous opportunities for public comment, including the 30-day extension of the original 90-day comment period for the Draft PEIS. An informative project Web site has also been maintained throughout the PEIS process.

The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures that any commercial oil shale program meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offer opportunities for states, Tribes, local communities, and the public to be involved at each decision point.

52810-002: Text regarding the Rio Blanco Test site (the location of three subsurface nuclear detonations that were conducted by the Atomic Energy Commission in 1973) has been added to Section 3.1 of the PEIS. Information about the site is available in a DOE fact sheet, available at http://www.lm.doe.gov/documents/sites/co/rio/rioblancofactsheet.pdf. The 360-acre test site is on DOE land in the Piceance Basin, approximately 30 miles southwest of Meeker. This site is not included as part of the study area, because the area is not on BLM-administered land.

Because the detonations took place in low-permeability, low-transmissivity shale and claystone formations with sandstone lenses, test-related radionuclides are not expected to travel far from the source area. Ongoing monitoring conducted at this DOE Legacy site shows no surface contamination, and there are no surface use restrictions at the site. However, subsurface disturbance is not allowed within a 600-ft radius of the test area without U.S. Government permission. Groundwater and surface water monitoring has shown no radiological contamination.

The Green River formation lies about 3,000 ft above the depth where the detonations occurred. If the BLM were to lease bordering or nearby property for oil shale development in the future, stipulations would be included to confirm that no radioactive contaminants would be mobilized.

52810-003: This PEIS is a programmatic document that analyzes land use allocation decisions and provides an effective analytical foundation for subsequent project-specific NEPA documents. Decisions in the PEIS will not create any rights or commitments for future development of oil shale. The BLM is not committing to any level of development at this stage. If commercial oil shale development is committed, the water needed for each project would be evaluated in project-specific NEPA documents.

52810-004: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

The potential emissions of any air pollutant (including mercury) would not result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

52810-005: The role of tax revenues in attempts to diversify local economies and reduce dependency on natural resource extraction industries, thereby reducing the susceptibility of local communities to the boom-and-bust economic cycle associated with energy development in rural areas, is included in Sections 4.11.2 and 5.11.2 covering potential mitigation measures.

52810-006: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. This information may be a consequence of research on the RD&D leases or a result of industry research or studies on

nonfederal lands. When applications to lease are received and additional information becomes available, the BLM will conduct further NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52810-007: Thank you for your comment.

Thank you for your comment, David Rodgers.

The comment tracking number that has been assigned to your comment is OSTSD52811.

Comment Date: March 20, 2008 00:57:07AM
Oil Shale and Tar Sands
Comment ID: OSTSD52811

First Name: David
Middle Initial: E
Last Name: Rodgers
Organization:
Address: 15636 Burt Ct.
Address 2:
Address 3:
City: Santa Clarita
State: CA
Zip: 91387
Country: USA
Email: wildcanyons@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am adamantly opposed to the extraction of oil from shale or tar sands on public lands in the United States, particularly in the magnificent unspoiled lands of the West including the San Rafael Swell of Utah and Roan Plateau of Colorado. These activities will cause substantial and likely permanent damage to soils, watersheds, and plant and animal communities. The processes used will consume vast amounts of fresh water which we cannot spare, and also contribute to air pollution through energy use. Further, we should be moving away from the burning of oil and gasoline as much and as soon as possible to reduce carbon emissions and other pollution, rather than engaging in activities which will do nothing but encourage the burning of increasing quantities of these fossil fuels! 52811-001 52811-002

All of us, and especially you as decision makers on these proposals, have a very serious obligation to protect our public lands, our water supplies, our air, our climate and ultimately our global environment from the harmful impacts of oil extraction from shale and tar sands. I strongly urge you to reject this type of energy exploration/development, and focus instead on the development of clean, renewable sources of energy such as wind and solar on non-wilderness quality public lands. Thank you. 52811-001 (cont.)

Responses for Document 52811

52811-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52811-002: Thank you for your comment.

Thank you for your comment, Brandon Covey.

The comment tracking number that has been assigned to your comment is OSTSD52812.

Comment Date: March 20, 2008 03:24:48AM
Oil Shale and Tar Sands
Comment ID: OSTSD52812

First Name: Brandon
Middle Initial: L
Last Name: Covey
Organization:
Address: [Withheld by requestor]
Address 2: [Withheld by requestor]
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

NO ACTION on Alternative Plan B. Please think about the Macro Level impacts of a project like this. Short term gains at the expense of long term devastation.

Please give me a glimpse of hope in my governments ability to enact sound environmental policies and not pander to the oil companies interests.

52812-001

Response for Document 52812

52812-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Craig Thompson.

The comment tracking number that has been assigned to your comment is OSTSD52814.

Comment Date: March 20, 2008 06:41:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD52814

First Name: Craig
Middle Initial: D
Last Name: Thompson
Organization:
Address: 809 Rose Crown Circle
Address 2:
Address 3:
City: Rock Springs
State: WY
Zip: 82901
Country: USA
Email: cthompso@wwcc.cc.wy.us
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I favor alternative A or the no action alternative. USA needs to get beyond our hydrocarbon addiction. I worked on the USERDA oil shale retort site near Rock Springs in the early seventies. Forty years later the taxpayer is still trying to clean this site up. The environmental problems and the toxins released into the groundwater are not worth the small gain in non-renewable fuels we recover. 52814-001

Response for Document 52814

52814-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52815.

Comment Date: March 20, 2008 06:59:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD52815

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization: The Sentient Group - Natural Soda Inc
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment: EIS Submission final.pdf

Comment Submitted:

Please find attached submission from The Sentient Group - Natural Soda Inc See Attachment.

PETER
CASSIDY
CHAIRMAN

THE SENTIENT GROUP LIMITED

A SUBMISSION IN RESPONSE TO REQUESTS FOR COMMENT

ON THE

DRAFT OIL SHALE AND TAR SANDS RESOURCE MANAGEMENT PLAN AMMENDMENTS TO ADDRESS LAND USE ALLOCATIONS IN COLORADO, UTAH, AND WYOMING AND PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT.

SUBMITTED BY THE SENTIENT GROUP "Sentient" ON BEHALF OF THE SENTIENT GROUP AND ITS AFFILIATES, NATURAL SODA INC. AND AMERALIA Inc.
20th March 2008

Dear Sir/Madam

I am writing to you on behalf of The Sentient Group ("Sentient"), an international private equity firm focused on the development of natural resources and its affiliates. A significant number of Sentient's investors are North American institutions.

Sentient has been the financier of Natural Soda Inc "NSI" since 2003 and today owns 53% of the company. Sentient also owns 46% of AmerAlia Inc. "AmerAlia", an OTC listed company that owns the remaining 47% of NSI. AmerAlia owns the "Rock School" sodium leases in the Piceance Basin area of Colorado through its subsidiary company, Natural Soda Holdings Inc. (NSHI). NSI, in its own right, also owns the adjacent "Wolf Ridge" sodium leases and water rights in the Piceance Basin area. NSI currently operates the only business producing naturally occurring sodium bicarbonate in North America from its sodium leases. NSI's and Ameralia's sodium leases lie within the BLM defined multi-mineral zone where the regulations require that all potentially economic minerals in the zone, namely oil shale, nahcolite and dawsonite, should be preserved for economic development.

Sentient has determined that it will invest in the development of the resources within NSI's sodium lease areas and has begun a process of restructuring AmerAlia and NSI in preparation for this development. Apart from optimizing the corporate and capital structure of the companies, Sentient will be ensuring that the board of the listed company consists of experienced, well credentialed and competent people with a knowledge of the US oil industry, technical knowledge of oil shale, sodium and aluminium, and the capital markets.

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Sentient has reviewed the PEIS from the perspective of a developer focused on optimizing the value proposition of a revitalized AmerAlia as it seeks to raise capital for its development program.

Sentient's comments are as follows and only relate to oil shale development in the Piceance Creek area of Colorado.

1	The PEIS report is comprehensive in its scope and is generally reasonable in its views and recommendations.	52815-001
2	Sentient supports the preferred Option B in the Piceance Basin as the only option that can lead to the establishment of a viable oil shale industry in Colorado.	52815-002
3	Sentient supports the concept that the exploitation of one mineral in the Multi-mineral lease zone should not sterilize or interfere with the development of other economically viable minerals. In this regard Sentient has undertaken a detailed review of all of the geologic and test data available from the public domain and data held by NSI and established a comprehensive database detailing the resources within its sodium leases and the surrounding district. In addition Sentient is targeting a drilling program within its sodium leases to add to its knowledge base.	52815-003
4	Sentient has in-house expertise in creating synthetic fuels from reacting hydrocarbons such as coal and oil shale with water and hydrogen. Sentient believes that with expanded mineral mining rights to exploit the sodium, oil shale and aluminium resources plus its water rights, it can pursue its own oil shale liquefaction program in the mixed nahcolite/dawsonite/oil shale resources below the Mahogany zone and the Boise bed. Sentient believes that it will have to license a technology solution to develop oil shale production from the Mahogany zone resource that takes account of managing the water aquifers that bound the Mahogany zone.	52815-004
5	Sentient believes that with its knowledge of the production of oil from oil shale and coal, NSI's proven knowledge of solution mining and processing of sodium salts combined with its unique water drawing and water storage rights in the district; Sentient, NSI and AmerAlia in combination have the potential to contribute to the development of a viable oil shale industry in the Piceance Basin. Furthermore, Sentient envisages that AmerAlia and NSI, appropriately resourced and scaled up, can provide environmental processing services by delivering fresh water to an oil shale development and processing of sodium enriched water streams produced from an oil shale development targeting the Mahogany zone above the lower dissolution surface and the sodium and aluminium resources.	52815-005

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6 It is with these views in mind, that Sentient provides higher level comments, of a strategic nature, on the PEIS:

a. It is important that lease owners have certainty of tenure to develop all of the resources within their lease areas and that the BLM be prepared to accommodate the exchange of lease areas to optimize a commercial development. For example today AmerAlia/NSI's leases have been separated by an industry participant acquiring the surface rights down the valley between the Rock School and Wolf Ridge lease areas. The splitting of properties will create difficulties for commercial developments if there are not viable, zero cost easements established that guarantee right of way and access for the holder of the exploitation rights to the under ground resources. 52815-006

b. Mineral resources available for commercial development should be optimized. For example, NSI has the only operating business on the plateau producing sodium salts. The specific Boise bed that is being solution mined is not across all of NSI's lease areas. Equally there are BLM controlled properties adjacent to NSI that contain the Boise bed. AmerAlia/NSI is likely to be the only operator for the foreseeable future capable of ensuring the proper commercial development of sodium bicarbonate from the Boise bed. In the spirit of the Multi mineral lease concept, AmerAlia/NSI seeks to swap some of its areas that do not contain the Boise Bed for the adjacent areas that contain the Boise bed with a view to ensuring that the development of the total Boise bed resource is optimized. In addition AmerAlia/NSI will be seeking the oil shale, sodium and aluminium mining and exploitation rights within its sodium lease areas. 52815-007

c. Access to infrastructure is critical for a successful oil shale development and for ensuring the viability of the on-going nahcolite solution mining operations. Processes that ensure surface access rights and easements for water pipelines, product pipelines (oil, water, waste-water), power lines need to be sufficient such that development initiatives, consistent with federal, state and local regulatory requirements, are not constrained. 52815-008

The following are comments which indicate Sentient's position on key specific elements, contained within the PEIS:

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Lease Application Process

We understand from the PEIS, an analysis of federal, state and other regulations, as they relate to oil shale lease applications, is to be conducted with a view to streamlining the process.

We also note that under Options B and C, prior to the issuance of commercial leases, a NEPA analysis is to be conducted and following issuance of an oil shale lease, a further site specific NEPA analysis is required enabling process specific impacts and definition of appropriate lease stipulations and mitigations issues to be defined.

Coupled with this process, is the requirement for companies, such as AmerAlia and NSI, holding leases located in the Multi Minerals Zone, to comply with provisions of the White River RMP. This compliance requires that "….multi mineral development will be allowed only if recovery technologies are implemented to ensure each of these minerals can be recovered without preventing recovery of the others."

We note the footnote contained in the PEIS which states that, "Additional NEPA analysis is also required for oil shale leasing under the White River 1997 RMP".

Sentient requests that any review of the BLM oil shale lease application process recognizes the work required to develop environmentally acceptable, economic oil shale processing technology will require long lead times, significant investment capital and other resources. 52815-009

The allocation of investment capital in commercial organizations is a competitive process. Before serious amounts of capital are allocated, company directors inevitably focuses on the degree of uncertainty surrounding the success of the application of project funds, in this case, an oil shale lease application irrespective of whether it's an R&D, preferential or commercial lease.

The degree of complexity (and accordingly risk), coupled with the upfront costs required to put forward a competent, credible oil shale lease application under the current process regime is high as developing a professional detailed NEPA information to accompany such an application is not a trivial task. Any accompanying NEPA submission document, of necessity, would require the input of a multidisciplinary group, likely on a consulting basis.

Any regulatory mechanisms developed in support of the streamlining of the leasing program need to deliver the prospect, to those who make capital allocation decisions, a reduction in the perceived level of risk associated with funding the preparation and funding of any lease application, as the successful acquisition of a legal right to develop any mineral lease, is a fundamental precondition of investment and development occurring.

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Consideration should be given to allowing existing sodium leases to be modified to multi-mineral leases, incorporating the right to conduct oil shale R&D process development activities subject to program pre-approval and appropriate supervision, reporting and control mechanisms. This would go a considerable way to alleviating this funding risk concern.

52815-009 (cont.)

Multi Mineral Zone Leasing Anomaly

The adoption of the BLM lease-by-application process may have unintended consequences for companies such as AmerAlia and NSI, operating in the Multi mineral zone under the White River RMP.

The PEIS states that :

> "Under both programmatic oil shale alternatives, in Colorado, lands with-in the Multi Mineral zone identified in the White River RMP would be made available for application **only** if the applicant can **demonstrate** that it would use technologies that allow recovery of oil shale resources without preventing the recovery of or otherwise destroying other minerals (ie nahcolite and dawsonite)".

Given that the lease-by-application process proposed by the PEIS requires "…NEPA analyses to be conducted prior to lease issuance" and that "… applicants would be required to identify key information regarding aspects of the proposed development needed to support a complete NEPA review (e.g. **technologies to be employed**, level of planned development…"), the adoption of the PEIS as currently drafted would create a "Gordian knot" not only for AmerAlia and NSI but also others who might seek to operate in the Multi mineral zone in the future.

52815-010

NSI and AmerAlia do not have any rights, nor the prospect of acquiring the rights that will allow it to conduct the necessary oil shale process recovery R&D to determine the appropriate technology to "…allow recovery of oil shale resources without preventing the recovery of or otherwise destroying other minerals (ie nahcolite and dawsonite)" such that it is in a position to specify the "…technologies to be employed…", as required under the PEIS lease-by-application process.

Unless a mechanism is found to address this issue, this anomaly has the effect of quarantining development of oil shale and or other mineral development in the multi mineral zone as an unintended consequence and works against the overlying principle that the US government agencies are seeking to promote.

One solution could be to create multi-mineral leases (with associated conditional oil shale rights) and allow operators in the multi-mineral zone to conduct R&D in

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specified area(s), provided this occurred within compliance of existing federal, state and local regulatory requirements.

Sentient would not like to see a division of the oil shale resource on a vertical stratification basis between the oil shale in the relatively shallow mahogany zone and the deeper oil shale, interbedded with the nahcolite and Dawsonite in the area of any such multi mineral leases. The rational for this perspective is that Sentient does not believe that it is possible to isolate mineral recovery operations and that heating the upper zone has the potential to interfere with the deeper resources. 52815-010 (cont.)

Lease Block Optimization

Sentient supports the concept of lease block optimization with its attendant associated efficiencies. The concept of developing large lease blocks sufficient to support a minimum 30 years of operation is desirable.

Provided all statutory and regulatory requirements can be met, the economic investment return characteristics of a development coupled with the market requirements to advance equity and debt will ultimately determine the minimum resource size necessary for commercial operation. Such a development will require a resource that can be expanded over time, to ensure that the business remains cost effective. 52815-011

We would be less supportive however, if a mandated 30 year of operation is adopted which results in an award of lease area that has not taken into account the technology and investment characteristics of the development, which to a large extent will determine the minimum area necessary for a successful development.

Fragmented Ownership

Whilst fragmented ownership issues addressed in the PEIS primarily address potential inefficiencies related to oil shale resource ownership stemming from differences between federal, state, tribal and private land owner related interests, to the extent that they do not yet already exist, mechanisms should be developed which allow existing mineral lease holders to consolidate their holdings into logical development units. This benefits all stakeholders. 52815-012

Sentient would support the development of a directive at federal level to enable consolidation of such lease-holdings into logical units providing the decision to do so is at the discretion of the existing lease holder.

Sentient believes that any such initiative should be broad enough to allow consolidation of existing fragmented leases by way of land exchanges or other appropriate mechanisms.

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Expedited Permitting

Sentient supports the proposal that Congress should mandate compliance with executive order No. 13211 [42U.S.C. 13201] and impose deadlines for consideration of permit applications. These deadlines should be practical and commercial and in particular consideration of issues relating to the effects of delays or uncertainty on raising equity and debt capital for a development. 52815-013 (cont.)

Protests and Litigation

Sentient supports the concept of community consultation and the provision of a mechanism to allow challenges to applications and decisions provide there are adequate checks and balances in the process plus effective and timely mechanisms to circumvent vexatious subversion of the oil shale lease application process. The process of applying for a commercial oil shale lease will be costly and require substantial application of resources. It is not unreasonable to expect companies making legitimate applications, having invested significant time, funds and resources and following a mandated applications process, not be subject to obstructionist and/or vexatious interference. 52815-014

Mechanisms need to be adopted that identify and remove such actions to avoid unwarranted delays, costs and administrative/human resource "log jams" with the potential consequence of threatening resource development and funding options.

Water Related Issues

Sentient notes that the PEIS recognizes the importance of water for the success of any oil shale operation and would not support a process that weakens the existing rights mandated by Water Court Decree. NSI has a court approved water augmentation plan relating to its water rights in the Piceance area and Sentient would not support any action that weakened NSI's water augmentation plan and water decree rights. 52815-015

Sentient notes the reported calls by water suppliers, local government and conservation groups seeking a 45 to 60 day extension of the period for comment on the PEIS. Sentient reserves it right to add a subsidiary submission in the event that such an extension is granted to specific interest groups and or the general public at large.

Your faithfully,

Peter Cassidy
Chairman - The Sentient Group, Director - Natural Soda Inc

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Responses for Document 52815

52815-001: Thank you for your comment.

52815-002: The BLM acknowledges the commentor's preference for Alternative B.

52815-003: Thank you for your comment.

52815-004: Thank you for your comment.

52815-005: Thank you for your comment.

52815-006: Thank you for your comment. Any decision made as a result of this PEIS is subject to valid existing rights. The consideration of potential exchange of leases is outside the scope of this PEIS.

52815-007: The BLM is committed to managing public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals. The consideration of potential exchanges of leases is outside the scope of this PEIS.

52815-008: Thank you for your comment. The BLM will continue to consider Rights-of-Way applications for supporting oil shale processing infrastructure that might cross BLM-controlled lands.

52815-009: The BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedures to implement a commercial leasing program. The BLM published a proposed rule for the management of a commercial oil shale leasing program in the *Federal Register* on July 23, 2008. The BLM rulemaking process is separate and apart from the drafting of the PEIS. The PEIS is analyzing the environmental consequences of an allocation decision, and therefore comment concerning the regulatory process is outside the scope of the PEIS.

The suggested modification of existing sodium leases to multi-mineral leases to allow oil shale RD&D activities would involve modifying the prior existing rights associated with the sodium leases and is beyond the scope of the PEIS.

52815-010: Conflicts associated with potential oil shale leasing and existing oil and gas leases will be analyzed and stipulations could be developed to mitigate the conflict consistent with BLM policy. It is the BLM's policy to optimize the recovery of both resources in an endeavor to secure the maximum return to the public in revenue and energy production; prevent avoidable waste of the public's resources utilizing authority under existing statutes, regulations, and lease terms; honor the rights of each lessee, subject to the terms of the lease, and sound principles of

resource conservation; protect public health and safety; and mitigate environmental impacts.

52815-011: Thank you for your comment.

52815-012: Thank you for your comment.

52815-013: Thank you for your comment.

52815-014: Thank you for your comment.

52815-015: Thank you for your comment.

Thank you for your comment, Jon Hill.

The comment tracking number that has been assigned to your comment is OSTSD52816.

Comment Date: March 20, 2008 07:57:48AM
Oil Shale and Tar Sands
Comment ID: OSTSD52816

First Name: Jon
Middle Initial: D
Last Name: Hill
Organization:
Address: P. O. Box 40
Address 2:
Address 3:
City: Rangely
State: CO
Zip: 81648
Country: USA
Email: cripple-cowboy@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I have several problems with this, but here are 3. 1. Even though the law requires it, you have no business writing this when you don't know what methods are going to be used to do the work. You cannot determine if there will be problems or not. It should not be done until the r&d leases have shown if it can be done. 2. You are subcribing to the notion that NW Colorado has to be a "national sacrifice zone". It does not, you are trying to force someting to happen, and all this do is cause an environmental disaster the likes of which you have to go to Russia or China to see. 3. You write it as a forgone conclusion that the current uses of the land will just have to not only get out of the way, but also leave the area. I believe that the term local area also means the entire Colorado River system. You are going to first pollute then dry it all up. That will be a bigger hardship on the U.S. than the shortage of oil that would occur while trying to build a sustainable oil shale industry. By sustainable I mean one that lasts 300 years instead of the 25 you appear to be shooting for. Thank you for your time, Jon D. Hill

52816-001

52816-002

Responses for Document 52816

52816-001: The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands.

52816-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Richard Moskowitz.

The comment tracking number that has been assigned to your comment is OSTSD52817.

Comment Date: March 20, 2008 08:53:29AM
Oil Shale and Tar Sands
Comment ID: OSTSD52817

First Name: Richard
Middle Initial:
Last Name: Moskowitz
Organization: American Trucking Associations
Address: 950 N. Glebe Road
Address 2:
Address 3:
City: Arlington
State: VA
Zip: 22203
Country: USA
Email: rmoskowitz@trucking.org
Privacy Preference: Don't withhold name or address from public record
Attachment: Oil Shale PEIS Comments 032008.pdf

Comment Submitted:

See Attachment.

March 20, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Avenue
Argonne, IL 60439

Re: American Trucking Associations' Comments on the BLM Programmatic Environmental Impact Statement on Oil, Shale and Tar Sands Leasing

To Whom It May Concern:

The American Trucking Associations, Inc.[1] ("ATA") is writing to comment on the U.S. Department of the Interior, Bureau of Land Management ("BLM") Programmatic Environmental Impact Statement (PEIS), evaluating the potential effects of oil shale and tar sands development in Colorado, Utah and Wyoming.[2] As the national representative of the trucking industry, ATA is interested in matters affecting the supply of diesel fuel, including potential increases in the domestic production of crude oil.

Fuel is the lifeblood of the trucking industry. Commercial trucks consume 53.9 billion gallons of fuel each year to deliver virtually all of the consumer goods in the United States.[3] In 2007, the trucking industry spent more than $112 billion on fuel, and this year that figure will likely increase to $135 billion. The trucking industry is suffering from the dramatic escalation in the price of diesel fuel. A one-penny increase in the price of diesel annualized over an entire year costs the trucking industry an additional $391 million a year. Historically, diesel was the second highest operating expense after labor for motor carriers. However, for many carriers fuel has now surpassed labor as their largest expense. As a result, the rapid increase in fuel costs is likely to lead to an increase in trucking company bankruptcies. 52817-001

To ameliorate the volatility of diesel prices, ATA believes that the federal government must take immediate steps to increase the domestic supply of crude oil and

[1] ATA is a united federation of motor carriers, state trucking associations, and national trucking conferences created to promote and protect the interests of the trucking industry. Directly and through its affiliated organizations, ATA encompasses over 37,000 companies and every type and class of motor carrier operation.

[2] *See Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and PEIS*, http://ostseis.anl.gov/eis/guide/index.cfm

[3] About 39 billion gallons, or 73 percent, is diesel. The remaining 27 percent is gasoline.

refined diesel fuel in an environmentally responsible manner. One means of accomplishing this is to develop the oil shale and tar sands resources in Colorado, Utah and Wyoming. The completion of the PEIS is a prerequisite to developing this critical natural resource. The PEIS evaluates the direct, indirect and cumulative environmental, cultural, and socioeconomic impacts associated with commercial leasing of these resources under a range of alternatives.

The PEIS sets forth three alternatives. Alternative A is the "no action" alternative, which would preclude revisions to the land use plans necessary to accommodate the commercial development of oil shale and tar sands. Alternative B, which has been designated the preferred alternative for both oil shale and tar sands, would make the largest amount of potential oil resources available, while still providing for an environmentally sound program. Alternative C would make a smaller amount of potential oil resources available for commercial leasing. ATA supports Alternative B.

The trucking industry requires an uninterrupted supply of diesel fuel at consistently reasonable prices. One of the best means of securing this goal is to increase domestic sources of oil production. ATA believes that the increase in the supply of domestically produced oil must be accomplished in an environmentally responsible manner. Alternative B would provide the greatest potential to increase the domestic supplies of oil. Alternative B also makes clear that the environmental impact of the commercial development of tar sands and oil shale would occur on a project-by-project basis that will consider both site-specific factors and project-specific factors. Moreover, we understand that Alternative C would allow development only on small non-contiguous parcels, raising the question of whether such development is commercially practicable.

52817-001
(cont.)

For these reasons, we believe that Alternative B will provide the maximum potential for the commercialization of domestically produced tar sands and oil shale, while simultaneously ensuring that such development occurs in an environmentally responsible manner.

If you have any questions or concerns with the trucking industry's support of Alternative B, please contact the undersigned at (703) 838-1910.

Respectfully submitted,

Richard Moskowitz
Vice President & Regulatory Affairs Counsel

Response for Document 52817

52817-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52818.

Comment Date: March 20, 2008 09:09:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD52818

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization: Exxon Mobil Corporation
Address: [Withheld by requestor]
Address 2: [Withheld by requestor]
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment: Response to BLM DPEIS Oil Shale_Tar Sands 032008.pdf

Comment Submitted:

Exxon Mobil Corporation submits its comments through the files attached to this and to a second form that follows. The file attached contains a four page letter signed by Ray Charles, Area Geoscience and Exploration Manager, United States and Mexico. Appended to this letter is a twenty one page attachment containing more detailed comments. That attachment will be sent via a second comment form, per the instructions for these comments. The original letter and twenty one page attachment will be delivered via overnight delivery to the address stated in the Federal Register notice. See Attachment.

ExxonMobil Exploration Company
P. O. Box 4778
Houston, Texas 77210
281 654 7016 Telephone
281 654 5155 Facsimile

Ray G. Charles
Area Geoscience & Exploration Manager
U. S. & Mexico

ExxonMobil Exploration

March 20, 2008

BLM Oil Shale and Tar Sands Resources Draft PEIS
Comments
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Re Draft Oil Shale and Tar Sands Resource Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement (DOI No. DES 07-60)

Ladies and Gentlemen:

ExxonMobil Exploration Company appreciates this opportunity to comment on the *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement* (DPEIS). ExxonMobil Exploration Company supports the BLM in amending the twelve land use plans to guide future management of geologically prospective areas where oil shale and tar sands resources are present. We believe a commercial oil shale and tar sands leasing program is in the best interest of the nation in contributing to meeting the country's energy needs. We also support the process for the environmental analysis of oil shale and tar sand lands leasing. 52818-001

Need for Additional Energy Resources

The Energy Policy Act of 2005 succinctly highlights the critical nature of energy supplies for the United States and encourages the development of oil shale and tar sand resources. This development must carefully balance other priorities with respect to the use of Federal lands including environmental protection. This balancing should also address the need for paced development that is required to progress technology and infrastructure on an evolutionary basis.

Support for Multiple Environmental Analyses

Amendment of the land use plans, along with the supporting Programmatic Environmental Impact Statement, is the first step in a commercial oil shale and tar sands leasing program that includes further reviews; thus there is no Federal action that will have direct or immediate effect on the environment at this point in the process. As part of the review process, the PEIS supports the BLM in revising the land use plans to allow possible future commercial leasing for oil shale and tar sands development. It is our 52818-002

understanding that any commercial oil shale lease sales will undergo additional environmental analyses at the lease nomination stage and prior to approval of proposed projects on the oil shale leases. Further, it is our understanding that the conventional oil and gas leasing process will remain unchanged because that technology is well understood and can be assessed.

These subsequent environmental analyses for oil shale / tar sands leases will be the focal point of resolution of more specific issues as exemplified by the approach taken with the RD&D leases issued in 2007. With the RD&D leases, the major issues were considered in light of the site-specific concerns and development plans under consideration (e.g., groundwater protection, cultural resources, and threatened and endangered species).

52818-002 (cont.)

Support of Commercial Leasing Program and Alternative B

We support the BLM in its efforts to develop a commercial leasing program and the government's recent efforts to make Federal lands available for oil shale research. We urge the BLM to recognize in any leasing program that there is a need for ongoing opportunities to develop and test new technologies on a phased basis to avoid precluding the development of new, and potentially better, ideas for the recovery of shale oil.

52818-003

We strongly urge the BLM to maintain its preference for Alternative B as the preferred alternative to make lands available for leasing. We believe that access to oil shale resources under Alternative B could significantly increase domestic sources of energy supply in the years to come and, thereby, increase our nation's energy security.

We believe the case for Alternative B is much stronger than acknowledged in the DPEIS. It is our view that the size of the resource and the benefits of oil shale development have been understated in the DPEIS. The in-place oil shale resource for the Green River formation in the three state area has been estimated by others at 1.5 to 1.8 trillion barrels[1] versus the DPEIS estimate of 61 billion in-place barrels with respect to Alternative B, a reduction of more than 95%. There will be significant benefits to the nation from the moderating effects of new domestic energy supplies on U. S. energy markets and the economic benefits that will accrue locally, statewide and nationally as a result of oil shale development.

52818-004

We consider Alternative C as a "non-development" alternative given the widely scattered nature of the parcels, which reduces operational efficiency and increases infrastructure impacts. Alternative C also severely limits resource access, particularly in the Piceance Basin where the highest quality oil shale resource exists. To place this in context, we estimate that an election of Alternative C over Alternative B will remove lands having a potential 50 to150 billion barrels of recoverable oil resources from consideration for oil shale leasing in the Piceance Basin. We view the criteria for excluding lands in Alternative C to be overly restrictive and inconsistent with the BLM's "multiple-use management" mandate. We note in our specific comments that both Alternative A and

52818-005

[1] Bartis, J., LaTourrette, T., Dixon, L., Peterson, D.J. and G. Cecchine, 2005, Oil Shale Development in the United States: Prospects and Policy Issues, RAND Report, 68 p.

Alternative C will, we believe, effectively limit competition in the oil shale development sector to the companies that currently have RD&D leases. This will preclude development and testing of alternative technologies having the potential for improved total resource recovery and minimization of other impacts. 52818-004 (cont.)

Compatibility of Development with Other Resources

It is our view that the compatibility of oil shale development with other uses of BLM administered lands is an area that deserves re-examination in the DPEIS. Experience with conventional oil and gas operations indicates that there are lands that currently have stipulations for no surface disturbance or seasonal limitations that can be leased and developed to recover the mineral potential without adversely harming the protected surface uses. The DPEIS Alternative C presents a case that oil shale leasing should be limited to those lands where there would be no such potential issues. We believe it is premature to make this type of decision within the context of this PEIS; rather, such a decision is more appropriate when a leasing analysis, contemplated by the process outlined by the BLM in the DPEIS, is accomplished. If the DPEIS is revised with respect to this compatibility issue, additional lands can be considered for future leasing, with the opportunity to provide greater resources to U.S. energy markets. 52818-005

Similarly, oil shale development can be compatible with the development of other mineral resources on the same lands, especially conventional oil and gas and nahcolite resources. Of course, the conventional oil and gas and nahcolite resource holders must be allowed to develop these resources. Technology is currently being developed by ExxonMobil that promises to enhance this type of multi-mineral development. We urge that the DPEIS reflect the high probability of mineral co-development in the future and afford, through the envisioned leasing program, opportunity for these types of technologies to be tested. This is best accomplished through further leasing similar in scope and detail to the BLM's previous RD&D leasing action.

Overstatement of Risk

We are concerned that overstating risk occurs through the inclusion in the DPEIS of speculative scenarios and risks that should be evaluated either at the leasing phase or development phase of oil shale commercialization. The approach uses "worst-case" scenarios and hypothetical socio-economic impact assessments based upon limited, out-dated, or incomplete information. We urge the BLM to apply well-accepted risk assessment techniques and more current data to establish "weight of evidence" requirements for the characterization of potentially adverse impacts of oil shale development on the physical and socio-economic environments. 52818-006

BLM Information Quality Guidelines

We also urge a more rigorous application of the BLM Information Quality Guidelines. For example, the DPEIS includes speculation presented as empirical data, opinion from unnamed sources, the use of personal communications from unidentified sources, and the use of information that does not satisfy the government's requirements for transparency, accuracy, and utility of information in the rulemaking process. It also includes factually incorrect information about ExxonMobil's Colony Shale Oil Project. It is our view that the PEIS will be a more substantial base document in the future in 52818-007

connection with oil shale leasing if the Information Quality Guidelines are applied rigorously in the final document. 52818-007 (cont.)

Attached to this letter are more in-depth comments on the DPEIS for your consideration. We commend the BLM for undertaking this work to bring commercial oil shale leasing to fruition.

Sincerely,

Responses for Document 52818

52818-001: The BLM acknowledges the commentor's preference for Alternative B.

52818-002: Thank you for your comment.

52818-003: The numbers in question were calculated for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The number was developed with the understanding that the number underestimates the actual in-place resource. The numbers were developed using the values that described the minimum quality and thickness that were deemed to be economic. Those values are a minimum 25 ft thickness and a minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming, the values used were 15 ft thick and 15 gallons per ton. These values coupled with the acreage in each of the alternatives generated the numbers in question. It is true that using more exact isopachs and quality data, if available, would have provided much higher values for each of the alternatives, but the alternatives would remain comparable.

52818-004: The BLM acknowledges the commentor's general support of access to oil shale and tar sands and the preference for the BLM to not select Alternative C.

52818-005: The alternatives in the PEIS were formulated to give the decision maker the ability to fully compare the consequences of protecting or not protecting the resources within the planning areas. Since the alternative identifies lands that could be available for application for leasing in the future (i.e., an allocation decision), subsequent NEPA analysis will be required prior to a leasing decision. When applications are received, an interdisciplinary team of resource specialists, with on-the-ground knowledge of the planning area, will analyze the current management situation; desired conditions; and existing uses, activities, and management prescriptions to create a framework to resolve the issues raised through the development of the leasing alternatives. A balanced approach consistent with the FLPMA principles of "multiple use" will be a key component of the analysis. Another factor will be existing BLM policies, such as optimizing the recovery of multiple resources in an endeavor to secure the maximum return to the public in revenue and energy production. The BLM does not believe that Alternatives B and C limit competing uses. In addition, there is nothing to preclude the development of additional technologies on either private or state lands.

52818-006: The PEIS has been revised to more clearly indicate the basis for assumptions, analyses, and conclusions. As noted in the comment, considerable uncertainty exists regarding many technical and environmental issues associated with oil shale development. Uncertainties exist regarding the location of projects, resources within project areas and their susceptibility to impact, technologies to be deployed, water and energy needs of projects, and mitigations to be applied. For this reason, the BLM has taken a conservative approach using the best

information available about the distribution of resources, technologies as they exist today, the footprint of facilities, and the impacting factors associated with those technologies. In most cases, this conservative approach results in an overstatement of impacts. Subsequent project-specific NEPA evaluations would use more realistic assumptions based on specific project proposals.

52818-007: In preparing the PEIS, the BLM used the best information available to the agency at the time the PEIS was prepared. Considerable uncertainty exists regarding many technical and environmental issues associated with oil shale development, including the location of projects, resources within project areas and their susceptibility to impact, technologies to be deployed, water and energy needs of projects, and mitigation measures to be applied. Subsequent project-specific NEPA evaluations would use more realistic assumptions based on specific project proposals and site-specific data that met the BLM's Information Quality Guidelines.

The BLM does not concur that the Draft PEIS includes speculation presented as empirical data, opinion from unnamed sources, or factually incorrect information about the Colony Shale Oil Project.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52819.

Comment Date: March 20, 2008 09:13:27AM
Oil Shale and Tar Sands
Comment ID: OSTSD52819

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization: Exxon Mobil Corporation
Address: [Withheld by requestor]
Address 2: [Withheld by requestor]
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City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment: 3.8 BLM DPEIS Response - Comments 031808.doc

Comment Submitted:

Exxon Mobil Corporation submits this second filing containing the attachment to the comment letter previously sent. Please assure that this document is attached to the letter previously sent as the two documents constitute the comments of ExxonMobil. See Attachment.

COMMENTS OF EXXONMOBIL EXPLORATION COMPANY

Draft Oil Shale and Tar Sands Resource Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement (DOI No. DES 07-60)

March 20, 2008

Following are the specific comments of ExxonMobil Exploration Company with respect to the *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement*. These comments should be considered in conjunction with the general comments made in the letter to which this document is attached. ExxonMobil Exploration Company supports the BLM in amending the twelve land use plans to describe geologically prospective areas where oil shale and tar sands resources are present for possible leasing of this potentially important domestic energy resource. Our purpose in submitting these specific comments is to suggest areas in which the DPEIS may be strengthened to provide a document that can serve as a base for the further environmental analysis work outlined by BLM in the DPEIS.

The Tables included in these comments present examples supporting the issues raised. The Tables are not exhaustive of all specific items of concern but are illustrative of our concerns.

I. Underestimated Benefits of Oil Shale Development

The estimated oil shale resource potential in the draft PEIS (DPEIS) is inconsistently reported and, in the Executive Summary, significantly underestimated (95 percent reduction) relative to previously published estimates.

In published literature, estimates of shale oil resources in the three-state Green River Formation range from 1.5 to 1.8 trillion oil equivalent barrels of in-place resource. The DPEIS in the preferred Alternative B presents a combined estimate of 61 billion barrels, comprising less than 5 percent of published estimates. Although the Executive Summary Table ES-1, indicates the 61 billion barrels of in-place resource is a "minimum estimate," the very low BLM estimate may lead to a public misunderstanding of the significant value and materiality of Western U.S. oil shale resources. We understand that resource estimates are dependent on land availability. However, our understanding is that BLM does not plan to limit land availability to an extent that only 4% to 5% of the available resource will be made available for development. To place this in context, we estimate that an election of Alternative C over Alternative B will remove lands having a potential 50 to150 billion

52819-001

barrels of recoverable oil resources from consideration for oil shale leasing in the Piceance Basin alone. It is noteworthy that 100 billion barrels (the mid-point of this range) would supply one-quarter of current U.S. oil demand for approximately 40 years.

The table, below, indicates in greater detail in-place resource values as reported in the literature contrasted with the DPEIS values.

Basin / Data Source	Draft PEIS (2007), Executive Summary (Alternative B)	Dyni (2006); Pitman *et al.* (1989); Trudell *et al.* (1983); Culbertson *et al.* (1980); Russell (1990); DPEIS (2007), Appendix A	Bartis *et al.* (2005)
Piceance Basin, CO	16	1000 - 1200	
Uinta Basin, UT	28	214	
Green River Basin, WY	17	244-250	
Total	61	1458	1500

52819-001
(cont.)

Suggested Changes in DPEIS:

1. Use broadly accepted, in-place resource estimates from peer reviewed, published literature.
2. Using a range of published recovery factor estimates, document the range of potential U.S. oil reserves removed from consideration for development if Alternative A or Alternative C is selected.
3. Replace the estimate of resource potential in Wyoming based on a "personal communication" with a published estimate.

Further details are shown in the following Table I.

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Table I. Detailed Comments on DPEIS's Underestimation of Benefits.

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action
1	ES-4 / ES-6 2-27 / 2.3.3.2 A-8 / A.1.2	In Table ES-1 (Page ES-4, Section ES-6), the combined "potential shale oil resource" for the three-state area is reported as 61 billion barrels for BLM-preferred Alternative B. Conversely, in Appendix A (Page A-8, Section A.1.2), the authors report "1.2 trillion barrels of oil" resource in the Piceance basin alone with "about 480 billion barrels in deposits averaging at least 25 gal/ton." For the Piceance basin, Table ES-1 indicates 16 billion barrels for Alternative B and 2 billion barrels for Alternative C. These data are also presented in Chapter 2: "The BLM has estimated that under Alternative C, approximately 2 billion bbl of oil would be available from Colorado, 21 billion bbl from Utah, and 8 billion bbl from Wyoming."	In contrast to the Table ES-1 estimate of 61 billion barrels for the three-state area under Alternative B, Bartis et al. (2005) report an oil resource in-place of 1.5 to 1.8 trillion barrels for the Green River Formation in Colorado, Utah and Wyoming. They estimate the recoverable oil resource to range between 500 billion and 1.1 trillion barrels, with a midpoint estimate of 800 billion barrels. The resource potential estimates of Bartis et al. (2005) are further supported by Dyni (2006) , who cites several publications that estimate substantially greater resources in-place in each of the three (3) States: Pitman et al. (1989) estimate the in-place Piceance basin, Colorado, oil shale resource at 1 trillion barrels; Trudell et al. (1983) estimate the in-place Uinta basin, Utah, oil shale resource at 214 billion barrels; Culbertson et al. (1980) estimate the in-place Green River basin, Wyoming, oil shale resource at 244 billion barrels.	Correct the estimates in Table ES-1 to appropriately represent the resource potential, consistent with the scientific literature. This could be accomplished simply by multiplying the published in-place shale oil volume for each basin by the ratio of acreage available for lease nomination to total acreage in the most geologically prospective area. Although this approach is not ideal, it would provide a more reasonable estimate than those reported in Table ES-1. Ideally, the calculation of resources under the various Alternatives for each basin requires a more detailed analysis of the spatial distribution of oil shale thickness and grade. Such an exercise may not be possible for the Uinta and Greater Green River basins as the required maps may be unavailable over significant portions of these areas. However, the required maps for the Piceance basin do exist in the public domain in (see USGS web site, http://energy.cr.usgs.gov/other/oil_shale/, for information about their oil shale geodatabase for the Piceance Basin.)

52819-001 (cont.)

5195

Table I (continued). Detailed Comments on Underestimation of Benefits.

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action
2	A-4 / A.1	The in-place shale oil values for the Greater Green River Basin in Appendix A are cited as coming from a "personal communication from Wiig."	Such a citation, without an explanation of procedure or proper reference, is difficult to assess. Published estimates for the resource in the Green River basin include Dyni (2006), who estimates 250 GBO with a 15 gal/ton cutoff, and Russell (1990), who estimates 430 GBO with no cutoffs.	We recommend that the in-place shale oil values for the Greater Green River Basin in Appendix A be more appropriately referenced by the publicly available literature.

52819-002

5196

II. Compatibility of Oil Shale Development with Other Activities and Resources

A. Compatibility with Other Activities. The PEIS considers whether oil shale development is compatible with other land use activities. The PEIS presents a case premised on the assumption that oil shale development should be limited to those areas that would not require re-opening any of the existing Resource Management Plans (RMPs) with respect to other land use activities because shale development would conflict with "stipulations for no surface-disturbance or seasonal limitations" now embodied in those plans. ExxonMobil believes such a restriction on oil shale lands availability to be inappropriate. There may be lands with current surface-disturbance or seasonal limitations that can be made available under proper circumstances. This issue should be addressed at the time of commercial leasing rather than in this DPEIS. Alternative C reduces oil shale lands availability to small, somewhat non-contiguous parcels effectively rendering Alternative C a second "no action" alternative. In the Piceance basin alone, this approach reduces available oil shale lands from the lands available under Alternative B by approximately 90% (359,798 versus 40,325 acres), excluding an estimated 125 to 250 billion barrels of developable, in-place shale oil resources. Applying a range of potential recovery factors of 40% to 60% (see Bartis (2005)), the range of potentially recoverable oil shale resource excluded is 50 to 150 billion barrels. We therefore urge the BLM to continue to reject Alternative C because the oil shale resources that are eliminated through this alternative are too great to not be considered at this point in the planning process. Similarly, we urge BLM to continue to reject Alternative A because it also would prematurely limit lands available for possible oil shale development.

52819-003

Furthermore, either Alternative A or Alternative C would in essence limit competition in the shale development sector to only three companies and would preclude development and testing of alternative technologies with the potential for improved total resource recovery and minimization of other impacts (e.g., reduced surface footprint.).

52819-003 (cont.)

B. Compatibility with Other Mineral Resources (Co-Development). Oil shale development can be compatible with the development of other mineral resources on the same lands, especially the recovery of oil, gas and sodium minerals. DPEIS statements that oil shale development and oil, gas or sodium mineral development are "largely incompatible" should be deleted because they ignore both new technologies and likely future development. BLM should not assume an order in which mineral development occurs, as co-development is likely to be technology-specific. For example, ExxonMobil has submitted a patent application (U.S. publication 2007/0246994) for technology that specifically addresses oil shale / nahcolite co-development. In addition, ExxonMobil has submitted a patent application (U.S. application Ser. No. 11/973,750) for technology by which oil / gas operations can occur simultaneously with in situ oil shale development, potentially producing significant synergies in surface facility needs and uses. To our knowledge, these co-development matters are not currently under research in BLM's RD&D program, but are particularly relevant to the Piceance Basin where oil shale occurs in close association with nahcolite deposits and in areas where oil / gas operations are currently underway. Of course, the conventional oil and gas and nahcolite resource holders must be allowed to develop these resources.

52819-004

Suggested Changes in DPEIS:

1. Apply BLM's 'multiple-use' mandate. Address surface use limitations in subsequent environmental analyses in order to **not** prematurely limit lands available for possible shale oil development.
2. Exclude statements that shale oil development is incompatible with either sodium mineral production or conventional oil / gas operations.
3. Make additional lands available for increased RD&D on co-development and sequential development technologies.

Further details are shown in the following Table II.

Table II. Detailed Comments on Oil Shale Compatibility with Other Activities and Resources.

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action
3	2-27, 28 / 2.3.3.2	"To identify those lands that would be excluded on the basis of existing land use plan decisions, the BLM considered the possible impacts associated with individual commercial oil shale development projects. On the basis of these impact analyses … , it was determined that commercial oil shale development could be in conflict with existing land use plan decisions that require surface-disturbance restrictions or seasonal limitations on activities in order to adequately protect a specific resource. It was decided to exclude from Alternative C all lands where such surface-disturbance and seasonal limitations are in place to protect known sensitive resources. The BLM made the determination that the most effective means of identifying lands that should be excluded on this basis was to exclude those lands within each field office where stipulations for no surface-disturbance or seasonal limitations are in place for oil and gas leasing. Under this alternative, the BLM would place a priority on protecting known sensitive resources within each field office by excluding certain lands from application for leasing."	These criteria presuppose oil shale development to be largely incompatible or in conflict with a variety of other activities, including the co-development of other resources. We contend that oil shale development technologies can be compatible with the development of other mineral resources on the same lands, especially the recovery of oil, gas and sodium minerals. The degree of compatibility and the order of recovery will depend on the technologies employed for the development of each mineral estate.	Continue to reject Alternative C as overly restrictive and inconsistent with BLM's "multiple-use" land management mandate. Acknowledge that multi-mineral co-development is a realistic probability as technology develops. Implement additional leasing similar in approach to the RD&D leasing program to test alternative sodium mineral co-development technologies and conventional oil and gas co-development technologies.

52819-005

Table II (continued). Detailed Comments on Oil Shale Compatibility with Other Activities and Resources.

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action
4	4-17 / 4.2.1.1	"A significant portion of the land within the most geologically prospective oil shale areas is already undergoing mineral development, particularly for the development of oil and gas resources. Commercial oil shale development, using any technology under consideration in this PEIS, is largely incompatible with other mineral development activities and will likely preclude these other activities while oil shale development and production are ongoing… While it is possible that undeveloped portions of an oil shale lease area could be available for other mineral development, such development would be unlikely to occur on a widespread basis, except possibly in areas where a single company was developing multiple resources. Similarly, it is possible that oil shale extraction technologies could evolve to a point where other mineral development activities could be conducted simultaneously; however, predicting how that would translate into land use impacts is not possible at this time."	Oil shale development can be compatible with oil / gas development by using a combination of pad and directional drilling with proper location of oil shale development volumes and oil and gas wells. With pad drilling, multiple well bores are drilled from the same location and directional drilling allows for wellbores to be deviated below the oil shale interval to target deeper oil and gas zones over a broad area. Also, underground oil shale workings can be designed to avoid drill-pad locations.	Exclude all statements from the PEIS that presume shale oil development to be incompatible with either sodium mineral production or conventional oil / gas operations. Acknowledge that multi-mineral co-development is a realistic probability as technology develops. Implement additional leasing similar in approach to the RD&D leasing program to test alternative sodium mineral co-development technologies and conventional oil and gas co-development technologies.

52819-006

5199

Table II (continued). Detailed Comments on Oil Shale Compatibility with Other Activities and Resources.

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action	
5	4-17 / 4.2.1.1	"The BLM also has determined that it will not carry forward decisions in the White River RMP to restrict oil shale leasing from the Piceance Creek Dome area."	Confusion could exist between the meaning of this language and that in Section 2.3.3 (p. 2-21) where the same concept is set forth but in different terms.	Revise the cited language in Section 4.2.1.1 to read: "The current White River RMP restricts oil shale leasing in the Piceance Creek Dome area. That prohibition on leasing will be eliminated."	52819-007
6	6-37 / 6.1.2.1	"Commercial oil shale development, using any technology under consideration in this PEIS, is largely incompatible with other mineral development activities because they dominate the lease area in which they are located. Oil and gas development is ongoing in many parts of the study area, and conflict between oil shale projects and oil and gas projects would be expected. While it is possible that undeveloped portions of an oil shale lease area could be available for other mineral development, such development would be unlikely to occur on a widespread basis, except possibly in areas where a single company is developing multiple resources. A possible exception is being investigated as part of one of the RD&D projects where nahcolite mining is being conducted in advance of oil shale production."	See Comment 4.	Exclude all statements from the PEIS that presume shale oil development to be incompatible with either sodium mineral production or conventional oil / gas operations. Acknowledge that multi-mineral co-development is a realistic probability as technology develops. Implement additional leasing similar in approach to the RD&D leasing program to test alternative sodium mineral co-development technologies and conventional oil and gas co-development technologies.	52819-008

III. Overstatement of Risk / Use of "Worst-Case" Scenarios / Speculation / Uncertainty

Section 4.1 of the DPEIS states: "In those instances where specific data are not available to define a potential impact-producing factor, best professional judgments have been made to establish reasonable assumptions."

A. The Use of "Best Professional Judgments." The agency has a responsibility to present a range of opinions where they exist. It is recognized that the process of how expert judgment is elicited can yield biased results. We believe that in several areas of the DPEIS there is not an adequate balancing of the existing range of perspectives. Also, sources are not transparently identified. The result, in several cases, is an unbalanced view of both the range and the magnitude of the risks associated with oil shale development.

B. Thresholds Necessary to Validate a "Concern." The DPEIS does not discuss nor establish a "weight of evidence" requirement with respect to the basis for the selection of environmental issues to address. Without this, any potential adverse effect, regardless of whether it is reasonably likely or even technically feasible, is given standing in the DPEIS notwithstanding well-accepted risk assessment policies of BLM and EPA.

52819-009

C. Ranges of Risk Are Improperly Presented as "Worst-Case Scenarios." "Worst-case" scenarios do not portray an accurate nor useful depiction of a potential oil shale industry in the Western United States. We propose that such scenarios be balanced by expert judgment in the final PEIS, as suggested by the statement regarding "reasonable assumptions" in Section 4.1. We believe that "reasonably likely" scenarios will be of greater utility in future leasing and development considerations.

5201

D. Anecdotal Observations or Hypotheses of Adverse Impacts Do Not Constitute Risks. The introductory text of the DPEIS appropriately notes that substantial uncertainty exists regarding many technical and environmental issues associated with oil shale development. For this reason, the BLM oil shale development process appropriately includes subsequent environmental analyses. However, the DPEIS then sets forth, section-by-section, arbitrary statements about the adverse effects of oil shale development in conflict with BLM observations and in the absence of supporting and publicly available data.

E. Environmental Risks Overstated.

1. The DPEIS addresses at length various water quality issues. Arguably, many of these will relate to the extent to which water moves through the rock and what, if any, impurities will be picked up and transported. The DPEIS assumes that a rock porosity of 30%, and presumably enhanced permeability, will be created by in situ oil shale development. To the extent that porosity and presumably permeability will or will not be changed is, in all probability, technology dependent and should be addressed in the environmental assessment associated with a specific plan of development.

52819-010

2. The DPEIS places considerable emphasis on assessments about surface impacts. In many cases the DPEIS does not adequately differentiate between in situ development technologies and surface mining / retorting technologies and, as a result, overstates the potential surface impacts of in situ development. 52819-011
3. We understand that the final PEIS is not intended to provide an environmental analysis for agency decisions beyond the revision of specific land use management plans. As a result, future and more accurate risk assessments are an integral part of oil shale leasing and development. However, we are concerned that both the public and policy makers will fail to remember this important procedural point and fail to recognize that the PEIS provides insufficient information about specific activities to mitigate possible impacts. 52819-012

Suggested Changes:

1. Acknowledge a range of opinions and expert judgments, especially on potentially influential topics that are assessed via "personal communication" or single-party assessments.
2. Apply well-accepted risk assessment policies of BLM and EPA to establish "weight of evidence" requirements for the selection of potential impacts of oil shale development on the environment. 52819-009 (cont.)
3. In areas of significant uncertainty, replace "worst-case" scenarios with "reasonably likely scenarios" based on expert judgments.
4. Delete anecdotal observations or hypotheses of adverse impact or provide supporting scientific data and citations. Where appropriate, cross-reference opinions with supporting or conflicting data provided elsewhere in the text.
5. Clearly differentiate ex situ from in situ oil shale development technologies as they relate to potential environmental effects. 52819-011 (cont.)
6. Avoid conclusions of risk that are better suited for assessment in subsequent environmental assessments. 52819-012 (cont.)

Further details are shown in the following Table III.

5202

Table III. Detailed Comments on the Overstatement of Risk / Use of "Worst-Case" Scenarios / Uncertainty / Speculation.

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action	
7	3-97 / 3.5.1.2	"Increasing CO2 concentrations also lead to preferential fertilization and growth of specific plant species."	This statement is speculative and not supported by any references. We find no scientifically sound studies in the literature supporting this assertion.	Delete statement.	52819-013
8	3-103 / 3.5.3	"Predominant wind direction aloft is from the southwest in the region; thus, potential air quality for the Class I areas located northeast of the study area would be affected."	No references are cited to indicate wind directions in the areas included. Indication that air quality "would be affected" is premature and requires further technology- and location-specific analyses.	Provide references to prevailing wind directions in and around the ROIs. Acknowledge that mitigations measures would be investigated and implemented as required by all applicable air quality control laws and regulations.	52819-014
9	3-142 / 3.7.3.2.3	"While no single or combination of factors has been proven to have caused the decline in greater sage-grouse numbers over the past half-century, the decline in greater sage-grouse populations is believed to be the result of a number of factors, including drought, oil and gas wells and their associated infrastructure, power lines, predators, and a decline in the quality and quantity of sagebrush habitat (due to livestock grazing, range management treatments, and development activities) (Connelly et al. 2000; Crawford et al. 2004)."	Inclusion of oil and gas in the list of reasons for the sage grouse population decline is tenuous. Connelly et al. (2000) list several reasons, including oil and gas, based on largely anecdotal evidence. Crawford et al. (2004) do not include oil and gas in their list of reasons for the population decline. Moreover, there is considerable evidence that the population decline has been occurring for decades, long before the recent increase in oil and gas activity in the area.	Revise statement to accurately represent sources. Provide references from literature if oil and gas activities have contributed to the population decline. If not, delete the statement.	52819-015

Table III (continued). Detailed Comments on the Overstatement of Risk / Use of "Worst-Case" Scenarios / Uncertainty / Speculation.

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action	
10	3-159 / 3.7.4.1.7	"The Canada lynx could occur in the Green River, Piceance, and Uinta Basins and in the vicinity of the Asphalt Ridge STSA."	The connection to the Piceance basin is speculative and unsupported by a scientific citation.	Delete statement or cite supporting evidence.	52819-016
11	3-168 / 3.7.4.1.22	"The [Uinta Basin hookless cactus] could occur within or in the vicinity of development areas in the Piceance and Uinta Basins and the Asphalt Ridge, Hill Creek, Pariette, P.R. Spring, Raven Ridge, and Sunnyside STSAs."	The connection to the Piceance basin is speculative and unsupported by a scientific citation. Moreover, references to the location of the cactus appear to be inconsistent, e.g. references in one paragraph are to specific counties and in another paragraph to the entirety of the Piceance and Uinta Basins .	Delete statement or cite supporting evidence. Clarify where the species occurs.	52819-017
12	3-219 / Table 3.10.2-11	"Colorado county manager" asserts that high wages in the oil and gas sector "…affects the ability of local communities to diversify 'a degradation in the college bound population.'"	This is one of many opinions cited in the socio-economics section where an individual is identified by title only and referenced as a "personal communication." Such statements, particularly when they are potentially influential in nature, should be held to a higher standard of quality and transparency per the BLM's own Data / Information Quality Guidelines. This is particularly true when the statements contradict the data provided in the very same section. For example, Table 3.10.2-11 indicates school dropout rates in the Colorado ROI are lower than the State average.	Delete statement or cite supporting evidence from the publicly available literature. The section on socioeconomics would be strengthened significantly by ensuring that cited and / or publicly available data are consistent with solicited opinions.	52819-018

Table III (continued). Detailed Comments on the Overstatement of Risk / Use of "Worst-Case" Scenarios / Uncertainty / Speculation.

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action	
13	4-2 / 4.1	"In those instances where specific data are not available to define a potential impact-producing factor, best professional judgments have been made to establish reasonable assumptions."	We concur with this statement. However, the statement does not represent the manner in which Chapter 4 is written. The tendency in Chapter 4 is to present "worst-case" scenarios in the absence of available data or in the case of uncertainty.	Revise Chapter 4 to present risks and uncertainties in a way that is consistent with this statement (i.e., by presenting "reasonably likely" impacts based on reasonable assumptions.)	52819-019
14	4-12 / 4.1.4	"....it is assumed that one connecting transmission line and ROW would serve each project …. it is assumed that one pipeline and ROW would serve each project…. Although new transmission lines and pipelines could very likely be utilized by more than one oil shale production facility, the resulting overall reduction in land disturbance is not considered ...."	Infrastructure synergies among projects are a reasonable expectation of future oil shale development. This "worst-case" depiction inaccurately portrays the potential scale of land use for transmission lines and pipelines that is not "reasonably likely" and, therefore, is of questionable utility.	Revise such analyses in Chapter 4 to present "reasonably likely" risks and an adequate treatment of uncertainty.	52819-020
15	4-16 / 4.1.8	"Efficiencies and economies that would be realized from integrated systems or centralized services are not considered."	Per comment 13, the authors make assumptions that they themselves consider unlikely. The utility of this analysis is thus questionable.	Revise such analyses in Chapter 4 to present "reasonably likely" risks and an adequate treatment of uncertainty.	52819-021

5205

Table III (continued). Detailed Comments on the Overstatement of Risk / Use of "Worst-Case" Scenarios / Uncertainty / Speculation.

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action
16	4-25 / 4.3.1.1	"In situ techniques would result in rolling operations and would result in continuous ground disturbance areas and reclamation areas.... A total of 5,760 acres ... would potentially be disturbed and subject to erosion and sediment runoff."	This statement portrays a scenario where the entire surface area of a project encompassing 5,760 acres is potentially disturbed. This is highly unlikely and the statement is inconsistent with potential in situ oil shale development technologies. For example, ExxonMobil's concept for in situ oil shale development involves pad-drilling of deviated wellbores that would significantly decrease the surface footprint of drilling operations and the associated ground disturbance (see U.S. patent application Ser. No. 11/973,750 expected to publish in April 2008).	Revise statement to present a "reasonably likely" scenario, differentiated by the various approaches and technologies under consideration in the DPEIS (e.g., in situ vs. ex situ).

52819-022

5206

Table III (continued). Detailed Comments on the Overstatement of Risk / Use of "Worst-Case" Scenarios / Uncertainty / Speculation.

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action
17	4-139 / 4.11.1.1	Table 4.11.1-1, ROI Economic Impacts of Oil Shale Developments	The economic impacts considered are employment and income for housing, construction and operation phases. No attempt has been made to estimate potential government revenues to the States or within ROIs. Employment numbers and estimation of direct / indirect effects are highly dependent on the initial assumptions input into the IMPLAN® model. The assumption for direct employment figures comes from a personal communication and is not independently verifiable. The numbers for underground mining with surface retorting should be compared against actual projects in the 50,000 bbl/day range rather than projections from 1973. Given the economic imperative for a project moving to a long-term operations phase to train and transition to local labor, the assumption that "the entire ... operations labor force for oil shale facilities and the associated power plants and coal mines would come from outside the ROI in each state" seems unsupported. The assumption for local materials purchase during the operations phase similarly appears understated.	Assuming the current fiscal regime, which in certain ROIs include energy impact mitigation funds, provide an estimate of revenues that may accrue to the States and ROI from all sources. Modify IMPLAN® input assumptions based on supporting evidence from the publicly available literature. Compare employment numbers and (to the extent possible) income with actual ex situ projects in the 50,000 bbl/day range from publicly available sources, and make appropriate calibrations to the IMPLAN® model assumptions.

52819-023

5207

IV. Data / Information Quality

There should be adherence to the BLM's Information Quality Guidelines. Certainly, the information provided in the DPEIS comes within the scope of these Guidelines. The final PEIS must be viewed as a document that is influential requiring an added level of scrutiny with respect to that which is put in this document. The four key points of the BLM Information Quality Guidelines are: 1.) quality of information from external sources, 2.) objectivity of data, 3.) utility of data, and 4.) data integrity and transparency. We submit that the DPEIS contains factually incorrect information or information based on invalid assumptions that are not in compliance with these standards. We have noted in the foregoing text that there are a number of instances where the DPEIS does not conform to these standards. For example, in Part III of these comments, we note that there is an imbalance with respect to the range of perspectives on a particular topic or concern. Further, we call attention to the fact that the transparency and reproducibility of information from unnamed sources is a recurring issue as is the frequent use of "worst case" scenarios.

Set forth in the following Table IV are further examples of areas where the BLM Information Quality Guidelines are not met, in our judgment. With respect to the comments on the Colony Shale Oil Project, we specifically request a correction of the information presented. For questions relating to these comments, contact information is provided below:

Mail address: Supervisor – Oil Shale
ExxonMobil Exploration Company
Corp GP8 397
P. O. Box 4778
Houston, Texas 77210-4778

Telephone: 281 654 5402 (Office)
281 654 5899 (Fax)

52819-024

5208

Suggested Changes:

1. Review the DPEIS in its entirety to confirm that this influential document adheres to the BLM Information Quality Guidelines.
2. Remove or correct erroneous information with respect to ExxonMobil's Colony Shale Oil Project and Piceance Project activities.

Further details are shown in the following Table IV:

Table IV. Examples of Data / Information Quality Concerns

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action	
18	2-15 / 2.3.1	"... The BLM circulated a 15-project development scenario to the cooperating agencies for review and comment…. The cooperating agencies commented that the BLM's analysis would be too speculative at this point to support a decision to issue any leases on the basis of this 15-project scenario."	We question the utility of this information. The conclusions of this DPEIS do not presuppose any particular level of development. As such, this information is superfluous and may inappropriately influence the level of development in the future.	Replace with: "The BLM circulated a potential development scenario to the cooperating agencies for review and comment. The cooperating agencies commented that the BLM's analysis is too speculative at this point to support a decision to issue any leases on the basis of this scenario."	52819-025
19	3-207 / 3.10.1	"The largest development on private land was the Colony Project, begun by Atlantic Richfield, Shell, Ashland, Cleveland Cliffs and TOSCO in the early 1970s. Using room-and-pillar mining and surface retorting, the project extended from Parachute Creek to the Roan Plateau, and had produced 800 bbl/day by 1972, with 50,000 bbl/day planned by 1995."	The assertion that the Colony Project "...extended from Parachute Creek to the Roan Plateau..." is highly exaggerated. The actual disturbance of the semi-commercial works was about 15 acres. The ultimate extent of the commercial project's underground mine was planned for about 8,900 acres, with the closest point to the Roan Cliffs being 6 miles distant. The date of peak production is also incorrect; 50,000 bbl/day was planned by 1985.	We recommend that Section 3.10.1, based entirely on Gulliford (1989) [16 citations] and Lamm and McCarthy (1982) [6 citations], be deleted given its numerous factual errors and bias. Alternatively, we recommend that it be replaced with an adequately researched, accurate and objective depiction of historical events. Should you choose the alternative, we will be pleased to work with you on preparing an accurate statement. In furtherance of this point, a Colony fact sheet will shortly be submitted to supplement these comments.	5209 52819-026

Table IV (continued). Examples of Data / Information Quality Concerns

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action
20	3-208 / 3.10.1	"The largest development, however, was the Colony Project announced by Exxon in 1980, which envisaged production of 600,000 bbl/day by 1990, 1 million by 1995 and 8 million bbl/day by 2010…."	The Colony Shale Oil Project was neither planned nor permitted to exceed 50,000 bbl/day. Furthermore, it was not the largest of the first generation surface retort projects envisioned. Exxon acquired Arco's 60% share of the existing Colony Development Operation in 1980, renaming it the Colony Shale Oil Project. This account is correctly described in Appendix A.2. In August 1980, to enhance public awareness of what it would take to achieve U.S. energy self-sufficiency in the 21st century, Exxon Company, U.S.A. published a ten-page energy outlook "white paper" that discussed the opportunities and constraints in bridging the gap between growing imports and declining production through the development of a synthetic fuels industry capable of 15 million bbl/day, of which 8 million might come from oil shale. Exxon hoped to be one of many private developers of a future shale oil industry, not the sole developer as erroneously described in the DPEIS.	See Suggested Action, Comment 19.

52819-027

Table IV (continued). Examples of Data / Information Quality Concerns

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action	
21	3-208 / 3.10.1	"To satisfy water demand, Exxon planned to build a pipeline from the Missouri River in South Dakota, with three 1,000-MW power plants built to provide the energy to pump the water through the pipeline into western Colorado."	The apparent source for these comments is the previously referenced "white paper." In the early 1980s Exxon considered multiple water source alternatives for a bourgeoning oil shale industry in Western Colorado. Most of these ideas, such as a possible pipeline from the Missouri River, were never planned nor acted upon. In fact, ExxonMobil's water plan for the Colony Project is to use a senior industrial water right to withdraw water from the Colorado River, supplementing that water with releases from Reudi Reservoir under a contract it has with the Bureau of Reclamation at times when the Colorado right might be called out.	See Suggested Action, Comment 19.	52819-028
22	3-209 / 3.10.1	"By early 1982, the Colony Project workforce had doubled from 3,000 in 1980, and in order to process up to 50,000 bbl/day, was expected to reach 6,992 by 1985 (Gulliford 1989). Rather than continued rapid development, however, in May 1982, Exxon decided to close the Colony Project, leaving (it's) 2,100 oil shale workers … unemployed."	Exxon's Colony Project workforce was relatively small at year-end 1980 and comprised 2,100 workers in May 1982 (not 3,000 in 1980, and 6,000 in early 1982, as the reference suggests.)	See Suggested Action, Comment 19.	52819-029

Table IV (continued). Examples of Data / Information Quality Concerns

No.	Page / Section	DPEIS Reference or Statement(s)	Comment	Suggested Action	
23	3-219 / 3.10.2.2	"A plan publicized by Exxon calls for '15,000 wells over a 15-year period.'"	ExxonMobil has no plans, nor has it publicized intent, to drill 15,000 wells over a 15-year period as the text implies. ExxonMobil's plans for gas resource development in the area are documented in the "Environmental Assessment - Piceance Development Project (CO-110-2005-219-EA)," dated April 23, 2007.	Delete statement. See BLM, 2007, *Environmental Assessment Piceance Development,* White River Field Office, Meeker, Colorado for a description of ExxonMobil's plans for its Piceance Project.	52819-030
24	6-68 / 6.1.3.1	"Although Alternative C makes approximately 1.2 million fewer acres available for application for commercial leasing, it does not provide for less potential development of commercial oil shale than does Alternative B."	This is an inaccurate and misleading statement (see Comment 1 and associated text.)	Delete or correct statement as follows: "Alternative C makes approximately 1.2 million fewer acres available for application for commercial leasing, dramatically reducing the potential development of commercial oil shale relative to Alternative B."	52819-031
25	9-14 / Glossary	"Kerogen: The hydrocarbon in oil shale. Kerogen is a pyrobitumen, and oil is formed from kerogen by heating. It consists chiefly of low forms of plant life; chemically it is a complex mixture of hydrocarbon compounds of large molecules, containing hydrogen, carbon, oxygen, nitrogen, and sulfur. Kerogen is the chief source of oil in oil shales."	The definition of "kerogen" is incorrect.	Replace with: Insoluble organic matter preserved in rocks that yields hydrocarbons upon thermal breakdown. It is derived from the degradation and polymerization of plant and bacterial remains.	52819-032

References

BLM (Bureau of Land Management), 2007, *Environmental Assessment Piceance Development,* White River Field Office, Meeker, Colorado, April.

Bartis, J., LaTourrette, T., Dixon, L., Peterson, D.J. and G. Cecchine, 2005, Oil Shale Development in the United States: Prospects and Policy Issues, RAND Report, 68 p.

Culbertson, W.C., Smith, J.W. and L.G. Trudell, 1980, Oil shale resources and geology of the Green River Formation in the Green river Basin, Wyoming: U.S. Department of Energy, Laramie Energy Technology Center, LETC/RI-80/6, 102 p.

Dyni, J.R., 2006, Geology and resources of some world oil-shale deposits: U.S. Geological Survey Scientific Investigations Report 2005-5294, 42 p.

Pitman, J.K., Pierce, F.W. and W.D. Grundy, 1989, Thickness, oil yield, and kriged resource estimates for the Eocene Green River Formation, Piceance Creek Basin, Colorado: U.S. Geological Survey Oil and Gas Investigations Chart OC-132, 6 sheets with 4-page text.

Russell, P. L., 1990, Oil Shales of the World, Their Origin, Occurrence and Exploitation, New York, Pergamon Press, 753 p.

Trudell, L.G., Smith, J.W., Beard, T.N. and G.M. Mason, 1983, Primary oil-shale resources of the Green river Formation in the eastern Uinta Basin, Utah: U.S. Department of Energy, Laramie Energy Technology Center, DOE/LC/RI-82-4, 58 p.

Responses for Document 52819

52819-001: The number in question was calculated for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The number was developed with the understanding that the number underestimates the actual in-place resource. The number was developed using the values that described the minimum quality and thickness that were deemed to be economic. Those values are a minimum 25 ft thickness and a minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming, the values used were 15 ft thick and 15 gallons per ton. These values coupled with the acreage in each of the alternatives generated the numbers in question. It is true that using more exact isopachs and quality data, if available, would have provided much higher values for each of the alternatives, but the alternatives would remain comparable.

52819-002: The section referenced does not give an estimate of the resource in the Green River Basin but explains how the boundaries of the geologically prospective areas were identified. See response to Comment 52819-001.

In Wyoming, the most prospective oil shale resources were defined on the basis of detailed oil shale assay data, analyzed by Mr. Wiig. In Wyoming, the values used were 15 ft thick and 15 gallons per ton. These values coupled with the acreage in each of the alternatives generated the numbers in question. It is true that using more exact isopachs and quality data, if available, would have provided much higher values for each of the alternatives, but the alternatives would remain comparable.

52819-003: The BLM acknowledges the commentor's preference for Alternative B.

52819-004: It is the BLM's policy to optimize the recovery of both resources in an endeavor to secure the maximum return to the public in revenue and energy production; prevent avoidable waste of the public's resources by utilizing authority under existing statutes, regulations, and lease terms; honor the rights of each lessee, subject to the terms of the lease and sound principles of resource conservation; and protect public health and safety and mitigate environmental impacts.

The PEIS does recognize that commercial oil shale development could be largely incompatible with other mineral development activities and will likely preclude other mineral resource development while there is ongoing oil shale development and production (see Section 2.3.3). While it is possible that undeveloped portions of an oil shale lease area could be available for other mineral development, such development would be unlikely to occur on a widespread basis. As with the coal and coalbed methane conflict, it is the BLM's policy to encourage companies to resolve conflicts between themselves and when requested, the BLM will assist in facilitating agreements between the companies (Washington Office Instruction Memorandum 2006-153, May 11, 2006).

In particular, the PEIS notes that lands within the Multimineral Zone identified in the White River RMP would be made available for application for commercial lease only if the applicant can demonstrate that it would use technologies that allow recovery of oil shale resources without preventing the recovery of or otherwise destroying other minerals (i.e., nahcolite and dawsonite) (see Section 3.1.1.3).

Although future rounds of RD&D leasing are possible, no decision has been made whether there will be additional opportunities to compete for RD&D leases on federal lands.

52819-005: The BLM recognizes the commentor's preference for a rejection of Alternative C. Also, see response to Comment 52819-004.

52819-006: See response to Comment 52819-004.

52819-007: It is the BLM's policy to optimize the recovery of both resources in an endeavor to secure the maximum return to the public in revenue and energy production; prevent avoidable waste of the public's resources by utilizing authority under existing statutes, regulations, and lease terms; honor the rights of each lessee, subject to the terms of the lease and sound principles of resource conservation; and protect public health and safety and mitigate environmental impacts. Conflicts associated with potential oil shale leasing and existing oil and gas leases would be analyzed, and stipulations could be developed to mitigate the conflict between oil and gas and oil shale consistent with BLM policy, and therefore it was determined that it was unnecessary to close the Piceance Creek Dome area to consideration for future leasing.

52819-008: See response to Comment 52819-004.

52819-009: The PEIS has been revised to more clearly indicate the basis for assumptions, analyses, and conclusions. As noted in the comment, considerable uncertainty exists regarding many technical and environmental issues associated with oil shale development. Uncertainties exist regarding the location of projects, resources within project areas and their susceptibility to impact, technologies to be deployed, water and energy needs of projects, and mitigations to be applied. For this reason, the BLM has taken a conservative approach using the best information available about the distribution of resources, technologies as they exist today, the footprint of facilities, and the impacting factors associated with those technologies. In most cases, this conservative approach results in an overstatement of impacts. Subsequent project-specific NEPA evaluations would use more realistic assumptions based on specific project proposals.

52819-010: Many project-specific and technology-specific details, including the porosity of oil shale formations following in situ extraction, will have to be addressed in subsequent NEPA documents prepared prior to leasing and development

decisions. The PEIS used generally conservative assumptions based on the best available information at the time the document was prepared.

52819-011: The presentation of impacts in Chapters 4 and 5 differentiates between surface mining, underground mining, and in situ mining to the extent possible. In many cases (e.g., vegetation disturbance, changes in topography), in situ mining has much of the same impacts as surface mining because the entire footprint of the area to be mined will be modified. While grading an area flat for in situ mining is less severe of an alteration than is strip mining an area, both mining techniques would result in complete loss of surface resources.

52819-012: The PEIS repeatedly states that project-specific NEPA evaluations would be prepared prior to leasing and development decisions.

52819-013: The relationship between increasing CO_2 concentrations and plant response is addressed in the IPCC Fourth Assessment Report, available online at http://www.ipcc.ch/ipccreports/ar4-wg2.htm. The report specifically stated that CO_2 fertilization is the "stimulation of plant photosynthesis due to elevated CO_2 concentrations, leading to either enhanced productivity and/or efficiency of primary production. In general, C3 plants show a larger response to elevated CO_2 than C4 plants." However, including this information was in no way intended to "justify emitting more carbon into the atmosphere."

52819-014: Section 3.5.1.1 of the Draft PEIS (Figure 3.5.1-1) provided both prevailing wind information at several monitoring locations throughout the study area and a citation for where the information was obtained. Speculation regarding specific air quality impacts' mitigation measures is premature at this stage of the process.

As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM

would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52819-015: The paragraph on reasons for greater sage-grouse declines in Section 3.7.3.2.3 has been revised to list additional factors that have contributed to declines in the species. Additional reference citations have also been provided, including several that address impacts of oil and gas developments on greater sage-grouse.

52819-016: As stated in Sections 4.8.1.4 and 5.8.1.4 of the PEIS, species occurrence in potential development areas is based on the potential or known occurrence of species in counties of the study areas. The distribution of Canada lynx is based on information from the Colorado Division of Wildlife's Natural Diversity Information Source available at http://ndis.nrel.colostate.edu/wildlife.asp.

52819-017: The text has been modified to more clearly indicate the range of the Uinta Basin hookless cactus. A supporting reference for the species occurrence in Garfield County, Colorado, and the Piceance Basin also has been added.

52819-018: Text has been added to the PEIS indicating that the opinions and perceptions of interview respondents may or may not be consistent with statistics compiled by local, state, and federal agencies.

52819-019: Thank you for your comments. The referenced section and Section 5.1 are written in the way they are because there is no consensus on what a "reasonably likely" scenario would look like. The BLM agrees that what is presented ultimately may be shown to be a worst case scenario, but for the purposes of making land use allocation decisions, it is believed to be appropriate at this time.

52819-020: The cited paragraph implies such synergies when it anticipates that new interstate transmission lines and pipelines could be utilized by more than one facility. But each facility would still need a connecting transmission line or pipeline to that common infrastructure. The analysis presented is based on reasonable scenarios and not worst case as the comment suggests.

52819-021: Thank you for your comment. Although it is reasonable to anticipate that commercial oil shale developments will seek out and implement economies of scale to the greatest extent possible, at this stage of development of the industry, it would be highly speculative to identify what those efficiencies and synergies are.

52819-022: The text in 4.3.1.1 has been modified to account for possible approaches and technologies that may reduce the overall amount of disturbed area.

52819-023: As the scale of development and project locations associated with oil shale and tar sands resource and ancillary development are not known, rather than analyze impacts at the individual county and community level, or at the state level, the analysis described in the PEIS was limited to estimating impacts for a region-of-influence in each state, based on the projected residential location of project workers. As described in Section 4.11.1.1 of the PEIS, in-migrating population assumed with each facility was assigned to local communities in each ROI. Expenditure levels to support the in-migrating population at existing levels of service were then estimated for each community and aggregated for each ROI. Because the extent to which revenues to support increased expenditures would be raised by local governments as opposed to the state or federal government is uncertain, with, as the commentor suggests, additional impact mitigation funds available to many local communities in some states, the analysis in the PEIS was limited to an assessment of the expenditures required in each community and county to maintain existing levels of service.

Assumptions regarding direct oil shale and tar sands and ancillary project employment and the in-migration of workers and their families during both construction and operations phases were based on publicly available NEPA reviews, past BLM experience with oil shale and tar sands and other energy-related projects, publicly available literature on current in situ projects, and industry data on power generation and coal mining. These assumptions are reasonable for a programmatic review of potential socioeconomic impacts. Information contained in personal communications can be viewed as part of the administrative record for the project.

52819-024: In preparing the PEIS, the BLM used the best information available to the agency at the time the PEIS was prepared. Considerable uncertainty exists regarding many technical and environmental issues associated with oil shale development including the location of projects, resources within project areas and their susceptibility to impact, technologies to be deployed, water and energy needs of projects, and mitigations to be applied. Subsequent project-specific NEPA evaluations would use more realistic assumptions based on specific project proposals and site-specific data that met the BLM’s Information Quality Guidelines.

52819-025: Thank you for your comment. The internal draft was officially circulated only to cooperating agencies for review but it became well known outside of the group of

cooperating agencies. The BLM believes that recognition of the consideration and the magnitude of the original RFDS is an important piece of information that should be acknowledged in the PEIS.

52819-026: Text in the Section 3.10.1 of the PEIS has been changed to include information provided in the comment.

52819-027: Text in the Section 3.10.1 of the PEIS has been changed to include information provided in the comment.

52819-028: Text in the Section 3.10.1 of the PEIS has been changed to include information provided in the comment.

52819-029: Text in the Section 3.10.1 of the PEIS has been changed to include information provided in the comment.

52819-030: Text in the Section 3.10.1 of the PEIS has been changed to include information provided in the comment.

52819-031: The BLM declines to make the suggested wording changes because the commentor did not provide any rationale as to why the suggested change is necessary or how the current data and analysis are incorrect.

52819-032: Thank you for your comment. There are potentially several different definitions of kerogen, and we would not presume the one offered in the PEIS is better or worse than another. For the purposes of the PEIS, we will retain the current definition.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52820.

Comment Date: March 20, 2008 09:14:06AM
Oil Shale and Tar Sands
Comment ID: OSTSD52820

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

As a very concerned citizen of Carbon County, I am distressed over the prospect of additional gas & oil drilling in our "World Famous" Nine Mile Canyon. The prehistoric and historic rock art in the canyon is being damaged by dust at the present time. Further damage is not acceptable if we want to protect and secure the rock art for generations to come. This rock art is unique to the world in that it has more consentration of rock art in one area than anywhere else in the world. There are sites not even recorded as well as habitat sites which are not yet known which can be damaged by both dust and vibration. The roads are being destroyed by the heavy truck traffic from the gas & oil companies. Please do not let this great canyon be only a memory to the public. Thank you..... 52820-001

Response for Document 52820

52820-001: The BLM acknowledges the commentor's concern over the impacts of oil and gas drilling in Nine Mile Canyon. Oil and gas drilling is not within the scope of the PEIS. This PEIS evaluates a land use allocation decision to make certain lands open or closed to application for leasing and development of oil shale and tar sands resources. No lease rights are granted, nor are any mineral resources committed to development. A project-specific NEPA analysis of the impacts of any future leasing or development action will be conducted in accordance with CEQ regulations. These future analyses will take into consideration direct, indirect, and cumulative effects of the proposed action, such as possible dust and vibration impacts on cultural resources from increased traffic.

Thank you for your comment, Nancy Hess.

The comment tracking number that has been assigned to your comment is OSTSD52821.

Comment Date: March 20, 2008 09:19:17AM
Oil Shale and Tar Sands
Comment ID: OSTSD52821

First Name: Nancy
Middle Initial:
Last Name: Hess
Organization:
Address: 3169 Plateau Dr.
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84109
Country: USA
Email: hess.n@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

My family and friends and I have been running rivers and hiking in the Green River and San Rafael Swell area of Utah for many years. This area is so special and fragile. I am very concerned that oil shale mining will destroy a precious resource which will never return to the beauty of nature that it is today. I have seen the difference between the White River area where industry exists and other watersheds like the Green River where there is no industry. I am sure that oil shale mining will have an impact. 52821-001

You have a very important role in the world to protect a precious resource for my grandchildren and their grandchildren. I am hopeful that you consider their inheritance when you consider the current energy crisis.

Nancy Hess

Response for Document 52821

52821-001: Thank you for your comment. The analysis in the PEIS takes into consideration the general geologic, cultural, and scenic values of areas such as the Green River and San Rafael Swell. Since the BLM is analyzing an allocation decision in the PEIS, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of the area prior to a decision being made.

Thank you for your comment, Ken Neubecker.

The comment tracking number that has been assigned to your comment is OSTSD52822.

Comment Date: March 20, 2008 09:24:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD52822

First Name: Ken
Middle Initial:
Last Name: Neubecker
Organization: Colorado Trout Unlimited
Address: PO Box 1029
Address 2: 209 Holland Thompson Dr.
Address 3:
City: Carbondale
State: CO
Zip: 81623
Country: USA
Email: eagleriver@sopris.net
Privacy Preference: Don't withhold name or address from public record
Attachment: CTU PEIS Comments.doc

Comment Submitted:

See Attachment.

March 19, 2008

Via email and mail

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Ave.
Argonne, IL 60439

RE: Comments on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement

Dear ANL:

Colorado Trout Unlimited (CTU) appreciates this opportunity to respond and comment on this Oil Shale and Tar Sands PEIS. CTU has a membership of nearly 10,000 throughout Colorado, including chapters in the area of western Colorado affected by this PEIS.

While we feel that Oil Shale and Tar Sand development will be a concern in the future it is premature at this time to consider any large scale commercial leasing, especially on the scale envisioned in Alternative B, the preferred Alternative. The fact that so little is known about the technology, the impacts or even the prospects for commercial development is demonstrated amply in this three volume PEIS which contains little meaningful information or analysis. There is just too little information to make any truly informed decision regarding commercial leasing or development. This is far too important of a decision for the communities and environment of northwestern Colorado to be based on such scanty information. CTU believes that any Alternative other than Alternative A would be extremely premature and irresponsible. 52822-001

CTU is deeply concerned that BLM has to date not developed any specific regulations or stipulations regarding Oil Shale and Tar Sands development. Currently the BLM places these activities under the same regulatory environment as Oil and Gas development. This simply will not work. Development of these resources is remarkably different. Also, under the traditional oil and gas standards there is no further NEPA review or public involvement after the lands are deemed suitable for leasing. 52822-002

We are also concerned that with adoption of this PEIS any further NEPA studies will be fragmented, diluting if not completely eliminating true cumulative impact analysis as required. 52822-003

Alternative B also paints a rather bleak picture for the impacts on wildlife, water and aquatic resources. The PEIS offers little hard data yet states that for water "Potential project related impacts may include reduced water quality due to erosion and sedimentation, dewatering of local aquifers, modification of surface and ground water flow, and contamination of surface water or groundwater by accidental releases of hazardous materials". The study then claims that potential types of impacts to aquatic life from Alternative B "would be similar to 52822-004

those identified for Alternative A and could result in habitat loss or degradation, which could affect the abundance and distribution of aquatic biota in the affected habitats." It appears that in the thinking of the PEIS that the only real difference between Alternative A and B is scale and little else.

Alternative A is limited to a small handful of RD&D sites while Alternative B covers 1.2 million acres. This difference is staggering. The impacts cited for Alternative B when placed over the landscape scale of the affected area in Colorado, Wyoming and Utah is alarming. It is utterly unacceptable to present this type of regional devastation and then relegate any future analysis to localized NEPA studies which will not link the overall cumulative impacts. 52822-004 (cont.)

CTU is also concerned about the fact that any ACEC's within the study area will be open to mineral leasing under Alternative B. The ACEC's as proposed for Trapper, Northwater and E. Fork of Parachute Creeks in the Roan Plateau Planning area must be kept closed to all mineral development. In 2002 the BLM declared that the populations of Colorado River Cutthroat trout and other resources within these areas were "unique and irreplaceable" and should be given full watershed protection as ACEC's. The current assault on these areas for gas development is bad enough. To open them entirely to the proposed devastation of Oil Shale development is completely irresponsible and unacceptable. 52822-005

The PEIS also notes that "Commercial oil shale development activities are largely incompatible with recreational land use." It is also likely to be incompatible with just about any other land use as well, especially with open pit mining. Recreational uses of BLM land has been growing and will continue to grow and b a vital part of land use and the economy in this part of Colorado. Yet the PEIS continues to dismiss these realities and suggest that oil shale development should and will become the only important use of BLM lands. 52822-006

The PEIS analysis of water demands is incomplete and inadequate. First, the analysis presented in this PEIS discounts and ignores the "non-consumptive" water supply uses that will be needed for Colorado's economic future and healthy rivers. This oversight is inexcusable. Non-consumptive water use has become a major part of Colorado's economy. Environmental and Recreational water needs are fully recognized as beneficial uses with rights and protections accorded in priority as with more traditional consumptive water uses. Discounting this whole side of the water use equation shows that the analysis in this PEIS is both incomplete and invalid. 52822-007

The remaining analysis in Chapter 6 (6-150) is inadequate. The assumption that the "sustainable, annually available water in the Upper Colorado was assumed to be 6,000 thousand ac-ft per year" is absurd. Not only is that a high end assumption it is highly unlikely that the sustained amount of available water will be anywhere near that amount given the persistent drought and climate change. This number was based on figures from 1997. We would have hoped that this PEIS would have used more recent and reliable data which is readily available. Further, the analysis then has the audacity to state "the current combined water uses for agriculture, municipal and industrial activities are assumed to remain at the same level as those found in 1990 to 2000". This statement utterly ignores conditions, proposed water projects and in particular developments within the state of Colorado over the past few years. 52822-008

Colorado is currently going through a statewide process to determine the water needs, both consumptive and non-consumptive, for the foreseeable future. At this point the state is unsure of the water needed or the water available for the needs we already have. The water needs for oil shale development is an unknown despite the numbers provided in the PEIS. The water demands statewide are increasing as the supply is shrinking. To recommend Alternative B, the most development intensive alternative before the completion of these State 52822-009

studies and process is again irresponsible and inconsiderate. Given the limited water supply available for future needs Colorado can hardly be expected to cripple its economic future or jeopardize the health of its rivers for the development of a single resource.

From a water use perspective this PEIS appears to have completely ignored developments in Colorado and the upper Colorado basin from a political, legal and climate perspective. The PEIS appears to have been prepared in a vacuum, ignoring the actual reality of the situation on the ground. The assumptions are unrealistic. The speculative water supply purported to be available for oil shale development is equally unrealistic, based on unfounded speculation. It would have been valuable for the PEIS writers to have talked with people involved in the aforementioned process. 52822-009 (cont.)

CTU is also very concerned about the proposed amendment to the White River RMP in both Alternatives B and C that would completely eliminate "carrying capacity thresholds for air quality, socioeconomic impacts, big game and water quality" and the prohibition of leasing within the Piceance Creek Dome area. (Appendix C, C-9) The idea of and the application of carrying capacity for these areas and issues is very important. Removing these requirements is again irresponsible, especially as there is no real knowledge or analysis of what impacts these removals may cause. Carrying capacity is a vital concept when approaching any of the BLM's land use decisions. This was recently re-enforced in the Glenwood Springs Field Office's RAC Sub-Committee. Carrying capacity thresholds are a vital tool in managing and protecting the health and safety of all the public resources that BLM is charged to maintain. Removing the carrying capacity thresholds opens the door for sever abuse and misuse of all the BLM's public resources for the benefit of a single resource. The impacts from these misuses and abuses will likely extend far beyond the area of oil shale development. 52822-010

If anything the RMP's of all the BLM Field Offices should be amended to require carrying capacity thresholds, not eliminate them.

Again, CTU believes that any alternative other than A would be premature and irresponsible at this time. We simply do not know enough about the technology or the nature of oil shale development to proceed at this time. The lack of substantial information and analysis in this PEIS only re-enforces that belief.

Sincerely

Ken Neubecker
Vice President, CTU
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Responses for Document 52822

52822-001: The BLM acknowledges the commentor's preference for Alternative A.

52822-002: The BLM agrees that the impacts of oil shale and tar sands development are likely to be different from those of oil and gas development. The BLM is currently in the process of developing regulations for oil shale leasing and development. This rulemaking process will involve opportunities for public involvement. The BLM is also committed to requiring project-specific NEPA evaluations for future oil shale and tar sands leasing and development proposals.

52822-003: Future project-specific NEPA evaluations for oil shale and tar sands leasing and development decisions will include analysis of cumulative impacts resulting from past, present, and reasonably foreseeable future actions in the affected region including any other oil shale or tar sands projects or proposals. There is no reason to believe that these evaluations would be fragmented or diluted in any way. The BLM expects these evaluations to be more realistic and less speculative than a cumulative impact analysis at this PEIS stage based on an RFDS and using assumptions of impacts based on existing technology. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. However, an RFDS would be developed at a future step in the assessment process, based on a clear set of supportable assumptions associated with a leasing or development proposed action.

52822-004: The impacts of oil shale alternatives are compared in Section 6.1.4. Alternative A includes not only the six existing RD&D projects mentioned in the comment, but also 353,000 acres of land in Utah and Colorado that had already been allocated for commercial oil shale development in existing RMPs. In Colorado, much of the land available for lease application under Alternative A is also included under Alternative B; however, this is not the case in Utah and Wyoming. As mentioned in the PEIS, there is much uncertainty regarding the specific details of actual commercial oil shale development both in terms of location, scale of development, and other project characteristics. Without knowledge of those details, the analysis can focus only on the amount of land available for lease application under different alternatives.

To estimate the total expected land area disturbed would require an RFDS for oil shale and/or tar sands development. See also response to Comment 52822-003.

52822-005: The BLM recognizes CTU's objection to including the listed ACECs as available for application for leasing in Alternative B. This alternative was specifically developed to allow consideration of a wide range of areas for potential leasing, including ACECs not closed to mineral entry and areas with stipulations to protect

sensitive resources. For that reason, the ACECs listed in the comment are included in Alternative B. Prior to any leasing decision affecting these areas, additional site-specific NEPA analysis will be completed on any future lease application. If, as part of this preleasing NEPA analysis, the BLM determines that leasing and subsequent development of the oil shale resources would cause significant impacts to the ACECs, the BLM can require the applicant to: 1) mitigate the impact so that it is no longer significant; 2) move the proposed lease location, or if neither of these options resolves the anticipated conflicts; 3) the BLM can decide that development of the oil shale resource outweighs protection of the on site resources and approve the application. This NEPA analysis would include opportunities for public involvement and comment that are part of the PEIS process and every other planning and NEPA process the BLM undertakes.

52822-006: The BLM is managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

The PEIS analyzes the environmental consequences of allocating certain lands for the possible commercial exploration and development of these resources. The allocation decisions to be made do not commit any resources or grant any lease rights.

52822-007: Sections 3.4.1, 4.5.1.2, and 5.5.1.2 in the PEIS discuss water use. Various compacts of the Colorado River are based on consumptive uses of water. Environmental and recreational water uses are classified as nonconsumptive use in the river states.

Water for environmental and recreational uses is managed by CWCB as instream flows. They are water rights and are protected the same ways as are other water rights. Water rights and water uses are two different issues. Any water uses would not negate water rights.

52822-008: This PEIS assumes that 6,000 thousand ac-ft per year is available for use in the Upper Colorado River Basin. This is based on long-term historical hydrologic data with a mean undepleted flow at Lee Ferry of about 15,000 thousand ac-ft/year. The data were collected from 1906 to 1995 within which wet and drought

years existed. Some studies (Kuhn 2005, Tipton 1965) suggested that a mean undepleted flow of 13,500 thousand ac-ft/year be used. That flow is based on historical data from 1930 to 1964. A tree-ring study supported the 13,500 thousand ac-ft/year figure (Kuhn 2005).

To evaluate water supply of the Colorado River Basin, we prefer long-term to relatively short-term historical data. Historically, we learned that short-term historical data fluctuate and are less reliable than long-term data, resulting in biased assumptions. That happened in the Colorado River Compact of 1922 that assumed a mean flow of 16,400 thousand ac-ft/year (Smerdon et al. 2007). Similarly, if we select the drought years of early 2000s data for our evaluation, we would likely produce another kind of biased results.

The use of tree-ring data to reconstruct past river flows is not direct measurement of stream flow and must rely on interpretation. The credibility of the interpreted results is less than that of the historical hydrologic data. Therefore, the long-term historical data is used in our evaluation. However, we are aware of possible prolonged or severe drought that can affect water availability in our evaluation (see Section 4.5.2).

Current water uses do not include water uses caused by proposed water projects. The current water uses are based on historical data (see Figure 6.1.5-4). It is possible that the combined water uses for agriculture and municipal and industrial activities stayed within a range from 1990 to 2000 as water uses may transfer from one sector to another.

52822-009: Please see the response to Comment 52822-008.

The PEIS discloses the fact that the BLM will consider new information, such as that emerging from the RD&D leases, during subsequent NEPA analysis performed as the basis for making any leasing decisions. The proposed action is a land use allocation and does not commit any resources for leasing of oil shale and tar sands development.

52822-010: The Final PEIS does not modify or eliminate the carrying capacity thresholds contained in the WRFO RMP. The statement that the WRFO RMP land use plan would be amended to remove the thresholds, as described on page C-9 of the Draft PEIS, should have been deleted prior to the release of the draft. Any decisions concerning the application of thresholds within the PEIS study area will be made at the site-specific level where detailed information relevant to that determination can be made, and where inter-agency consultation can be accomplished.

The removal of the prohibition on oil shale leasing in the Piceance Dome area is included Final PEIS. Both oil and gas leasing are discretionary activities, and the BLM has the current authority to determine how this area will be managed.

References:

Kuhn, E., 2005. “Science and the Future of Colorado River Policy and Compact Issues.” Powerpoint slideshow presented at the 2005 USGS Drought Workshop. Available at co.water.usgs.gov/drought/workshop200501/pdf/Eric_Kuhn.pdf.

Smerdon, E.T., 2007, *Colorado River Basin Water Management: Evaluating and Adjusting to Hydroclimatic Variability*, The National Academies, Feb.

Thank you for your comment, Laura Stroup.

The comment tracking number that has been assigned to your comment is OSTSD52823.

Comment Date: March 20, 2008 09:25:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD52823

First Name: Laura
Middle Initial: J
Last Name: Stroup
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Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment: BLMCommentMarch202008.doc

Comment Submitted:

See Attachment.

Sherry Thompson, Project Manager
BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
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March 20, 2008

Dear Ms. Thompson,

I am writing to comment on the Bureau of Land Management's Oil Shale and Tar Sands Draft Programmatic EIS. I strongly oppose Alternative B, the "Preferred Alternative" and support Alternative A, the "No Action" alternative in the PEIS. 52823-001

It is clear that the "Preferred Alternative" B is almost certain to cause massive, irreversible damage to large areas of Utah, Colorado, and Wyoming. This includes devastating the land and water, endangering wildlife and their habitats, harming the people in local communities, and generating massive greenhouse gas pollution that would add to global climate change. In light of the persistent drought over the last nine years, I don't think anyone in the U.S. should be considering willingly contributing to yet more greenhouse gas generation, let alone the federal government promoting this outdated mode of generating energy. Moreover, the BLM admits that more research is needed before we know the true impacts of the technology or if it is even commercially feasible. 52823-002 52823-003

At a time when we need to be moving away from fossil fuels and the damage they cause, this proposal would continue our dependence on them. I recently attended a conference in Jackson, WY regarding balancing energy development with concerns regarding climate change. It was inspiring for me to see citizens in the most conservative state in the U.S., and the largest producer of coal for electricity generation, knowledgably discussing wind power and cleaner coal gasification and carbon capture technologies. This proposal by BLM to develop oil shale is so outdated, it is certain that the next Presidential Administration will no doubt end this wild goose chase for an inefficient and unlikely energy source. 52823-004

The PEIS fails to adequately address any of these issues, or to consider a reasonable range of alternatives, including the potential for increased energy conservation and efficiency. This is contrary to agency regulations and the law. Sadly, this has been business as usual for this Presidential Administration.

Additionally, it is clear that since the last oil shale speculation in the 1970s and 80s, western Colorado and eastern Utah have diversified their economies into the tourism and promoting the natural and wildlife amenity (hunting, fishing, bird watching, skiing, etc.) sectors. Any development of oil shale in the area would be in direct opposition to this economic engine and in fact destroy this source of livelihood for many of the region's residents. 52823-005

I urge the BLM to choose the "No Action" alternative A, and to halt efforts to develop oil shale and tar sands on public lands. Thank you for the opportunity to comment on the Oil Shale and Tar Sands Draft Programmatic EIS. 52823-001 (cont.)

Sincerely,
Laura J. Stroup

Responses for Document 52823

52823-001: The BLM acknowledges the commentor's preference for Alternative A.

52823-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52823-003: Thank you for your comment.

52823-004: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS

does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

The preparation of the PEIS is not contrary to agency regulations or laws. Preparation of the PEIS is in full compliance with the principles of the FLPMA of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals.

52823-005: Text has been added to Section 4.11 of the PEIS covering the importance of amenities to economic development in rural areas and the potential conflict with energy development.

Thank you for your comment, Stan Dempsey.

The comment tracking number that has been assigned to your comment is OSTSD52824.

Comment Date: March 20, 2008 09:51:26AM
Oil Shale and Tar Sands
Comment ID: OSTSD52824

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Attachment: final final cpa comments.pdf

Comment Submitted:

See Attachment.

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BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory EVS/900
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RE: Comments on Draft Oil Shale and Tar Sands Resource Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS) December 21, 2007 (BLM-WO-GI-08-005-3900) (DOI No. DES07-60)

March 20, 2007

Dear Sir or Madam:

The Colorado Petroleum Association and its member companies appreciate the opportunity to comment on the Draft Oil Shale and Tar Sands Programmatic Environmental Impact Statement.

The Colorado Petroleum Association (CPA) is a non-profit trade organization representing the oil and gas industry before state, regional and federal government entities. Since 1951 large and small companies have banded their voices together through the association to advance ideas and plans, which have helped shape a strong and thriving energy industry. While all CPA members are involved in the Colorado energy industry, many members also have activities in other states and around the world. This diverse experience provides CPA with a unique perspective on issues impacting the industry. CPA member companies are committed to the responsible production of energy in a manner that respects the law and our neighbors.

We believe that a strong program to promote research and development of Colorado's oil shale is in the best interest of Colorado and the United States. We are disappointed that this document does far less than the Energy Policy Act of 2005 envisioned, by only amending land use plans as opposed to making actual leasing decisions. It is nevertheless a very thorough analysis of the types of impacts that might be associated with oil shale and tar sands development and forms an excellent basis for moving forward to ultimately develop these important resources.

The Colorado Petroleum Association strongly supports the BLM's preferred alternative, Alternative B. We support BLM's efforts to make "The largest amount of potential oil resources available for application for leasing while still providing for an environmentally sound program." Only Alternative B provides BLM with "The greatest flexibility in locating future development" (Chapter 2, Page 2-1, Section 2.1). We further support

52824-001

BLM's determination that "the amendment of land use plans to designate lands as available for application for commercial leasing would have no impact on the environment" as the amendments "do not commit the BLM to a particular course of action" and allow only for more thoughtful consideration of future leasing decisions (Executive Summary, Page ES-5, Section ES-7).

52824-001 (cont.)

While there is much that the PEIS does well, and we commented to that effect in the following pages. We also believe it is important to touch on a few concerns and areas for improvement that we believe will improve the document and assist the BLM is meeting it's obligations. In the following twenty pages we provide specific comments pertaining to:

- The important role unconventional oil resources including oil shale will play in providing the energy our nation needs in the future.
- Support for moving a commercial leasing program forward.
- The commercial adequacy of each alternative.
- The apparent underestimation of the size of oil shale resources.
- Concerns about additional NEPA reviews and the envisioned leasing program.
- Affect of existing regulatory/permitting programs in reducing the impacts analyzed.
- Concerns about stipulations analyzed in the PEIS.
- The existing rights granted by Research Development and Demonstration leases.
- Socioeconomic assumptions and analysis.
- And finally, a few comments regarding C02 emissions.

Role of unconventional/oil shale resource

The federal government is best situated to put in place a national energy strategy to meet our short-, medium- and long-term energy needs. Today's ever-growing reliance on oil imports continues to decrease our energy security. There are no perfect solutions, single answers or easy alternatives for a secure energy future. Resource access, supply diversity, demand management and decreasing reliance on imports all play vital roles in meeting our future energy needs.

For our long-term needs, we must continue to accelerate development of new technologies that will provide for a renewable and alternate energy future. In the short-term, we must have responsible access to more domestic resources, and we must do everything possible to streamline, but not shortcut, regulatory requirements that will allow us to deliver vital new resources more effectively. Perhaps our biggest challenge is meeting our medium-term needs as supplies of conventional oil and gas become harder to find, both domestically and internationally. Part of the solution to bridging the gap between now and a renewable energy future is the development of our nation's vast unconventional oil shale resources.

A frank reality of our energy situation is that fossil fuels make up the heart of our energy system, and they will continue to do as long as the increase in demand for oil outpaces the ability of renewables and alternates to significantly contribute to our national energy needs. Therefore, the vast resource represented by over a trillion barrels of oil in oil shale in the Western United States, most of it in Colorado, is of critical strategic

importance. What remains is to have a prudent and comprehensive federal program in place that assures these resources are developed in a manner that is environmentally and socially sound, and this PEIS sets the stage to assure that happens.

What also remains is to have a program in place that facilitates the development of these critical resources for the opportunity they represent for our country. In assessing the perceived and real impacts of developing oil shale resources and how to mitigate them, BLM should also evaluate the positive impacts that will come with such development and how to enhance them, as well as reviewing the negative impacts the US incurs by not developing them. 52824-002

The PEIS should recognize that development of oil shale resources in the US is critical to strengthening our national energy security. There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production. Because energy prices are based on supply and demand, expanding supply in conjunction with reducing demand is the best strategy for keeping gasoline prices affordable.

Increasing our domestic oil supplies would keep large sums of American dollars in the US, rather than being part of the $1.2 trillion dollars we send to other countries each year. The development of oil shale resources in western Colorado will provide for significant economic development growth in the region. Taxes and royalties that would result both directly and indirectly from oil shale and tar sands development would be a huge revenue stream for federal, state and local governments and would also provide great benefit to the socioeconomic infrastructure of the nation and the region. A growing oil shale and tar sands industry would also provide great employment opportunities in the region. We can achieve the multi use purpose intended for these lands through careful planning, management, mitigation and reclamation.

Support for moving a commercial program forward

This PEIS is more limited in scope than was originally mandated by the Energy Policy Act of 2005. However, it is quite thorough in analyzing a broad range of potential issues, and it leads the way forward for prudent development. The PEIS is well developed in terms of listing the depth and range of actual and potential issues to consider when developing management plans to address potential environmental impacts on an area-wide or site-specific basis. By managing oil shale development through resource management plans, the US stands to best select leasing sites that are most favorable for the preservation and enhancement of environmental resources.

Energy security for the US will take both development and conservation of resources. This effort will require the commitment and involvement of energy companies, individuals and policymakers alike. Development of the United States oil shale and tar sands resources should be viewed as an integral part of our energy strategy and a great opportunity for our country to build a bridge toward our more renewable energy future.

The Colorado Petroleum Association supports the goals set forth in the Energy Policy Act of 2005 to establish a viable and sustainable commercial oil shale leasing program. There is a strong likelihood that global conventional oil production will decline in the coming decades. Further, global demand for oil exceeding conventional supplies makes a strong case for development of our nation's oil shale resources. If not quickly

addressed, these deteriorating global market conditions, could, and likely will, result in even higher oil prices and reduced availability of oil resources.

The president recognized the importance of energy-related projects in Executive Order 13212, which notes that the "increased production and transmission of energy in a safe and environmentally sound manner is essential to the well-being of the American people." Further, the Executive Order establishes the policy that "agencies shall take appropriate actions, to the extent consistent with applicable law, to expedite projects that will increase the production, transmission, or conservation of energy." *Id.* This policy forms the backdrop against which BLM should consider access to oil shale as a key energy resource to secure our energy future.

America's rich and concentrated oil shale resources, if developed in a timely and economically efficient manner, offer the potential to help offset the anticipated global production declines of conventional oil, reduce oil imports and their economic costs, stimulate domestic employment and economic activity, and provide a reliable domestic source of liquid transportation fuels. Oil shale development can also play a vital strategic role, providing the military with long-term, secure access to domestic fuels of superior quality.

Mindful of these challenges and the congressional mandate, members of the Colorado Petroleum Association have been working diligently to advance their research toward developing oil shale in the United States, and working with the BLM and other federal, state, and local agencies to pursue future commercial oil shale development in an environmentally friendly and responsible manner.

Commercial Adequacy of Alternatives

We support BLM's assertion that making "the largest amount of potential oil resources available for application for leasing while still providing for an environmentally sound program" provides BLM with "the greatest flexibility in locating future development" (Chapter 2, Page 2-1, Section 2.1). This is best accomplished through Alternative B.

Alternative C is unnecessarily restrictive at this stage of the process and, in the Piceance basin, allows for potential development on only small, widely scattered, non-contiguous parcels. Such an alternative is highly unlikely to provide commercially viable opportunities, effectively making it a non-development alternative.

The commercial inadequacy of Alternative C is evidenced by its dramatic reduction in land availability in the Piceance basin, which is widely recognized as having the thickest, highest grade oil shale in the region. An election of Alternative C, in our estimation, will remove approximately 125-250 billion barrels of potentially developable resource from consideration in the Piceance Basin, of which an estimated 50-150 billion barrels are potentially recoverable. To place this in context, a mid-range estimate of 100 billion barrels would supply one-quarter of current U.S. demand for approximately 40 years. 52824-003

Alternative C is also inconsistent with the BLM's "multiple-use management" mandate. Given the relative immaturity of *in situ* oil shale technologies in particular, the DPEIS prematurely assumes oil shale development to be largely incompatible with other activities and dismisses the potential for "multiple-use." And, given the apparent "restrictions or seasonal limitations" on much of the existing "preferential rights" acreage 52824-004

assigned to RD&D lessees in the Piceance and Uinta basins, the criteria for Alternative C are inconsistent with BLM's previous commitments of preferential rights for potential oil shale development.

52824-004 (cont.)

In contrast to Alternative C, Alternative B provides suitably sized tracts of continuous land with the potential to support economically viable oil shale development. This is particularly true for the Piceance basin of Colorado as previously noted.

Alternative B also provides industry with the opportunity to nominate areas for *in situ* development that can be most prospective and economically viable, particularly in the Piceance basin, with the possibility of significantly reducing environmental impacts through localized infrastructure synergies.

For commercial *in situ* oil shale development opportunities in the Piceance basin, Alternative A does not allow for leasing on federal lands and therefore precludes potential developers from testing and developing technologies in the portion of the basin with the greatest potential for development by *in situ* technologies.

Finally, we suggest that the final PEIS clearly summarize the in-place and "most likely" recoverable resource potential that is associated with each of the three alternatives, preferably as part of the Executive Summary (e.g., via Tables ES-1 and associated text), Chapter 2 and Appendix A. We also suggest that it is premature to exclude all potential oil shale surface mining from Colorado's Piceance basin based on the unsupported, "economic" assumptions with respect to overburden thicknesses and oil shale development and to the exclusion of potential future technologies. The pros and cons of alternative technologies for development should be weighed using site specific and project-specific data and information as part of later environmental assessments.

52824-005

Resource estimates

The Colorado Petroleum Association believes the Draft Programmatic Environmental Impact Statement's reported shale oil resources in the three-State area to be inconsistently presented and, in the DPEIS Executive Summary, grossly underestimated. While it is not possible to fully evaluate this discrepancy from the information provided in the DPEIS, it appears related in part to a methodology that does not account for significant variations in oil shale thickness and grade (*i.e.*, yield in gallons per ton of resource).

The combined resource in-place for the Green River Formation in the three-state area has been estimated in the literature at 1.5 - 1.8 trillion barrels. By contrast, the DPEIS in the preferred Alternative B presents a combined estimate of 61 billion barrels, comprising only 3-4% of these published estimates. While it is noted in the DPEIS that the resource potential, reported specifically in Executive Summary Table ES-1, represents a "minimum estimate," such a misrepresentation may lead to uninformed policy decision-making on the basis of resource materiality.

52824-006

The CPA believes that Colorado's oil shale resources in particular represent a significant domestic energy resource that has the potential to increase supply and economic activity, while being developed in an environmentally responsible and socially sustainable manner. We suggest that a consistent and valid representation of resource

potential in Colorado, Utah and Wyoming is critically important for informed public opinion on this topic.

In Table ES-1 (Page ES-4, Section ES-6), the combined "potential shale oil resource" for the three-State area is reported as 61 billion barrels for BLM-preferred Alternative B. In contrast, in Appendix A (Page A-8, Section A.1.2), the authors report "1.2 trillion barrels of oil" resource in the Piceance basin alone with "about 480 billion barrels in deposits averaging at least 25 gal/ton." For the Piceance basin, Table ES-1 indicates 16 billion barrels for Alternative B and 2 billion barrels for Alternative C.

For comparison to the DPEIS Table ES-1 estimate of 61 billion barrels for the three-State area under Alternative B, Bartis *et al.* (2005)[1] report an oil resource in-place of 1.5 – 1.8 trillion barrels for the Green River Formation in Colorado, Utah and Wyoming. They estimate the recoverable oil resource to range between 500 billion and 1.1 trillion barrels, with a midpoint estimate of 800 billion barrels. For context, the authors note that such resource potential comprises more than three times the proven oil reserves of Saudi Arabia.

The resource potential estimates of Bartis *et al.* (2005) are further supported by Dyni (2006)[2], who cites several publications that estimate substantially greater resources in-place in each of the three (3) States:

- Pitman *et al.* (1989)[3] estimate the in-place Piceance basin, Colorado, oil shale resource at 1 trillion barrels.
- Trudell *et al.* (1983)[4] estimate the in-place Uinta basin, Utah, oil shale resource at 214 billion barrels.
- Culbertson *et al.* (1980)[5] estimate the in-place Green River basin, Wyoming, oil shale resource at 244 billion barrels.

52824-006 (cont.)

Taken together, these estimates approach the 1.5 trillion-barrel, low-side estimate of Bartis *et al.* (2005). Also, the estimate of Pitman et al. (1989) is in good agreement with the DPEIS Appendix A estimate of 1.2 trillion barrels for the Piceance basin alone.

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[1] Bartis, J., LaTourrette, T., Dixon, L., Peterson, D.J. and G. Cecchine, 2005, Oil Shale Development in the United States: RAND Report, 68 p.

[2] Dyni, J.R., 2006, Geology and resources of some world oil-shale deposits: U.S. Geological Survey Scientific Investigations Report 2005-5294, 42 p.

[3] Pitman, J.K., Pierce, F.W. and W.D. Grundy, 1989, Thickness, oil yield, and kriged resource estimates for the Eocene Green River Formation, Piceance Creek Basin, Colorado: U.S. Geological Survey Oil and Gas Investigations Chart OC-132, 6 sheets with 4-page text.

[4] Trudell, L.G., Smith, J.W., Beard, T.N. and G.M. Mason, 1983, Primary oil-shale resources of the Green river Formation in the eastern Uinta Basin, Utah: U.S. Department of Energy, Laramie Energy Technology Center, DOE/LC/RI-82-4, 58 p.

[5] Culbertson, W.C., Smith, J.W. and L.G. Trudell, 1980, Oil shale resources and geology of the Green River Formation in the Green river Basin, Wyoming: U.S. Department of Energy, Laramie Energy Technology Center, LETC/RI-80/6, 102 p.

[6] Russell, P.L., 1990, Oil Shales of the World, Their Origin, Occurrence and Exploitation. Pergamon Press, New York, 753 p.

Additionally, the in-place shale oil values for the Greater Green River Basin in Appendix A are derived from a "personal communication from Wiig." Such a citation, without an explanation of procedure or publicly available reference, is difficult to assess. Published estimates for the resource in the Green River basin include Dyni (2006), who estimates 250 GBO with a 15 gal/ton cutoff. Russell (1990)[6] estimates 430 GBO for the Green River basin with no cutoffs. 52824-007

These data are tabulated for comparison purposes in Table 1 below.

Table 1. Comparison of DPEIS and Published Resource Estimates by Basin (in Billion Bbls).

Basin / Data Source	Draft PEIS (2007), Executive Summary	Dyni (2006); Pitman *et al.* (1989); Trudell *et al.* (1983); Culbertson *et al.* (1980); Russell (1990); DPEIS (2007), Appendix A	Bartis *et al.* (2005)
Piceance Basin, CO	16	1000 - 1200	
Uinta Basin, UT	28	214	
Green River Basin, WY	17	244-250	
Total	61	1458	1500

One likely reason for the discrepancy is that the estimates in the DPEIS correspond to lands identified for potential lease nomination, whereas estimates from the literature are basin-wide. Another likely reason for the difference is that values in the literature represent gross estimates that include oil shale resource with grades less than 25 gal/ton. For example, Dyni (2006) notes that the 1 trillion-barrel estimate for the Piceance basin is reduced to 578 billion barrels when oil shale less than 25 gal/ton is excluded.

These issues aside, what seems most significant is the apparent methodology used to estimate resource potential in the DPEIS Executive Summary. Although not expressly stated, the estimates in Table ES-1 are apparently derived by assuming a constant oil shale thickness of an average grade applied to the total prospective areas. For example, the amount of oil calculated assuming a constant 25 ft thickness with an average grade of 25 gal/ton over the reported areas for Piceance Alternatives B and C is 16.2 billion barrels and 1.8 billion barrels, respectively. These values agree closely with the 16 and 2 billion-barrel values reported in Table ES-1. 52824-006 (cont.)

While the use of a minimum thickness of a defined grade is a reasonable approach to characterizing the "most geologically prospective area," it is not a reasonable practice for estimating total resource potential. This methodology does not account for significant variations in thickness and grade above the stated minimums which are well documented in the Green River oil shale. As noted in DPEIS Appendix A, for example, the "higher-grade shale sections (in the Piceance basin) range from 10 ft to more than 2,000 ft in thickness…." Furthermore, the methodology does not account for the potential recovery of shale oil from rocks of lesser grade that are inter-layered with the higher grade resource.

While the authors of the DPEIS note that the resource potential in Table ES-1 represents a "minimum estimate," such a misrepresentation may lead to a significant public misunderstanding of the significant size and materiality of Western U.S. oil shale resources.

We recommend that Table ES-1 be corrected for consistency with the best available, in-place resource data from the publicly available, scientific literature for each basin. This can be accomplished simply by multiplying the published in-place shale oil volume for each basin by the ratio of *acreage available for lease nomination* to *total acreage in the most geologically prospective area*. Although this approach is not ideal, it would provide a more reasonable estimate than those reported in Table ES-1. Ideally, the calculation of resources under the various Alternatives for each basin requires a more detailed analysis of the aerial distribution of oil shale thickness and grade. Such an exercise may not be possible for the Uinta and Greater Green River basins as the required maps may be unavailable over significant portions of these areas. However, the required maps for the Piceance basin do exist in the public domain in (see the USGS web site for information about their oil shale geodatabase for the Piceance Basin.)

52824-006 (cont.)

Lastly, we recommend that the in-place shale oil values for the Greater Green River Basin in Appendix A, cited as a personal communication from Wiig, be more appropriately referenced by the publicly available literature.

52824-007 (cont.)

Concerns about additional NEPA reviews and leasing program

The Colorado Petroleum Association is disappointed that the PEIS has been narrowed to include only amendments to land use plans so that multiple additional NEPA reviews will be necessary prior to development. The Energy Policy Act of 2005 did not envision this multi-layered NEPA review process, and in fact required that an expedited PEIS that applied to the entire leasing program be completed. In addition, the Unconventional Fuels Task Force created by the Act recommended an effort to streamline the permitting process in order to provide a more efficient and predictable permitting process. This recommendation is consistent with provisions of section 369(k) of the Energy Policy Act directing the Department of Interior to undertake efforts to streamline federal permitting processes associated with energy resources.

The PEIS creates a process necessitating future NEPA analysis, which is problematic for operators who have made a significant investment in proprietary technology. Specifically, the process created in the PEIS is cumbersome and inefficient in terms of an investment of time and resources and is unlikely to yield better environmental data to the BLM. To illustrate, the PEIS states that future leasing and development will require site-specific NEPA evaluation or that additional site-specific NEPA analysis is necessary prior to lease issuance. See PEIS, at ES-5; 1-7–1-8; 2-16; 2-19; 2-20; 3-9.

Page ES-3 and 2-20 of the PEIS note that commercial oil shale leasing would occur by utilizing a lease-by-application process in which BLM would "issue a call for applications for commercial leases," and in response, "companies would be required to identify the specific lands that they are interested in as part of their lease application process." Alternatively, "it is also possible that the BLM would identify specific tracts to be leased in the call for applications." The PEIS also notes that the process would require that NEPA analyses be conducted prior to lease issuance and that information collected as

part of the lease application process would be incorporated into the NEPA analysis. Moreover, "applicants would be required to identify key information regarding aspects of the proposed development needed to support a complete NEPA review (*e.g.*, technologies to be employed, level of planned development, anticipated off-site impacts, strategies to comply with regulatory requirements, and so forth)." *Id.* at 2-20. During the NEPA review for commercial leases, BLM would identify and establish appropriate lease stipulations to mitigate anticipated impacts. In addition, the subsequent approval of project-specific plans of development would require project-specific NEPA review to (1) consider site-specific and project-specific factors, and (2) identify and require appropriate mitigation measures as needed to control impacts beyond those established in the lease stipulations. *Id.*

The proposed leasing arrangements and NEPA review for commercial leasing are problematic for two reasons. First, the requirements to obtain a commercial lease include significant pre-lease issuance expenses, including significant environmental, engineering and project design costs. These expenses are onerous, and because a NEPA review will be necessary at the leasing level and again at the project-specific level, incurring significant expenses at the pre-leasing stage is improper. Second, in addition to expending vast sums at a premature stage, the PEIS mentions that operators will need to share information and proprietary technology with competitors bidding on the same parcels.

In laying the ground work for proposed leasing arrangements, it is important for BLM to remember that the development of oil shale technology is still in its early stages and that oil shale development is entirely different from standard commercial oil and gas or coal technology. Unlike standard technology used in oil and gas or coal extraction, which has been developed over many years and is uniform in its application, oil shale technology varies, is still being refined and is proprietary at this stage. Also, although there are standard operating procedures for other industries, there are no operating practices or procedures for oil shale yet at this stage of industry development. Consequently, it is incumbent upon BLM to set forth a proposed commercial leasing framework that will protect proprietary information. 52824-008

The purpose of the commercial lease will be to provide an operator an exclusive and non-competitive right to this specific tract of land. But, as currently contemplated in the PEIS, project development would only occur following a project-specific NEPA analysis and regulatory approvals. Unlike a traditional oil and gas or coal lease, the proposed commercial lease framework will not authorize any on-the-ground activities until after a project-specific NEPA analysis. Instead of authorizing activity, the NEPA analysis at the leasing stage would only result in the dedication of certain parcels of land as leases for future commercial oil shale development. Therefore, granting such a lease will not in and of itself cause environmental impacts, as no activities are authorized by the actual lease itself. Project-development activities will be subject to a project specific NEPA analysis, which will require project development plans, mitigation to meet local, state, federal regulatory requirements, and conformity of the lease to the applicable RMP. 52824-009

The framework for commercial leasing proposed in the PEIS requires detailed plans of operation to be available at an early stage prior to the authorization of any project activity. In order to develop a detailed plan under this framework, an operator would need to conduct exploratory activities, assess the hydrological and environmental aspects of the site, evaluate the resource potential, and consider commercial aspects of

marketing the product. Developing the extent of information currently contemplated in the PEIS proposed lease framework would require months, perhaps years, of data gathering and analysis. Moreover, some relevant information cannot be obtained without subsurface work. Consequently, it is unreasonable to assume that the level of detail necessary to accompany a lease application would be available at the pre-leasing stage prior to authorization of any activity, as most detailed information would not be readily available. Such burdensome requirements at the pre-leasing stage would require project design, proposed mitigations, divulgence of proprietary information and monetary risk at a premature stage with no assurance of a land position. Then, following the NEPA analysis at the leasing stage, a NEPA analysis would be required at the project-specific level as contemplated in the PEIS before any commercial activity may be authorized, which is redundant and inefficient. 52824-009 (cont.)

The proposed commercial lease framework announced in the PEIS should be revised to eliminate the cumbersome and time-consuming multi-NEPA review process and to recognize the unique situation commercial oil shale leasing and development presents. In addition, the process must safeguard the resources and proprietary information of operators seeking to obtain such leases and to engage in development.

Page ES-3 of the PEIS recognizes the possibility that, in the future, some operators may be in a position to have gathered sufficient information and data at the pre-leasing stage. Under these circumstances, the PEIS provides an opportunity for a combined review and states that "the NEPA review for the plan of development may be incorporated into the NEPA review conducted for the lease application, if adequate operational data are provided by the applicant(s)." CPA agrees that the option to combine the NEPA review at the leasing stage and at the project-specific stage should be available to operators who have detailed project information available at the pre-leasing stage. Allowing operators to combine the NEPA review at an earlier stage when the appropriate information is available will increase the efficiency of the NEPA process, which, in turn, will potentially lead to increased energy security and will allow the economic benefits of oil shale development to be recognized sooner. Consequently, the commercial leasing framework should also include a provision allowing the combination of the lease application NEPA review and the project-specific NEPA review when project-specific information is available at the pre-leasing stage. 52824-010

Affect of existing regulatory/permitting programs

The BLM in some cases has recognized the existence of specific regulatory programs that will appropriately control the impacts contemplated in the PEIS. But in many cases these existing regulatory programs have not been recognized and the PEIS attempts to outline stipulations, mitigations and conservation measures which are more appropriate to consider in a site-specific NEPA review. Their existence in this PEIS, throughout the document but especially in Chapter 4 under mitigation measures and in Appendix F, is helpful but also lengthens and complicates the PEIS. 52824-011

Any development of commercial oil shale or tar sands operations will be subject to many regulatory and permitting controls. Yet in many of the impact analyses presented in this document, the BLM identifies needed mitigation or conservation measures to address perceived environmental impacts of these projects that are already required by regulation. The BLM further identifies potential environmental impacts that would arise if there were no environmental regulations in place. For these reasons the environmental

impact analysis is flawed by these apparent assumptions that the operators will not comply with existing environmental regulation, or that the regulating agency will not implement measures as part of the permitting processes that would eliminate or mitigate certain environmental impacts. Appendix D in the PEIS is a partial list of federal, state and local government entities that will be involved in permitting and regulating oil shale development. This appendix is helpful in understanding the role that permitting and regulatory programs will play in minimizing and managing impacts and should perhaps be referenced in these various analysis sections.

52824-011 (cont.)

The final PEIS should clearly state in its summary and in the recommended amending language for the RMPs, that compliance with all environmental regulations is assumed. Only mitigation measures that would go beyond minimum requirements set forth by other regulatory programs should be specified as conditions in the RMP. Impact analyses should be done applying mitigation measures already required by regulation.

Concerns about stipulations

Although the PEIS serves only to amend RMPs to make certain lands available for future leasing subject to further NEPA analysis, the document devotes time to potential impacts from typical technologies and identifies a variety of potential mitigation measures. In some cases, such as noise, it identifies standards. The existing Resource Management Plans already contain stipulations applicable to all surface disturbing activities. The stipulations are established to be broad and far reaching, but are subject to exception, modification and waiver as described in the RMP, typically by the Area Manager subject to environmental analysis and sometimes in consultation with USFWS. The RMPs also contain conditions of approval (COA) that are considered by BLM to be best management practices (BMPs). A project proponent may propose alternate methods to accomplish the same or better result than the COA provided in the RMP. BLM implements the RMP when making land use decisions or approvals and attaches stipulations and COAs from the RMP to the approval, whether it be a drilling permit or an RD&D lease.

The PEIS amends the RMP to allow leasing on certain lands subject to further NEPA analysis. The RMP contains stipulations and COAs appropriate for environmental protection in the resource area. The appropriate place to work project mitigation measures is in the project specific EIS and not the PEIS. Further, the stipulations and COAs in the RMP will be applied as appropriate by the BLM in the project specific NEPA process.

52824-012

Each operator will be required to submit a plan of operation for its proposed commercial project. A NEPA analysis will be required to evaluate, and address, environmental impacts. Site-specific mitigation measures are devised as part of the operating plan, and perfected with the environmental analysis. Site-specific mitigation measures are far more practical than mitigation measures generically specified in the RMPs. Not only are some of the proposed mitigation measures impossible or impractical for some operations, the specificity could limit the use of new technologies and innovative management tools.

Many of the mitigation measures listed on pages 101 through 107 in Chapter 4 (Section 4.8.2) are already required by other programs, and should not be presented as new mitigation measures that should be required as part of the RMP amendments.

Other measures are included but may be too far-reaching or limited to be effective. Many of the requirements are not practicable; some are not applicable to every situation. A better approach would be to identify areas where site-specific environmental control plans should be developed as part of operating plans. This will not only enable implementation of the best site specific mitigation measures, but will require the operator to design and implement the plans in an efficient, economic and realistic manner.

It is important to recognize that oil shale development projects, like other temporary projects, will follow a pattern of construction, operation and reclamation. During the construction and operation periods impacts will be mitigated and managed to meet all existing requirements. During reclamation, the land and other resources will be returned to approved and acceptable contour and vegetation that will allow multiple uses to resume.

52824-012 (cont.)

The Colorado Petroleum Association requests that the Final PEIS clearly state that the mitigations suggested in the PEIS were provided along with the typical technologies to assist the PEIS reader in better understanding the general technology, general impacts, and typical mitigations that could be considered. Individual RMPs contain Stipulations and COAs appropriate for those individual resource areas and the RMP Stipulations and COAs will be applied by BLM as appropriate through the project specific NEPA process.

Existing Rights Granted by RD&D Leases

The BLM previously granted six RD&D leases that authorize lessees to construct and operate their recovery technology for oil shale development on these parcels of BLM land. Each RD&D lease encompasses a 160-acre tract associated with a preference right lease (PRL) of up to an additional 4,960 acres. The BLM issued environmental assessments ("EA") and a finding of no significant impact ("FONSI") for each of these RD&D leases.

Each RD&D lease grants the lessee the "exclusive right and privilege to prospect for, drill, mine, extract, remove, beneficiate, concentrate, process and dispose of the oil shale and the products of oil shale contained within the Leased Lands as proposed in the nomination submitted in response to the Federal Register notice of June 9, 2005." *See* RD&D Lease, at § 2. The BLM issued each lease for a term of ten years with an option to extend the lease term for up to five more years upon demonstration of its diligent pursuit of a process leading to the production of commercial quantities of oil shale. Upon demonstration of production of commercial quantities , the RD&D leases may be converted into oil shale commercial leases subject to a fee and to the commercial oil shale regulations.

Under each RD&D lease agreement, the lessee has the "exclusive right to acquire any or all portions of a preference lease area for inclusion in the commercial lease, up to a total of 5,120 contiguous acres," in part, upon (1) documenting to the satisfaction of the authorized officer that it has produced commercial quantities of oil shale from the RD&D lease; (2) payment of a bonus based on the fair market value of the lease determined by the lessor through rulemaking or other process for obtaining public input; (3) documentation of consultation with state and local officials to develop a plan for mitigating the socioeconomic impacts of commercial development on communities; (4)

52824-013

an adequate bond to cover all reclamation and abandonment costs; and (5) BLM's determination following a NEPA analysis that commercial-scale operations can be conducted without unacceptable environmental consequences. Once those conditions have been met, under the RD&D lease terms, the "lessee *shall* have the exclusive right" to a commercial lease that includes the preference right area (a "PRL") (emphasis added). *See* RD&D Lease, at § 23(a). Thus, once the RD&D leaseholders have met the conditions necessary for conversion listed in the RD&D lease agreement, BLM must grant a PRL. 52824-013 (cont.)

Socioeconomics

The socioeconomics sections of the Draft PEIS provide a general overview of social and economic conditions in the three ROIs and the potential impacts associated with the defined oil shale and tar sands prototype projects. However, the assessment relies on dated information, broad generalizations drawn from past social and economic impact research that is in many instances not applicable to the current situation, ignores or overlooks critical dimensions of foreseeable impacts (e.g., short-term peak impacts and the spatial distribution of impacts.

Specific Comments

Chapter/Section: 3.10.2 Page 3-211, Current Conditions - No mention of the steady, ongoing growth of R&D projects since 1995, how many people they employ, how much money has been spent, etc. To date oil shale research has provided many benefits to the local communities. Please revise the text to acknowledge the positive impacts. 52824-014

Chapter/Section: 3.10.2.1 Page 3-213, Figure 3.10.2-1 - The rationale used to establish the defined ROIs is unclear. The effects of commercial development of either Oil Shale or Tar Sands in any of the areas will unlikely be confined to communities within the specific state in which the project is located, particularly given the proximity of Grand Junction to the resource areas in Utah. Furthermore, the rationales for including or excluding some counties, e.g., Delta County, Colorado, Sublette County, Wyoming, and Daggett County, Utah are unclear. For example, Delta County contains no Oil Shale or Tar Sands resources and its population centers are separated by considerable distance and terrain from the areas of oil shale development. Finally, the defined ROIs are not consistent with the assumptions regarding electrical power generation, e.g., the 150 mile radius criteria would encompass power plants in both Colorado and Utah for developments in Wyoming. We suggest either revising the ROIs, or revising the text to acknowledge the potential for impacts in other areas. 52824-015

Chapter/Section: 3.10.2.1.2, Page 3-214, Paragraph 1 - The discussion in this paragraph and Table 3.10.2-4 focuses on 2004 employment statistics, yet employment has continued to grow in the natural gas-producing counties in the ROI in all states. The discussion of employment and labor market conditions also ignores the potential implications of future oil and gas development with respect to Oil Shale and Tar Sands. For example, the narrative on 3-124 indicates "…the number of local workers presently unemployed and potentially available for oil shale and tar sands development is currently small." While factual, the statement is moot on the point of whether the labor market effects of current natural gas and oil development in the region is expected to be sustained over the next 10 years such that it is still a factor when commercial scale development is foreseeable or whether oil and gas development is expected to peak and decline, thereby easing pressures on local labor markets. The use of more current 52824-016

statistics or at least a mention of the continued dramatic employment growth in many of these counties is warranted. Please include more recent employment statistics or acknowledge employment growth since 2004. 52824-016 (cont.)

Chapter/Section: 3.10.2.2, Page 3-219, Paragraph 2, last two sentences
The discussion in the last two sentences of this paragraph does not acknowledge the energy industry's considerable efforts to work with local and statewide institutions of higher learning to develop college and vocational programs to provide advanced learning opportunities to youth and residents of northwestern Colorado. We suggest the PEIS acknowledge industry workforce development efforts. 52824-017

Chapter/Section: 3.10.2.2.2, Page 3-221, Paragraph 1 and Table 3.10.2-6
This paragraph and Table 3.10.2 – 6 refer to population statistics from the 2000 census, which are now approaching eight years old. Both the US census Bureau and the respective states have published population estimates for 2006. This is particularly important in the Colorado ROI, because substantial population growth occurred over the last several years. Consider updating population statistics or acknowledge that considerable growth occurred in recent years. 52824-018

Chapter/Section: 3.10.2.2.3, Page 3-223, Paragraph 1 – Fiscal Conditions
"There has been little support from energy companies where existing roads need to be upgraded." One CPA member company alone reports contributions for roads of roughly$500,000 over the last 5 years in the vicinity of their research project not including other in-kind work. Another company reports that upgrading public roads was an integral part of the work done by oil shale developers in the 1980s time frame. Please revise this estimate to recognize the significant contributions made by industry. 52824-019

Chapter/Sections: 3.10.2.2.5 through 3.10.2.2.7, Page 3-224 through Page 3-231
These two sections and the subsequent sections in Chapter 4 dealing with social disruption ignore the social change that has been occurring in most communities in all three ROIs over the past quarter century or more. Much of the literature on social change associated with energy development during the 1970s and 1980s describes effects on small, stable, culturally cohesive and relatively isolated rural communities. In contrast, many of the communities in the three ROIs have undergone extensive growth and development during the recent past, associated with energy and mining development, tourism/recreation, retirement and second home development, and lifestyle migration. In the case of some of the communities in the Colorado ROI, a combination of development from all these factors occurred over the course of the past few years. In fact, there are few small, stable rural communities in the Colorado ROI. Most communities recently underwent population growth and/or social change. A discussion of the kinds of social change that occurred in these communities and the social trends and issues associated with the kinds of development that recently occurred would be of greater value to the understanding of how these communities might be affected under the Oil Shale development alternatives than a summary of the literature on social effects of population growth on small, isolated rural communities. Please acknowledge the social change that occurred in communities in the ROI. 52824-020

Chapter/Sections: 3.10.3, Pages 3-231 through 3-233 (Recreation Economy)
This section should provide a discussion of the recreation resources that are both in the ROI and near the Oil Shale and Tar Sands development areas and the role those specific resources play in the recreation economies and visitor statistics in each ROI. 52824-021

For example, there are no major tourism or recreation attractions within or immediately adjacent to the most likely area for Oil Shale development in the Colorado ROI. These areas are used primarily for hunting and other forms of dispersed outdoor recreation. Few developed recreation sites exist near these areas. An area-specific description of recreation resources would yield clearer insights into the kinds of resources that could be impacted and the types of on- and off-site measures that could mitigate these impacts. Please identify recreation resources potentially affected by development. 52824-021 (cont.)

Chapter/Section: 3.10.3.2, Page 3-233 and Table 3.10.3-1 on Page 232
This section and the associated table are misleading in that expenditures in many of the areas included in the recreation sector (e.g., amusement, lodging, eating and drinking places, hotels and lodging places and recreational vehicle parks) are being made by business visitors, transient natural gas workers and interstate travelers, which would overstate recreation expenditures, employment and income. Please acknowledge that some of these expenditures are not tourism/recreation related. 52824-022

Chapter/Section: 4.11, Page 4-134, Paragraph 1, Line 7
The socioeconomic assessment assumes that no proactive community development effort to avoid, manage or mitigate negative social, economic and fiscal consequences of Oil Shale development will occur prior to development, when in fact federal, state and local governments and Oil Shale companies are all likely to encourage and perhaps require such efforts. While the details of these requirements are not known at this time, it would be useful for the decision makers and readers of the document to know that proactive community development planning would help avoid many potential socioeconomic impacts and reduce the magnitude of most impacts. We suggest a description of likely planning and community development efforts and their role in avoiding and mitigating potential social impacts. 52824-023

Chapter/Section: 4.11.1.3, Page 4-144, Paragraph 2, starting at line 6
Again, this section does not acknowledge the social change that recently occurred in most communities in the Colorado ROI. They have already under considerable growth and change owing to tourism, recreation, lifestyle migration and energy development. These communities already adapted to a different quality of life and transitioned away from a more traditional lifestyle involving ranching. Most communities in the Colorado ROI are not small, isolated, close knit, homogenous communities. The majority of these communities already transitioned toward a more urban lifestyle with increasing cultural and ethnic diversity. By not acknowledge these conditions the Draft PEIS inaccurately assesses potential impacts and fails to consider the kinds of social effects that Oil Shale and Tar Sands development may have on these communities. The PEIS should accurately describe social conditions in the ROI and accurately assess how Oil Shale development may affect these conditions. 52824-024

Chapter/Section: 4.11.1.5, Recreation Impacts
Because the recreation discussion in Section 3.10.3 did not identify "popular recreation locations" in each ROI or discuss the proximity of popular recreation locations to the likely Oil Shale development areas, we cannot determine if economic impacts to recreation would be substantial or approach the 10 or 20 percent reductions in recreation employment described in these two scenarios. It would be more useful to describe the potential recreation resources near the likely Oil Shale and Tar Sands development areas, discuss the importance of those resources to the recreation economy within the ROI and describe how oil shale and tar sands activity and ancillary 52824-025

development might affect recreational uses associated with those resources. The discussion of the effects of a 10 to 20 percent reduction in recreation employment without tying these scenarios to likely occurrences is not helpful to the decision makers or readers of the document. Many of the in-migrating Oil Shale and Tar Sands workers would likely recreate within the ROI resulting in additional recreation expenditures and employment. The Colorado Petroleum Association (CPA) suggests that the PEIS describe the types of recreation resources likely to be affected and the relationship of those resources to the recreation economy within the ROI.

52824-025 (cont.)

Chapter/Section: 4.11.1.6, Page 4-146.
There is no corresponding Chapter 3 discussion of existing properties in areas that might be affected by Oil Shale development and trends in valuation of those properties, consequently, decision makers and readers are not able to put into perspective the magnitude or severity of this issue. For example, in the Colorado ROI, much of the likely Oil Shale development area, including the existing RD&D projects are on BLM land, located at some distance from most private lands. Consequently, property values on most private lands are unlikely to be directly affected by Oil Shale development. Furthermore, indirect effects on property values could include increases in property values for some properties, not only decreases.

52824-026

The assertion that breakdown in social structures of rural communities can adversely affect property values is counterintuitive to the experience of property value changes in boomtowns, and should be supported by documentation if it is to be used in the assessment. Please describe the amount and type of private land near likely areas of development and discuss the types of effects that Oil Shale and Tar Sands development might have on those lands and associated property values.

Chapter/Section: 4.12.1.3, Page 4-152, 3rd paragraph
The statement "*Given the location of environmental justice populations in each state, construction and operation of oil shale facilities, power plants, and employee housing required for the oil shale development projects would produce impacts that would be experienced disproportionately by minority and low-income populations*," is not supported by the assessment. In the Colorado ROI, there is no evidence presented in the assessment to show that low income and minority populations would be either adversely impacted or disproportionately impacted by Oil Shale development.

The assessment states that there is one census block group with an environmental justice population in the town of Carbondale and two census block groups with low income populations located in Grand Junction. The discussion asserts that "*Of particular importance would be social disruption impacts of large increases in population in small rural communities, the undermining of local community social structures and the resulting deterioration of quality of life.*" While there may be an existing low income population in Carbondale, property values, housing costs (currently housing sales process average over $1 million) and commuting distance will prevent virtually any Oil Shale employees from moving into the community, effectively preventing Oil Shale related population increases. Indirect population gain will also unlikely occur in Carbondale because it is not a regional commercial center as are Rifle, Glenwood Springs and Grand Junction.

52824-027

Regarding the two census block groups located in Grand Junction, we note that the US Census Bureau designated the Grand Junction area as a *Metropolitan Statistical Area*

(MSA) (emphasis added), which means that it is no longer considered rural. Note that the 2006 population estimate for the Grand Junction MSA was over 130,000 people. Consequently population growth associated with Oil Shale development is not likely to lead to the types of social disruption discussed in this section, given the size of the municipality and the recent growth and change that has occurred there. The Draft PEIS has not presented any analysis that the air or water effects of Oil Shale development will adversely affect Carbondale or Grand Junction, or disproportionately affect the block groups which contain environmental justice populations in those communities. Transmission lines associated with Oil Shale development and land use and visual impacts of Oil Shale development are highly unlikely to affect Carbondale or Grand Junction, or disproportionally affect environmental justice populations in those communities. Consequently the PEIS should not conclude for the Colorado ROI that… "*Given the location of environmental justice populations in each state, construction and operation of oil shale facilities, power plants, and employee housing required for the oil shale development projects would produce impacts that would be experienced disproportionately by minority and low-income populations*."

52824-027 (cont.)

At a minimum the PEIS should state that Environmental Justice communities may be adversely impacted by Oil Shale development rather than will be affected by development.

Chapter/Section: G.2.4, Page G-7, 1st paragraph, 4th line
This Social Disruption section assumes the absence of adequate planning measures, as has been assumed throughout the Draft PEIS. In reality federal, state and local governments and the Oil Shale companies themselves will require extensive planning and community development efforts before any development begins. While some adverse and beneficial social change will certainly accompany the population growth associated with Oil Shale development regardless, it is not realistic or useful to decision makers or readers of the Draft PEIS to assume that Oil Shale development would occur without planning and community development and that increases in social distress and deterioration of quality of life are an inevitable consequence of Oil Shale development.

52824-028

It should also be said again that the assertion that "*Changes in cultural values may also occur as the resident population is exposed to, and may be required to at least partially adopt to, the cultural values of the in-migrant population*," appears to be rooted in the notion that the communities in the Colorado ROI are stable, isolated rural communities in spite of the substantial population growth and social change that already occurred in these communities recently. The PEIS should discuss the potential for proactive community development efforts to avoid or mitigate many social impacts.

C02 emissions

While it is recognized earlier in these comments that oil shale has the potential to play a very important strategic role in our nation's energy security future it also has the potential to impact climate change. In addition, increased diversity of fuel supply can help moderate the impact of global supply interruptions as well as improve security of supply. It is also important that CO2 emissions and their link to global climate change associated with unconventional fuels are thoroughly analyzed and discussed. We offer the following specific suggestions for inclusion.

52824-029

The PEIS discusses climate change and greenhouse gas emissions in several locations. The document cites two leading studies about greenhouse gas emissions and their climate change impacts. As the studies cited by BLM and others note, climate change has global implications.

Impacts and regional effects, though highly uncertain have been documented by the IPCC. The IPCC Fourth Assessment Report provides useful information to expand on the impacts of climate change on North America. "Impacts of climate change on North America will not occur in isolation, but in the context of technological, economic, social and ecological changes. In addition, challenges from climate change will not appear as isolated effects on a single sector, region or group. They will occur in concert, creating the possibility of a suite of local, as well as long distance, interactions, involving both impacts of climate change and other societal and ecosystem trends. In some cases, these interactions may reduce impacts of decreased vulnerability, but in others they may amplify impacts of increased vulnerability." Working Group 2, Chapter 14.4.9. p. 635.

The IPCC also notes, at chapter 14.8 p. 639; "Projections of climate changes still have important uncertainties; especially on a regional scale. For North America, the greater uncertainty about future precipitation than about future temperature substantially expands the uncertainty of a broad range of impacts on ecosystems, hydrology and water resources and on industries."

Oil shale production has the potential to emit significant quantities of carbon dioxide. The PEIS contains some information about the potential CO_2 emissions from oil shale activities, but this information can be supplemented using information that the US government previously published.

52824-029 (cont.)

The Task Force on Strategic Unconventional Fuels issued a report to the President and Congress in September 2006 titled "Development of America's Strategic Unconventional Fuels Resources" Page 25 includes bar charts comparing the energy balance of oil shale mining and in-situ production methods with that of Alberta oil sands mining and in-situ production. The comparison indicates that the GHG footprint of oil shale operations can be the same as what is currently experienced in Alberta and for which there is a fair amount of publicly reported data. We may need to apply some allocation of additional CO_2 emissions to oil shale based on the effects of thermal processing of minerals embedded in the oil shale. An additional adjustment may be required to account for the energy efficiency improvements achieved in the oil sands business over the past decade.

Emissions from an oil shale industry should be assessed against their marginal impact relative to displaced fuels not on an absolute basis. Over time, it is possible that the lifecycle carbon emissions associated with fuel derived from unconventional sources can be lower than that of our current fuel mix. So it is important that carbon intensities of fuels derived from unconventional resources are not assumed, especially while the technologies to produce these resources are under development. Given examples of energy efficiency improvements achieved in oil sands operations in Canada, there is no reason to believe that unconventional resources cannot be developed over time with a carbon footprint at least as small as that of fuels produced from conventional sources, especially when including the impacts of carbon sequestration.

Conclusion

The Colorado Petroleum Association believes that a strong program to promote research and development of Colorado's oil shale is in the best interests of Colorado and the U.S. We believe that the selection of Alternative B will provide the best opportunity to develop the critical energy supplies our nation needs and will assist the BLM in achieving its mandate of "The largest amount of potential oil resources available for application for leasing while still providing for an environmentally sound program…" The Colorado Petroleum Association and its member companies appreciate the opportunity to comment on the Draft Oil Shale and Tar Sands Programmatic Environmental Statement and we further appreciate your consideration of our views expressed in these comments.

Stan Dempsey, Jr.

Stan Dempsey, Jr.
President

Responses for Document 52824

52824-001: The BLM acknowledges the commentor's preference for Alternative B.

52824-002: Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sands resources among other unconventional fuels, if it can be done in an environmentally sound manner. Through this PEIS, the BLM the is implementing the Act in concert with other applicable Congressional mandates; in this case, the requirements of NEPA and FLPMA. In the analysis of impacts, the BLM has identified both negative and positive impacts. For examples of positive impacts see Sections 4.4.1, 4.10.1, 4.11.1.1, and 4.12.1. Subsequent NEPA analysis will help managers make decisions regarding the competing uses proposed for specific areas of public lands.

52824-003: While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. It was determined that the three alternatives provided a reasonable range because the allocation decisions, as being proposed in the PEIS, had a very narrow and limited scope: to allow certain lands to be considered for future leasing. This approach is in full compliance with NEPA since the purpose and need of the PEIS serves as the basis to determine the reasonable range of alternatives in a NEPA document. Alternative B was structured to make the most geologically prospective lands available, and Alternative C was structured to apply existing land use plan decisions associated with the affected planning areas that concern the protection of sensitive resources, including those resource values found in ACECs. The analysis of the alternatives discloses the impact of opening or closing lands to oil shale application. This gives the decision maker the ability to fully compare the consequences of each alternative in relationship to energy development and the protection of sensitive resources

52824-004: Please see the response to Comment 52824-003. The BLM does not believe that Alternative C or any of the other alternatives are inconsistent with the concept of multiple use. Under all alternatives, all uses could be accommodated, but in different mixes and amounts of any particular use.

The "preferential rights" mentioned in the comment are only associated with the existing RD&D leases. In general, valid existing rights are considered to be administrative actions by the BLM and do not require a specific planning decision to implement. This is a planning criterion and, as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decisions are subject to valid existing rights. With respect to the federal government's commitment to issue commercial leases on the preference right lease areas (PRLAs) to the RD&D lease holders, a lease will

be issued only if the terms and conditions of the lease are met. This includes evaluation pursuant to NEPA that concludes that commercial-scale operations of the applicant's technology at that site do not pose environmental or social risks unacceptable to the BLM. The discussion of the PRLAs, however, has been revised to reflect the language in the lease and to clarify that this is a component of all of the PEIS oil shale alternatives.

52824-005: Although the PEIS excludes areas where the overburden is greater than 500 ft (on the basis of economics), this exclusion in the PEIS does not preclude an applicant from pursuing such an option in the future. Should industry come forward with an economically and environmentally sound proposal for surface mining that would involve depths of overburden of greater than 500 feet, the BLM and the Secretary of the Interior have the authority to undertake another EIS that would consider additional modification of land use plans to allow leasing for such a proposal.

52824-006: The number in question was calculated for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The number was developed with the understanding that the number underestimates the actual in-place resource. The number was developed using the values that described the minimum quality and thickness that was deemed to be economic. Those values are a minimum 25 ft thickness and a minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming, the values used were 15 ft thick and 15 gallons per ton. These values, coupled with the acreage in each of the alternatives, generated the numbers in question. It is true that using more exact isopachs and quality data, if available, would have provided much higher values for each of the alternatives, but the alternatives would remain comparable.

52824-007: The section referenced does not give an estimate of the resource in the Green River Basin but explains how the boundaries of the geologically prospective areas were identified. See also response to 52824-006.

52824-008: Thank you for your comment, but the establishment of a regulatory framework that addresses operating conditions and proprietary information is outside of the scope of the PEIS.

52824-009: The BLM currently envisions requiring a NEPA evaluation at both the leasing and development phases of projects. Many of the issues raised in the comment will be addressed by regulations currently being developed by the BLM for the oil shale and tar sands program. This rule-making process will involve public participation and comments. The commentor can submit comments and concerns as part of that process.

52824-010: See the response to Comment 52824-009.

52824-011: Sections 4.1 and 5.1 of the PEIS include possible mitigation measures. The PEIS puts operators on notice that development of oil shale can only occur if it is done in an environmentally acceptable manner, and it also reiterates the obvious requirements that any development will have to comply with existing laws and regulations regarding protection of the natural, social, and cultural environment. Future environmental analysis for leasing and development actions will include evaluation of potential direct, indirect, and cumulative impacts on wildlife, plants, and threatened and endangered species and the development of specific mitigation measures.

The commentor is correct in stating that all leasing and development activities would require compliance with existing environmental regulations. However, legal and regulatory frameworks represent the minimum requirements for resource protection. Depending upon the values found on a particular site and the findings in the NEPA analysis for the lease or project, the BLM could require a higher level of protection than the legal minimum.

52824-012: The mitigation measures presented in Chapters 4 and 5 and in Appendix F are presented as examples of mitigation measures that could be applied to individual projects. They may not be applicable to all project areas, and more suitable mitigations may be appropriate in certain circumstances. As stated in the PEIS, the final set of mitigation measures would be developed in consultation with the BLM and other federal and state agencies.

52824-013: The administration of the RD&D leases is beyond the scope of the PEIS. Additional information has been incorporated into the Final PEIS to ensure adequate description of the relationship of the existing RD&D leases to the PEIS.

52824-014: The text in the PEIS has been changed to address the issues raised in the comment.

52824-015: Given the programmatic nature of the PEIS, the purpose of the analysis of socioeconomic impacts is to provide an overview of the type and magnitude of impacts that would likely occur with the construction and operation of representative OSTS and ancillary facilities. As the technologies, scale of development, and project locations associated with these facilities are not known, the analysis described in the PEIS was limited to estimating impacts for an ROI in each state, based on the likely residential location of project workers, and consequently the region in which the majority of socioeconomic impacts of the prospective facilities would most likely occur. Selection of the counties in each ROI was based on those used in the Final EIS for the Prototype Oil Shale Leasing Program (BLM 1973).

If commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken to analyze in detail the extent of regional economic impacts, including impacts on local wholesale and retail price

inflation, housing markets, recreation, and agriculture. Site-specific reviews would take into account actual worker residential locations by county, the extent of wage and salary spending, and equipment material and service procurement patterns in each county by oil shale and tar sands resource developers and operators when these details are known. If it is determined that additional impacts may occur in other counties outside each ROI, particularly with regard to workforce commuting patterns and oil shale and tar sands project-related electricity generation facilities, these counties would be included in any future site-specific assessment.

52824-016: The text in the PEIS has been changed to indicate that ROI population projections, including data for 2004 presented in Section 6.1.1.10, were taken from county population forecasts prepared by each state and reflect growth rates projected in those forecasts, including growth during the forecast period in oil and gas activity.

52824-017: Text has been added to Section 3.10 of the PEIS indicating the various industry contributions toward mitigating the adverse impacts of oil and gas development in local communities.

52824-018: Population baseline data for each ROI for 2000 were the most recent actual data available when the Draft PEIS was released. ROI population projections, including data for 2004 presented in Section 6.1.1.10, were taken from county population forecasts prepared by each state and reflect growth rates projected in those forecasts.

52824-019: See response to Comment 52824-017.

52824-020: The text in the PEIS has been changed to acknowledge that it is likely that some degree of social change may have already occurred in each ROI with the advent of the recent oil and gas boom, and that social change is not just a factor of the recent oil and gas boom, but also associated with energy and mining development, tourism/recreation, retirement and second-home development, and lifestyle migration.

52824-021: As indicated in Section 3.10.3 of the PEIS, Table 3.1.2-1 identifies resources in each ROI that are used for recreational purposes.

52824-022: Text has been added to the PEIS to reflect that, as the commentor suggests, some expenditures in the sectors identified as providing equipment and services to outdoor recreation may also include expenditures made by business visitors, oil and gas workers, and interstate travelers.

52824-023: While it may be the case that community development programs, with participation from energy resource developers and local, state and federal governments, will be implemented in each ROI at various stages of the oil shale

and tar sands development process, the nature, extent, level of participation, and timing of these programs are not known at this time. As a result, the analysis undertaken for the PEIS provides information on impacts in each ROI in the absence of these measures. A series of mitigation measures related to the provision of direct and indirect employee housing and related services and to the development of a socioeconomic monitoring, vocational training, and outreach programs is provided in order to reduce the initial impact of construction and operations activities in each ROI, particularly with regard to the impact on housing markets, local public services and infrastructure, social disruption, and wholesale and retail price inflation.

Text has been added to the PEIS stating that various additional impact mitigation strategies could be designed and implemented at the local and state level, once the location, timing, and magnitude of impacts of specific projects are known, and stating that the role of tax revenues in attempts to diversify local economies and reduce dependency on natural resource extraction industries could also be considered.

52824-024: The text in the PEIS has been changed to acknowledge that it is likely that some degree of social change may have already occurred with the advent of the recent oil and gas boom in each ROI.

52824-025: As indicated in Section 3.10.3 of the PEIS, Table 3.1.2-1 identifies resources in each ROI that are used for recreational purposes.

52824-026: Text has been added to Section 3.1 of the PEIS regarding the amount of private land in the study area. Information on the impacts of the Colony Project on property values can be found in Section 3.10.1 and on the impacts of recent oil and gas development can be found in Section 3.10.2.2.2. Discussion of the potential impacts of oil shale and tar sands development and ancillary projects on property values can be found in Section 4.11.1.6.

52824-027: Text in Sections 4.12 and 5.12 of the PEIS has been changed to indicate that impacts on environmental justice populations would only occur in a number of locations in each ROI.

52824-028: See response to 52824-023.

52824-029: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues

associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

Thank you for your comment, timothy bluhm.

The comment tracking number that has been assigned to your comment is OSTSD52825.

Comment Date: March 20, 2008 10:13:08AM
Oil Shale and Tar Sands
Comment ID: OSTSD52825

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Comment Submitted:

The Utah wilderness is extremely important to me and my family. We strongly oppose any action that would infringe upon this beloved land in any way. In fact, my new wife has never even been to Utah, and I am going to take her there for the first time this spring, and for many springs to come. Let's make sure it is still there. We'll take the train if there's not enough gas to drive. No problem. Thank you. 52825-001

Response for Document 52825

52825-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Jim Sims.

The comment tracking number that has been assigned to your comment is OSTSD52826.

Comment Date: March 20, 2008 10:15:37AM
Oil Shale and Tar Sands
Comment ID: OSTSD52826

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Comment Submitted:

Dear Sir/Madam:

On behalf of the Western Business Roundtable, I am writing in support of the Bureau of Land Management's ("BLM") "Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement" ("Draft PEIS") as a critical step towards development of new energy resources in the United States.

The Western United States is home to the world's largest deposits of oil shale. The Green River Formation in Colorado, Utah and Wyoming contain an estimated 1.2 to 1.8 billion barrels of oil. Even by conservative estimates, there are 800 billion barrels of recoverable oil from oil shale in the area – that is three times greater than the proven oil reserves of Saudi Arabia. Seventy percent of these reserves are under the control of the federal government.

Tapping these extraordinary energy resources will lessen our reliance on hostile, foreign sources of energy, strengthen our domestic energy independence and contribute greatly to the long-term security of our nation.

The Energy Policy Act of 2005 ("EPAct05") took significant steps toward a strengthening of our nation's energy independence by encouraging further responsible development of domestic resources. Among them were oil shale, tar sands, and other strategic unconventional fuels. The statute includes a requirement for the Secretary of the Interior to develop an oil shale and tar sands leasing program as soon as practicable and publish a final regulation to implement the program.

The proposed Draft PEIS is an important stage in this process. It has brought attention to the increasingly significant potential of unconventional fuels, particularly oil shale, and presents an important opportunity to further educate the public regarding such fuels' economic and natural

energy security attributes.

The Roundtable recognizes that the Draft PEIS is a land allocation document, not a leasing document. As such, it is critical that policymakers and the public have solid information on the size of the resource, the social, economic and environmental impacts of development and the latest technology. We need to guard against use of outdated or unreliable data.

Section 369(h) of EPAct05 directed the Secretary of Energy "to develop a program to coordinate and accelerate the commercial development of strategic unconventional fuels, including, but not limited to, oil shale and tar sands resources within the United States, in an integrated manner." While this Congressional mandate has not yet been met, it has led to the creation and subsequent work of the Strategic Unconventional Fuels Task Force. The Task Force is comprised of the representatives of:

• The U.S. Secretary of Energy • The U.S. Secretary of the Interior • The U.S. Secretary of Defense • Governor of Colorado • Governor of Kentucky (Co-Chair) • Governor of Mississippi • Governor of Utah (Co-Chair) • Governor of Wyoming • Associated Governments of Northwest Colorado • Uintah County Vernal City Economic Development, Utah • Choctaw County Economic Foundation, Mississippi

The nation's foremost experts on unconventional fuels have contributed to a tremendous body of work. We encourage BLM to incorporate the work of the Strategic Unconventional Fuels Task Force, including the "Resource and Technology Profiles" Report, as the agency reviews comments submitted through the Draft PEIS process. The Task Force should be commended on its extensive research in this area. It has published information that provides thorough responses to many of the questions raised during the town hall meetings held by BLM related to the Draft PEIS. 52826-001

The Draft PEIS presents three alternatives to consider as part of future oil shale development. The Roundtable joins BLM and many other supporters of balanced domestic energy production in support for Alternative B. For future oil shale development to occur in an economically viable and environmentally sustainable manner, we should give future lessees the broadest possible landscape as they consider deployment of new technologies and impact mitigation strategies. 52826-002

Realizing the potential of oil shale will require enormous investment by the companies that pursue development. Part of this investment will include the extensive environmental reviews that will be required. The NEPA review process along with state and local assessments will, independent of the actual development, require significant capital. This process should be as efficient as possible. It also should not force industry to publicly disclose proprietary technological information. Project specific reviews are necessary but companies that have invested millions of dollars to meet our domestic energy needs should have confidence that their investment will not become a competitor's profit. 52826-003

We recognize that there have been several factors that have delayed the release of commercial leasing regulations. We agree that any development of oil shale must consider the very important impacts to our region's environment, communities and economy. These are issues that should be addressed during the formal regulatory and rulemaking process. They should not hold-up the release of regulations. We urge the Department to move expeditiously in issuing commercial leasing regulations for oil shale and tar sands. 52826-004

Thank you for this opportunity to comment on this important regulatory initiative.

Best regards.

Jim Sims President and CEO Western Business Roundtable

Responses for Document 52826

52826-001: Thank you for your comment. The BLM is familiar with the report you cite and recognizes it as an important strategic planning document in the evolution of the Nation's energy policy. However, because its purpose is strategic, its treatment of associated environmental issues does not extend to the detail necessary to satisfy NEPA requirements or to serve as a satisfactory basis for oil shale lease issuance. The conclusions of that strategic study are, nevertheless, generally consistent with BLM's understanding of the potential value of oil shale in the Nation's energy portfolio.

52826-002: The BLM acknowledges the commentor's preference for Alternative B.

52826-003: Thank you for your comment.

52826-004: Thank you for your comment.

Thank you for your comment, Peg Rector.

The comment tracking number that has been assigned to your comment is OSTSD52827.

Comment Date: March 20, 2008 10:19:16AM
Oil Shale and Tar Sands
Comment ID: OSTSD52827

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Comment Submitted:

Environmentally Conscious Consumers for Oil Shale (ECCOS) is a community-based organization based in Rangely, Colorado that works to promote the development of the vast oil shale reserves in the Rocky Mountain region in order to increase our nation's energy independence and strengthen the economy of the region. ECCOS supports projects that are done in an environmentally responsible manner and are responsive to the needs of local communities impacted by oil shale development.

With oil prices near record highs and world supplies increasingly in the hands of countries set on destroying our country, now is not the time to close the door on any domestic energy source. We need more energy, both traditional and renewable, for our economy and for our nation's security. That is why the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands should receive serious consideration as step towards a commercial leasing program for oil shale on federal lands.

52827-001

The history of oil shale in Northwestern Colorado has been controversial. None of us want a repeat of the bust of 25 years ago. The impacts to our communities were long-lasting. But our region contains an estimated 1.2 to 1.8 trillion barrels of oil. Even by conservative estimates, there are 800 billion barrels of recoverable oil from oil shale in the area. That is three times greater than the proven oil reserves of Saudi Arabia. Seventy percent of these reserves are under the control of the federal government.

The balanced and responsible development of oil shale should not become a Democrat vs. Republican or energy industry vs. environmentalist issue. Fundamentally this is an issue about using our own energy resources to meet our growing energy needs. In spite of new approaches to extract oil shale under research and development, Congress last year reversed course and took steps to remove the resource from our future energy mix.

The Energy Policy Act of 2005 (EPAct05) took significant steps toward strengthening our nation's energy independence by encouraging further responsible development of domestic resources. Among them were oil shale, tar sands, and other strategic unconventional fuels. The bill included a requirement (Section 369) for the Secretary of the Interior to develop a commercial oil shale and tar sands leasing program on federal lands in the States of Colorado, Utah and Wyoming as soon as practicable and publish a final regulation to implement the program.

The federal government should implement the 2005 energy bill, put the country on the path to energy independence and move quickly on a commercial oil shale program.

The Rocky Mountains contribute significantly to the nation's energy needs already. We want oil shale develop to proceed with careful consideration of its impact to local communities, water and the environment. Planning for the growth brought on by future oil shale development should begin now, in a coordinated manner across the region. BLM can play a key role in proactively addressing these impacts. Coordination with local governments should continue. Consideration also should be given to establishment of dedicated liaison within the BLM who would act on the behalf of local officials on issues related to oil shale impact mitigation. 52827-001

We need to allow the oil shale regulatory process to move forward, permit industry to continue its research programs and keep the door open to local input when it comes to this critical energy issue. Now is the time to strengthen our domestic energy security. The oil shale and tar sands resources in Colorado, Utah and Wyoming hold too great a potential to dismiss. If we are to become energy independent and more secure, we must act boldly. We urge BLM to carefully consider the comments received as part of the Draft PEIS process and then move quickly on a commercial oil shale leasing program.

Sincerely,

Peg Rector Chair

Response for Document 52827

52827-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Steven Schamel.

The comment tracking number that has been assigned to your comment is OSTSD52828.

Comment Date: March 20, 2008 10:32:58AM
Oil Shale and Tar Sands
Comment ID: OSTSD52828

First Name: Steven
Middle Initial:
Last Name: Schamel
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Address: 1265 Yale Avenue
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City: Salt Lake City
State: UT
Zip: 84105
Country: USA
Email: geox-slc@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The Public's interest in the tar sand and oil shale resources on Federal lands in the West is best served through the rational and responsible development of these natural resources. However, rational and responsible development will not be accomplished by wholesale opening of all land with these resources to a normal leasing process. This will result in speculation on future value of the leases for private gain, and preversely stiffle development by operators with a suitable technology and sufficent working capital to actually develop the resource. Serious developers of unconventional oil resources need to have large tracts of resource-bearing lands availible in order to realize the efficiencies of scale of operation. 52828-001

I urge the BLM to adopt a "go-slow" policy on granting of leases. This might include holding back from nomination for leasing all lands with environimental values until such time that we know how to efficiently and responsibly produce hydrocarbons from these lands. I would recommend Option C for this reason.

Furthermore, leases should be granted only to operators willing to initiate pilot projects that have a high probability to be successful. Demonstrated success of the pilot project should be the condition for granting leases for larger tracts of adjacent lands to move to full-scale development. 52828-002

The Nation needs to promote actual commercial and responsible development of domestic energy resources, not private speculation in Federal energy leases. 52828-001 (cont.)

Responses for Document 52828

52828-001: The BLM acknowledges the commentor's preference for Alternative C.

52828-002: The determination of how leases are to be granted is outside the scope of the PEIS.

Thank you for your comment, Bill Johnson.

The comment tracking number that has been assigned to your comment is OSTSD52829.

Comment Date: March 20, 2008 10:51:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD52829

First Name: Bill
Middle Initial:
Last Name: Johnson
Organization: US Congress Task Force on Strategic Unconventional Fuels
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Address 3:
City: Vernal
State: UT
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Country: USA
Email: bill@vernalutah.org
Privacy Preference: Don't withhold name or address from public record
Attachment: Final Draft PEIS Comments.doc

Comment Submitted:

Signed hard copy will also be delivered later today. See Attachment.

March 19, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Ladies and Gentlemen:

Thank you for the opportunity to provide comments to the Oil Shale/Tar Sand Programmatic Environmental Impact Statement (PEIS). With the passage of the Energy Policy Act of 2005 (EPA), Congress recognized the fact that development of these resources is crucial to the future of the United States and I whole-heartedly agree. In addition, by achieving a quality programmatic EIS with factual information, we can develop this resources and achieve environmentally sound practices while we grow the economies of rural areas such as Vernal and Uintah County, UT and ease our Countries dependence on foreign oil from unstable and sometimes hostile countries and governments.

I am a member of the Congressional Task Force on Strategic Unconventional Fuels (Task Force) established by the same aforesaid Energy Policy Act in Section 369, (P.L. 109-58). My position on the Task Force is to represent the interest of the impacted local communities in Utah. I am considered to be an expert in the area of local Uintah Basin demographics and socioeconomic issues. It is from that position that I will make comments, mort specifically addressing some of the socioeconomic concerns that I see with the PEIS. I am quite concerned that the efforts of the Task Force, in which the BLM is a quasi member through the Department of Interior, are not included, used or even referenced as the most current and up to date data available. These reports and accompanying, fact sheets on each resource plus a plethora of other information is available online at: www.unconventionalfuels.org These are unbiased report(s) to the President and the United States Congress need to be utilized as much as possible in this and any ongoing documents regarding unconventional fuels. These are consensus findings from Governors, Cabinet level Federal Agencies and local communities from both the southern and eastern part of the United states as well as the western states involved in this ROI. I highly encourage at the minimum a reference in the introduction to this and a link to the Task Force website for access to a plethora of information

52829-001

VOLUME 1

Section 3.10.1 Past Oil Shale Development

This section does not adequately describe the past history in Utah but is very biased towards Colorado. The White River Oil Shale Company built and completed the White River Oil Shale Mine, investing tens of millions in infrastructure, highways, and water development. Geo-Kinetics used a modified in situ process that produced 100,000 barrels of oil. These are just two examples that should be explored in this section. It should be

52829-002

noted that both of these companies did not leave financial impacts on the local community or the environment. 52829-002 (cont.)

Section 3.10.2

Paragraph two has a typo on the spelling of Uinta. The County in Utah is spelled Uintah, where the Uinta spelling is that of a Wyoming county. This should be changed to avoid any confusion 52829-003

Table 3.10.2-3 and Table 3.10.2-4

This data is from the Dept. of Labor, Census, and USDA. It was outdated at the time it was placed into the draft. It very incorrectly reflects the actual unemployment picture here in Utah and I assume throughout the entire EIS area. The most current data is available from the Department of Workforce Services here in Utah and is what should be used to give a current and accurate accounting of the labor pool and unemployment rate. That rate is presently around 2% in Uintah County. This inaccurate information then carries forth through the narrative and extrapolation of the numbers into incomes, etc. 52829-004

3.10.2.2 Social Environment

This section again is heavily weighted to the former development and impacts that occurred in Colorado but it does address the Utah projects and impacts adequately if at all. 52829-005

3.10.2.2.3 Fiscal Conditions

This section needs to identify how mineral lease revenues are returned to the local communities in Utah, special service districts and what they can and not use funds for and the Permanent Community Impact Board. There are a variety of state agencies that share mineral lease funds before anything is returned to the local area. This section again focuses more on the Colorado methodology but need to more accurately explain the Utah scenario. 52829-006

VOLUME 2

4 Effects of Oil Shale Technologies

This section provides scenarios that would be "worst case" and may be either a long time away or not realistic whatsoever. It appears that the Alberta numbers were used and in the case of Utah Tar Sands, that will never happen. I think this section should use scenarios that are in the Task Force reports and would be more accurate. There also seems to be very inconsistent numbers used through out the section for the number of jobs that will be expected for oil shale. It appears that in many areas tar sands and oil shale may be lumped together. As development and technologies will vary by these resources this document should also clearly separate them. The tar sand resources only are located with 52829-007

the State of Utah. Also it is important to note that there is presently a variety of research and development taking place in Utah as well as Colorado. This is being done on either State owned or fee lands. It is important for the readers of this document to realize that this PEIS only affects that land under BLM control. 52829-007 (cont.)

4.11.1.5 Recreation Impacts

Paragraph 2 states in part, "Because the impact of each oil shale technology and alternative on visitation is not known, this section presents two simple scenarios to indicate the magnitude of the economic impact of oil shale development on recreation: the impact of a 10% and a 20% reduction in ROI recreation employment in each state ROI. Impacts include the direct loss of recreation employment in the recreation sectors in each ROI, and the indirect effects, which represent the impact on the remainder of the economy in each ROI as a result of a declining recreation employee wage and salary spending, and expenditures by the recreation sector on materials, equipment, and services." These numbers are assumptions and in the case of Utah very poor ones and very unrealistic. Most of if not all of the unconventional fuels development will take place far from the areas of peak recreation in NE Utah, namely the upper Green River, Dinosaur National Monument and Vernal City. Even if I would agree with these assumptions, any loss of employment in these traditionally very low paying seasonal jobs would be made up by extractive careers that are nearly double the County's average wage. (Research previously mentioned data from the Utah Department of Workforce Services) The Implan model is only as good as the information that it is given for its baseline and can't be responsible for the outcome if this entry data is inaccurate. In this case that data is totally out of line for Utah's rural communities. 52829-008

5.11.1.1 Economic Impacts and TABLE 5.11.1-1 ROI Economic Impacts of Tar Sands Development

These are 24 year old numbers and not indicative of the present companies doing R and D in the Basin and their expectations for commercial development. Again, the Task Force reports have current data that is scientifically sound and provides much better and current analyses than these outdated numbers. Again the Implan model can only put out results from the numbers it is given. 52829-009

5.11.1.3 Recreation Impacts

Repeat of my comments above, see 4.11.1.5 Recreation Impacts. 52829-010

6.1.2.10 Socioeconomics

The first paragraph makes the statement, "The designation of lands as available for leasing and the amendment of land use plans would not have socioeconomic impacts". I believe this in total contradiction to one of the main purposes of this document requirement by NEPA and that is to review and analyze socio economic impacts. In a region that is less than 20% fee land, ANY change in ANY federal management plan will 52829-011

have a socio economic impact to our communities. This statement should be removed in this and any other section that it may appear.

52829-011 (cont.)

In the bullet points there is a repeat of the recreation numbers that were addressed by my comments in 4.11.1.5 Recreation Impacts.

6.2.5.2.3 Other Minerals Development

There is always a chance of a typo when a paragraph is extended numerous pages because of graphs and tables inserted in the middle but I would argue that there is not any gilsonite in the Henry's. I would assume the writer has a type and meant to say Uintah County where the only commercial gilsonite mining is done in this Country.

52829-012

G.1.1.2 Tar Sands Facilities and TABLE G-1 Input Data for Tar Sands Direct Employment Estimates

These are yet different numbers that are being used than those in Volume 2 which is confusing and shows a lack of consistency in the document.

52829-013

I urge the BLM to look towards the future and not the past as you enter into the preparation of the PEIS. The world's economy has changed dramatically. We will never see oil prices fall to $6 a barrel again as we did during the last oil shale research era. And when we get to the bottom of why research stopped over twenty years ago, that is the true reason. Why do we import 25% of the crude for our Utah refineries from Canada? Partly because they have persisted in the development of oil from oil/tar sands while we, in the US, have sat idly by. We no longer can take that position. We must now move forward and move as rapidly as we safely can to secure our Country and our children's future.

All will agree that many challenges will face us as we proceed with this process. Local impacts and needs of communities such as those that I represent will be paramount. However, we are most willing and excited to assist and sit at the table to mitigate any impacts so that our future energy needs are given top priority. No one can disagree that by exploiting the enormous potential these resources hold, all of us benefit in the end.

I applaud Congress and the BLM for moving forward with this EIS and also making R, D and D lease available on BLM lands. I encourage the development of a commercial lease program for all to participate as well. I appreciate the opportunity to submit these comments and offer my resources to you in return.

Sincerely,

Bill Johnson (Representing Utah's Impacted Communities)
Congressional Task Force on Strategic Unconventional Fuels
483 E 700 N , Vernal, UT 84078
Phone: (435) 828-5687

Responses for Document 52829

52829-001: Thank you for your comment. The BLM is familiar with the report you cite and recognizes it as an important strategic planning document in the evolution of the Nation's energy policy. However, the report makes recommendations and develops an integrated program to coordinate and accelerate the development of fuels from domestic unconventional fuels resources. Its treatment of associated environmental issues identified as factors constraining investment and it does not satisfy NEPA requirements nor serve as a satisfactory basis for oil shale lease issuance. The conclusions of that strategic study are, nevertheless, generally consistent with the BLM's understanding of the potential value of oil shale in the Nation's energy portfolio.

52829-002: Text in the Section 3.10.1 of the PEIS has been changed to include information provided in the comment.

52829-003: The text in the PEIS has been changed to address information provided in the comment.

52829-004: The text in the PEIS has been changed to address the issues raised in the comment. Baseline data for each ROI, including unemployment statistics, were taken from the most recent federal data available when the draft PEIS was released. Rather than present data at the county level, given the programmatic nature of the PEIS, the purpose of the data presented in Section 3.10 is to provide an overview of socioeconomic conditions in a region of influence around each oil shale and tar sands resource area, based on the likely residential location of project workers, and consequently the region in which the majority of socioeconomic impacts of the prospective facilities would most likely occur.

52829-005: More information on perceptions and experience of energy development in Utah and Wyoming has been added to the PEIS.

52829-006: Text has been added to Section 3.10 of the PEIS that discusses how, and the extent to which, mineral lease revenues are provided to local communities in Utah.

52829-007: Employment assumptions for oil shale facilities, described in Section 4.11 of the PEIS, were based on publicly available NEPA reviews and past BLM experience with oil shale and tar sands and other energy-related projects. These assumptions are reasonable for a programmatic review of potential socioeconomic impacts.

Differences in the number of jobs created by oil shale development between the PEIS and the Task Force may result from differences in the amount of accessible oil shale resources and levels of development. There may also be some uncertainty surrounding the job numbers used by the Task Force depending on actual levels of development or technologies selected.

In the Draft PEIS, it is stated clearly throughout the document (starting with the purpose and need in Section 1.1) that only BLM-administered lands are under consideration. Additionally, the assumptions and analyses for potential future oil shale and tar sands development are presented separately (see especially Sections 4 and 6.2 for oil shale and 5 and 6.3 for tar sands). Although many of the impacts would be similar, as the comment notes, the locations of oil shale and tar sands development differ.

52829-008: The analysis of impacts of changes in recreation on the economy of each ROI takes into account the importance of the various sectors providing recreational services in the economy of each ROI only, and estimates impacts on employment and income only in these areas of each state. Activity in recreation-related sectors providing services to visitors to recreation resources located outside each ROI is not included in the analysis.

52829-009: Employment assumptions for oil shale and tar sands facilities, described in Section 4.11 of the PEIS, were based on publicly available NEPA reviews and past BLM experience with oil shale and tar sands and other energy-related projects. These assumptions are reasonable for a programmatic review of potential socioeconomic impacts.

The analysis described in the PEIS is consistent with the strategic recommendations of the Task Force for development of unconventional fuels. Differences in the number of jobs created by oil shale development between the PEIS and the Task Force may result from differences in the amount of accessible oil shale resources and levels of development. There may also be some uncertainty surrounding the job numbers used by the Task Force depending on actual levels of development or technologies selected.

52829-010: Please see response to Comment 52829-008.

52829-011: The text in the PEIS has been changed to stress that the designation of lands for oil shale and tar sands development would have socioeconomic impacts, although these would be limited to property value impacts in the vicinity of project locations and in communities in which project workers and their families might reside in the event of the development of commercial-scale facilities. The extent to which these impacts may have occurred with land use designation for oil shale and tar sands development, and might subsequently occur with commercial-scale development, could be assessed in additional NEPA analyses undertaken with the leasing of specific land parcels.

52829-012: The commentor is correct; the text was in error. The statements in Sections 6.1.6.2.2 and 6.2.5.2.4 have been changed to state that gilsonite is produced in the Book Cliffs area.

52829-013: The data in Table G-1 show the number of direct employees/1,000 bbl/day to provide a simple basis for comparing technologies that have different output and employment levels in the commercial facilities assessed in Chapters 4 and 5 of the PEIS. These direct employment data were used as input for the estimation of the socioeconomic impacts of each technology in the PEIS.

Thank you for your comment, Pat DeWald.

The comment tracking number that has been assigned to your comment is OSTSD52830.

Comment Date: March 20, 2008 10:56:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD52830

First Name: Pat
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Last Name: DeWald
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Address 3:
City: Redding
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Zip: 96001
Country: USA
Email: pdewald@eklaw.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to express my concern about development on public lands. In particular, with respect to the BLM Oil Shale and Tar Sands EIS, as we do not know the full environmental impact in some of the areas of Colorado, Utah, and Wyoming, and further do not know if the planned BLM actions would be of and commercial/financial benefit to anyone in this region of the Country, I oppose the "Preferred Alternative" BLM Oil Shale and Tar Sands Draft EIS action and support Alternative A in the PEIS. 52830-001

Pat DeWald

Response for Document 52830

52830-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Kent Land.

The comment tracking number that has been assigned to your comment is OSTSD52831.

Comment Date: March 20, 2008 11:28:02AM
Oil Shale and Tar Sands
Comment ID: OSTSD52831

First Name: Kent
Middle Initial:
Last Name: Land
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I request that my address be witheld from public record.

The BLM's Oil Shale and Tar Sands Draft PEIS is a plan for environmental devastation on a huge scale. Alternative B, the BLM's "Preferred Alternative" in the PEIS, would amend 12 existing BLM land use plans to open almost 2 million acres of public lands in Colorado, Utah, and Wyoming for commercial leasing, exploration, and development of fossil fuels. This includes pristine wildlands and watersheds adjacent to Glen Canyon National Recreation Area, other national parks, and wilderness areas, and vast, unspoiled expanses of the Colorado River watershed. Oil shale and tar sands development is being marketed by the Bush administration as a way to help provide energy security for the U.S. In reality, there has not been adequate research to show the full environmental, economic, and social impacts of this technology. There is no doubt that the proposed development would cause massive, irreversible environmental damage - scarring the landscape with mines, roads, pipelines, and power lines; releasing toxic pollution; consuming enormous amounts of scarce water; requiring ten new coal-fired power plants to provide needed power; endangering the health of local communities; and spewing out greenhouse gases that add to climate change impacts. This BLM plan will set the baseline against which all future oil shale and tar sands development will be assessed. Unfortunately, the plan completely fails to provide a thorough and scientifically credible basis for action. As a result, the BLM's "Preferred Alternative" B is fatally flawed and must be rejected. "NO ACTION": THE ONLY ACCEPTABLE ALTERNATIVE

52831-001

52831-002

Responses for Document 52831

52831-001: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52831-002: The BLM acknowledges the commentor’s preference for Alternative A.

Thank you for your comment, Sandy Zelasko.

The comment tracking number that has been assigned to your comment is OSTSD52832.

Comment Date: March 20, 2008 11:56:53AM
Oil Shale and Tar Sands
Comment ID: OSTSD52832

First Name: Sandy
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Last Name: Zelasko
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Address 3:
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State: CA
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Country: USA
Email: slzphoto@sbcglobal.net
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Attachment:

Comment Submitted:

am writing to comment on the Bureau of Land Management's Oil Shale and Tar Sands Draft Programmatic EIS. I strongly oppose Alternative B, the "Preferred Alternative" and support Alternative A, the "No Action" alternative in the PEIS. 52832-001

It is clear that the "Preferred Alternative" B is almost certain to cause massive, irreversible damage to large areas of Utah, Colorado, and Wyoming. This includes devastating the land and water, endangering wildlife and their habitats, harming the people in local communities, and generating massive greenhouse gas pollution that would add to global climate change. Moreover, the BLM admits that more research is needed before we know the true impacts of the technology or if it is even commercially feasible. 52832-002

At a time when we need to be moving away from fossil fuels and the damage they cause, this proposal would continue our dependence on them. The PEIS fails to adequately address any of these issues, or to consider a reasonable range of alternatives, including the potential for increased energy conservation and efficiency. This is contrary to agency regulations and the law. 52832-003

I urge the BLM to choose the "No Action" alternative A, and to halt efforts to develop oil shale and tar sands on public lands. Thank you for the opportunity to comment on the Oil Shale and Tar Sands Draft Programmatic EIS. 52832-001 (cont.)

Sincerely, Sandy Zelasko

Responses for Document 52832

52832-001: The BLM acknowledges the commentor's preference for Alternative A.

52832-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52832-003: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process. An energy conservation alternative was brought up during scoping, but it was eliminated from detailed analysis (see Section 2.5.3 of the PEIS) because it did not meet the purpose and need of the document, which is to determine which lands are suitable for further consideration of commercial oil shale and tar sands development.

As a result, the alternatives focus on amending land use plans and identifying public lands that would be available, or would not be available, for application for the potential leasing of oil shale or tar sands in the future. Therefore, an alternative based on energy conservation or energy efficiency does not fall within the nature of the proposal to amend BLM land use plans. In addition, the PEIS does not assume a particular level of development or production. Without this information, it would not be reasonable to assume an alternative energy or

conservation mix that would be necessary to offset lost production to form the basis of the alternative. When applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. Again, full public participation during the scoping process will help to determine the range of reasonable alternatives for analysis.

The preparation of the PEIS is not contrary to agency regulations or laws. Preparing the PEIS is in full compliance with the principles of the FLPMA of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals.

Thank you for your comment, John Weisheit.

The comment tracking number that has been assigned to your comment is OSTSD52834.

Comment Date: March 20, 2008 12:07:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD52834

First Name: John
Middle Initial: S
Last Name: Weisheit
Organization: Living Rivers/Colorado Riverkeeper
Address: PO Box 466
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Address 3:
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Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Living Rivers Colorado Riverkeeper PO Box 466 Moab, UT 84532 www.livingrivers.org

March 20, 2008

Sherri Thompson Bureau of Land Management Colorado State Office 2850 Youngfield Street Lakewood, CO 80215

Sent Via Fax: 303-239-3808 Re: Oil Shale and Tar Sands Draft Programmatic Environmental Impact Statement

Dear Ms. Thompson,

Thank you for this opportunity to provide comments for the Programmatic Environmental Impact Statement on development of oil shale and tar sands in Utah, Colorado and Wyoming. We understand that this NEPA process will be ongoing for several years and we desire to be added to the contact list for all future correspondence about public participation in this process. 52834-001

Living Rivers/Colorado Riverkeeper is a non-profit organization based in Moab, Utah. Our mission is to mobilize the public toward restoring the ecological integrity of the Colorado River and its tributaries, especially as it relates to federal reserve lands.

We understand this federal action now under review will have serious negative impacts on the scarce water resources of the Colorado River basin. This federal program should be terminated because it will harm the water supply of 30 million people and to critical habitat for threatened and endangered species. 52834-002

We support a new direction for the federal government to provide leadership toward energy independence through conservation, improving efficiency standards, and investing in renewable alternatives that do not further impair water resources and the atmosphere.

Quality fossil fuel products derived from deposits of oil shale and tar sands are wholly dependent on the availability of water resources. The demand for water in the Colorado River basin remains over-allocated and federal and state leadership to balance demand with supply has yet to occur. The annual supply from the 52834-003

Colorado River at the Compact Point, Lees Ferry, Arizona, has declined by 2 million acre feet since 1922, when the Colorado River Compact was first negotiated. Contrarily, the over-allocated demand continues to increase, of which this federal action will contribute to. Consequently, this federal leasing program will cause unnecessary harm to existing downstream users and ecosystems in the acquisition new water rights. 52834-003 (cont.)

Furthermore, the transfer of senior water rights from agriculture to shale and tar extraction will adversely affect water quality in the form of diminished return flows, which will bring harm to wildlife habitat and increase the load of total dissolved solids in the water supply. 52834-004

Many hydrology and climate studies funded by the federal government continue to provide more evidence that the downward trend in the water supply will continue into the 21st century and beyond. Indeed, it is highly probable that senior water rights are at risk as well. This federal action is poised to further aggravate an already serious water quantity/quality problem for the basin. 52834-003 (cont.)

The Bureau of Reclamation recently completed an EIS (2007) called Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lakes Powell and Mead (Shortage Criteria). This document permits further depletions in the upper basin of the Colorado River. Contrarily, hydrologists and climate scientists have recently provided evidence, since the signing of the Record of Decision, that Lakes Mead and Powell have a 50/50 chance of going empty as soon as 2021. Regardless of the odds or the dates, these reservoirs will empty for reasons of over-consumption and increased evaporation due to atmospheric warming. 52834-005

We strongly recommend that the Bureau of Land Management do what the Bureau of Reclamation for Shortage Criteria did not: model the water supply of the Colorado River using paleoclimate and climate change data to make a sound determination of the hydrologic condition of the Colorado River basin for the 21st century.

Again, we thank you for this opportunity to comment and if we can be of any assistance to you please do not hesitate to call us.

Sincerely yours,

John Weisheit Conservation Director Colorado Riverkeeper

References:

Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lakes Powell and Mead (Shortage Criteria). http://www.usbr.gov/lc/region/programs/strategies.html

Barnett, T. P., and D. W. Pierce (2008), When will Lake Mead go dry? Water Resources Research, doi:10.1029/2007WR006704, in press.
http://www.onthecolorado.org/Resources/ClimateDocs/2008BarnettPierce.pdf

Colorado River Open Source Simulator http://www.onthecolorado.org/cross.cfm

Responses for Document 52834

52834-001: You may sign up to receive important e-mail updates on the PEIS and public participation opportunities on the project website, http://www.ostseis.anl.gov.

52834-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52834-003: Various compacts for the Colorado River are based on consumptive uses of water instead of the demands. There is water that has been allocated but not consumed because of lack of capital investment in storage and delivery systems.

New water rights have lower priority than existing water rights. Existing water rights as well as instream flow water rights for downstream users are protected from the new water rights by existing laws and regulations.

Projection of future climate change relies on modeling, which, in turn, uses assumptions and mathematical algorithms that vary among models. Different model results have been reported and sometimes are contradictory. To avoid such uncertainty, the PEIS evaluation uses long-term hydrologic data. The hydrologic data cover periods of dry and wet years.

Additional evaluation of specific impacts on water resources would be provided in future project-specific NEPA documents.

52834-004: Thank you for your comment. The impacts on water resources from transferring water from agricultural use to oil shale and tar sands development have been added to the discussion in Section 4.5.1.2.

52834-005: See response to Comment 52834-003 regarding modeling.

Thank you for your comment, Joani Matranga.

The comment tracking number that has been assigned to your comment is OSTSD52836.

Comment Date: March 20, 2008 12:43:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD52836

First Name: Joani
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Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am opposed to opening the Glen Canyon Wilderness or BLM or forest service lands to oil shale/tar sands development. This is an environmental disaster and the devistation that would result is not acceptable to the future of western public lands for our children. | 52836-001

Response for Document 52836

52836-001: Thank you for your comment. Wilderness Areas, Wilderness Study Areas, and lands under the jurisdiction of the U.S. Forest Service are not available for oil shale or tar sands leasing or development on the basis of decisions that could result from this PEIS.

Thank you for your comment, Governor Bill Ritter, Jr..

The comment tracking number that has been assigned to your comment is OSTSD52837.

Comment Date: March 20, 2008 12:47:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD52837

First Name: Governor Bill
Middle Initial:
Last Name: Ritter, Jr.
Organization: State of Colorado
Address:
Address 2:
Address 3:
City: Denver
State: CO
Zip: 80203
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment: Governor Bill Ritter Jr FINAL.pdf

Comment Submitted:

Attached are the comments from Governor Bill Ritter, Jr., State of Colorado

These supercede the previous version. See Attachment.

STATE OF COLORADO

OFFICE OF THE GOVERNOR
136 State Capitol Building
Denver, Colorado 80203
(303) 866 - 2471
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Bill Ritter, Jr.
Governor

March 20, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Avenue
Argonne, IL 60439

Re: *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (DES 07-60)*

To Whom It May Concern:

As the Governor of the State of Colorado, and in coordination with the Colorado Department of Natural Resources, Colorado Department of Public Health and Environment, and Colorado Department of Local Affairs (Departments), I respectfully submit the following comments regarding the Department of the Interior, Bureau of Land Management's (BLM) *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement* (Draft PEIS). The Draft PEIS raises important issues for Coloradans, and all Americans, with respect to energy supplies, environmental protection, socioeconomic impacts, and national security. If BLM were to authorize a commercial oil shale industry in Colorado, such a development would likely constitute the largest industrial development in the State's history with enormous implications for all of Northwest Colorado and for the State itself.

For Colorado, there is much at stake in the outcome of this program. Colorado recognizes the importance of the oil shale resource to the country. In our uncertain world, a reliable, sustainable domestic oil-based resource is increasingly important. But equally important, from Colorado's perspective, is protection of the State's exceptional environment including our air quality, water quality, vegetation and soil resources. Northwest Colorado is blessed with a remarkably diversified economy in which agriculture, tourism, recreation, hunting & fishing, natural gas & mineral development, retirement communities, and their economic drivers co-exist in a relatively balanced and supportive way. Within the Piceance Basin, Colorado is beneficiary of some of the nation's most important wildlife resources, including robust elk populations and the largest migratory mule deer in North America. These wildlife treasures, the envy of other states, have gradually evolved and grown over the past century to the exceptional levels of today. The importance of the State's wildlife resources is not something Colorado takes for granted.

Similarly, Colorado is very mindful of the potential impacts of oil shale development on Colorado's water resources. The State is rapidly approaching full allocation of its Colorado River entitlements where Colorado will enter a new period of trading and sharing water between different users. If oil shale were to consume vast quantities of water, there would be corresponding impacts to the State's agricultural, recreational, and other energy sectors on the West Slope, the Front Range and even along the Eastern Plains. Hence, the State is very concerned that the water implications of this industry be understood prior to decisions regarding commercialization.

Therefore, the State places great importance on a thoughtful, comprehensive PEIS, whereby federal, state and local decision-makers will have the necessary tools in hand to evaluate what type of federal program makes the most sense at this point in time. Based on our evaluation of the Draft PEIS and the information in hand, it is premature for the BLM to make any decisions that allocate federal land to a commercial leasing program through its resource management plans or otherwise.

BLM must gain critical answers to many questions before any commitment to commercial leasing occurs. Equally important, BLM must similarly gain answers to such questions before any rules and regulations for commercial oil shale development can or should be finalized. Absent obtaining these answers, BLM and Colorado run the serious risk of development that will have tremendous adverse impacts on Colorado. 52837-001

The State continues to believe that the best course of action is to see the research and development program authorized by BLM developed, tested, and monitored so the answers can be forthcoming. Colorado is host to five of the six federal research and development sites and we are confident these programs will yield the necessary information upon which rules and regulations and commercial leasing can be based.

Importance of Northwest Colorado

Northwest Colorado is blessed with diverse, exceptional natural resources and a vibrant, diversified economy. For starters, it is the home to world-class hydrocarbon resources, holding trillions of cubic feet of clean-burning natural gas which are currently undergoing an unprecedented and historically unanticipated gas development boom. In 2006, natural gas and other energy-related development accounted for 15 percent of direct and secondary employment in the region. Similarly, the region has one of the most important oil shale deposits in the world, as described below.

The region also supports superlative wildlife resources. The Piceance Basin is home to the largest migratory mule deer herd in North America, a robust migratory elk population, one of only six greater sage-grouse populations in Colorado, populations of Colorado River cutthroat trout, and a host of other wildlife species. These wildlife resources have been built up over millennia and are of long-term statewide and national economic, ecological, and aesthetic importance. Colorado's future is reliant on these resources remaining strong and healthy.

In the last twenty years, the region has developed a growing recreational tourism industry as well as a vigorous hunting and fishing community. In 2006, approximately 17,000 jobs were found to be supported by the tourism industry for the region including Moffat, Rio Blanco, Garfield, and Mesa counties, representing about 15 percent of the jobs in the area. About 20 percent of the tourism jobs in Northwest Colorado are in the outdoor recreation segment -- or about 3,400 jobs.

The region also sustains a healthy agriculture industry, a vibrant and long-standing ranching tradition, and growing retirement communities. Employment in the agriculture and ranching industries contribute between 6 percent and 15 percent of all base jobs in the counties in this region. Retirees comprise 13 percent of the population in the region and their spending supports 11 percent of the basic jobs.

As a result of its abundance of natural resources, Northwest Colorado is experiencing extraordinary growth in population and associated challenges. Housing costs in the region, roughly 35 percent below comparable Denver metropolitan area costs just six years ago, now often match or exceed Denver-area prices. Housing affordability is a significant challenge to these local communities, and the capacity of local communities to absorb growth is already largely consumed. Many workers are housed in hotels and motels rather than conventional housing. Many of the conventional resources available to local governments to meet infrastructure needs, like aggregates and construction materials, are being diverted to the gas patch. Much of the transportation infrastructure in these communities is in disrepair and is being severely stressed by growth pressures. The costs to repair infrastructure will require up-front financing, before revenues become available from traditional sources such as severance taxes, property taxes, sales taxes, and federal royalties.

This region is thus vitally important to Colorado's future. It is in a precarious balance in the face of extraordinary pressures precipitated by possibly the largest industrial development in the history of the state. Everything state and federal policy makers do with regard to Northwest Colorado must protect the resources, values, and diverse economies and interests found there, and we cannot simply think of this region as an area to be sacrificed for any one purpose.

A Rational Approach to Oil Shale Development

Northwest Colorado is also home to extraordinary oil shale resources, among the richest in the world, yielding 25 gallons of oil or more per ton of rock and estimated to hold nearly 500 billion barrels of recoverable shale oil, which is more than double the proven reserves of Saudi Arabia. Successful development of this resource could provide a substantial new source of domestic oil for the United States, which would have positive implications for our national energy policy and national security. Demand for oil is rapidly increasing while additions to reserves are in decline, both domestically and globally. The United States currently imports considerable quantities of oil from unstable regions and regimes whose interests may conflict with ours.

Remarkable as Colorado's oil shale resource is, however, it has remained in the ground since its discovery over a hundred years ago. Past attempts at development have failed due to a

number of challenges -- technical, economic, and environmental -- that have yet to be addressed, notwithstanding significant investment over the last 40 years by both government and industry. Given the significant oil shale resource and exigent national energy interests, Colorado is committed to seeing ongoing oil shale research and development move forward. Colorado officials have assisted BLM in reviewing applications for federal research and development leases, and the State currently hosts five of the six federal research and development leases issued in 2006. If successful, these research and development projects could set the foundation of a subsequent commercial oil shale industry.

Therefore, Colorado maintains that a prerequisite to federal oil shale leasing, regulation, and development is the development of information that will allow us to address historic challenges. Construction has not yet begun on the federal research and development leases, and these projects are critical in showing that new proposed technologies work, that they can be utilized economically, and that they will not have unacceptable impacts on Colorado's environment and communities.

Colorado is committed to working with the federal government and industry on oil shale efforts going forward. But this requires a thoughtful approach -- economically, environmentally, and socially -- rather than a rush to premature leasing and regulatory decisions. Yet another boom and bust cycle for energy development will be dire for Northwest Colorado, a region that retains considerable skepticism and frustration over the collapse of the oil shale boom of the 1970s. Another failed attempt at oil shale development could preclude development of this nationally significant resource for decades. Sound public policy requires allowing research projects to yield information that will answer crucial questions and allow the industry to proceed with public support, and Colorado will roll up our sleeves to work with other stakeholders to ensure that this happens.

As set forth more fully below and in the attached technical comments from the Departments, the approach set forth in the BLM's Preferred Alternative is misguided and unacceptable. The BLM proposes to open nearly 2 million acres of federal oil shale resources to potential oil shale development, yet it lacks information about the technologies that would be used or their impacts on the environment. Colorado recommends selection of Alternative A, which would allow activities on federal research and development leases to continue and potentially expand to commercial leases. Under this alternative, 223,860 acres in the White River Resource Area's Piceance Basin would continue to be available for future oil shale leasing under existing BLM plans. 52837-002

Because proven development technologies do not yet exist, the BLM cannot reliably analyze likely effects on water resources or air quality, impacts on local communities, energy requirements, or impacts on wildlife resources, and this information is critical to making sound land-allocation decisions in compliance with the law. The BLM also failed to consider adequately the cumulative impacts of its proposed land allocation decisions, and this important analysis will be impossible when performing lease-by-lease reviews as the BLM proposes. There is simply no substitute for doing a thorough, comprehensive analysis at the programmatic stage that might set the framework for later individual leases. The BLM also proposes, without analysis, to do away with long-standing carrying capacity thresholds for the protection of 52837-001 (cont.) 52837-003 52837-004

communities, the environment, and wildlife resources. Given the information missing from the BLM's analysis, a decision to make 360,000 acres available for oil shale leasing is ill-advised. 52837-004 (cont.)

Similarly, the BLM lacks the information necessary to finalize any comprehensive set of rules and regulations for oil shale development. These regulations will establish environmental-protection standards, set royalty rates and address bonding, establish standards for diligent development, determine the allowable size of leases, and make myriad other important decisions that will directly and significantly affect how oil shale development proceeds. Until the basic answers are derived from the research and development program, establishing the rules for commercial leasing is premature. 52837-005

Again, Colorado supports the research and development approach and pledges its continued support of that effort. Once data is available from the research and development projects, it is possible that land allocation decisions can be made and regulatory requirements can be developed. But making land available or promulgating regulations in the absence of underlying data from the research and development projects is reckless and will lead to long-term and significant negative impacts on Colorado. 52837-006

DISCUSSION

The State of Colorado has consistently urged that federal oil shale leasing, regulation, and development be based on solid, reliable results that will emanate from the research and development leases. Such development could provide a substantial new source of domestic oil for the United States, but it must proceed in a reasoned and responsible manner. The process must take into account what has been learned from 100 years of efforts to develop this important resource, what we know and do not know about current proposed technologies, and the various changes in the environmental and social landscape of the region. Colorado is home to five of the federal research, development, and demonstration (RD&D) leases issued in 2006. The State supports an oil shale program in which research and development activities provide information that may inform commercial regulatory and leasing decisions. Because oil shale development will likely utilize untested technology with potential long-term impacts to Colorado's communities and the environment, the State has consistently opposed plans to commercialize leasing or production of federal oil shale resources prior to a meaningful evaluation of the results of the RD&D projects.

For these reasons, Colorado cannot support the BLM's selection of Alternative B – making 1,991,222 acres available for application for oil shale leases in the three-state region, including 359,798 acres in Colorado – as the Preferred Alternative in the Draft PEIS. As more fully set out below, Colorado recommends that the BLM adopt the **Alternative A** as the Preferred Alternative in the Final PEIS. Under this alternative, activities on federal research and development leases could continue and potentially be expanded to commercial leases, and 223,860 acres in the White River Resource Area would remain available for future oil shale leasing.[1] Colorado further recommends that the BLM explicitly commit to preparing a 52837-007 52837-008

[1] BLM White River Resource Area, Record of Decision and Approved Resource Management Plan at 2-6 (July 1997).

supplemental PEIS at a later date, when adequate information, including information from the RD&D leases, is available, prior to proceeding with the establishment of commercial oil shale regulations and subsequent offering of commercial leases. 52837-008 (cont.)

Decisions about land allocations, regulatory requirements, financial assurances, taxation structures, and leasing should not be made until land managers and the public can reliably predict and understand the impacts that are likely to result from those decisions. Because the information necessary to develop that understanding does not yet exist, making any federal oil shale resources available for application for commercial oil shale leases is premature. It is highly probable that no production from the RD&D leases will occur within the next six years, and commercial oil shale production is not anticipated before 2020. 52837-009

Below are Colorado's summary comments about the BLM's management approach in the Draft PEIS. Supporting detailed technical comments from state officials with significant expertise regarding the potential for oil shale development's impact to Colorado's air and water quality, wildlife, communities, and quality of life are attached. From a regulatory standpoint, Colorado recognizes that there are several areas of complimentary jurisdiction and analysis. For instance, water quality issues arise in the technical comments of several Divisions, highlighting both the importance of this issue and the cross-cutting nature of the concerns raised by the possibility of oil shale development. As noted in the technical comments, the Draft PEIS identifies many significant concerns and contains several major deficiencies that must be remedied in the Final PEIS and before the BLM signs a Record of Decision (ROD). These include:

- The Piceance Basin contains unique or irreplaceable habitats for a host of wildlife species such as leks for greater sage-grouse, movement corridors for big game species, winter range for North America's largest migratory mule deer herd, and streams containing native cutthroat trout. The primary concern for wildlife due to oil shale development is the overall loss and fragmentation of this valuable wildlife habitat, the feasibility of reclamation of disturbed areas, and the damage that would accrue to wildlife populations. The detail provided in the Draft PEIS is insufficient to allow for an accurate or complete assessment of the cumulative impacts to wildlife habitats and populations that will occur from commercial-scale oil shale projects.

- The amount of water that may be available for oil shale development is a significant concern, as is the impact oil shale development poses to the State's entitlements under the Colorado River Compacts. We are also concerned about the impacts of oil shale development on existing instream flow segments in and adjacent to the leased land and any potential increases in flooding as a result. Finally, we are concerned about the interactions between oil shale development and the Colorado River Salinity Program and the Upper Colorado River Recovery Implementation Program. Oil shale development has the right to benefit from these programs, but adverse impacts must be minimal. 52837-010

- The BLM's socioeconomic analysis did not address statutory and regulatory oversight relative to the licensing, inspection, and enforcement of labor camps (man camps), retail

food establishments, wholesale food firms, schools, childcare, mobile home parks, public accommodations (hotels/motels) and campgrounds.

• There is tremendous uncertainty of what the environmental impacts will be on both surface water and ground water quality due to commercial shale extraction operations. The PEIS does not address the impacts of additional growth on water and wastewater infrastructure in nearby communities. The PEIS also does not address potential impacts of water withdrawals on flows upstream of wastewater facilities, and the concomitant reduction in permit limits that might result for these facilities.

• The PEIS does not present sufficient data to assess potential degradation of the human environment and resulting health impacts to the affected public, potentially resulting from direct or indirect exposure to contaminated media. Scientifically defensible conclusions about potential risks and health impacts cannot be developed until detailed RD&D results are available to better characterize the potential for community exposure and the toxic potential associated with different development alternatives, based on technology-specific processes and fate and transport characteristics.

• The Draft PEIS fails to document or consider the large amount of information about baseline air monitoring being conducted in Colorado. The BLM must discuss this monitoring and commit to conducting the monitoring studies needed in the future to assess baseline air quality conditions. This would include, for example, monitoring in both the Piceance Basin and the Flat Tops Wilderness Area. Further, there is no emissions or operating data from any of the five RD&D leases.

52837-010 (cont.)

• All diversions and use of water must be done in compliance with Colorado Water Law. This will require all necessary approvals from the Colorado Water Courts, the Division of Water Resources and other governmental agencies, and gaining such approvals will require applicants to address all relevant technical concerns. The Draft PEIS fails entirely to acknowledge or discuss the need to comply with Colorado Water Law.

• There is no information about potential levels of Mercury, Ozone precursors, and Hazardous Air Pollutants occurring from oil shale development. This deficiency must be resolved prior to a Record of Decision.

• There is no discussion of the air quality impacts of the additional energy development for electricity generation that is an integral part of future commercial shale development on regional air quality levels (both for visibility and public health). If there is significant additional energy needed to develop this resource, then the impacts must be identified and disclosed in the BLM's PEIS.

• The Draft PEIS is woefully inadequate in assessing the needs and impacts of an industrial complex significantly greater than the infrastructure that exists today. While commercial oil shale development decisions will not be made until the 2012-2014 time frame (with commercial production around 2020), the same lead time will be required to

develop water treatment and storage and power plants or networks to support such a commercial oil shale industry. 52837-010 (cont.)

Preferred Alternative

The State of Colorado recommends that the BLM abandon its intention to make large areas of Colorado available for application for commercial oil shale leasing, and instead adopt Alternative A as the Preferred Alternative in the Final PEIS. 52837-011

Colorado recognizes that oil shale development may offer potential to supplement the nation's energy supplies. Colorado's goal is that commercial oil shale development be done right – in a manner that avoids unacceptable and irreparable impacts on Colorado's land, air, water, wildlife resources, and communities and that minimizes those adverse environmental and socioeconomic impacts that would result from such development through front-end planning and financing and long-term monitoring and mitigation. According to the Draft PEIS, the lands the BLM proposes to make available for oil shale leasing in Colorado would result in production of 16 billion barrels of oil. Draft PEIS at 2-22. Elsewhere, however, the Draft PEIS concedes that "[f]uture production levels are unknown at this time," and that its discussion of impacts would necessarily be limited to "potential impact-producing factors." *Id.* at 4-2.

In view of the substantial adverse environmental impacts that could result from commercial oil shale development, and given the lack of reliable information and analysis to meaningfully assess likely impacts at this time, the only defensible alternative is Alternative A. BLM argues that "the amendment of land use plans to designate lands as available for application for commercial leasing would have no impact on the environment" since the actual decision whether to issue leases would be made at a later date. Draft PEIS at ES-5. This is an inconsistent argument that inherently undermines the value of this document. In summarizing a comparison of "Potential Environmental Impacts" of the three alternatives on various resources – water resources, air quality, land use, wildlife, socioeconomics, etc. – the BLM repeatedly states that each resource "would not be impacted by land use plan amendments." *See* Draft PEIS at 2-55 to 2-84. Yet, in other places BLM indicates that the result of this action will "facilitate" or "make possible" commercial oil shale development. Draft PEIS at E-5 and 6-36. BLM cannot have it both ways. The bottom line is that the great uncertainty that currently exists about the potential impacts of commercial oil shale development means that any change to the current applicable Resource Management Plans relative to oil shale development is premature and insupportable – and not without consequences on the land, resources, communities, and economy. 52837-011 (cont.)

Selection of the Alternative A would still allow activities on the five federal RD&D leases to proceed, and these leases could still potentially be converted to commercial production. Because concrete environmental and technological information is necessary to make long-term policy and land-management decisions, Colorado supports the RD&D efforts underway. Making additional lands available for application to lease prior to the results of these projects will foreclose the necessary comprehensive analysis of the direct, indirect, and cumulative environmental impacts from commercial oil shale in conjunction with non-oil shale activities planned or currently underway. In addition, oil companies own substantial holdings of oil shale 52837-002 (cont.) 52837-012 52837-013

in the Colorado's Piceance Basin.[2] Though the BLM acknowledges that 14 companies owned private oil shale lands in 1979, *see* Draft PEIS at 3-207, the Draft PEIS fails entirely to acknowledge the development potential of private oil shale holdings. Without substantially more information about the technologies to be used, their effects on the environment, the potential for oil shale development activities on private land, and the ability to effectively mitigate potentially significant environmental and socio-economic impacts, it is imprudent to allocate any additional federal lands as available for commercial oil shale leasing at this time. It is necessary to await the results from the RD&D projects before making additional federal oil shale resources available for application for commercial lease. Similarly, the results of these tests are necessary to inform the scope of rules and regulations for a commercial leasing program.

52837-013 (cont.)

52837-001 (cont.)

If planning for and implementation of oil shale development efforts are not done responsibly and thoughtfully in the first instance, there is a greater risk that development will be delayed, and that any development that does occur will have unacceptable impacts. More specifically, BLM's preferred alternative would subject a substantial portion of Colorado to uncertain impacts that are likely to be significant, and this will erode public and political support for the fledgling industry.

52837-014

As noted by the RAND Corporation in Congressional testimony last year, the knowledge base about the economic, technical, and environmental feasibility of oil shale development is not yet adequate to support the formulation of a commercial oil shale leasing program.[3] This testimony noted that while a number of companies are making appreciable investments in oil shale research, "none of these firms has gathered technical information adequate to warrant a decision to invest hundreds of millions, if not billions, of dollars on first-of-a-kind commercial oil shale plants." RAND testimony at 3. The RAND Corporation found that "industry is years away from establishing commercial viability." *Id.*

52837-011 (cont.)

Because industry is currently unable to commit its substantial resources to large-scale oil shale development, it is likewise premature for the BLM to select any alternative that would make federal oil shale lands available for application for commercial lease or to adopt leasing regulations at this time.

Missing Information

The decision to make federal lands available for application for commercial lease is "intended to facilitate the establishment of a long-term program of commercial [oil shale] leasing." Draft PEIS at ES-5. This program, in turn, would lead to development activities utilizing untested technology to convert kerogen to shale oil, with unknown potential long-term negative impacts to Colorado's environment, public health and welfare, wildlife, and communities. The BLM concedes that "impacts on specific resources located within the

52837-015

[2] Federal lands overlie only about 80% of the estimated in-place oil shale resources, leaving 20% in private hands. *See* Bartis, *et al.*, "Oil Shale Development in the United States: Prospects and Policy Issues," RAND Corporation (2005) at 9.

[3] Senior Policy Researcher James T. Bartis, RAND Corporation, "Policy Issues for Oil Shale Development," testimony before House Committee on Natural Resources, Subcommittee on Energy and Mineral Resources, April 17, 2007, available at http://www.rand.org/pubs/testimonies/CT279.

1,991,222 acres [as provided in the Preferred Alternative] cannot be quantified at this time because key information about the location of commercial projects, the technologies that will be employed, the project size or production level, and development time lines are unknown." Draft PEIS at 6-36.

This finding triggers further information-disclosure requirements, according to regulations implementing NEPA. Because the information on oil shale impacts is essential to a choice as to whether to make land available for application for commercial oil shale leases yet cannot be obtained because it does not yet exist, the BLM is required to assess the relevance of the incomplete information and provide a summary of existing credible evidence relevant to the evaluation. 40 C.F.R. § 1502.22. The BLM, however, fails in the Draft PEIS to assess the relevance of the missing information on likely impacts of the oil shale development activities it is facilitating, and it provides only a general summary of the existing information. The BLM thus appears to dismiss the missing information as not necessary in assessing the propriety of making nearly 360,000 acres of federal oil shale resources available for application for commercial oil shale leases in Colorado.

52837-016

Given the paucity of information concerning the likely impacts of commercial-scale oil shale development, as well as the contradictory interpretations of NEPA requirements, Colorado continues to support the RD&D approach as a way to obtain an important part of the missing information that is required to make a reasoned choice among the various land management and policy alternatives. Colorado will continue to oppose any commercialization plan that calls for commercial leasing, or for the promulgation of leasing regulations, prior to a meaningful evaluation of the RD&D projects and proper NEPA analyses.[4]

52837-001 (cont.)

In order to be able to perform a meaningful environmental impact analysis and to reach a reasoned and informed decision regarding the feasible and appropriate scope of commercial oil shale development, BLM needs to proceed now to develop the information needed to fill the information gaps that limit the effectiveness of the current PEIS analysis. For example, needed information includes:

a. Baseline air quality monitoring;
b. Baseline ground and surface water quality monitoring;
c. Baseline wildlife monitoring and specific conservation measures for deer, elk, sage grouse, and Colorado River cutthroat trout;
d. An analysis of the availability of water supplies;
e. An analysis of options for meeting power demands for oil shale development in a manner consistent with Colorado's renewable energy standard;
f. Paleoseismic studies of faults within the oil shale basin;
g. A thorough realistic housing analysis incorporating local constraints including buildable land and infrastructure; and

52837-017

[4] *See* Colorado Statement on Unconventional Fuels, Task Force on Strategic Unconventional Fuels, America's Strategic Unconventional Fuels, Volume I at I-79 (Sept. 2007), *available at* http://www.unconventionalfuels.org/images/Volume_I_IntegratedPlan_Final_.pdf.

h. Baseline data for community infrastructure capacity that can be used to assess what additional infrastructure will be required to support oil shale development. 52837-017 (cont.)

Cumulative Impacts

The BLM proposes to make large areas of Northwest Colorado available for application for commercial oil shale leasing, without conducting the required analysis of the cumulative impacts of doing so. While the BLM claims in the Draft PEIS that it will study the cumulative impacts of proposed oil shale development projects when it receives an application for a commercial lease, the proper time to evaluate the regional cumulative impacts of a new oil shale leasing program is at the PEIS stage. In 2007, the Colorado General Assembly unanimously acknowledged that comprehensive planning of energy development on a basin-wide scale should be performed in order to adequately assess cumulative impacts. *See* HB07-1298, *codified at* C.R.S. § 34-60-128(3)(d)(II).

The BLM is proposing to make hundreds of thousands of acres open to application for oil shale leases, which could lead to multiple applications for large-scale oil shale projects. Logistically, the BLM simply cannot analyze the cumulative impacts of this decision when performing NEPA review on a project-specific, piecemeal basis in response to an individual application for a commercial lease. For example, an accurate assessment of cumulative impacts would be impossible where there are multiple applications under review simultaneously, at various times of review, and without knowing the number and size of projects that will be proposed in the future. The BLM has provided no assurance that it will be able to perform an adequate comprehensive review of cumulative impacts for each individual application prior to consideration and review of additional applications. 52837-018

It is important to understand the social and environmental circumstances present in Colorado today, as the analysis of cumulative impacts required by NEPA and requested herein is not merely an academic exercise. The State of Colorado is currently experiencing an unprecedented energy boom in many portions of our state. In particular, the areas that the BLM proposes to make available for application for commercial oil shale leases are experiencing rapid natural gas development. In Colorado's Piceance Basin, the BLM proposes to make 359,798 acres available for application for commercial oil shale leasing. Draft PEIS at 2-27. In this same area, the BLM is analyzing a change to management plans that could allow over 17,000 new natural gas wells to be drilled over the next twenty years.[5] In addition, the areas the BLM proposes to make available for application for oil shale leasing are seeing increased tourism and recreation opportunities. In 2006, approximately 17,000 jobs were found to be supported by the tourism industry for the region including Moffat, Rio Blanco, Garfield, and Mesa Counties, and tourism as a whole represents about 15% of the jobs in the area. Past research on segments of the tourism industry found that about 20% of the tourism jobs in Northwest Colorado came from the outdoor recreation segment -- or about 3,400 jobs. In the Piceance Basin's Game Management Unit 22, there were 4,582 deer and elk hunters in 2006.

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[5] *See* Reasonable Foreseeable Development Scenario for Oil and Gas Activities in the BLM White River Field Office: Rio Blanco, Moffat, and Garfield Counties, Colorado, Executive Summary at 3, *available at* http://www.blm.gov/rmp/co/whiteriver/documents/RFD_Executuve_Sumnmary.pdf.

Any oil shale leasing on top of this existing network of energy development and changing land uses will put significantly more pressure on an already fragile ecosystem and public temperament, and it will further stress the system that provides the goods and materials for infrastructure needs driven by the current demands.[6] Furthermore, the inherent limitation of the oil shale industry may be in the existing environmental standards for the area. The proposed gas development, under current leasing schedules, coupled with other current industry-based activities in the area, may leave only a small increment under existing environmental performance standards for oil shale. The limit may not be land, may not be economics, but rather the air and water quality standards themselves. This cannot be determined without a detailed cumulative analysis. 52837-018 (cont.)

Thus, it is vitally important to the Departments and to the State of Colorado that the BLM proceeds cautiously and moves forward thoughtfully with the development of a commercial oil shale leasing program that truly looks at the cumulative impacts in a programmatic way. As the epicenter of the developable oil shale resource in the United States, Colorado has much to gain if this resource is developed responsibly, and much to lose if the risks are not assessed and managed appropriately.

A Programmatic Environmental Impact Statement is intended to provide a meaningful analysis of the impacts of an overall program, prior to proceeding with project-by-project approvals. *See Kleppe v. Sierra Club*, 427 U.S. 390 (1976) ("[W]hen several proposals for coal-related actions that will have cumulative or synergistic environmental impact upon a region are pending concurrently before an agency, their environmental consequences must be considered together."). Because of the absence of information to allow a meaningful assessment of the potential impacts of commercial oil shale development at this time, the Draft PEIS does not satisfy its intended purpose. Therefore, BLM should explicitly commit to preparing a supplemental PEIS at a later date, when adequate technical information is available and the agency is committed to conducting the necessary cumulative impacts analysis, prior to proceeding with commercial oil shale regulatory and leasing actions. Only in such a document may the BLM perform the analysis of cumulative impacts required by NEPA and demanded by responsible public policy. 52837-019

Carrying Capacity Thresholds

Recognizing the importance of resources in the oil shale region and the threat posed by large-scale oil shale development, the BLM's 1987 RMP for the Piceance Basin set "Critical Carrying Capacity" thresholds for oil shale development for air quality, annual growth rate of communities, wildlife, and water quality.[7] The Piceance RMP provides for continual monitoring of oil shale development in relation to the carrying capacity thresholds, and mandates that "[a] project exceeding any one of the thresholds will not be leased or approved as proposed." These 52837-20

[6] *See* DNR Executive Director Russell George on behalf of Governor Bill Owens, testimony before Senate Committee on Energy and Natural Resources, Oil Shale and Oil Sands Resources Hearing, April 12, 2005.

[7] BLM, White River Resource Area, Piceance Basin Resource Management Plan Record of Decision at 2-3, 2-6 (May 1987).

carrying capacity management decisions were specifically incorporated when the BLM adopted a new RMP for the White River Resource Area in 1997: "The oil shale management decisions developed in the Piceance Basin Resource Management Plan (March 1985) are carried forward as decisions in this document (See Map 2-6)."[8]

Because the areas of the Green River Formation are relatively sparsely populated, boom and bust cycles associated with oil shale could have disastrous effects on the communities, stressing existing infrastructure with increased population and associated needs. Recognizing this, the 1987 Piceance Basin RMP set a carrying capacity threshold of 5-15% annual growth rate in communities. Because of the potential for significant effects on wildlife habitat from oil shale development, the Piceance RMP imposed a carrying capacity threshold for wintering mule deer. The RMP imposed on the BLM the obligation to preserve the habitat needed to maintain 24,900 mule deer (24,650 AUMs). This figure was found to be 83% of the actual wintering Piceance Basin herd of 30,000 on all lands, and to represent the minimum acceptable herd size agreed to by BLM and Colorado Division of Wildlife (CDOW) in 1987. The Piceance RMP also found that "[s]tringent wildlife habitat mitigation" could be imposed instead of prohibiting leasing, depending on actual site-specific and cumulative impacts to mule deer, although it neglects to set out any potential mitigation measures.

In the Draft PEIS, the BLM describes the carrying capacity of a system as being "the maximum level of activity that can be sustained within a specific area without significant, detrimental impact." Draft PEIS at 2-53. Nonetheless, and without analysis, the BLM appears to propose doing away with the carrying capacity thresholds for Colorado oil shale lands entirely. Though the BLM acknowledges that development of an oil shale lease "would represent a loss of habitat for these species and potentially a reduction in carrying capacity in the area," Draft PEIS at 4-72, it again relies on future, site-specific NEPA reviews to consider impacts. It states that "programmatic alternatives do not explicitly consider carrying-capacity thresholds nor propose that commercial leasing levels be constrained in the future by these thresholds." Draft PEIS at 2-53.

52837-020 (cont.)

While the Departments cannot say with certainty that the numeric standards in the Piceance Basin and White River RMPs for carrying capacities continue to be the proper thresholds, the concept of carrying capacity thresholds should not be disregarded lightly. These carrying capacity thresholds have been in place for over two decades, imposing objective standards to guard valuable and imperiled public resources from the cumulative impacts of unchecked oil shale management decisions. Given that the BLM is here effectively deferring an analysis of cumulative impacts to the site-specific leasing stage, the carrying capacity thresholds are even more important. The BLM's apparent proposal to jettison these standards without any analysis of the impacts of doing so ignores the work of BLM and the State of Colorado through the years on the issue.

In the Final PEIS, the BLM should analyze data on the current populations of wintering mule deer and elk and update, if necessary, the number that must be supported for the benefit of the species. Likewise, the BLM should assess the likely socioeconomic impact of a significant

[8] *See supra* note 1, *at* 2-6.

new industry in the oil shale region, in conjunction with the current localized natural gas industry. The agency should also reevaluate the carrying capacities for air and water quality in order to assess whether they are currently adequate to protect these vitally important public resources.

52837-020 (cont.)

The BLM's anticipated leasing regulations

The Draft PEIS attempts to address the BLM's proposal to amend resource management plans to allow for potential oil shale lease applications, as opposed to any regulations for such lease applications or a leasing program. However, the BLM has indicated that it expects to later promulgate such regulations pursuant to section 369(d)(2) of the Energy Policy Act of 2005. During recent stakeholder meetings, the BLM has also indicated that it intends to issue an Environmental Assessment (EA) in conjunction with such leasing regulations. Colorado is concerned that such an approach will not comply with NEPA.

It appears that the BLM's leasing regulations will address such critical issues as the leasing process, bonding, royalty rates, fair market value, and bonus bids. Such regulations would thus set in place factors that will directly and significantly affect how oil shale development proceeds. As such, promulgation of such regulations would constitute a "major federal action significantly affecting the quality of the human environment," and would require preparation of an EIS and signing of a Record of Decision prior to adoption. *See* NEPA § 102(C), 42 U.S.C. § 4332(2)(C).

According to the BLM, "Actions whose impacts are expected to be significant and which are not fully covered in an existing EIS must be analyzed in a new or supplemental EIS. An EIS should also be prepared if, after or during preparation of an EA, it is determined that the impacts of a proposed action are significant." *National Environmental Policy Act Handbook and Department of the Interior NEPA Guidance Manual 516, BLM Handbook H-1790-1*, at p. I-2.

52837-021

While an EA may be used to decide whether to prepare an EIS, such an interim step is not necessary here. An agency need not prepare an EA if it prepares an EIS. *See* 40 CFR § 1501.3(a). Congress and the BLM have already determined that an EIS is appropriate for the BLM's proposed leasing program. Moreover, the BLM's Draft PEIS amending resource management plans repeatedly makes clear that due to missing and incomplete information, the BLM cannot adequately assess the potential impacts of commercial oil shale leasing at this time. There are thus serious questions as to how a NEPA analysis for leasing regulations (particularly a mere EA) could adequately tier off of, or otherwise rely on, the current Draft PEIS amending resource management plans.

Preparing draft leasing regulations without the benefit of data from the RD&D projects that these regulations would address will make any conclusions and recommendations premature, incomplete, and possibly irrelevant. While the State of Colorado will have to await the BLM's publication of draft leasing regulations before providing further comment, Colorado wants BLM to know in advance the test to which the State will put such proposals.

Conclusion

Thank you for this opportunity to comment. The State of Colorado believes that the issues discussed above and in the attached technical comments must be addressed in the Final PEIS.

We look forward to continuing to work cooperatively with BLM to ensure that the significant challenges associated with oil shale development are addressed in a thorough and protective manner.

Sincerely,

Bill Ritter, Jr.
Governor

Technical Comments of
Colorado Department of Natural Resources,
Colorado Department of Public Health and Environment, and
Colorado Department of Local Affairs
on Bureau of Land Management's
Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (December 2007)

The following technical comments from divisions and staff of the Colorado Department of Natural Resources (CDNR), Colorado Department of Public Health and Environment (CDPHE), and Colorado Department of Local Affairs (DOLA) highlight major technical deficiencies in the Bureau of Land Management's (BLM) Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (Draft PEIS).

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COLORADO
DEPARTMENT OF
NATURAL
RESOURCES

Bill Ritter, Jr.
Governor
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Executive Director

1) Division of Reclamation, Mining and Safety

There is very little real data with which to determine what the environmental effects of *in-situ* processing of oil shale will be since there has not yet been a commercial sized *in-situ* project to date. This information may be obtained in the next 5-10 years upon development and close monitoring through the various permitting processes of the RD&D projects. There is no stated mechanism to revisit the PEIS process in order to re-evaluate regional effects of commercial development if there is critical information gleaned from the RD&D operations. Instead, the PEIS states that such changes will be dealt with on a case by case basis via NEPA review of specific projects, a manner which is similar to the way that coal mining environmental impacts are evaluated. This approach will preclude consideration of regional impacts from the widespread use of new technologies for oil shale development. 52837-022

In Section 4.1.6, Table 4.1.6-1, the effects and needs of a 2,400 MW generating station are listed. Conspicuously missing are the effects of the coal mine that would be needed to feed the generating station. For example, the Craig Generating Station (1,284 MW) is fed primarily by the Trapper Mine which has a permitted acreage of 10,000 acres and a disturbed acreage of approximately 3,200 acres over its 25 year life. It is noted that the commercial options B, C and D would require the equivalent of almost 10 Craig-sized generating stations over the life of the commercial oil shale operations (12 GW of power required – although estimates of the electrical need for *in-situ* operations is not well documented since no commercial-scale operations have been started) for a total of not only the acreages listed in the table but also some 32,000 additional acres disturbed via coal mining with its own environmental and socio-economic effects and additional water requirements for coal processing, dust suppression, and other mine and workforce related activities. Additionally, if these mines are located near oil shale development areas, they will have their own effects on air quality which has also not been factored in. Moreover, there is no discussion on the effects of uranium fueled power plants and their environmental effects and operating needs if this type of power plant is used. 52837-023

Chapter 4, Table 4.5-1 lists the water resources available and expected to be available by 2040 (presumably when commercial oil shale operations would be fully functional). It is notable that the water requirements (on the lower estimate of the needs for commercial oil shale operations) will exceed those available in 2040 from surface sources. It is stated that the requirements can be made up from the ground water resources but the estimate of that resource varies by an order of magnitude (2.5 to 25 M ac-ft). The possible diminution of surface and ground water quantity and quality from the direct effects of oil shale development (e.g. mixing of aquifers, drainage of the upper aquifer into the lower aquifer, quality degradation from the release or organics, salts and metals via pyrolysis) is not accounted for in this table but should be estimated and included. 52837-024

Related to water balance for commercial operations, it is known that ground water in the Piceance Basin travels rather slowly and, therefore, is recharged rather slowly. It is also known and stated that both Piceance and Yellow Creeks (the main drainages out of the Piceance Basin) are both ground water fed creeks. It therefore seems reasonable to assume that withdrawal of the ground water for use in oil shale operations will most probably have a flow lessening effect on one or both of these creeks through the disruption of spring or seep flows that feed them. It is unclear whether this diminution in surface flow has been taken into account in the water balance estimates except for the statement that the freeze wall will mitigate these effects. The freeze wall will not be in existence after oil withdrawal and subsequent rinsing of the retorted area is complete and that area will have to recharge by some mechanism. This doesn't seem to be accounted for. 52837-025

The Draft PEIS omits discussion of several important issues. There is no mention or discussion of dissolved metals (boron, molybdenum, arsenic, and possibly others) and their effects on ground water from the *in-situ* pyrolysis of oil shale. There is no discussion of noise levels from resource development. There is no discussion on wilderness characteristic areas in Colorado. 52837-026

Legal Requirements

The Draft PEIS defers site specific NEPA analysis of potential impacts to 360,000 acres of public land in Colorado to future evaluations. There has to date never been commercially viable production of oil from Colorado oil shale resources, even though Colorado possesses the richest and most extensive global reserves. It is stated in the Executive Summary to the Draft PEIS that "As part of this PEIS, potential impacts of currently known technologies also have been described at the programmatic level to aid decision makers and readers in understanding the potential effects of future development." While this may be a currently legitimate course of action, it must be recognized that research and technology development for oil shale will require further analysis at the programmatic level, as opposed the project specific level, as the draft PEIS seems to presume. 52837-027

Chapter 2, Section 2.2.1 describes "Existing Relevant Statutory Requirements" and breaks out potentially applicable laws into general categories. Appendix D, Table D-3 places the Colorado Mined Land Reclamation Act (MLRA) into the "Energy Project Siting" category. The Energy Project Siting category is described in Chapter 2 as being relevant to "construction of facilities such as pipelines, gathering lines, transmission lines, or generation facilities." 52837-028

Essentially none of these activities are subject to regulation under the MLRA. The MLRA should be removed from the Energy Project Siting category in Appendix D, and should be included in the Appendix D tables under the following categories, over which the MLRA does exercise authority:

TABLE D-4 Floodplains and Wetlands
TABLE D-5 Groundwater, Drinking Water, and Water Rights
TABLE D-6 Hazardous Materials
TABLE D-7 Hazardous Waste and Polychlorinated Biphenyls
TABLE D-10 Pesticides and Noxious Weeds
TABLE D-13 Water Bodies and Wastewater
TABLE D-14 Wildlife and Plants

52837-028 (cont.)

It is stated in the Draft PEIS that Chapter 2, Section 2.2.1 "discusses, in very general terms, the major laws, Executive Orders (E.O.s), and policies that may provide environmental protection and compliance requirements for oil shale or tar sands development projects on public lands in Colorado, Utah, and Wyoming." However, there is little or no discussion, and no identified category of State mined land reclamation laws, even though each of the three potentially affected States have such laws. Mined land reclamation should be included in the listing of "major laws" for each of the three states, and the Colorado Mined Land Reclamation Act (34-32-101, *et. seq.*) should be specifically cited.

52837-029

Comments on Specific Passages of Draft PEIS

On page 1-3, the Draft PEIS states, "The BLM has identified the most geologically prospective areas for oil shale development on the basis of the grade and thickness of the deposits." Are the deposits sufficiently characterized that the agency can definitively state where the most geologically prospective areas are? Is the definition of a geologically prospective area based on detailed exploratory data, such as delineation drilling or geophysical surveys, or have extrapolations and generalizations been made from existing data? If there are deficiencies in the characterization of the geologically prospective areas, then important decisions regarding lease locations, or locations of facilities for exploration, extraction, infrastructure, and support are in danger of being made without adequate background information, leading subsequently to the risk of poorly conceived resource utilization.

52837-030

On Table 2.2.3-1 on page 2-8 of the Draft PEIS, the importance of the ACEC areas in this table are given considerable weight in the overall context of environmental impacts of oil shale development, yet very little specifics are provided for the ACEC areas.

52837-031

On page 3-73, the Draft PEIS states that "Oil shale basins and STSAs are situated in much smaller areas," yet it is unclear from the context of the passage to what the oil shale basins and STSAs are being compared.

52837-032

On page 3-77, the passage starting with "Topper et al. (2003) list common sources of..." is not particularly relevant to the subject of oil shale extraction. The passage refers to contaminants derived from hardrock and metal mines. The mining methods employed, and the geologic environment existing at oil shale deposits will be vastly different than those existing at

52837-033

hardrock or metal mining sites. The inclusion of this passage implies that the two types of mining situations could give rise to common environmental contaminants, which is an inaccurate and misleading implication. 52837-033 (cont.)

On page 4-3, the passage referring to the quantity of water used by oil shale operations, is one of many passages referring to the quantity of water that will be "used" by oil shale development, without sufficient explanation as to whether the water is actually consumed or simply diverted, used, and cycled back to the watershed as return flow. Proper emphasis on the amount of total water consumption versus simple usage will help provide a more realistic picture of the actual water demands of the oil shale industry. 52837-034

On page 4-6, the Draft PEIS states, "Regardless of the retort, spent shale volume would increase by 30%," yet it is unclear from the context of the passage over what the spent shale volume would increase by 30%. 52837-035

On page 4-12, the Draft PEIS states, "Project economics would likely select for sites closest to existing infrastructure." This passage is inconsistent with other passages in the document stating that companies will construct their own plants to provide power for operations. It seems a foregone conclusion that, due to the economic potential of oil shale development, project economics will drive the locations of power supply and infrastructure, not the other way around. 52837-036

On page 4-25, the Draft PEIS states, "In Colorado or Utah, 150 to 600 acres would be disturbed at any one time, while in Wyoming, the figure would be 1,000 to 2,000 acres." This is one of several passages in the document referencing the size of impacts or disturbances. However, it is unclear here and in other passages whether these numbers represent the total disturbance at any particular time, or per-site numbers within larger projects containing multiple sites, or something else. 52837-037

On page 4-33, in the paragraph that starts with "For in situ processes, the impact of in situ processing..." it is important to note that the permeabilities of the aquifers and aquitards may be affected not only by rock fracturing, but also by the removal of hydrocarbons. 52837-038

Finally on page 4-35, the Draft PEIS states, "In addition, the filled mine could become a vertical conduit for groundwater, resulting in a discharge area for the shallow aquifer and a recharge area for the deeper aquifer." An additional consideration is that of an upward hydraulic gradient. In the case of an upward hydraulic gradient, the opposite could be true, i.e., the filled mine could become a discharge area for the deeper aquifers and a recharge area for the shallow aquifer. 52837-039

2) Division of Wildlife

The Colorado Division of Wildlife (CDOW) appreciates the opportunity to comment on the December 2007 draft of the Bureau of Land Management's (BLM) Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming Programmatic Environmental Impact Statement (OSTS PEIS). Proposed oil shale 52837-040

development in Colorado would occur in the Piceance Basin, which includes portions of the BLM's White River, Glenwood Springs and Grand Junction Field Offices. As each of these field offices are currently undergoing or are about to begin Resource Management Plan (RMP) revisions, it will be important to incorporate new information from these revised RMPs in the OSTS PEIS, especially those areas protected by stipulations that would affect lands available for lease under Alternative C. It will be equally important for BLM to incorporate the impacts and other implications of oil shale development into these RMPs and to evaluate the cumulative impacts of oil shale leasing and development in each of the revised RMPs as well. It is as imperative now as ever that potential oil shale development impacts are evaluated and that an oil shale management strategy is developed to ensure that BLM's multiple use and sustained yield mandates are retained. CDOW expects the BLM to conduct meaningful analysis that is both specific and measurable to evaluate cumulative impacts resulting from mineral extractive industries.

52837-040 (cont.)

The Piceance Basin is home to the largest migratory mule deer herd in North America, a large migratory elk population, one of only six greater sage-grouse populations in Colorado, conservation and core conservation populations of Colorado River cutthroat trout, and a host of other wildlife species. These resources are of statewide economic, ecological, recreational, and aesthetic importance. Impacts to these wildlife resources from oil shale development will have local, regional, statewide, and even national implications to sportsmen and other wildlife enthusiasts. Areas that would be opened for commercial leasing under Alternative B include:

- 880 acres of important aquatic habitat
- 7 acres of bald eagle active nests (buffered at ½ mile--no surface occupancy)
- 190,478 acres of elk production area
- 6,506 acres of greater sage-grouse leks (buffered at 0.6 mile--no surface occupancy)
- 125,563 acres of greater sage-grouse production area (mapped as a 4 mile radius from leks to protect nesting and brood rearing habitat)
- 78,093 acres of mule deer critical winter range
- 31,479 acres of mule deer migration corridor(s)

52837-041

This list identifies the minimum set of specific species and habitats that CDOW believes require ***detailed and comprehensive*** analysis prior to any future commercial oil shale leasing in the Piceance Basin. The sum of these areas is shown on the attached map. When and if commercial leasing occurs, CDOW expects to consult with the BLM regarding the suitability of any lands proposed for leasing, the extraction mechanisms proposed, and mitigation techniques required to offset any impacts to wildlife and wildlife habitat that cannot be avoided. For CDOW to most effectively offset these impacts, it will be important for CDOW to be engaged in discussions with BLM early and often. This consultation should occur prior to the release of a NEPA scoping notice whenever possible.

Leasing Alternatives

Five Research, Development and Demonstration tracts have been recently permitted in the Piceance Basin, primarily for the purpose of evaluating oil shale extraction techniques and assessing the environmental impacts of oil shale development. Exploration of geologic

conditions and development plans for these RD&D sites are only in preliminary stages. Therefore, the ability to successfully predict environmental impacts is yet to be determined. While we understand that some amount of RD&D must occur to determine if oil shale can be produced without impacting the environment, CDOW supports BLM's decision not to allow any additional RD&D projects and their associated preference lease right acreages to be permitted. The five existing RD&D tracts include preference rights for commercial leasing of more than 25,000 acres within the Piceance Basin.

CDOW supports a "go slow" approach to oil shale development while it remains in this "experimental" phase and prefers that BLM adopt Alternative A—the No Action Alternative—to allow these RD&D projects sufficient time to provide necessary information to support future commercial leasing. Alternative A includes preference rights allowing more than 25,000 acres of commercial oil shale leasing within the Piceance Basin. 52837-042

Alternatives B and C propose significant additional lease areas in Colorado. CDOW considers the lease availability proposed in these alternatives, especially the identification of the entire Piceance Basin in Alternative B, to be an irrevocable commitment of the mineral resource that, when developed, will have significant, adverse, and long term impacts on the wildlife resource and that will complicate BLM's statutory mandate to manage federal lands in compliance with the "multiple use" and "sustained yield" concepts required by the Federal Land Policy and Management Act of 1976. 52837-043

Section 4.8.1.3 of the OSTS PEIS describes a number of impact mechanisms, from direct mortality to habitat loss and fragmentation, through which wildlife could be impacted by oil shale development proceeding from decisions made in the OSTS PEIS. CDOW believes that each of these mechanisms will indeed occur as a direct or indirect result of oil shale development in the Piceance Basin and that the resulting impacts on wildlife will be severe and potentially long lasting. Table 4.8.1-1 states that the effect on wildlife from one or more of these impact mechanisms will be moderate to large for each class of wildlife evaluated. Moderate effects are defined as resulting in measurable loss of wildlife carrying capacity of up to 50% within the affected area. Large effects would result in more than 50% loss of affected wildlife. CDOW believes that the loss of 50% or more of the ability of the landscape to support wildlife from any single activity is neither moderate nor acceptable. In addition, the Piceance Basin does not currently and may not ever have the capacity to meet oil shale's requirements for infrastructure, power, or water. CDOW anticipates this could be a substantially limiting factor to development and should be reflected in the decision about the appropriate amount of the Piceance Basin to make available for leasing. 52837-044

Alternative B, BLM's Preferred Alternative, proposes to make the entire Piceance Basin available for leasing. Adoption of this alternative is unsupportable given the complete lack of understanding affirmed in the OSTS PEIS about the extraction processes that may be feasible and the impacts that development will create for wildlife and wildlife habitat. While the pre- and post-lease NEPA requirements established by the OSTS PEIS will provide substantial additional protection for wildlife, designating the entire Piceance Basin as open for leasing conveys some expectation to industry, governmental agencies and others that substantial commercial leasing will occur relatively quickly. This expectation cannot be met, given the current state of 52837-045

knowledge, and still meet the "environmentally sound" standard under which commercial oil shale leasing is to occur. 52837-045 (cont.)

Finally, CDOW believes that the three alternatives proposed in the draft OSTS PEIS, the no-action alternative and two commercial leasing alternatives, do not constitute a complete range of actions for analysis. Analysis of additional alternatives, including a phased approach to lease availability, would provide a more thorough understanding of the implications of lease availability and the development impacts that will follow. 52837-046

Additional Recommendations for Analysis Prior to Commercial Leasing

1. Neither the OSTS PEIS nor the White River RMP adequately addresses either the commercial development potential or the likely impacts that will result from oil shale development on the tens of thousands of acres of oil shale that were patented during the previous oil shale boom and that are now privately owned. Additionally, neither document combines an analysis of the landscape effects of additional BLM oil shale leasing and development, private oil shale development, existing oil and gas development levels, or the proposed increase in oil and gas activity within the White River Field Office. This separation of oil shale and oil and gas development impacts results in a piecemeal approach to NEPA that prevents a full presentation and analysis of the full effect of these federal actions. 52837-047

2. The OSTS PEIS needs to provide a more detailed analysis as to how the proposed alternatives will impact wildlife populations and habitat. For example, the Colorado Division of Wildlife believes that oil shale RD&D activities within the central portion of the Piceance Basin will increase oil and gas activity on the periphery. If oil shale is considered the priority mineral in the area of the RD&D's, and coincident oil and gas development occurs, ecosystem-level effects will significantly impact many different wildlife species. For instance, the Parachute/Piceance/Roan (PPR) greater sage-grouse population utilizes higher elevation areas in the southern portion of the Piceance Basin and in the Magnolia area. The PPR population of greater sage-grouse is geographically isolated. The unique characteristics of greater sage-grouse habitat in the PPR and the high range fidelity exhibited by the species will make adjustment to the increased activity challenging. Consequently, availability of expanded leases for commercial oil shale development, as proposed in the OSTS PEIS, in conjunction with expanded oil and gas development will likely lead to extirpation of the PPR sage-grouse population. The PPR population is one of only six greater sage-grouse populations in Colorado. Extirpation of this population will make the avoidance of future Endangered Species Act (ESA) listing actions substantially more difficult. Any ESA listing will directly affect industry as well as any other users of public lands within the oil shale development areas. 52837-048

3. The alternatives detailed within the OSTS PEIS need to more fully assess the off-site impacts that might result from oil shale development, including issues such as: 52837-049

-damage that private landowners will suffer from big game species as a result of added pressure of oil shale development on lands already impacted by natural gas development.

-effects of big game being forced to occupy alternate winter range habitat, resulting in reduced survival of big game herds and increased competition with livestock on private lands.

52837-049 (cont.)

-effects of oil shale development on water quality and quantity in federally designated critical habitat for threatened and endangered aquatic species in the White River below the confluence with Piceance Creek.

4. An assessment of the water quality impacts to all wildlife species that utilize the Piceance Basin should be provided for each alternative presented in the OSTS PEIS. The assessment should not only factor in the effects of oil shale development, but also consider existing and anticipated oil and gas development within the Piceance Basin, coal extraction areas and new power plants needed to supply power to the oil shale extraction operations, and pipelines and other infrastructure needed to support the oil shale and oil and gas operations. The assessment should include an evaluation of the direct or indirect effects to wildlife populations from:
   a. increased sedimentation;
   b. increased stormwater runoff and salinity;
   c. rising water temperatures and lower stream water levels due to oil shale de-watering activities;
   d. increased contaminant spills to natural waterways; and
   e. increased concentrations of minerals, metals and other by-products liberated during the oil shale extraction and final reclamation processes and the level to which they cause detrimental water quality impacts to aquatic life and cold water fish species.

52837-050

5. The assessment of changes to water quantity at a watershed level from oil shale development for each alternative should address the anticipated resulting impacts to wildlife populations due to:
   a. elimination of springs, seeps, or other naturally occurring surface water expressions; and
   b. potential reduction and/or elimination of riparian habitat.

52837-051

6. The discussion in the cumulative impacts section within the present draft OSTS PEIS lacks sufficient detail and analysis to make any determination of the cumulative impacts to wildlife resources resulting from oil shale development and the interplay between oil shale, natural gas, and other types of development occurring in the Piceance Basin. The section of the OSTS PEIS which analyzes cumulative impacts should be substantially expanded to include temporal and spatial boundaries outside the immediate defined project area in order to effectively address impacts to migratory wildlife.

52837-052

7. The analysis of cumulative impacts should include an assessment of the reasonable foreseeable development of commercial oil shale development in terms of the timing and distribution and size of oil shale production that will occur, including the maximum number of leases that could be in development at any one time and the maximum "footprint" of surface disturbance for any one operation. The assessment of cumulative impacts to wildlife should include an assessment of impacts to all wildlife species occurring within the most geologically prospective area of the Piceance Basin and also on lands within the Piceance Basin that will be subject to surface disturbance via other forms of mineral development and land uses. It should also be expanded to include impacts occurring on other lands outside the boundaries of the prospective area of oil shale development that contain populations of wildlife that utilize all or portions of the prospective area of oil shale development periodically throughout the year. The cumulative impacts analysis section of the OSTS PEIS should include: 52837-053
    a. an assessment of baseline wildlife data including an evaluation of the status or health of existing populations and how the various populations have been affected previously be other forms of disturbance (oil & gas development, roads, etc.);
    b. detail regarding the thresholds that will cause significant damage to various species;
    c. an inventory of all types of disturbance including oil shale development;
    d. an overlay of crucial habitats including existing migration corridors over the areas slated for commercial oil shale development;
    e. an assessment of the magnitude and extent of crucial habitat areas that will be eliminated as a result of oil shale development;
    f. an assessment of the magnitude and extent of crucial habitat areas that will be adversely affected; and
    g. the duration of time that wildlife populations will be affected.

Additional Issues That Should Be Addressed in the OSTS PEIS or in Subsequent NEPA Analyses

1. Range-wide and interstate conservation agreements and strategies exist for several species present within the Piceance Basin, including Colorado River cutthroat trout, flannelmouth sucker, bluehead sucker, roundtail chub, and greater sage-grouse. These agreements, and conservation actions recommended within them, should be incorporated and referenced in the OSTS PEIS and subsequent NEPA documents. 52837-054

2. Specific detail should be presented on how the landscape will be managed for multiple uses as well as diverse assemblages of wildlife species as required by NEPA. The OSTS PEIS should contain an evaluation of how industrialization and the accompanying urbanization through oil shale development will reduce the carrying capacity of the landscape. For example, where existing agricultural water rights are acquired to support oil shale development, existing irrigation-based agricultural uses of the land from which the water is acquired will be modified to support lower value dry land use of the lands and may result in a complete loss of agricultural benefits. The final OSTS PEIS and subsequent NEPA documents need to detail how these impacts to the carrying capacity of the landscape at a regional scale will directly and indirectly affect the wildlife 52837-055

populations of the region. The final OSTS PEIS needs to include detail how the "multiple uses" of the landscape will be maintained at a regional scale in light of oil shale lease availability and subsequent development. 52837-055 (cont.)

3. The OSTS PEIS contains very limited information and analysis of the feasibility of reclamation of commercial scale oil shale operations. Oil shale development coincident with oil and gas development will likely result in long-term surface disturbance and severely fragment wildlife habitat for extended periods. Additional information should be provided as to the types of habitat and vegetation that will likely not be re-established during final reclamation, those habitat types and vegetation that will be difficult to re-establish, and the length of time needed to successfully re-establish the habitats and vegetation that sustain resident and migratory populations of wildlife and the quality of these reclaimed areas for wildlife following final reclamation. The OSTS PEIS analyses should also include an assessment of the feasibility of reclaiming affected surface and groundwater resources that are used by wildlife within the Piceance Basin. 52837-056

4. The OSTS PEIS should include an assessment of the existence, location, and extent of noxious weed species and/or infestations within the Piceance Basin and the likelihood that they will become established more widely in the Basin as a result of widespread oil shale development. 52837-057

5. The OSTS PEIS should include a comprehensive and detailed analysis of the economic impact that changes in wildlife populations resulting from commercial oil shale development, along with oil and gas development, coal extraction and power plant generation, and supporting infrastructure, will have on local communities. Local communities in western Colorado rely heavily on hunting revenue. The short-term influx of energy development may offset the immediate economic impact that will result from loss of hunting revenues. However, as Colorado's history has shown, energy booms do not last forever, whereas the regional wildlife resource is renewable and provides a stable source of revenue to communities like Craig, Meeker, and Rifle. 52837-058

Research Cooperation Recommendation

Because the Piceance Basin holds such valuable energy reserves and also supports some of the richest wildlife habitat and most abundant wildlife resources in North America, CDOW has developed research proposals to evaluate methods to improve conservation of sage-grouse, mule deer, native plant communities, and the aquatic environments in the Piceance Basin as energy development proceeds. Determining how to extract energy reserves without negatively impacting wildlife populations is an essential test of the ability to promote responsible development. This information is a prerequisite to commercial oil shale development.

The key objectives of the research are to:

- Provide scientific, peer-reviewed, and experimentally-based research to test the effectiveness of mitigation strategies on mule deer and sage-grouse population performance and behavior in Colorado habitats.
- Avoid reliance on studies done in other states.

- Provide opportunities for evaluating creative mitigation solutions versus historically implemented timing regulations or fixed buffer zones.
- Provide a basis for developing consistent guidelines on a landscape level rather than an individual site basis.
- Reduce the need for individual energy companies to conduct independent studies on sage-grouse, mule deer, and appropriate habitat restoration.
- Evaluate potential solutions to allow for responsible energy development and still maintain Colorado's productive wildlife, natural resource values, and heritage.
- Obtain and evaluate baseline aquatic species and water quality information.

Many measures proposed to minimize and mitigate oil shale and natural gas development impacts on wildlife have not been tested. CDOW seeks to fill that knowledge gap. This project represents a comprehensive and coordinated effort to improve understanding of the effectiveness of energy development mitigation practices. CDOW is committing personnel and operational resources to the success of this project over the next decade. This project has been planned within BLM's White River Field Office. Support of this project by industry and land managers is very important. It may prove to be of critical importance in helping wildlife and land managers develop mechanisms to balance wildlife and their habitat requirements with energy development.

Summary

CDOW appreciates the opportunity to comment on this draft resource allocation OSTS PEIS pertaining to oil shale development in Colorado. The Piceance Basin and surrounding areas provide a significant wildlife resource and natural heritage to the people of Colorado and visitors to the state. CDOW understands the importance of the Piceance Basin's mineral resource. However, oil shale development is currently experimental, with poor understanding of the economic and technical aspects of development as well as the environmental impacts of development. For those reasons, CDOW advocates the "go slow" approach to oil shale development embodied in Alternative A.

CDOW is encouraged by the leasing approach taken in the OSTS PEIS, where detailed site-specific NEPA analysis will be required before parcels can be offered for commercial oil shale lease and before a site-specific plan of development is approved. The ability to evaluate impacts and to apply lease terms, stipulations, and mitigations once the development is fully understood provides substantially improved protection for wildlife and other resources on public lands eventually leased for commercial oil shale development. CDOW will participate in future BLM actions pertaining to oil shale leasing and development, including the Leasing NEPA stage and Plan of Operations stage, in order to ensure that adequate planning occurs and that measures for avoidance, minimization, and mitigation of impacts to wildlife are incorporated in future oil shale decisions. 52837-059

CDOW expects that oil shale leasing potential, commercial development, and cumulative impacts will be evaluated in great detail in the White River, Glenwood Springs and Grand Junction Resource Management Plan revisions that are currently in progress or that will begin soon as well as in this OSTS PEIS. Consideration of potential oil shale impacts along with those resulting from oil and gas development will be important for a complete analysis of impacts on 52837-060

wildlife and wildlife habitats and the possibility of maintaining desired future conditions. CDOW also strongly encourages BLM to engage in research, such as the Piceance Basin research project described earlier in this letter, to evaluate wildlife impacts and effective habitat mitigation. 52837-060 (cont.)

We encourage the BLM to strike a balance between the mineral and wildlife resources in the Piceance Basin by integrating these comments into a final Programmatic Environmental Impact Statement that contains adequate detail to assess the potential effects and impacts that the land allocation decisions being made will have on the other natural resources in the Piceance Basin and surrounding areas. Thank you for your consideration of these comments. We look forward to seeing them incorporated in the final OSTS PEIS.

3) Colorado Geological Survey

The Colorado Geological Survey (CGS) conducted a review of the BLM Draft Oil Shale and Tar Sands Resources Leasing Programmatic Environmental Impact Statement (PEIS) for content relevant to geologic resources including water. This review was conducted in order to determine whether the document is adequate to go forward with a decision to have a commercial leasing program for oil shale.

While the total content of the document is immense, it misses the mark in adequately addressing potential impacts to geologic resources by development of oil shale in Colorado and fails to clearly identify constraints under which leasing, exploration, and development would be allowed, particularly with respect to water and potentially damaging seismicity. 52837-061

The document purports that there will be no impact from simply changing management plans. However, dealing with oil shale leasing in individual management plans, rather than as a programmatic EIS that evaluates the cumulative effects of all resource development within the Piceance Basin, including oil shale; is a violation of the spirit and intent of Congress in directing that an EIS be performed for the programmatic leasing of commercial oil shale. Therefore, because a programmatic environmental impact statement was not performed for commercial oil shale leasing, the only acceptable alternative is Alternative A. 52837-062

Comments on Water Resources

Whereas the draft PEIS does use current estimates for water availability to Colorado from the Colorado River Basin under the Colorado River Compact, BLM really does not know how much water is available to apply to meet any new demands, regardless of the type of demand. A study, funded through SB07-122, is currently underway to evaluate water availability in the Colorado River Basin. The PEIS is inadequate without reliable data on Colorado River Basin water availability. 52837-063

The draft PEIS only addresses groundwater as it is tributary to the rivers. The document does not address "non-tributary" groundwater in the region, particularly as it relates to cumulative impacts from in situ processes within the groundwater aquifers. Non-tributary groundwater is important because its availability and use could affect the entire water demand 52837-064

equation in this region. The PEIS does not adequately address this aspect, and therefore, is inadequate in assessing cumulative impacts to water resources. 52837-064 (cont.)

There is too much uncertainty in what technologies might be used, and therefore, what the water demands associated with those technologies will be to make reasonable estimates of water demands for oil shale development under the three scenarios.

Both the Colorado River Basin and Yampa/White/Green Basin roundtables have embarked on needs assessments addressing M&I, agricultural, and non-consumptive needs within their watershed areas. Results from these needs assessments would also be of great value to evaluating potential cumulative impacts under different oil shale development scenarios. In addition, the Energy Development Water Needs Study, (funded through the statewide Water Supply Reserve Account) is underway and will address anticipated water needs associated with all energy development in the region. Without these assessments, the PEIS is inadequate to address cumulative impacts on water resources. 52837-065

Comment on Soil and Geologic Resources

The draft PEIS falls short in integrating cumulative impacts that might arise from oil shale development under the different scenarios. For example, additional power generation would be necessary to meet the demand at the thermo-electric in-situ facilities; however the draft PEIS does not appear to account for the increase in coal mining in the basin that would be required by the additional power plants to produce this energy. 52837-066

Comments on Hazardous Materials and Waste Management

Impacts of hazardous materials and waste management due to oil shale production cannot be differentiated between alternatives because significant data related to differing technologies, in particular in-situ oil shale processes, is yet to be generated. Without this type of data, the cumulative impacts for specific constituents of concern related to oil shale development in Colorado, such as mercury and arsenic among others, cannot be estimated. Therefore the PEIS is inadequate in allowing discrimination among the alternatives regarding hazardous materials and waste management. Alternative A is the only option in the absence of this data. 52837-067

Note: Constituent concentration units are not given in Table A-6. 52837-068

Discussion of 3.2.1.4- Piceance seismology

The draft PEIS is inadequate in terms of evaluating the earthquake risk that could have serious consequences for development in the Piceance Basin resulting from the issuance of rights to extract oil from the Green River Formation oil shale. The PEIS contains only one dismissive sentence on the seismic potential of the Piceance Basin. The seismicity section is inadequate to safely allow leasing from several standpoints: 52837-069

1. It does not address potential, induced seismicity from fluid injection near fault zones.

2. It does not address the seismogenic potential of Neogene faults in the area.

3. It does not address the probabilistic ground accelerations higher than 5% g in the USGS National Earthquake Hazard Maps, nor

4. It does not address deterministic ground accelerations of >50% g from a strong earthquake on the Dudley Graben fault.

a. Neogene faulting

Forty five years ago, there were no faults in Colorado that had been identified as being active during the Quaternary Period. Today, the catalog contains more than 90. And yet, many parts of Colorado have not been studied in detail for the extent and hazard of young faults, e.g. northwestern Colorado being one of the least studied areas of the state.

Ten, northwest-trending normal faults are shown on the Geologic Map of Colorado cutting Tertiary sediments of the Piceance Basin in the area of most prospective oil shale deposits. Several have prominent topographic expression that suggests a very young history with the potential of generating strong earthquakes. Their orientation and character show that they are Neogene in age and therefore should have been evaluated for potential earthquake hazards before any decisions to lease be made.

The Cimarron fault located at the southern end of the Piceance Basin, is a normal fault of identical attitude and has been shown to have Quaternary movement. The Cimarron fault has been assigned a Maximum Credible Earthquake of M 6.5.

52837-069 (cont.)

The Dudley Bluffs graben is in the heart of oil shale country. This fault is so youthful in appearance that a major geotechnical firm attributed it as the source of the Magnitude 6.6 earthquake that struck Colorado in 1882. Although that has been largely discredited, the recurrence interval for large earthquakes and the date of the most recent event on this fault has not been determined. If the fault is indeed active and if the mapped length of the fault ruptured in a single event, then the fault would generate a magnitude 6.7 event, with ground accelerations exceeding 50% g.

b. Induced Seismicity

Colorado is the world's premier location for induced earthquakes from liquid injection. The best known events were located at the Rocky Mountain Arsenal and were associated with fluid injection that triggered hundreds of earthquakes in the 1960s, twelve of which caused damage.

Two additional localities with extensive records of induced seismicity are in western Colorado in the Paradox Valley and on the north edge of the Piceance Basin at Rangely field. The potential for induced seismicity from injection of waste fluids including CO2 sequestration must be thoroughly investigated before any leasing decisions are made.

c. Probabilistic and Deterministic Ground Accelerations

The highest area of probabilistic ground accelerations in Colorado as shown on the 2002 USGS Earthquake Hazard Maps lies in the southern Piceance Basin. The PEIS correctly cites the 5% g accelerations from the 10% probability maps, but ignores the 20-30% g accelerations in the 2% probability map, and further ignores a >50% g from a deterministic event. 52837-069 (cont.)

The potential for damaging earthquakes in the Oil Shale province of Colorado needs much more study before any leasing decisions are made.

4) Division of Water Resources

The Draft PEIS does a good job of identifying potential physical impacts attributed to ground surface disturbance, water uses, wastewater disposal, alteration of hydrologic flow systems in surface water and groundwater, and the interactions between groundwater and surface water. However as detailed below, while the document includes what appears to be a comprehensive list of potential injury to water resources, it contains little discussion regarding the magnitude or mitigation of these impacts.

Because of the large openings created in underground mining operations, the hydrologic properties of the geologic material in the mine are permanently altered. Abandoned mine shafts, as well as partially refilled (by spent shale) mines, will enhance vertical and lateral groundwater movement in the mined area after dewatering ceases and groundwater levels are reestablished.

Groundwater may be extracted from aquifers for use as a resource or for dewatering to control groundwater inflow into a mine. Mine dewatering would be necessary where saturated conditions, including perched aquifers, are present. Dewatering would lower the potentiometric surfaces and/or water table of the aquifers that are intercepted by the surface mine. Because some deeper groundwater is the source for springs and seeps in the region, the lowering of the potentiometric surface would have the same effect as withdrawals from shallow, surficial aquifers, reducing or eliminating flow of the connected springs and seeps. Existing groundwater supply wells within the cones of depression also would have reduced yields or could be dewatered. 52837-070

Diversion or modification of some natural drainage, and the creation of new drainage near access roads and construction sites. In the case of natural drainage channels that are rerouted, modified, or diverted, the surface runoff would be altered accordingly, affecting downstream flow. Ground surface disturbance would degrade surface water quality and enhance streamflow in areas downstream of development sites, access roads, gravel pits, employer-provided housing, power plants, refinery plants, pump stations, substations, various support facilities, and along the ROWs of pipelines and electrical transmission lines.

In the case of the Shell's in situ conversion process (ICP) sites, fractures could also form in rocks across the entire freeze column. Increased porosity (and permeability) would also occur after kerogen, nahcolite, and other soluble minerals were removed from the rock. Such alteration of permeability would promote vertical as well as horizontal flow and transport of groundwater. The thermal fractures and fractures created by steam, water, or CO2 in the source rock could potentially enhance the groundwater flow within aquifers and potentially increase the vertical

hydraulic conductivities of aquitards after the retorted areas are refilled by groundwater. In other words, the flow system in the subsurface would be modified, as would be the groundwater discharge to the surface water bodies.

Dewatering operations prior to heating of the oil shale could lower the local groundwater potentiometric surface below overburden by as much as 1,600 ft (see Appendix A), and thus reduce groundwater discharge to local springs or streams that are hydraulically connected to the groundwater. Groundwater withdrawal to supply water for oil shale development would have a similar effect. The cone of groundwater depression could extend more than 2 miles from a dewatering well for one foot of drawdown. Existing groundwater supply wells within the cones of depression could have reduced groundwater yields or could be dewatered.

The retorted zone may become a groundwater discharge zone for the shallower aquifers and a groundwater recharge zone for the deeper aquifers.

The streamflow would be reduced in areas downstream of water intakes and could be increased downstream from discharge outfalls.

Withdrawal of water from surface water bodies would reduce streamflows.

Groundwater withdrawals from a shallow, surficial aquifer would produce a cone of depression and reduce groundwater discharge to connected surface water bodies. The withdrawal could reduce streamflows.

If a reservoir is constructed to accommodate the water demand of a project, the construction and the operation of the reservoir can impact the environment. The flow pattern downgradient of the reservoirs could be altered, depending on the release schedule of the reservoirs.

In Colorado, the potential underground mining sites are located in the vicinity of Piceance Creek, Yellow Creek, and East Fork Parachute Creek. If the oil shale mine is situated above the water level of one of those creeks, dewatering the aquifers above the oil shale in support of mining operations could reduce groundwater discharge to the creek. On the other hand, if the oil shale mine is situated below the water level of the creek, the dewatering operations on the aquifers above the oil shale could dewater the creek.

52837-070 (cont.)

The document provides an estimate of the amount of water necessary for oil shale development and water availability, although the authors are advised to revise the estimates based on the water availability estimates developed by Colorado's Statewide Water Supply Initiative (SWASI). There is very little analysis regarding the severity of the impacts.

52837-071

The report does not consider in detail the potential sources of water for oil shale development, fails to identify that existing water rights in the Colorado and White River drainages that are decreed for such use, and overlooks the potential administrative impacts on these drainages (i.e. alteration of call periods, curtailment of junior water rights, etc.). Note that these impacts may affect the Upper Colorado River Endangered Fish Recovery Program.

52837-072

The following are general comments that have appeared in prior reviews of the proposed oil shale demonstration projects:

The Applicant will need to document that the water used at the site was obtained from a legal source, or the water was diverted in priority under a water right decreed for such use or under an approved substitute water supply plan (see http://www.water.state.co.us/wateradmin/wateradmin.asp#swsp) or plan for augmentation.

The proposed operations may have potential impact on existing water rights near the project location. A plan for augmentation (or a State Engineer approved substitute water supply plan) will be required to replace all water depletions in time, place and amount such that no injury will occur to the vested water rights of others. The Applicant needs to demonstrate that the proposed project will not alter or impact the historic operation of existing vested water rights.

Water is commonly collected via surface water drainage collection and conveyance systems to manage drainage throughout mining sites. These systems typically consist of ditches, storm sewers, culverts, curbs, paving and storm water ponds. Stormwater runoff collected and stored out-of-priority, must be released to the stream system within 72 hours. This may require a discharge permit from CDPHE-WQCD. Otherwise, the operator will need to make replacements for evaporation through an approved substitute water supply plan (see http://www.water.state.co.us/wateradmin/wateradmin.asp#swsp) or plan for augmentation. 52837-073

Jurisdictional size dams must be approved by the State Engineer prior to construction. For non jurisdictional size dams, a Notice of Intent to Construct a Non-jurisdictional Water Impoundment Structure must be filed 10 days prior to construction. There structures are governed by CRS 37-87-101 through 125 and the Rules and Regulations for Dam Safety Construction 2CCR-402-1. (See http://www.water.state.co.us/damsafety/dams.asp)

All monitoring wells, injection wells, freeze wells and heater wells must be permitted as monitoring wells pursuant to CRS 37-92-602. All de-watering wells and/or water supply wells, or wells that will be converted to de-watering wells and/or water supply wells, must be permitted pursuant to CRS 37-90-137.[1] All water well construction must be in compliance with the Water Well Construction Rules 2CCR-402-2, which may require submittal and approval of a variance from the rules. All wells permitted by the State Engineer must be constructed by a water well construction contractor licensed by the State of Colorado.[2] All permanent pump installations and cistern installations shall be completed by only a pump installation contractor licensed by the State of Colorado or a private pump installer (CRS 37-91-102(12.5) and 37-91-109(2)). Pumping equipment may be installed in wells constructed and used solely for purposes of aquifer remediation (recovery well) or temporary dewatering of the aquifer (dewatering well) by authorized individuals or anyone directly employed by or under the supervision of an authorized individual. (See http://www.water.state.co.us/boe/)

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1 See http://www.water.state.co.us/groundwater/groundwater.asp.

2 See Board of Examiner Rules 2 CCR 402-14.

In conclusion, note that due to the complexities of the hydrogeologic systems and the lack of information regarding the impacts of such projects, which are currently in the research and development phase, the detail provided by the PEIS is insufficient to allow for a complete and accurate determination of the effects to water resources that will occur from a specific Oil Shale and/or Tar Sands project. As such, each project must be reviewed based upon its own merits. 52837-074

5) Colorado Water Conservation Board

The Colorado Water Conservation Board (CWCB) is the state agency charged with promoting, protecting, conserving and developing Colorado's water resources in order to secure the greatest utilization of those resources for the benefit of present and future generations, and to minimize the risk of flood damage and related economic losses. The CWCB, as the state water planning agency, has a long association with activities concerning the Colorado River Compact and the "Law of the River." The CWCB submits the following technical comments on the draft ***"Oil Shale and Tar Sand Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming Programmatic Environmental Impact Statement" (PEIS),*** which comments will be included as part of the State's overall comment package. The CWCB has had the opportunity to review previous comments concerning the use of water for oil shale development and reaffirms their support of those comments. However, we feel it necessary to expand on those comments in certain areas.

While the document provides an estimate of the amount of water necessary for oil shale development and a discussion of water availability, there remains a need for additional information and clarity. The authors are advised to review and revise the estimates of water availability and uses by the State of Colorado based on information contained in the recently released Phase I Report done pursuant to Colorado's Statewide Water Supply Initiative (SWSI) and to utilize that information to better analyze the severity of various impacts. Not only is the amount of land impacted important, but with respect to water related impacts the amount of water used to support various levels of production at any given point in time is important in order to determine the impact to Colorado's water allocations under the Colorado River and Upper Colorado River Compacts. It would be much more useful to move Table 3.4.1-5 and the discussion of it to Section "3.4.1.1 Water Allocation" and expand that discussion to show the impact to states allocations at various levels of oil shale production. Without this type of analysis, the impacts of oil shale development can not be gauged with any real understanding. 52837-075

The report while discussing water availability and some water features still does not adequately describe the water available to projects on the lands potentially leased. There needs to be a clear linkage between water available, the water remaining available to a state under the compacts, and some indication of the availability under various hydrologic conditions. It is not sufficient to simply say so much water is available at a given point without providing some broad estimate of the water available for appropriation under various levels of compact development. The maps would be more useful if there was better linkage to water supplies in addition to showing watersheds and features. The potential sources of water for oil shale development fail to identify and consider existing water rights in the Colorado and White River drainages that are decreed for such use. The PEIS also overlooks the potential administrative impacts on these 52837-076

drainages (i.e. alteration of call periods, curtailment of junior water rights, etc.) by not considering water rights. Furthermore, the PEIS utilizes a hydrologic determination of water available to the Upper Colorado River Basin of 6.0 million acre-feet. However, the PEIS needs to also acknowledge that the Upper Basin has a legal entitlement to 7.5 million acre-feet and footnotes to that affect need to be made to the appropriate tables in the PEIS as well. 52837-076 (cont.)

The CWCB is a participant in the Colorado River Salinity Control Program and while the discussion of the Program is very helpful it remains incomplete. The discussion does not identify any specific BLM salinity control projects in or near the potentially leased lands and whether or not those projects will be impacted or how they may be protected during development of an oil shale leasing program. While BMP's will be employed during a leasing program, there is no discussion or cross reference to those BMP's. There are also NPDES permitting requirements administered by the respective state health departments that must be complied with for salinity control and those policies should be referenced as part of this discussion. It is fine to state that these NPDES standards must be complied with, but additional discussion of those polices and BMP's jointly is necessary to understand the relationships and how help minimize impacts of oil shale development. 52837-077

Colorado is also a participant in the Upper Colorado River Endangered Fish Recovery Implementation Program (UCRIP). While the purpose of the UCRIP is to offset the impacts of water development while recovering the Colorado River endangered fish, the UCRIP nevertheless is concerned about the potential impacts of oil shale development on the UCRIP efforts to recover the fish and the progress the Program has made to date. In addition to the very extensive discussion of threatened and endangered species already included, the PEIS needs to include a brief discussion of the UCRIP and the BMP's that BLM may require to help insure the recovery efforts of the UCRIP are supported and not adversely impacted. 52837-078

The CWCB administers an Instream Flow Program and has some instream flow segments either on leased lands or on streams that may be impacted by oil shale development. Those stream segments have not been identified. Identifying and incorporating a list of impacted water rights along with consultations with the CWCB and BLM's instream flow coordinator will help identify the affected stream reaches and measures that can be taken to mitigate the impacts of oil shale development on those streams. 52837-079

The PEIS needs to discuss whether or not there are any increases in flood potential resulting from oil shale development and whether or not any water users, agricultural operations or other communities will be impacted. If impacts are identified, what measures will be taken to mitigate those impacts? 52837-080

STATE OF COLORADO

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of Public Health
and Environment

1) Water Quality Control Division

The PEIS contains insufficient data defining potential environmental impacts to justify moving forward with a lease program for 360,000 acres of land in Colorado for oil shale production. The BLM should commit to gathering baseline surface water and ground water quality data at locations in and around the RD&D project sites for appropriate parameters and monitor at those sites during the construction and operation of the RD&D projects to gather data that could be used to establish expected environmental impacts for a commercial-scale project. 52837-081

We are concerned that the approach (Executive Summary – Page 5) of generally describing impacts in this PEIS and the proposal to identify detailed environmental impacts on a lease-by-lease basis will not address cumulative impacts to the environment on a geographic scale. The PEIS proposes that each EIS for a lease would have to describe off-site impacts but does not provide a process to address the cumulative impact of all leases on environmental conditions. For example, the impact on a watershed of discharges from sources on multiple leases would not be captured in an EIS for a single lease. As well, if power or water would need to be imported to support an in-situ project, this proposed approach would have each project proponent evaluating environmental impacts due to their proposal (e.g. power transmission lines, water pipe and reservoirs, etc.) without assessing the cumulative impact of these actions. Furthermore, this approach would not encourage consolidation of these types of infrastructure which could reduce the overall environmental impact. Of note, the cumulative impacts section (6.2.5) does not provide information of any value to allay the concern that the lease-by-lease approach will result in a reasonable assessment of cumulative impacts. 52837-082

The PEIS does not address the impacts of additional growth on water and wastewater infrastructure in nearby communities nor does it address potential impacts of water withdrawals on flows upstream of wastewater facilities and the concomitant reduction in permits limits that might result. Similarly, detailed water supply projections would need to be compared to available stream flows to determine if there is a sufficient water supply. In order to address this issue, specific population growth projections would need to be made for all the potentially impacted communities. Then, the capacities of the water and wastewater infrastructure would need to be assessed to identify gaps. At that point, projections could be made about the cost and impact of the efforts that would be needed to fill the gaps. 52837-083

A more meaningful environmental impact analysis should include regional numeric ground water modeling, including predictive simulations of both quantity and quality impacts. 52837-084

Our involvement with other EIS investigations has included such modeling efforts, and it is not uncommon to assess regional groundwater and surface water impacts using numeric models. A regional numeric model to assess oil shale development impacts on surface and groundwater would allow some quantitative assessment of the development on the scale envisioned by BLM under their current preferred alternative. There is currently no attempt to quantitatively assess cumulative impacts to surface and groundwater resources within the PEIS. Without additional information regarding these impacts the only feasible alternative would be the no-action alternative. 52837-084 (cont.)

General comment on socioeconomic analysis: State and local governments will need to invest significant resources to support these efforts, much of which (such as providing permits, etc.) would need to occur prior to actual commercial operations. The proposed socioeconomic studies do not appear to address funding for these efforts. This analysis is in Chapter 4. There is still no discussion of the impact on State and local governments. State approval is needed prior to constructing a new water or wastewater treatment system or expanding existing systems. Thus, if a city or town would need to expand its drinking water and/or wastewater treatment systems to meet the demands of the oil shale project workforce, either for direct service or water hauling, then that entity would need state approval prior to undertaking construction. The analysis suggested above could be evaluated to determine the number of systems needing to be constructed and/or expanded and the extent of the expansion, to estimate the levels of state and local government impacts. 52837-085

The PEIS does not address that surface waters may also be used as drinking water supplies. Specifically, the PEIS should state that commercial development projects will be designed to avoid (if possible) or mitigate impacts to surface waters that are used as public water supplies. 52837-086

Section 7.4 does not list CDPHE as a cooperating agency. 52837-087

Water quality issues

On page 2-5, first paragraph, the Draft PEIS should state that any discharge of spent shale leachate into waters of the United States or waters of a state would require a National Pollutant Discharge Elimination System (NPDES) permit or the state equivalent. The discussion that follows that sentence on page 2-5 is irrelevant as any discharge to state waters would require a state-issued permit under Colorado law. 52837-088

On page 2-5, second paragraph, this section should note that Colorado regulations prohibit the cumulative discharge of one ton per day or more of salinity from a commonly owned development unless amounts greater than one ton per day are mitigated elsewhere. 52837-089

In Section 3.4.1.2 (page 3-60), the Draft PEIS seems to focus on salinity as the key water quality issue. Although salinity was discussed, we found no discussion of the potential for any contribution of selenium or other pollutants expected to be found in the native soils/formations to area waters. Selenium is a significant water quality issue in the Colorado River Basin and around Colorado in general. The Department is aware that, according to the USGS, the targeted oil shale rich layers are expected to be at least 6000' to 7000' above the Mancos shale which is 52837-090

the significant source of selenium. That being said, in addition to identifying and addressing the issue of other potentially naturally occurring contaminants, the PEIS should address other sources of selenium as well. 52837-090 (cont.)

In Section 3.4.1.3, addressing 303(d) listed water bodies does not address listed segments along the lower Colorado River. The current 303(d) list for the lower Colorado River includes 8 segments, and it is anticipated that the number of listed segments could easily double during the next listing cycle. The PEIS lacks any substantive discussion of potential ramifications of the proposed preferred alternative on 303(d) list water bodies. Until such analysis is conducted the only appropriate alternative is the no-action alternative. 52837-091

Section 4.5 describes potential impacts from nonpoint source runoff, but does not attempt to quantify any potential impacts, nominally due to mining exemptions from NPDES requirements. However, Colorado does not exempt any construction activity from stormwater discharge permits impacting areas larger than one acre. Construction associated with oil shale development will represent a significant cumulative impact, especially in light of the increase emphasis on sedimentation impairments to surface water. The PEIS inadequately address the nonpoint source sedimentation impacts of the preferred alternative, and therefore until such impacts can be quantified the no-action alternative represents the only viable option. 52837-092

In Section 4.5.1, the Draft PEIS indicates that runoff from surface disturbances related to the oil shale operations would be non-point sources. In fact, and disturbance of one acre or more during construction would require a point source stormwater permit. This error is repeated in section 4.5.1.1. 52837-093

Section 4.5.1.2 states that the drawdown associated with ground water withdrawals from the shallow aquifers will impact springs, seeps, and surface water flows. The PEIS fails to address the magnitude of this impact, nor address the potential cumulative affect on both water availability and water quality. Significant dewatering associated with several of the currently envisioned oil shale production technologies will impact the timing and long term availability of water within the basin. These cumulative impacts are currently not addressed under the preferred alternative, and need to be considered. Therefore only the no-action alternative is appropriate. 52837-094

In Section 4.5.1.3, second paragraph, the Draft PEIS incorrectly states "Since discharge of surface runoff at a mining site is exempted from NPDES permits, surface runoff not intercepted at these sites could create a nonpoint source of contaminants and degrade the water quality of downgradient surface water bodies." As a mining activity, runoff from the mine site would require a Colorado stormwater permit. 52837-095

Section 4.5.1.3 describes implementation of potential UIC disposal of poor quality water and states that EPA R8 is responsible for permitting. While this is true for Colorado, it is not necessarily true for Utah or Wyoming which have delegated UIC programs. Current Colorado ground water regulations also address several potential oil shale related ground water contaminants that would not be addressed through the Region 8 UIC permitting process. The 52837-096

PEIS does not address Colorado's independent authority to regulate potential ground water contamination not addressed under the Region 8's UIC implementation of the SDWA. 52837-096 (cont.)

Section 4.5.1.4 describes the potential of aquifer degradation due to alterations in the permeability and hydraulic conductivity of both aquifers and aquitards. This could have ramifications for contamination of ground water from pollutants remaining in after extraction activities at an in-situ operation are suspended and could lead to increased loadings, including TDS, in surface water bodies as well. Information to confirm that impacts from pollutant leaching due to increased porosity and permeability due to in-situ mining can be appropriately managed should be addressed at one or more RD&D projects before commercial development to determine whether ground water contamination will occur during production or after production when the aquifer in the zone of withdrawal becomes saturated. 52837-097

Section 4.5.2 assumes that power requirements for a traditional mining scenario would not increase over current energy consumption levels. One of the largest consumptive uses of both power and water under a traditional mining scenario is associated with dewatering. This assumption cannot be validated until realistic estimates of the amount of traditional mining that would occur can be made. The preferred alternative inadequately estimates the amount and associated cumulative impacts associated with potential oil shale development utilizing traditional mining methods. 52837-098

Section 6.1.2.4 states "The inability to predict specific locations for potential future commercial development and the lack of information regarding the type of technology that might be employed make it impossible to predict the specific impacts on water resources that could occur with commercial development. Quantification of such impacts would depend on the specific location of the lease area being developed, as well as the design of the project and associated infrastructure." Again, this underscores a the lack of information that should preclude moving forward with a selected alternative that proposes developing 360,000 acres of land in Colorado for oil shale production. 52837-099

Drinking water and source water protection

Page 2-4 line 5 should indicate that compliance with Colorado Primary Drinking Water Regulations is required. 52837-100

Page 2-4 lines 32 to 38 should indicate that compliance with state and local regulations and ordinances with respect to Source Water Protection is required. 52837-101

Appendix A Pages A-27 (beginning on line 36) and A-29 (beginning on line 4) describe two recovery techniques, solvent flooding and chemically assisted recovery, which may be of concern if used near water supply aquifers. The PEIS should state that one of the criteria used to select recovery technique would be water supply protection. 52837-102

Appendix A Pages A-69; A-71; A-72; A-72; A-78; all refer to "potable water" and the trucking or hauling of that water. Trucked or hauled water must meet the requirements of the Colorado Primary Drinking Water Regulations. 52837-103

Appendix D should recognize that Colorado has primacy for implementing the Safe Drinking Water Act in Colorado. This has impacts throughout the document. All systems meeting the definition of public water system must comply with Colorado Primary Drinking Water Regulations which includes water hauling and the need for design approval prior to constructing a new system or expanding existing systems. Thus, if a city or town would need to expand its drinking water treatment system to meet the demands of the oil shale project workforce, either for direct service or water hauling, then that entity would need design approval prior to undertaking construction. 52837-104

Table D-5 on page D-9 should refer to any of the Colorado regulations relating to groundwater or drinking water. Similarly, Tables D-12 and D-13 should specifically reference Colorado's regulations. 52837-105

In Appendix D there should be sections under D.2 ADDITIONAL INFORMATION REGARDING THE REGULATORY AND POLICY ENVIRONMENT addressing each of the tables (this was done for Air Quality – it needs to be done for all). 52837-106

The document refers vaguely to environmentally sensitive areas, but there does not seem to be specific approach to defining these areas or a method of selecting best management practices for sensitive areas (e.g.: around drinking water intakes, wells). Other questions come to mind like… will waste pits be allowed in environmental sensitive areas? This leads to question of how the BLM might incorporate locally driven source water protection plans in the potentially impacted areas and downstream. Is there a plan to develop a watershed protection plan with specific best management practices that will be implemented, enforced, and evaluated over the time frame of the project? The BLM's process to addressing local concerns and selecting Best Management Practices (BMPs) in environmentally sensitive areas should be clearly defined. 52837-107

In the mass volume of information provided, source water protection is mentioned once in section 2-4, but there is no mention of a process for planned coordination. It also indicates that … "If hazardous chemicals or materials are used during the construction or operation of a project that is located within a wellhead protection area, reporting or control measures **may** apply". This language is very weak and does not significantly address potential drinking water impacts. 52837-108

Table 2.2.3-1 indicates existing ACEC's Intersecting Oil Shale or Tar Sand Areas. There seems to be a fair amount of ACEC's in the oil shale areas, but no specific environmental plans for the ACEC areas. The document indicates it will be handled by the local BLM offices. Will a guidance document be prepared to assist these local offices? Will there be an effort to establish standardized BMP's? 52837-109

2) Air Pollution Control Division

Overarching Comments

The scope of this one document is huge and the format, style of the writing and organization of the document seems to reflect a "business as usual approach" by the BLM. This 52837-110

is disappointing, given the history of oil shale development in the west and the significance it now is taking on when considering it alongside the expansion of oil and gas and coal development. In our mind, a much more creative and informative approach should have been pursued. As a result of the document's size and organization, the interested reviewer must be highly motivated to seek out critical information so as to form conclusions. There is probably no way to easily remedy this at this stage but assessing this development proposal's impact over three states is not going to be easily accomplished with the document in its current form. 52837-110 (cont.)

There are a number of significant issues that Colorado must have comprehensive and clearly written information about for the state to make any recommendation about the further development of this resource. For example, there are a number of air quality concerns that are not addressed in this draft PEIS to any substantive degree. These include:

1. **Regional air quality concerns** – There are several areas of concern not described to any sufficient degree in the document. These include: impacts from Mercury emissions; regional and local ozone impacts (both health and secondary impacts); impacts on regional haze; impacts on nitrogen deposition; and the impacts of hazardous air pollutants. 52837-111

2. **Urban and small community air quality levels** – Currently the Denver metro area is developing a SIP revision for the 8-hour ozone NAAQS. The draft document should describe whether and how the proposed development will affect the attainment and maintenance of the ozone standard. Additionally, the state has been required to develop and submit air quality plans for PM10 in many western Colorado towns. The state, in cooperation with the western slope communities of Aspen, Steamboat Springs, Telluride and Pagosa Springs, has successfully developed and implemented air quality plans (SIPs) to address violation of the PM10 NAAQS. The draft document has not aqequately identified how these areas are going to maintain compliance with the NAAQS. 52837-112

3. **Community exposure to Hazardous Air Pollutants** – Colorado has been implementing a state-wide air toxics program for several years and high on our list of source categories of concern are categories related to energy development. The Colorado Air Quality Control Commission adopted significant additional control requirements on oil and gas drilling and extraction operations and we are concerned about the levels of benzene and other HAPs compounds on the residents of Colorado. The impact of these pollutants deserves greater attention in the draft PEIS. 52837-113

4. **Oil shale related electrical power generation development** – The draft PEIS identified the need for significant additional power generation capacity to drive the shale (and tar sands) extraction/refining process across the west. Then the BLM backs off this major issue entirely. Nowhere in the document is the role of alternative energy applications raised or discussed as an option in meeting the additional power needs for this proposal. Further, the impacts of energy development itself should receive more attention in this document. This is an issue of tremendous significance because of the impact of coal fired utility plants and their impact on air quality. The 52837-114

PEIS should identify this issue a support a no action alternative until the overall energy needs and howi t will be provided can be more specifically detailed

52837-114 (cont.)

5. **Cumulative impacts to air quality** – The overarching direction of the narrative in the air quality impacts section, Section 6.1.4.5 Air Quality Impacts, last paragraph, page 6-94 can only lead to the conclusion of supporting the No Action Alternative. This paragraph states that "Because of the need for project- and site-specific information, it is not possible to identify the nature and magnitude of regional air quality impacts of commercial oil shale development under either Alternative B or Alternative C." Given this, the only logical selection is Alternative A (No Action). This is the only proposed alternative that presents any substantial evidence that no significant, adverse direct or cumulative air quality impacts are likely to occur (analyzed under previous NEPA analyses for the six RD&D projects, which would proceed under Alternative A). The potential adverse impacts which could occur under Alternatives B and C may be unacceptable to Colorado and therefore these Alternatives can not be supported without further analysis and quantification of impacts. This again points to a need for a comprehensive dispersion modeling analysis that will address the near-field and far-field impacts of both the oil shale leasing program and cumulative sources (all existing and reasonably foreseeable non-oil shale/tar sands development sources, including existing and proposed oil and gas leasing on federal and private lands, and the expansion of electric utilities in the region). The current proposal lacks the comprehensive analysis necessary for Colorado to support either Alternative B or Alternative C.

52837-115

6. **Baseline monitoring for Colorado's Class I areas** – This is a critical concern. The Draft PEIS misses a great deal of information about baseline ambient air quality monitoring currently being conducted in Colorado. As part of the PEIS, the BLM needs to discuss recent air quality monitoring in the prospective oil shale areas, and to commit to future ambient monitoring needed to assess the baseline environmental conditions. In Colorado, monitoring is needed both in the Piceance Basin itself, and in the Flat Tops Wilderness, a sensitive area that is likely to be impacted by industry emissions.

   For the Flat Tops area, we note the following history, and future needs.

52837-116

   Recent AQRV Monitoring In and Near Flat Tops Wilderness Area
   Shell began baseline monitoring in the Ripple Creek Pass (RCP) area, north of the Flat Tops Wilderness Area (FTWA) in January 03. Shell is to be commended for contacting federal land managers, the Air Division, and the US Geological Survey back in 2002 for input about what parameters needed to be monitored and characterized. Some monitoring is scheduled to cease in March 08, while other work will continue.

   Flat Tops: What Should Be Monitored and Why

   1. Every-Third-Day chemically speciated fine particles with an IMPROVE II sampler at RCP (this was run at RCP from Jan 03 thru March 08). Purpose: Very

good indicator of type of particles in the air; excellent measure of visibility/haze; and very useful for trends as well as event/episode characterization.

2. Hourly Nephelometer at RCP (at RCP in past). Purpose: Very good high time resolution air quality indicator; very useful for better understanding of short-term episodes that are averaged over by the IMPROVE sampler.

3. Hourly meteorological parameters (at RCP in past): full suite of parameters necessary for AERMOD model. Purpose: Very useful as inputs to air quality modeling; very useful in understanding air flow trajectory and source area/receptor area relations on average and in episode characterizations.

4. Digital camera system, at least 3 images/day (9am, noon, 3pm). Purpose: Provides images of visual air quality; helps establish relationships between other quantitative measures and how the air actually looked; can help communicate with public and officials about haze/visibility concerns; can be used for trends over time.

5. Wet deposition by NADP/NDN (at RCP in past). Purpose: chemistry of precipitation (rain, snow etc) in bulk help understand sources, possible concerns about aquatic and terrestrial impacts of acids or metals, and is very useful tool to track changes in chemistry of wetfall over time. Dry Deposition is needed also.

52837-116 (cont.)

6. In Situ Snow Pack Sampling (in and near FTWA and RCP, this has been and continues to be done by USGS). Purpose: chemical characterization of what chemicals, acids, metals are actually accumulated in the snowpack is essential to understanding what the ecosystem sees during snowmelt; also provides helpful trend information over time. Near or in FTWA and further downwind is essential.

7. Mercury sampling in bulk sampler (MDN) and in snowpack as well as other accumulators (some work has been done with this and may continue in RCP and FTWA by USGS). Purpose: mercury has the potential to be released in oil shale development. It is a potent neuro-toxin that needs to be tracked and better understood. USGS is very interested in sampling additional lakes in FTWA to learn whether they vary in mercury amount and sensitivity. USGS also looking at fish samples and potentially phytoplankton samples to test for mercury in lakes.

8. Lake sampling (Ned Wilson lake in FTWA was sampled in recent past). Purpose: chemical characterization of what ends-up in actual aquatic ecosystem after emissions are released, transported, deposited etc and ultimately end-up in a lake/pond. These areas are the locations where fish, salamanders etc are impacted. Several lakes should be sampled long-term after a lake reconnaissance has been conducted in and around FTWA.

For the Piceance Basin and Areas Affected by Oil Shale Development:

9. Additional long-term baseline monitoring sites are needed in both rural areas and within potentially affected communities. The monitoring network should be designed to support all applicable regulatory programs. Sites should monitor meteorology and the concentrations of criteria pollutants, particularly sulfur dioxide (SO2), ozone (O3), oxides of nitrogen (NOx), PM2.5, PM10, and carbon monoxide (CO). Meteorological data collection should include 10 meter towers, taller towers, and profilers. Meteorological instrumentation and collection should be designed to meet the needs of air quality modeling systems. In addition, meteorological data should be collected for purposes of evaluating the performance of the meteorological models.

10. A TSP sampler, to analyze for lead and other metals, is also suggested. Mercury evels in air should be sampled, to establish pre-industry levels of this air toxic. Due to recent oil and gas development, concentrations of benzene, toluene, ethylbenzene and other petroleum-related air toxics need to be determined.

11. In addition, monitoring short-term field studies should be designed and conducted to support application of regional air quality modeling systems. Specifically, baseline data is needed to evaluate baseline model performance.

All monitoring protocols should be developed in consultation with CDPHE and subject matter experts. Data should be publically available."

52837-116 (cont.)

The Air division staff members have prepared additional general and specific comments in several areas. Critical comments relate to BLM commitments to address monitoring, dispersion modeling, and the emission impact from leasing and project development. These comments are included below.

1. In several areas, the Draft PEIS lacks a meaningful analysis that is necessary to make an informed decision about the appropriate scale of commercial oil shale development.

Comment/What is still needed
Until some or all of the Research Design and Development projects are underway and are able to provide information to inform a potential commercial leasing program the BLM will not have enough detailed information about the various processes to analyze the potential direct The Final PEIS must provide a clear direction to ensure that information that is currently lacking will be collected and evaluated. The BLM should indicate in the Final PEIS how a broad stakeholder process will be initiated.

52837-117

Comment/What is still needed	
Several sections of the document refer to additional project-specific NEPA analyses that would be performed, subject to public agency review and comment, prior to approval of commercial leasing programs. However, to ensure that cumulative impacts from commercial scale development are adequately addressed, the PEIS should emphasize and provide more detail regarding BLM commitment to performing a cumulative local and regional scale modeling assessment prior to issuing leases for commercial-scale development. The PEIS document should emphasize the importance of the stakeholder process and indicate that any decision by BLM to grant commercial leases would be made only after completion and acceptance of a comprehensive local and regional scale cumulative air quality modeling analyses that has been developed with input and approval from all affected federal, state, and local agencies.	52837-118
Volume 2, Section 4.1.6 Expansion of Electricity-Generating Capacity, page 4-13 The Draft PEIS indicates, "Additional power generation capacity would need to be developed in the region to support commercial oil shale development; however, at this time, definitive information about the power requirements of commercial oil shale development is not available." even though the power requirements are not known at this time. The Final PEIS should set the standards for what is expected of the lease applicants as far as mitigation expectations for their power generation needs. Most of the Western States have established Renewable Portfolio Standard Programs, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent over the next 20 years. This is the same time frame the BLM is considering in this Draft PEIS. The BLM should require that all leases obtain at least 20 percent of their energy needs from renewable energy. There are a number of rural residences in the area surrounding the proposed land use allocations that utilize renewable energy for nearly 100% of their energy needs.	52837-119
Volume 2, Section 4.6.2 Mitigation Measures (Air Quality), page 4-5-- The Draft PEIS is 1460 pages long and about one-half of a page has been devoted to providing 5 possible mitigation measures for air quality. The Final PEIS needs to include a better discussion of the mitigation measures indicated and provide more examples of possible mitigations that will be required of lease applicants. Offset programs should be included in the list of potential mitigation programs.	52837-120

Comment/What is still needed	
Volume 2, Section 6.1.4.5 Air Quality, page 6-94According to the Draft PEIS, "Thus, compared to Alternative B, the areas where local air quality could be affected by future commercial oil shale development under Alternative C would be reduced by 89% in Colorado, 22% in Utah, and 70% in Wyoming." Without more information about the potential direct, indirect and cumulative air quality impacts of the oil shale development in Colorado, we must support the alternative with less significant air quality impacts.	52837-121
Comments Regarding the Next Step (Amendment of Specific Resource Management Plans) This Oil Shale PEIS provides the basis to amend specific Bureau of Land Management Resource Management Plans (RMPs) in Colorado, Wyoming, and Utah. The Colorado Air Pollution Control Division believes that these resource management plans should determine which areas of each BLM region should, or should not, be available for an oil shale leasing program. Therefore, the RMPs should carefully address the issue of which land areas are least sensitive to oil shale activities, and make only those areas available to the program. This is particularly important, since the current Utah oil shale research, development, and demonstration lease can be potentially expanded to include an area that is eligible for Wild and Scenic River status. According to lines 32 – 38 on page 2-28, major portions of the five Colorado RD&D "preference" lease areas for expansion to commercial scale would not be allowed for leasing under the present Alternative C, because they involve some sensitive areas. Lease areas should be delineated in ways that avoid such impacts in the future.	52837-122
The Draft PEIS states "in situ processing does not involve mining, with limited waste material disposal , it does not permanently modify land surface topography and therefore produces fewer air pollutant emissions." This is not so. Though this phase produces fewer *PM* emissions, it produces other criteria and hazardous air pollutants. These pollutants are not even addressed in this paragraph.	52837-123
Volume 2, Sections 6.1.2.5, 6.1.3.5, 6.2.2.5, 6.2.3.5 Air Quality, pages 6-47, 6-71, 6-185, 6-211 These identical sections mention "[o]perational releases of certain hazardous air pollutants (such as benzene, toluene, formaldehyde, and diesel PM) could also affect onsite workers and nearby residences (if any are present), but these impacts would be localized to the immediate project location and subject to further analyses prior to implementation." No mention is made of mercury even though research indicates that mercury is a component released from oil shale with even more severe environmental and health impacts than the HAPs mentioned.	52837-124

Comment/What is still needed	
Volume 2, Section 6.1.1.5 Air Quality, pages 6-8 and 6-9 In this section, BLM states that "the EAs, prepared for the RD&D projects … predicted potential air quality impacts using atmospheric dispersion methods….The air quality analyses presented in the EAs indicate that no significant adverse direct, or cumulative air quality impacts are likely to occur." The air quality analyses presented in the EAs indicate that no significant adverse direct, or cumulative air quality impacts are likely to occur." These air quality analyses have already been deemed suspect and inadequate by the Division.	52837-125
Appendix A Volume 3, Table A-10 EGL RD&D Project Air Emissions Summary, page A-66 EGL's sulfur dioxide emissions are unreasonable high. There is no discussion of how these could be reduced. Can they mitigate this by scrubbing the boiler emissions or using a lower sulfur fuel? Further, there is no mention of VOC or hazardous air pollutants in their emission inventory yet these are inevitable.	52837-126
Volume 3, Table A-14 Phase 3 Estimated Emissions, page A-83 The estimate for hazardous air pollutants is 1.8% of VOC emissions This is an unreasonably low estimate and should be researched and verified in the Final EIS.	52837-127

2. The Draft PEIS has indicated that substantial adverse impacts to air quality are likely to occur.

Impact identified/Level of certainty in PEIS
The overarching direction of the narrative in the air quality impacts section, Section 6.1.4.5 Air Quality Impacts, last paragraph, page 6-94 can only lead to the conclusion of supporting the No Action Alternative. This paragraph states that "Because of the need for project- and site-specific information, it is not possible to identify the nature and magnitude of regional air quality impacts of commercial oil shale development under either Alternative B or Alternative C." Given this, the only logical selection is Alternative A (No Action). This is the only proposed alternative that presents any substantial evidence that no significant, adverse direct or cumulative air quality impacts are likely to occur (analyzed under previous NEPA analyses for the six RD&D projects, which would proceed under Alternative A). The potential adverse impacts which could occur under Alternatives B and C may be unacceptable to Colorado and therefore these Alternatives can not be supported without further analysis and quantification of impacts. This again points to a need for a comprehensive dispersion modeling analysis that will address the near-field and far-field impacts of both the oil shale leasing program and cumulative sources (all existing and reasonably foreseeable non-oil shale/tar sands development sources, including existing and proposed oil and gas leasing on federal and private lands, and the expansion of electric utilities in the region). The current proposal lacks the comprehensive analysis necessary for Colorado to support either Alternative B or Alternative C.
The overarching direction of the narrative in the air quality impacts section, Section 6.1.4.5 Air Quality Impacts, last paragraph, page 6-94 can only lead to the conclusion of supporting the No action alternative. This paragraph states that "Because of the need for project- and site-specific information, it is not possible to identify the nature and magnitude of regional air quality impacts of commercial oil shale development under either Alternative B or Alternative C." Given this, the only logical selection is Alternative A (No Action). This is the only proposed alternative that presents any substantial evidence that no significant, adverse direct or cumulative air quality impacts are likely to occur (analyzed under previous NEPA analyses for the six RD&D projects, which would proceed under Alternative A). The potential adverse impacts which could occur under Alternatives B and C may be unacceptable to Colorado and therefore these Alternatives can not be supported without further analysis and quantification of impacts. This again points to a need for a comprehensive dispersion modeling analysis that will address the near-field and far-field impacts of both the oil shale leasing program and cumulative sources (all existing and reasonably foreseeable non-oil shale/tar sands development sources, including existing and proposed oil and gas leasing on federal and private lands, and the expansion of electric utilities in the region). The current proposal lacks the comprehensive analysis necessary for Colorado to support either Alternative B or Alternative C.

52837-128

3. **Several information gaps must be filled to support an informed decision regarding the feasible and appropriate scope of commercial oil shale development at a later date, when more information is available.**

Area of concern/What is needed to make decision
Regional air quality concerns – There are several areas of concern not described to any sufficient degree in the document. These include: impacts from Mercury emissions; regional and local ozone impacts (both health and secondary impacts); impacts on regional haze; impacts on nitrogen deposition; and, the impacts of hazardous air pollutants. Until some or all of the Research Design and Development projects are underway and are able to provide information to inform a potential commercial leasing program, the BLM will not have enough detailed information about the various processes to analyze the potential direct, indirect, and cumulative environmental, cultural, and socioeconomic impacts of a commercial leasing program. The Final PEIS must provide a clear direction to ensure that information that is currently lacking will be collected and evaluated. The BLM should indicate in the Final PEIS how a broad stakeholder process will be initiated. This stakeholder group should be utilized to collect and evaluate the data that is needed to inform future site-specific EIS's and develop regulations for potential commercial leasing. The information provided in the Draft PEIS does not provide the State of Colorado and others enough information to determine whether commercial oil shale leasing program in Colorado could be developed without significant direct, indirect and cumulative environmental, cultural, and socioeconomic impacts.
Oil shale related electrical power generation development – The EIS identified the need for significant additional power generation capacity to drive the shale (and tar sands) extraction/refining process across the west. Nowhere in the document is the role of alternative energy applications raised or discussed as an option in meeting the additional power needs for this proposal. Further, the impacts of energy development itself should receive more attention in this document. The draft PEIS identified the need for significant additional power generation capacity to drive the shale (and tar sands) extraction/refining process across the west. Then the BLM backs off this major issue entirely. Nowhere in the document is the role of alternative energy applications raised or discussed as an option in meeting the additional power needs for this proposal. Further, the impacts of energy development itself should receive more attention in this document. This is an issue of tremendous significance because of the impact of coal fired utility plants and their impact on air quality. The PEIS should identify this issue a support a no action alternative until the overall energy needs and how it will be provided can be more specifically detailed

52837-129

52837-130

Area of concern/What is needed to make decision	
In the Draft PEIS Volume 1, Section 2.3.1, page 2-16, BLM commits to the following: "If and when applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and possible mitigation measures, as well as what level of development may be anticipated." Only if these analyses contain approved analysis techniques, and if the cumulative effects include the appropriate sources, will the information be useful for stakeholders to make a determination of the potential impacts of the commercial leasing program.	52837-131
Several sections of the document refer to additional project-specific NEPA analyses that would be performed, subject to public agency review and comment, prior to approval of commercial leasing programs. However, to ensure that cumulative impacts from commercial scale development are adequately addressed, the PEIS should Emphasize and provide more detail regarding BLM commitment to performing a cumulative local and regional scale modeling assessment prior to issuing leases for commercial-scale development. The PEIS document should emphasize the importance of the stakeholder process and indicate that any decision by BLM to grant commercial leases would be made only after completion and acceptance of a comprehensive local and regional scale cumulative air quality modeling analyses that has been developed with input and approval from all affected federal, state, and local agencies.	52837-132
Volume 1, Section 3.5.3 Air Quality, page 3-101: The Draft PEIS states, "On the basis of limited monitoring data, air quality in the region is expected to be good (i.e., concentration levels for most criteria pollutants [except O3] are well below their applicable standards)." There is limited monitoring data in the region and background values will be crucial in making informed decisions on site-specific proposed commercial leasing projects in the future. It is time for the BLM to participate with other state, local and federal agencies in developing and funding a monitoring program in the region. A state must have better understanding of the contribution of oil and gas development to air quality emission levels, especially ozone, is needed. Since much of the oil and gas development is occurring on BLM lands and will be in the same areas as those proposed for oil shale development, BLM should take the lead in providing background monitoring for this region. Therefore to pile on the oil shale issue on top of this makes a decision to proceed with amending the documents to facilitate leasing premature.	52837-133

4. Other areas of concern/comment

Topic- Climate change - Section 4.6.1 Common Impacts, last paragraph, page 4-48: The last two paragraphs of this section discuss greenhouse gas emissions (GHG) and potential impacts of direct emissions of GHG from oil shale activities. The statement is made that "increasing concentrations of GHG, however, are likely to accelerate the rate of climate change" but that "direct emissions of climate change air pollutants from oil shale development facilities are likely to be a small fraction of global emissions". Since the technology and potential emissions from future commercial oil shale development are virtually unknown, the last statement cannot be supported. Furthermore, even if these emissions will be a small fraction of global emissions, it is plausible that they will be a significant fraction of local and regional GHG emissions and may in fact be a significant contributor to climate warming on a regional level. Given the large uncertainty regarding commercial oil shale emissions and the implications for climate change, the "No Action" alternative should be supported until further evidence and analysis can be provided.	52837-134
Volume 1, Table ES-1, page ES-5 The Colorado Air Pollution Control Division cannot support an alternative that will make areas identified as Areas of Critical Environmental Concern (ACEC) available for commercial oil shale leasing.	52837-135
Page 2-51, Section 2.5.2, Lines 24-40. The No-Action Alternative. This section indicates that several comments received during the public scoping process "suggested that BLM should not move forward to establish commercial leasing programs for oil shale". The PEIS addresses these concerns by stating: "The no action alternatives for oil shale and tar sands (Alternatives A) effectively are no leasing alternatives. Any other alternatives in the PEIS that did not evaluate opening public lands for commercial leasing would not be consistent with the Energy Policy Act." Colorado notes that Alternative A includes the six research and development leases that currently exist on public lands. Therefore, the BLM has made public land leases available to the oil shale industry. The limited-size, developmental nature of these projects in appropriate, given that technology for processing oil shale is not mature. Colorado also notes that NEPA requires that for any contemplated action, the no-action alternative must be given serious consideration. Therefore, choosing the no-action alternative is feasible.	52837-136

Page 4-17, Section 4.2.1.1. Lines 17 –26. This section states: "A significant portion of the land within the most geologically prospective oil shale areas is already undergoing mineral development, particularly for the development of oil and gas resources. Commercial oil shale development, using any technology under consideration in this PEIS, is largely incompatible with other mineral development activities and will likely preclude these other activities while oil shale development and production are ongoing."
Page 6-3, Section 6.1.12, lines 32 – 39 indicates that, due to natural gas flammability, gas wells cannot be allowed near an in-situ oil shale site.
If a goal of the Congress was to increase US energy independence, via the development of fuel from oil shale, then Colorado asserts that this goal is already being met by the large expansion of traditional oil and gas activity in the area. Indeed, oil shale, an unproven technology, can interfere with established operations for extracting oil and gas.

52837-137

Volume 1, Section2.3.3.2, Alternative C, pages 2-28 and 2-32.
This section states,
"Although the White River and Book Cliffs RMPs allow commercial leasing for oil shale development, as shown in Figures 2.3.3.4, 2.3.3-5, and 2.3.3.-6, under Alternative C, portions of three of the five preference right lease areas for the Colorado RD&D leases are not available for application for commercial leasing. These include portions of the areas associated with the Chevron, EGL, and Shell Site 2 RD&D projects. For the other two Colorado RD&D projects, Shell Sites 1 and 3, none of the preference right lease areas coincide with the areas available for application for commercial leasing. As with Alternative B, for the OSEC RD&D project in Utah, portions of the area are not available for application for commercial leasing under Alternative C because they are excluded due to the presence of a potentially eligible WSR, Evacuation Creek (see Section 2.3.3.). Under the terms of the RD&D program, the federal government has a commitment to grant the RD&D companies leases for commercial development within the preference right lease areas, provided that all conditions of the program are met (See Section 1.4.1). As a result, all lands within the preference right lease areas would be available for issuance of commercial leases to the RD&D companies under Alternative C if they meet all conditions of the program. For commercial oil shale development to occur on lands excluded by Alternative C, the specific land use plans would need to be amended to consider the excluded area for potential leasing. The federal government is not under an obligation to grant leases for commercial development within these areas to any other applicants."

It is somewhat unclear as to what "under an obligation" means. In order for the RD&D areas to expand to their full preference areas, additional NEPA analyses are required, because the original Findings of No Significant Impacts addressed only the research scale of 160 acres, not the full-scale areas.

52837-138

Most of the Western States have established Renewable Portfolio Standard Programs, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent over the next 20 years. This is the same time frame the BLM is considering in this Draft PEIS. The BLM should require that all leases obtain at least 20 percent of their energy needs from renewable energy. There are a number of rural residences in the area surrounding the proposed land use allocations that utilize renewable energy for nearly 100% of their energy needs.

52837-139

3) Hazardous Materials and Waste Management Division

Oil shale development offers tremendous potential to supplement the nation's energy supplies. Colorado's goal is that commercial oil shale development be done right – in a manner that avoids unacceptable impacts on Colorado's land, water and wildlife resources, and minimizes and mitigates those adverse environmental and socioeconomic impacts that would result from such development. If planning for and implementation of oil shale development efforts are not done responsibly and thoughtfully in the first instance, we all lose. There is a greater risk that development will be delayed and that any development that does occur will have unacceptable impacts.

In view of the potentially substantial adverse environmental impacts that the PEIS acknowledges could result from commercial oil shale development, and the lack of factual information and analysis to meaningfully assess likely impacts at this time, the only defensible alternative is the "no action" alternative. The information currently presented provides no support for amending the current Resource Management Plans to "facilitate" or "make possible" commercial oil shale development. Just as it was inappropriate for the BLM to select a leasing alternative in the Preliminary Draft PEIS that the State reviewed in June due to substantial uncertainties, it is inappropriate for the agency to select any alternative here that would make lands available for applications for commercial lease. 52837-140

A Programmatic Environmental Impact Statement is intended to provide a meaningful analysis of the impacts of an overall program, in this case commercial oil shale development, prior to proceeding with project by project irretrievable commitments of resources. Because of the absence of information to allow a meaningful assessment of the potential impacts of commercial oil shale development at this time, the current draft PEIS does not satisfy its intended purpose. Therefore, BLM should commit to preparation of a supplemental PEIS at a later date, when adequate information is available, prior to proceeding with commercial oil shale leasing. 52837-141

While the BLM claims that it will study the cumulative impacts of proposed oil shale development when it receives an application for a commercial lease, the proper time to evaluate the regional cumulative impacts of new oil shale development is at the PEIS stage. The BLM is proposing to make hundreds of thousands of acre open to oil shale leasing, which could lead to multiple applications for large-scale oil shale projects. The BLM cannot analyze the cumulative impacts of this decision when performing NEPA review on a project-specific, piecemeal basis. 52837-142

Although BLM's plans regarding the development of commercial oil shale leasing regulations are unclear at this time, we note that the current PEIS also provides no meaningful analysis of environmental impacts that could form the basis to support the issuance of such regulations. For example, setting an appropriate royalty rate should be based on the feasibility and cost of oil shale development technology, the anticipated environmental impacts of such technology, and the costs of mitigation of such impacts. None of that information is included in this PEIS. 52837-143

Oil shale development will use untested technology with potential long-term negative impacts to Colorado's environment and communities. Colorado therefore supports the RD&D approach. Colorado will not support any commercialization plan that calls for commercial leasing, or for the promulgation of leasing regulations, prior to a meaningful evaluation of the RD&D projects. 52837-144

Specific Technical Comments:

Capacity: There is insufficient information to determine exactly what type or types of solid and/or hazardous waste treatment, storage and disposal facilities will be required for the RD&D projects. The information, such as geology, hydrology and engineering requirements may require substantial effort, resources and time. It is not clear that the resources and time were allocated, even in the RD&D process to define the needs and develop the capacity to support the RD&D project. This is important because all waste types and all waste volumes must be accounted for and managed appropriately. Without an understanding of the types and volumes of the wastes to be generated, it is not possible to determine the additional capacity for the waste storage, treatment and disposal facilities needed to support even the RD&D approach identified in #6 above. 52837-145

Regulatory Compliance: While this comment pertains to the later aspect of commercial oil shale development, there appears toe be a flaw even in the RD&D phase identified in element #6 above. Page 2-18 Table 2.3.2-1 under the Regulatory and Operational Constraints for Alternative A (960 acres for 6 RD&D projects) where it states "[N]ot applicable; no commercial leasing would occur under this alternative." The federal, state and local solid and hazardous waste statutes and regulations must be adhered to for RD&D projects, even if no commercial leasing occurs. This would be applicable to the generation, storage, treatment, transportation and ultimate disposal of solid and/or hazardous waste. 52837-146

4) Disease Control and Environmental Epidemiology Division

1. Current knowledge about in-situ and other oil shale (OS) technology is inadequate to fully assess associated environmental impacts or determine necessary mitigation measures. More detailed analysis of enhanced potential for community exposure and potential toxic impacts associated with different in-situ OS technologies is needed before an appropriate action alternative can be selected. Data gaps/inadequacies that need to be addressed to fully and adequately compare PEIS alternatives include: 52837-147

    - Development of a chemical inventory associated with different OS technologies and select alternatives;
    - Assessment of the toxic potential of various chemically-assisted OS technologies, based on detailed R&D findings;
    - Identification of metrics to establish baseline conditions;

- Identification of metrics to assess baseline risks, analyze trends over time, and generally improve the scientific accuracy of the analysis of degradation to the human environment and potential risk to health associated with specific OS technologies;

- Determination of areas of greatest community impact anticipated during the active production phase of commercial OS development projects, through identification of significant exposure pathways associated with specific technologies;

- Quantitative estimate of exposure dose and potential health impacts to the affected public, due to direct impacts from air, water or surface contamination, or from indirect exposure to contaminated media, such as use of contaminated surface or ground water for drinking water, agricultural, or recreational use;

- Identification of methods to assess cumulative effects, where additive impacts are anticipated. Additional environmental studies are needed to be able to assess incremental impacts within the common geographic area. Establish risk-based systems to support decisions about avoidance or mitigation of adverse impacts to public health, and to allow meaningful comparison of alternatives in the future.

52837-147 (cont.)

2. Development of the PEIS and leasing for commercial OS development should include sufficient detail to ensure stipulations for protection of resources and prevention or mitigation of impacts to the public that are consistent with other allowed energy uses, such as conventional oil and gas development.

52837-148

Specific Comments

Page 2-50, section 2.5.1, 2nd paragraph - The PEIS states that published information is too dated to accurately describe commercial OS technologies of the future. This section of the report concludes that, under conservative assumptions, impacts could be significant, but uncertainties are currently too great to develop reliable assumptions. While this conclusion seems reasonable, it also appears to indicate there is very little basis to compare action alternatives at this time. For example, the lack of detailed process information makes it impossible to determine the degree of degradation, potential for exposure, or significance of toxic impacts associated with chemical-specific technologies prior to availability of RD&D results. No information is available to fully assess the long-term potential for health impacts to the affected public due to direct or indirect exposure to contaminated media (i.e., use of contaminated groundwater or surface water for drinking water or agricultural use; recreational contact with degraded surface water).

52837-149

Page 4-2, Section 4 – The paragraph at the top of the page states that information presented in section 4 "does not necessarily define the range of possible technologies and issues that may develop". Alternative technologies are anticipated to have different potential to cause significant impacts, due to differences in associated process methods and chemicals, and unique fate and transport characteristics. It is not possible to assess the effects of activity or evaluate actual outcomes with the general information available. Therefore, conclusions about potential risks and impacts to public health associated with the various alternatives are highly uncertain.

52837-150

Table 4.14-2 - Estimated health risks for chemical exposure in workers fails to take into account systemic toxic effects, other than cancer, which may be associated with process chemicals, naturally-occurring pollutants, or other by-products of OS development. 52837-151

Section 6 – Impact assessments of the OS alternatives are generally lacking in discussions of the toxic potential of process chemicals and wastes, or potential routes for offsite exposure. Impacts would depend on factors such as location and quantity of leases and technology-specific differences in fate and transport of contaminants, but no detailed analysis is provided in the discussion of the alternatives. Benchmarks to compare toxic potential for different technologies, under different conditions, are not provided or discussed. These data gaps preclude a firm scientific basis for selection of the preferred alternative. 52837-152

5) Consumer Protection Division

Section 3.10, 4.10 and 4.11 Appendix I (Socioeconomic analysis methodology).

Statutory and regulatory oversight relative to the licensing, inspection, and enforcement specific to labor camps (man camps), retail food establishments, wholesale food firms, schools, childcare, mobile home parks, public accommodations (hotels/motels) and campgrounds are not addressed.

Inspections relative to mobile home parks, public accommodations and campgrounds are only done on a complaint basis. The increase in the number and use of these facilities will dictate the need for additional resources to respond to the associated complaints which are not addressed in the PEIS.

Labor camp housing is only inspected on a complaint basis, however the food service portion is addressed as indicated in the bullet below addressing retail food establishments. The labor camp regulations are the authority used to address man camps. The Labor Camp regulations were adopted in 1968 and a revision will be needed to address issues relative to man camps. 52837-153

Retail food establishments (restaurants, grocery stores, school cafeterias, food service to summer camps) whether associated with man camps or are community-based require minimally, plan review and approval, pre-opening inspections, licensing, routine inspections on a semi-annual basis, and any additional regulatory activity needed for non-compliance. If an establishment moves from one location to another, which may occur more frequently with man camps, the license is non-transferable and all the plan review, pre-opening, etc. must be repeated. All these activities are resource intensive and additional increases needed to perform these functions are not addressed in the PEIS.

Schools are inspected on an annual basis. Any new construction must go through the plan review submittal and approval process. There are no statutory or regulatory fees required to be paid for the plan review and inspection services. The increase in resources needed to perform these functions are not addressed in the PEIS.

Child care facilities are inspected on an annual basis. There are no regulatory or statutory fees assessed for these facilities. The increase in resources needed to perform these functions are not addressed in the PEIS.

6) CDPHE Climate Change

Commercial development of oil shale will result in carbon dioxide emissions from production, refining and transportation. Because production of oil from oil shale is expected to be energy intensive, commercial oil shale development will have significant greenhouse gas implications. Most of these emissions will come from processing plants as well as power plants that provide electricity to oil shale facilities. While some of these emissions could be reduced by capturing carbon dioxide for enhanced oil recovery in nearby oil production areas and geological sequestration of the carbon dioxide, section 2.5.3 indicates that such an evaluation should occur at the time of site-specific NEPA analysis of a specific plan of development. In addition, there will be indirect greenhouse gas emissions from population growth and the commensurate demand for infrastructure and services, none of which is addressed.

52837-166

While sections 3.5.1.2 and 4.6.1 offer brief tutorials on the science behind climate change and point out that increasing concentrations of greenhouse gas emissions are likely to accelerate the rate of climate change, section 4.6.1 goes on to merely conclude that "direct emissions of climate change air pollutants from oil shale development facilities are likely to be a small fraction of global emissions." It is irrelevant whether the emissions will be a small fraction of total global emissions. That is true for every major emitter. The PEIS offers no specificity or any analysis of the primary contributors of carbon dioxide emissions from oil shale development, such as the power plants needed to provide electricity to oil shale facilities. The PEIS is lacking a meaningful analysis of impacts from oil shale development to climate change and, accordingly, offers no substantive provisions on which to comment.

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General Comments:
The Colorado Department of Local Affairs evaluated the Colorado socioeconomic components of the "Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement". Due to the uncertainty of the oil shale development technology and resulting impacts the total socioeconomic effects of oil shale development cannot be properly evaluated. Making lands available through the resource management plans does not address the scope or magnitudes of oil shale development and its resulting socioeconomic impacts. 52837-154

Additionally, the assumptions of socioeconomic impacts provided in the PEIS are very narrow and do not provide the reader the broad spectrum of potential production realities. The assumptions are for **one operation** with three different types of technology at **one level of production**. Chapter 6 which compares the alternatives does not discuss how likely one operation versus 10 operations would be or how different levels of production would increase or decrease employment levels. 52837-155

Finally, after reviewing the Draft PEIS we strongly feel that the PEIS is missing important components. Below we have identified socioeconomic impacts that we feel have not been addressed or not addressed fully. These issues should be addressed prior to decisions being made.

Issue: A thorough, realistic, housing analysis must be included in the PEIS. The assumptions used concerning the use of "temporary" housing, especially the ability to locate buildable land and infrastructure for the housing and related structures seem very unrealistic. Additionally, a clearer discussion of the meaning of the concept "temporary", as it relates to workforce and housing, needs to be presented. One of the primary assumptions in Chapter 4.11 is that a high percentage of the workforce would be housed in temporary company housing. However, no data or research is presented that supports that assumption. The indirect and induced effect of the direct oil shale workers would create additional demand for housing that has not been adequately addressed in the PEIS. Affordable and attainable housing is a current concern in the ROI. Even a moderate spike in demand for housing will impact the entire community. 52837-156

Recommendation: Include a complete, realistic, housing impact analysis in the PEIS. Research and present information from other similar projects throughout the world. Identify the elements included in the concept of "temporary" as it relates to workforce and housing needs and present

information and research regarding this "temporary" assumption when the timeline appears longer term. Present information or support documents regarding workers choosing to live in temporary work camps when the time frame may be longer term. Present information on the strengths and threats of this "temporary" or not so temporary workforce. Include in the "mitigation measures" the need for a housing program that would engage the industry, the community, and where necessary the state or federal government. 52837-156 (cont.)

Issue: The baseline information related to housing vacancy is not a true picture. Vacant housing units can either be truly vacant and for sale or for rent, they can be "seasonal" housing or they can be second homes and not a primary residence. In this case and especially in this ROI it would be very wrong to assume that all vacant homes are available for use. Additionally, the BLM PEIS suggests that up to 15 % of the workforce would be accommodated in rental housing and motels - this seems unrealistic in a market with 1 - 3% vacancy rates. 52837-157

Recommendation:
Review the Census Bureau vacancy data to identify what percentage of the housing units could be considered available for a local workforce and are not a part of the growing second home cohort. Review and revise assumptions that the local housing market could absorb 15% of the workforce.

Issue: There is no baseline data presented for community infrastructure capacity. (water, sewer, water treatment, energy, schools, hospitals, emergency management etc.) Without this baseline data it is impossible to evaluate what the community infrastructure demands will be with oil shale development. For example, will population increases due to oil shale development push local infrastructure capacity over their current planning horizon and create major unforeseen costs to local governments.

Recommendation: A standard state and local government fiscal analysis is needed which would include: 52837-158

1) Community facility capacity over the period of analysis.
2) Baseline facility utilization rate (is there available capacity or a deficit?)
3) Project facility capacity requirements over time
4) Capital costs of facility capacity required by project impacts
5) Public revenues generates by the project
6) Discussion of the net of cost and revenues with regard to timing or jurisdictional mismatch.

Issue: One of the primary socioeconomic impacts resulting from population change is the impacts to local governments. Chapter 3 mentions that maintenance of county roads is the largest dollar impact to Rio Blanco County yet, in Chapter 4.11. there are no transportation/infrastructure costs included in the impact assessment. Additionally, other impacts to local governments are noted in terms of social disruptions (4.11.) and again, no costs are included in the analysis. 52837-159

Recommendation: A more complete set of costs to local governments needs to be included in the analysis to enable an adequate evaluation of the total costs of oil shale development.

Issue: A cumulative socioeconomic analysis must be performed when more information is available. It does make sense to evaluate the magnitude and extent of the impacts at the project level, which it states in Chapter 2.6, however it is just as important to look at the cumulative impacts across all projects. 52837-160

Issue: The socioeconomic data is not broken down by county in the PEIS and it is therefore impossible to accurately evaluate the impacts. The counties in the ROI in Colorado are very different from each other and their current conditions and policies will influence how the potential growth from oil shale development will impact their county and municipalities. The distribution of the socioeconomic impacts is very important to consider because it will impact resources and costs to the counties and municipalities differently. 52837-161

Recommendation: Break the region of influence down by state and county to estimate the economic impacts.

Issue: One of the key assumptions is that the local economy in each ROI would minimally provide materials, goods, and services related to the construction and operation of oil shale facilities therefore reducing the risk of local inflation. The Draft PEIS makes the assumption that 50% of the materials and labor for the construction of temporary employer-provided housing and housing provided by local communities would come from each ROI. However, the price inflation created both in the labor market as well as in the housing materials/construction market are not included in the socioeconomic analysis. Current impacts from gas development in the ROI show that local factor price inflation does occur especially in the labor market, housing and housing/construction materials. Chapter 3 of the PEIS discusses the historical and current factor price issues yet it is not included in Chapter 4 of the PEIS. 52837-162

Recommendation: The socioeconomic analysis must include a component that reflects the impact of the oil shale development on local prices in the labor, goods and services, and construction materials markets.

Issue: The total employment impact from a direct construction or direct operation job is not complete. The socioeconomic sections of the PEIS present the direct and indirect employment and income impacts using IMPLAN as the model source. We do not see that the work has included the "induced"effect, the spending of the income earned locally. Chapter 3 of the PEIS which presents the history of the prior oil shale boom and acknowledges that when the direct oil shale jobs pulled out that there were the indirect suppliers effected as well as the local businesses that provided services to the workers. The PEIS states in Chapter 3 "Exxon decided to close leaving 2100 oil shale workers and 7500 support workers unemployed. Our current research using IMPLAN shows that the employment multiplier for an oil and gas job is around 2.5 (each 1 direct oil and gas job creates an additional 1.5 indirect and induced jobs). The data in the PEIS shows the multiplier closer to 1.6 which is underestimating the true total impact of oil shale jobs by almost 100%. 52837-163

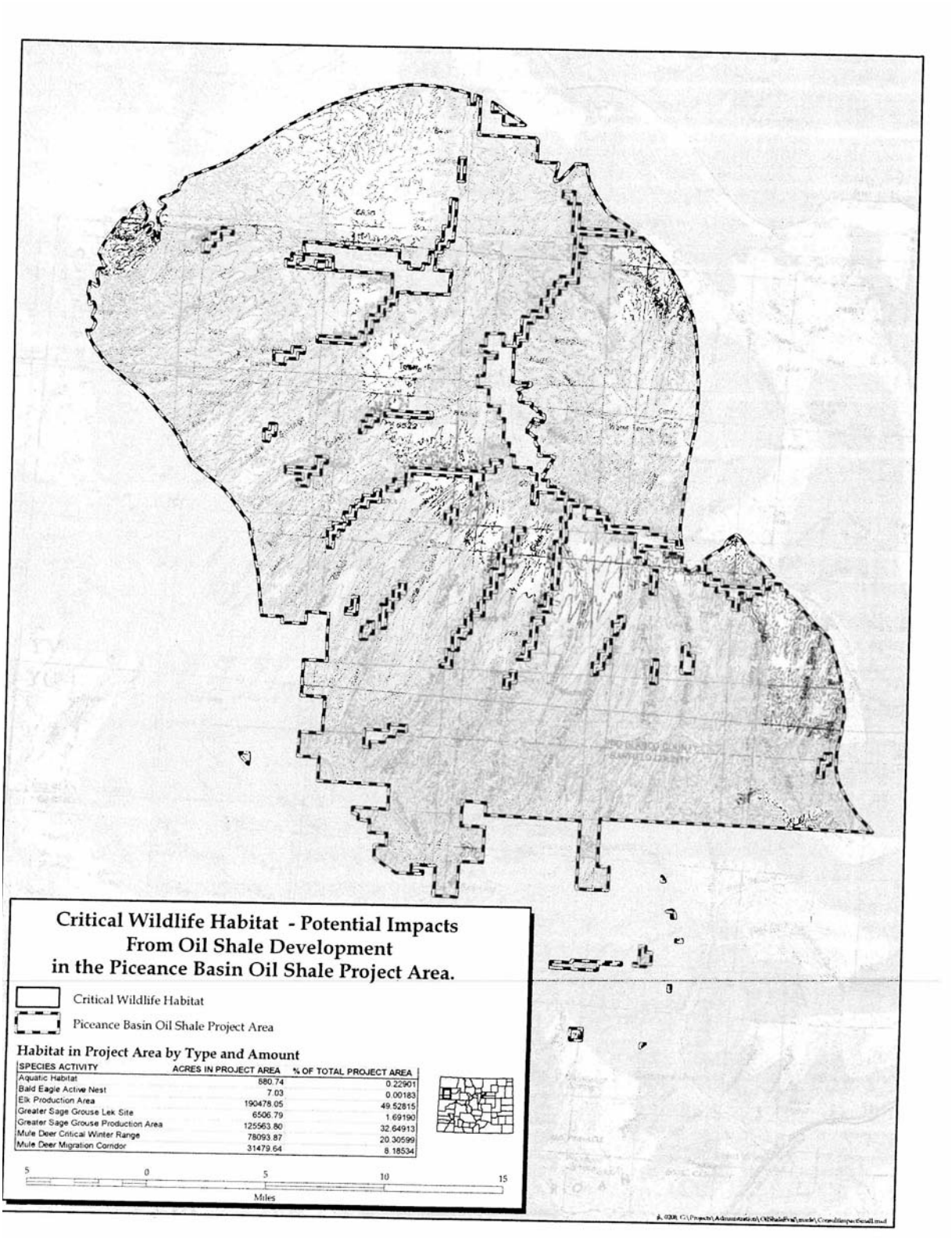
Recommendation: Review the work from IMPLAN and provide information supportive of the low multipliers being used or adjust the multiplier to acknowledge the true total impact.

Issue: The impact to an area from a large new project(s) is not just in the "Boom" but also in the risk of the "Bust". Chapter 3 of the PEIS describes the historic context of the oil shale "boom and bust" yet no attention is paid to the risk of a "bust" in the impact analysis sections or in terms of mitigation. The ROI suffered a 20 year recession due to the last oil shale boom/bust. 52837-164

Recommendation: The socioeconomic analysis must address the risk and impacts of a bust and what mitigation measures will be put in place to keep the ROI from suffering similar impacts from the previous oil shale boom and bust.

Issue: There is a cost to the loss of economic diversification which is related to the ability of a region to bounce back from either a bust or change in the business cycle. The socioeconomic analysis does discuss the impact of oil shale development on agriculture and on tourism in terms of total jobs and income but does not address how the loss of economic diversification increases the economic risks of the region. 52837-165

Recommendation: Address the risks and/or costs of the loss of economic diversification caused by oil shale development on tourism, agriculture or other industries.


Critical Wildlife Habitat - Potential Impacts
From Oil Shale Development
in the Piceance Basin Oil Shale Project Area.
Critical Wildlife Habitat
Piceance Basin Oil Shale Project Area
Habitat in Project Area by Type and Amount
SPECIES ACTIVITY | ACRES IN PROJECT AREA | % OF TOTAL PROJECT AREA
Aquatic Habitat | 880.74 | 0.22901
Bald Eagle Active Nest | 7.03 | 0.00183
Elk Production Area | 190478.05 | 49.52815
Greater Sage Grouse Lek Site | 6506.79 | 1.69190
Greater Sage Grouse Production Area | 125563.80 | 32.64913
Mule Deer Critical Winter Range | 78093.87 | 20.30599
Mule Deer Migration Corridor | 31479.64 | 8.18534
5 0 5 10 15
Miles

Responses for Document 52837

52837-001: Pursuant to Congress's mandate in Section 369 of the Energy Policy Act of 2005, the original intent of the PEIS was to amend 12 existing BLM land use plans to support commercial oil shale and tar sands leasing. As preparation of the PEIS proceeded, and in consultation with BLM's cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the decision to offer specific parcels for lease was dropped from consideration in the PEIS. To still be responsive to Congress' direction, the focus of the PEIS was changed to only identify public lands to be opened or closed to application for commercial oil shale and tar sands leasing.

Nevertheless, there is sufficient information at the programmatic level to make a reasoned choice among the alternatives when considering lands open or closed for consideration of commercial leasing. The PEIS analyzes the environmental consequences of this allocation decision in sufficient detail for the decision maker to choose which lands would be available for further consideration for leasing. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development nor do they create any development rights. When applications to lease are received and additional information becomes available, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and possible mitigation measures, as well as what level of development may be anticipated.

52837-002: The BLM initiated the RD&D leasing process to provide important information that can be used as the BLM works with communities, states, and other federal agencies to develop strategies for managing any environmental effects and enhancing communities' ability to support the orderly development of the oil shale resource. The alternatives within the PEIS do not alter the intent of the RD&D program. Under each alternative, the RD&D lessees would continue their efforts to prove their oil shale technology and gather additional technical and environmental information. In Section 369 of the Energy Policy Act of 2005, Congress authorized a commercial leasing program for oil shale in addition to the RD&D program. Additional information about environmental impacts from commercial oil shale operations would be required before the BLM would issue commercial oil shale leases or approve plans of development.

52837-003: This PEIS is a programmatic-level document analyzing land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. The BLM believes there currently is sufficient information at the programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing.

The PEIS presents, for the purposes of analysis, a cumulative analysis based on the nature and scope of the proposed action and on available nonspeculative information. It provides a summary of the extensive ongoing activities in the Piceance Basin and elsewhere in the study area, and considers these in its overview of potential cumulative impacts (see Sections 6.1.5 and 6.2.5). The PEIS analyzes the environmental consequence of an allocation decision that does not commit any resources or grant any lease rights.

Please see also the response to Comment 52837-018.

52837-004: The affected environment of the PEIS covers portions of three states and nine separate land use plans. It is important to note that the carrying capacity thresholds included in the WRFO RMP are unique to that plan. There are no comparable management prescriptions in the other eight land use plans. These thresholds are based on existing statutory requirements or site-specific analysis and are only applicable to oil shale. Prior to changing the proposed action to an allocation decision, the intent was to review and subsequently revise or remove the thresholds based on new information since 1989 when the thresholds were first established. However, after the purpose of the PEIS was changed from providing opportunities for commercial leasing to making only land use allocations, the revision or removal of the thresholds was no longer applicable. The PEIS does not modify or eliminate the carrying capacity thresholds for the protection of communities, the environment, and wildlife resources contained in the WRFO RMP. The statement regarding the WRFO RMP land use plan amendment, which would remove the thresholds, as described on page C-9 of the Draft PEIS, should have been deleted prior to the release of the draft. Any decisions concerning the application of thresholds will be made at the site-specific level where detailed information relevant to that determination can be made and where interagency consultation can be accomplished.

52837-005: The promulgation of regulations on environmental protection standards, setting royalty rates and addressing bonding, establishing standards for diligent development, and determining the allowable size of leases, are outside the scope of the PEIS.

52837-006: The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands within Colorado without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the State, local communities, and the public throughout the NEPA processes. The Energy Policy

Act of 2005 requires the BLM to finalize this PEIS, knowing that results from the RD&D program would probably not be available for inclusion in this document. It is not necessary to await the results from the RD&D program prior to amending the land use plans under analysis in this PEIS.

As noted in the response to Comment 52837-005, the promulgation of regulations is outside the scope of the PEIS.

52837-007: The BLM acknowledges the commentor's preference for Alternative A.

52837-008: The BLM does recognize that additional NEPA analysis will be required and is committed to preparing the appropriate level of analysis prior to the issuance of any oil shale lease. (See page 2-19 of the Draft PEIS for the description of additional NEPA requirements.) A supplemental EIS as defined under the CEQ regulations, 40 CFR 1502.9, however, would not be appropriate for such additional NEPA analysis. This is because the nature and scope of the proposed action (i.e., leasing) will be different from the plan amendment action analyzed in the PEIS. Supplemental EISs are prepared when the agency makes substantial changes to a proposed action analyzed in an EIS or when there are significant new circumstances or information bearing on a proposed action analyzed in an EIS. Supplemental analyses focus on only those parts of the EIS that require updating before a decision on that proposed action is actually made. Since leasing will be an entirely different decision, a new NEPA analysis will be required. It is inappropriate to speculate at this stage whether such NEPA analysis will be programmatic in nature.

This new NEPA analysis will analyze whether to offer for lease parcels of land for commercial oil shale exploration and development and under what conditions or stipulations. The analysis will also contain any new information or circumstances relevant to the technology, the affected environment, and any associated environmental consequences. This information may be a consequence of research on the RD&D leases or a result of industry performing research or studies on nonfederal lands.

As required by NEPA, all subsequent NEPA documents will analyze the cumulative effects from other reasonably foreseeable future actions. The scope and nature of the specific proposed action will drive the type of NEPA analysis the BLM performs. As required by NEPA, the cumulative effects analysis would consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) federal and nonfederal actions, taking into account the relationship between the proposed action and these reasonably foreseeable actions.

The affected environment of the action could vary greatly from a large regional area to a small discrete area. The scope of the analysis in the NEPA document would be dependent upon the number of applications received and the type and

size of operations proposed by the applicant(s). This could result in a statewide, regional, basin-wide, or site-specific impact analysis. Overall, the geographic extent of the analysis would be limited to those areas that could experience a change in the pattern of land use as a consequence of a direct impact or other induced effects on the natural resources. The nature of the action can also vary greatly based on the type of technology or mining method. Another critical factor would be the type of infrastructure needed to support the operation, in particular, the source of electrical power.

Hypothetically, the proposal in subsequent NEPA documents could offer for commercial lease (1) only a limited number of parcels, (2) parcels located in a geologic basin, or (3) parcels located throughout a state. Estimated oil shale exploration and development activities assumed to occur as a result of issuing the leases would be based on actual applications; therefore, analyses of proposed operations, hypothetical development scenarios, and an RFDS could be developed. Depending on the information included in the applications, technologies whose impacts would be analyzed could include any or all of underground and surface mining with surface retort operations and/or in situ operations.

Based on the nature of the proposed action, existing sources of electrical power may be sufficient to power the operation, or electrical power may need to be generated on lease using either conventional energy sources like natural gas or renewable energy sources like wind or solar. A third hypothetical analysis may include the expansion of existing power plants or the construction of additional power plants (coal, gas, nuclear). In each case, the scope of the NEPA analysis would be limited to the extent of the direct and indirect effects from activities described in an RFDS.

For example, if the proposed action were to lease three tracts in Utah using underground mining technology only, the scope and scale of the analysis would vary from that which would be performed if the proposed action were to lease several parcels in all three states using a variety of technologies. The geographic extent of analysis for a leasing decision is based on the extent of the potentially affected resource(s). In the first instance, the NEPA analysis would most likely not be a programmatic EIS but would define the area subject to analysis as the area bounded by the three leases. The analysis may not necessarily include an analysis of building additional power plants (dependent on whether the additional mines could pull power off the existing grid or not). In the second instance, it may be appropriate for the BLM to perform a regional NEPA analysis that would look at leasing in all three states and would include an analysis of the power plants (coal, gas, nuclear) as well as refinery capacity that might be necessary for any development to occur.

In both instances, the NEPA analysis would be limited to the extent of effects from activities described in an RFDS. While the proposed leasing area may be the

three Utah tracts, effects on some resources can be extensive, going beyond the boundaries of the proposed leasing area and determined by the distance over which effects remain significant (e.g., effects on air quality or effects on an entire watershed), while the effects on other resources remain within the leasing area boundary and are geographically limited by the resource itself (e.g., a specific species of threatened and endangered plant or a specific culturally significant feature). The impact zones of particular resources may be superimposed or may overlap only in part. All relevant effects, including those that extend outside the project, or even, in some cases, the planning area where the project is located, must be evaluated and considered in the leasing decision that is made for the planning area.

Thus, while the BLM is committed to performing NEPA analyses prior to leasing, we cannot commit to a certain type of NEPA analysis (regional, planning area, or local). The proposed action will drive what analysis must be performed to comply with the requirements of NEPA.

52837-009: Please see Comment 52837-001 above for the response regarding land use allocations.

Regarding regulatory issues, those are being considered in a separate rule-making process and are outside the scope of the PEIS.

52837-010: The comment contains a summary of issues identified in the technical sections of the State's comment letter. Responses to the individual agency technical comments are provided later in this response, but it is important to note that many of the issues cannot be addressed without reference to site-specific locations and conditions. Additionally, many of the comments address compliance with existing law and regulation. This PEIS states repeatedly that lessees will be required to comply with applicable local, state, and federal laws and regulations. The specific methods of compliance will be established by the appropriate regulatory authorities when a specific proposal can be evaluated against those legal and regulatory requirements.

As described in the response to Comment 52837-001, the BLM has determined that there is sufficient information to support the land allocation decisions proposed in the PEIS. The local conditions identified in the State's comment summary will be included in the NEPA analysis that will accompany future site-specific leasing and/or development applications if those conditions are present. Note also that activities occurring on nonfederal lands, though at times foreseeable, are usually beyond the authority of the BLM to regulate. The BLM will welcome the participation of local, state, and other federal agencies in the NEPA processes for those future decisions.

52837-011: Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sand resources among other

unconventional fuels in an environmentally sound manner. As required by that Act, the BLM initiated this PEIS intending to provide the environmental analysis for issuance of commercial leases that would convey development rights to lease holders. As discussed in the Draft PEIS, because of various uncertainties regarding location of developments, technologies to be employed, and the lack of knowledge of specific impacts on various resources, the BLM decided not to analyze the environmental impacts of issuing particular leases at this time and instead decided to analyze amendments of land use plans. Amending those plans is necessary, but not sufficient, to proceed to commercial development of federal oil shale resources.

Thus, this PEIS: (1) identifies the most geologically prospective oil shale resources on public lands in Colorado, Utah, and Wyoming; (2) supports amendment of certain land use plans to identify areas as available for application for commercial leasing in the future; (3) supports amendment of certain land use plans to identify areas as off-limits to application for commercial leasing in the future; (4) supports amendment of land use plans to specify that the BLM will consider and give priority to the use of land exchanges to facilitate oil shale development; and (5) discloses what is known about oil shale development as well as what information and data must be obtained in order to be able to complete the NEPA analysis necessary to lease. This PEIS clarifies, to the extent possible, how potential oil shale development could proceed on public lands and stipulates that site-specific NEPA analysis will be required prior to leasing and development. This PEIS, therefore, facilitates subsequent environmental analysis but it does not convey any lease or development rights on public lands. For that reason, and coupled with the requirements for subsequent site-specific NEPA analysis prior to leasing and development, the BLM has determined that, other than potential impacts to property values, there will be no impact on the environment as a result of these allocation (land use plan amendment) decisions.

The PEIS, while not exhaustive in its identification of potential impacts of commercial development, has disclosed potential impacts of oil shale development based primarily on BLM experiences with surface-disturbing activities as a result of other types of mineral development, such as coal mining and oil and gas development. We cannot say for certain that those would be the impacts from commercial oil shale or tar sands development, but we can say, based on our experience with other types of mineral development, that those type impacts may occur. The result is that this PEIS fulfills three purposes: (1) it provides sufficient information for the decision maker to make a reasoned choice among the alternatives as to which lands should be open or closed to oil shale leasing; (2) it addresses additional information needed by industry, government, and the public to facilitate future environmental analysis of leasing and development actions; and (3) it allows operators to compare environmental impacts of their proposed operations with those identified in the PEIS and to include proposed mitigation measures (although not necessarily those potential mitigation measures discussed in the PEIS) as part of their proposed actions. It

puts operators on notice that development of oil shale can only occur if it is done in an environmentally acceptable manner. It also reiterates the obvious requirements that any development will have to comply with existing laws and regulations regarding protection of the natural, social, and cultural environment.

The Rand Corporation testimony cited in the comment—that is, that commercial development will not occur for some time—is consistent with statements in the press and those heard during public open house meetings on the Draft PEIS. Industry is proceeding cautiously, which underscores the point that Rand was making; however, that commentary alone does not obviate the need for BLM to analyze the environmental impacts of amending land use plans to allow or to prevent leasing of oil shale and tar sands. Industry advocates for certainty about what a new government program will look like before it will invest several million dollars in development projects. The PEIS, along with oil shale regulations (such as those proposed separately by the BLM), would be the foundation for that program.

Finally, in the Energy Policy Act of 2005, Congress set a deadline for the BLM to complete this PEIS. That deadline has been exceeded, but that does not allow the BLM to postpone this PEIS until new information becomes available or until the industry is ready to invest in commercial operations.

52837-012: The PEIS analyzes the environmental consequences of proposed allocation decisions in sufficient detail for the decision maker to choose which lands would be available within the most geologically prospective areas for further consideration for leasing. The proposed allocations do not authorize the immediate leasing of lands for commercial development nor do they create any development rights. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. This future analysis will be done in the context of ongoing and anticipated future development of other resources within the area of influence of any proposed oil shale lease.

52837-013: There is a substantial amount of nonfederal land in the study area (see discussion in Section 3.1); however, the scale and timing of potential future oil shale and tar sands development on these lands, as well as the technologies that would be used for development, are highly speculative at this time. Text has been added in Sections 6.1.5 and 6.2.5 to clarify that future levels of commercial oil shale and tar sands development (both on public and private lands) are unknown.

As stated in Sections 6.1.5 and 6.2.5 of the PEIS, for the purposes of analysis, the cumulative impacts assessment looks at the incremental impacts of a single oil shale facility and a single tar sands facility, recognizing that there may be more than one of each type of these facilities brought into operation during the study period. Additionally, for the general cumulative analysis conducted for this PEIS,

the impacts of potential development on nonfederal lands were included by assuming that the impacts of oil shale or tar sands facilities on nonfederal lands would be similar to the impacts of such facilities on federal lands (see text added in Sections 6.1.5.3 and 6.2.5.3). Therefore, the cumulative analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decision and the uncertainty of oil shale and tar sands development on private lands.

A more specific analysis of cumulative impacts of facilities on nonfederal lands in conjunction with impacts from facilities on federal lands may be conducted at a future step in the assessment process, when an RFDS for oil shale development would be included. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. An RFDS at a future step in the assessment process would be based on a clear set of supportable assumptions associated with a leasing or development proposed action.

52837-014: As stated in the Energy Policy Act of 2005, the development of oil shale, tar sands, and other strategic unconventional fuels for research and commercial development should be conducted in an environmentally sound manner using practices that minimize impacts. The BLM believes that analyzing an allocation decision provides the opportunity to build on scientific, governmental, or industry research in order to analyze, in a general way, the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale exploration and development, further analysis will be carried out and documented in accordance with NEPA to support any decisions in this regard. That NEPA analysis will evaluate the environmental impacts of the oil shale exploration and development and develop specific mitigation measures to mitigate or eliminate the identified impacts. The BLM believes that such a phased approach ensures that commercial oil shale development programs both meet the intent of Congress and take advantage of the best available practices to minimize impacts, and that state, local communities, and the public have the opportunity to participate in the process. While uncertainty is an inherent part of planning in accordance with FLPMA's multiple-use mandate, and delays are possible in bringing any new resource into commercial development, the BLM manages public lands in compliance with the FLPMA principles of sustained yield and multiple use, to protect the public lands, and to provide for domestic sources of minerals.

52837-015: With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development of this resource, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. After beginning the analysis of a leasing program, and in

consultation with cooperating agencies, the PEIS was modified from a leasing document to one analyzing the impacts of an allocation decision, creating a "staged" or "phased" approach to an oil shale program. This provides an opportunity to build on scientific, governmental, or industry research, including findings from the existing RD&D leases. Any new information and/or circumstances will be taken into consideration in the preparation of future NEPA analysis. Future analysis will consider a full range of alternatives, as well as specific mitigation measures, such as BMPs or stipulations to avoid or mitigate short-term or long-term adverse impacts to Colorado's environment, public safety, wildlife, and local communities.

52837-016: The CEQ regulations at 40 CFR 1502.22 require an agency to disclose whether there is "incomplete or unavailable information" and to seek to acquire that information if it is "relevant to reasonably foreseeable significant adverse impacts" and is "essential to a reasoned choice among alternatives." The purpose of the provision is to advance decision making even in the absence of complete information regarding environmental effects associated with the proposed action. Agencies are required to comply with this provision when evaluating "reasonably foreseeable significant adverse effects."

The PEIS proposed action is to amend land use plans thereby allowing certain lands to be considered for future leasing. The decision does nothing more than remove the administrative barrier to BLM considering any application for leasing for some lands, while leaving other lands unavailable for leasing. The amendment does not commit any resources or grant any lease rights. For that reason and because there will be subsequent site-specific NEPA analysis prior to leasing and development, the BLM has determined that there will be no impact on the environment as a result of these allocation decisions and, therefore, does not trigger the requirements of 40 CFR 1502.22.

For the purposes of analysis, in the absence of more specific information on the technology and environmental consequences of commercial development of oil shale and tar sands, this PEIS employs information derived from other types of mineral development (i.e., oil and gas, and underground and surface mining of coal). The BLM has taken this approach because it anticipates, to the best of its knowledge, that the surface-disturbing activities involved with these other types of mineral development are comparable to those that may result from oil shale and tar sands development. There is a wealth of information concerning the consequences of oil and gas and underground and surface mining activities, and projecting on the basis of this information, to the extent that it is applicable, permits a decision maker to decide whether to open areas to future application for leasing or to protect the specific resources by closing areas. Therefore, it is not a case of information missing that is needed to make a land use allocation decision such as that contemplated here; rather, the BLM is engaged in a projection based on these anticipated similarities. To the extent that additional information will be required in order to analyze alternatives to a leasing or development decision, that

is not a matter of information missing with respect to the land use allocation decision under consideration here, but a matter of information that will be developed in its proper place—during the NEPA analysis for these later decisions.

Therefore, the PEIS need not assess the relevance of the missing information needed to make an oil shale leasing or development decision. The PEIS, however, does disclose the fact that BLM will consider new information, such as that emerging from the RD&D leases, during subsequent NEPA analysis performed as the basis for making any leasing decisions.

Also, see the response to Comment 52837-015 above that describes the "staged" or "phased" approach that is expected to facilitate development of necessary additional information to support actual leasing and development activities.

52837-017: The prerequisite level of information necessary to make a reasoned choice among the alternatives is based on the scope and nature of the proposed action. An allocation decision is very limited in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. See response to Comment 52837-001 regarding the level of information needed to support land allocation decisions.

The level of information necessary for subsequent NEPA analysis will be based on the nature and scope of the proposed action and gathered in full compliance with BLM's land use planning and NEPA procedures. The BLM's land use planning decisions and associated NEPA analysis guides decisions for every action on the public lands. A major component of the NEPA process associated with such planning is working with cooperating agencies to collect inventory data and analyze the current management situation (BLM Planning Handbook H1601-1, F.2.c.). In preparing a land use plan, amendment, or revision, a systematic interdisciplinary approach is used to provide accurate, objective, and scientifically sound environmental analysis based on the best available information to formulate management prescriptions, including mitigation measures to avoid or mitigate adverse impacts. The BLM uses a public scoping process to identify issues, concerns, and alternatives and to solicit information or identify information gaps concerning a wide range of topics, including water quality and quantity, air quality, wildlife resources, and socioeconomic impacts. Analysis of the information gathered through these processes provides the foundation for the decision maker to make informed decisions concerning the various management prescriptions. In addition, the BLM recognizes the merits of the oil shale RD&D program to provide information not only about technologies, but also about possible impacts to resources to ensure that oil shale technologies operate at economically and environmentally acceptable levels. The BLM believes this effort will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. Data will be collected, as

appropriate, to ensure that operations are in compliance with state and federal statutes and regulations.

If there is incomplete or unavailable information regarding any particular decision, the BLM will comply with CEQ regulations (40 CFR 1502.22) and make it clear that such information is lacking. If the incomplete information relevant to reasonably foreseeable significant adverse impacts is essential to making a reasoned choice among alternatives and the overall costs of obtaining it are not exorbitant, the BLM will obtain the information. If overall costs of obtaining the information are exorbitant or the means to obtain it are not known, the BLM will provide the appropriate statements on the relevance of the information and a summary of any existing information.

52837-018: This PEIS is a programmatic-level document analyzing land use allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. The BLM believes there currently is sufficient information at the programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing.

The PEIS does provide a summary of the extensive ongoing activities in the Piceance Basin and elsewhere in the study area and considers these in its overview of potential cumulative impacts. For example, Table 6.1.5-4 shows that over 30,000 oil and natural gas wells are planned for installation over the 20-year study period in the affected field offices. The approximate land disturbance for these well installations, as well as from other activities, was used to estimate total cumulative land disturbance from other activities in the study area over the next 20 years. Section 6.1.5.3.10 acknowledges that income in the recreation sector may be lost due to oil shale and tar sands development. Also, Sections 6.1.5.3.4 and 6.1.5.3.5 note that depending on the type and level of development, regional water and air impacts may limit oil shale and tar sands development.

The BLM anticipates that oil shale development would proceed in a three-step decision making process similar to that used for federal onshore oil and gas: land use planning (i.e., amending RMPs); leasing; and approval of a drilling permit or a plan of operations. In the present experimental stage of the oil shale and tar sands industries, however, the BLM believes that the stages of NEPA compliance will be different from those used in oil and gas.

As a result of the maturity of the oil and gas industry, the BLM is usually able to include sufficient site-specific analysis in its NEPA documentation for amendments to RMPs so that an additional NEPA document is not required prior to issuing an oil and gas lease in conformance with the RMP. Nonetheless, the BLM does prepare a NEPA analysis before approving a plan of operation or a drilling permit that would authorize significant disturbance of the leased area. The

NEPA analysis for both decision levels includes cumulative effects analysis. Analysis of each oil and gas decision is based on technical information associated with the particular proposed action, as well as information about other reasonably foreseeable future actions in and near the area of the proposal.

In contrast, the present experimental state of the oil shale and tar sands industries does not allow this PEIS for land use allocation to include sufficient site-specific information or cumulative impact analysis to support issuance of a lease. Accordingly, unlike in oil and gas leasing, prior to oil shale leasing, additional NEPA analysis that will be required. That NEPA analysis could result in decisions not to lease in specific areas, or to lease particular areas with stipulations, such as a stipulation precluding disturbance of the surface.

As with oil and gas leases, although the lease would grant the lessee the right to explore and develop the oil shale and tar sands resources, the lease would not authorize surface disturbance. Before disturbing the surface, the operator would have to obtain the BLM's approval of a plan of development through a project-level NEPA analysis.

NEPA analysis at the leasing and at the development approval stages of oil shale and tar sands decision making would be based on reasonably available technical information associated with the proposed action and on information about other reasonably foreseeable future actions in and near the area of the proposal.

The BLM believes that cumulative impacts would be adequately assessed at the leasing stage. As required under NEPA, all subsequent NEPA documents will also analyze the cumulative effects from other reasonably foreseeable future actions. The scope and nature of the specific proposed action will drive the type of NEPA analysis that the BLM performs. The cumulative effects analysis would consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) federal and nonfederal actions, taking into account the relationship between the proposed action and these reasonably foreseeable actions.

As described in the proposed action in the PEIS, the BLM is committed to performing NEPA analyses prior to leasing and development, but until the scope of the potential leasing and/or development is known, we cannot commit to the scope of the NEPA analysis (regional, planning area, or local) that will be required. The proposed action will drive what analysis must be performed to comply with the requirements of NEPA.

52837-019: Before any activities can take place on public lands, such activities must be allowed for in the land use plan governing use of those lands. As explained in the document itself, this PEIS analyzes the environmental consequences of allocating certain lands for the possible commercial exploration and development of these resources. The allocation decisions to be made do not commit any resources or

grant any lease rights. Therefore, in addition to the analysis of direct and indirect effects of these land allocation decisions, including consideration of alternative ways of making these decisions, the PEIS presents a cumulative impact assessment based on the nature and scope of this proposed action and on available nonspeculative information. Programmatic EISs such as this one are considered adequate without site-specific analysis when the federal action proposed, as here, does not involve a site-specific or critical decision. As explained in the document itself, as well as in responses to other comments (see, e.g., response to Comment 52837-018), prior to any commercial leasing, additional NEPA analysis will take place. Because it is still a matter of speculation as to whether leasing and development will ever take place, and because there will be additional environmental analysis prior to leasing, a cumulative analysis associated with the effects of the land use allocation decision contemplated here need not analyze the impacts of leasing and development.

In fact, if parcels are considered for potential leasing in the future, a NEPA analysis, including a cumulative analysis, appropriate to that action, will be required prior to any leasing. This cumulative analysis would include other Reasonably Foreseeable Future Actions, such as local oil and gas exploration and development, and any connected actions associated with the specific proposed action, such as, for instance, the establishment of a source of electrical power generation, if relevant. See response to Comment 52837-008 for a discussion on the scope of potential subsequent cumulative analyses.

The comment recommends preparation of a supplemental PEIS when additional information is available. Please see the response to Comment 52837-008, which contains a discussion of the use of a supplemental EIS.

52837-020: Please see the response to Comment 52837-004.

52837-021: The Energy Policy Act of 2005 directed the Secretary of the Interior to (1) complete a programmatic environmental impact statement for a commercial leasing program for oil shale and tar sands resources on public lands, and (2) publish a final regulation reestablishing such a program. The BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedure to implement a commercial leasing program. The BLM published a proposed rule for the management of a commercial oil shale leasing program in the *Federal Register* on July 23, 2008. The BLM rulemaking process is separate and apart from the drafting of the PEIS. The PEIS analyzes the environmental consequences of an allocation decision, and therefore comments concerning the regulatory process are outside the scope of the PEIS.

52837-022: The BLM does recognize that additional NEPA analysis will be required and is committed to preparing the appropriate level of analysis prior to the issuance of any oil shale lease. (See page 2-19 of the Draft PEIS for the description of additional NEPA requirements.) This new NEPA analysis will analyze whether to

offer for lease parcels of land for commercial oil shale exploration and development and under what conditions or stipulations. The analysis will also contain any new information or circumstances relevant to the technology, the affected environment, and any associated environmental consequences. This information may be a consequence of research on the RD&D leases or a result of industry performing research or studies on nonfederal lands.

The affected environment of the action could vary greatly from a large regional area to a small discrete area. The scope of the analysis in the NEPA document would be dependent upon the number of applications received and the type and size of operations proposed by the applicant(s). This could result in a statewide, regional, basin-wide, or site-specific impact analysis. Overall, the geographic extent of the analysis would be limited to those areas that could experience a change in the pattern of land use, as a consequence of a direct impact or other induced effects on the natural resources. The nature of the action can also vary greatly based on the type of technology or mining method. Another critical factor would be the type of infrastructure needed to support the operation, in particular, the source of electrical power.

Thus, while the BLM is committed to performing NEPA analyses prior to leasing, we cannot commit to a certain type of NEPA analysis (regional, planning area, or local). The proposed action will drive what analysis must be performed to comply with the requirements of NEPA.

52837-023: The PEIS serves as the basis for land allocation and does not support leasing decisions. It is, therefore, premature and highly speculative to predict or assume power sources, when, at this time, definitive information about the technologies, including the amount of power needed, the size of the operations, the locations, etc., are unknown. The effects associated with a surface coal mine are different from those associated with an underground operation. Effects associated with a power plant could change drastically depending on where the plant is located and the power requirements of the operations. The assumptions made in the PEIS are based on the best information available. The PEIS analysis is a consequence of those assumptions, the available data, and an attempt to present the potential impacts that reflect known conditions or circumstances.

52837-024: Table 4.5.2-1 shows examples of how much water would be needed in oil shale development under different technologies. It does not imply that commercial oil shale development is committed or is functioning. The table also shows projected available water for the states of Colorado, Utah, and Wyoming. Therefore, a comparison of what is available to address the water needs using different oil shale development technologies could be made.

Information on groundwater availability is limited. A range of groundwater available is used in this PEIS and shown in the table.

Common impacts on the quality of water resources are described in Section 4.5.1.

52837-025: Withdrawal of groundwater that discharged to certain segments of Piceance and Yellow Creeks would generally decrease stream flow, especially during the summer seasons. The decrease of the stream flow depends on the amount of groundwater withdrawn, the location of project sites, the hydrologic connections between the creeks and aquifers, and any discharge of water from the project sites. As these are factors unknown, their impacts on the water resources, therefore, could not be evaluated. However, the impacts would be evaluated at the project levels when these unknown factors are better quantified.

The general impacts that could occur after the melting of the freeze wall are described in Section 4.5.1.

52837-026: The PEIS is a general document and is not intended to list all potential contaminants that may be associated with commercial leasing of oil shale and tar sands. Section 4.5.1.3 of the Draft PEIS recognizes that contaminants to water could be introduced through different means associated with commercial operations. Future site-specific NEPA analyses will consider potential contamination and mitigating measures.

Sections 4.7 and 5.7 contain analysis of noise issues, including information regarding different phases of commercial operations.

There are no areas in Colorado that were identified to have wilderness characteristics outside of Wilderness Areas and Wilderness Study Areas within the PEIS study area.

52837-027: The BLM does recognize that additional NEPA analysis will be required and, as described in the PEIS itself, is committed to preparing the appropriate level of analysis prior to the issuance of any oil shale lease. The BLM is conducting phased decision making—proceeding from land use planning, to leasing, to operational permitting—as the BLM does for other resources such as oil and gas. This first step—RMP amendment to allow the BLM to consider applications for leasing—may be followed by the subsequent steps of leasing and plans of development, if necessary. The locations, scales, and scopes of the later steps are too speculative at this point and will require their own distinct decision making process when the industry can provide the necessary information. Therefore, it is inappropriate to speculate at this stage whether such NEPA analysis will be programmatic in nature.

52837-028: The reference to the Colorado Mined Land Reclamation Act has been removed from Table D-3 but added to Tables D-4,-5,-6,-7,-10,-13, and-14.

52837-029: The mined land reclamation laws have been added to Appendix D of the Final PEIS.

52837-030: The best available information to define the geologically prospective area was used, and the deposits were sufficiently characterized so the BLM could delineate where the most geologically prospective resources are located. The specific reports used to delineate the most geologically prospective areas are cited in footnote 2 on page 1-6 of the Draft PEIS. In the Piceance Basin, the deposits were characterized using USGS data. The Green River, Washakie, and Uinta Basins were characterized by a BLM geologist using Fischer Assay data from existing exploration drill holes. It can be assumed that comparable procedures would be developed, as in the coal, oil, and gas program, etc., to explore the oil shale deposit in order to obtain geological, geophysical, environmental, and other pertinent data concerning the oil shale deposit, thereby gathering adequate information for subsequent stages of exploration and development.

52837-031: The information in Table 2.2.3-1 is supplemented in Section 3.1.1 of the PEIS where the existing ACECs included in the discussion of the Field Office in that they are located are discussed. The relevance and importance criteria that supported the designation as ACEC are included along with specific acreages.

52837-032: The referenced text has been revised to clarify the comparison.

52837-033: The referenced paragraph in Section 3.4.2.1 has been deleted.

52837-034: Thank you for your comment.

There is large potential variability in water use depending upon the technologies used, the source of the water, the economics of treatment versus injection disposal, and so forth. The question of water consumption versus water diversion must be dealt with in subsequent and site-specific NEPA analysis.

52837-035: Volume expansion comes from known and suspected sources. The referenced increase (30%) comes from all activities (including mining, crushing, and sizing in preparation for retorting) and compares the spent shale to the in situ condition of the raw shale.

Clarifications have been made to the text.

52837-036: The maturing oil shale industry will influence the placement of power generation sources and other supporting infrastructures. In the early years of the industry, however, the BLM believes it is reasonable to assume that oil shale developers will have to install their own power generating capabilities. Those developers are expected to rely on existing pipeline infrastructures, however, and must bear the cost of connecting their facility to that infrastructure. Additionally, with respect to pipeline conveyance of raw shale oil, shale oils that have not been sufficiently upgraded at the mine site to remove contaminants (especially nitrogen-bearing contaminants) may not be eligible for transport in existing conventional crude oil

pipelines for fear of contamination of those conventional crudes, and a fully independent pipeline network for delivery of raw shale oil to refineries may be required.

52837-037: Tables in Section 4.1 of the PEIS present the acreage figures noted in the comment. The Tables' footnotes present the assumptions associated with the acreage figures. For example, Table 4.1.1-1 describes the assumed values for surface disturbance (and other factors) for one surface mine with retort that could be located in either Utah or Wyoming. Footnote b identifies the surface disturbance number as the estimated range of surface disturbance that could occur at any given time during the life of the project.

52837-038: The text in Section 4.5.1.2 has been modified accordingly.

52837-039: The text in Section 4.5.1.4 has been modified accordingly.

52837-040: You are correct that the areas considered in the PEIS and the three referenced RMPs overlap. All decisions related to land use planning for oil shale and tar sands resources in the PEIS study area will be made in the ROD for the PEIS. The ROD will amend the existing RMPs by making decisions on whether or not lands will be available for application for future leasing and development of oil shale on public lands for those areas where the resource is present. Additional site-specific NEPA analysis will be completed on any future lease application before any leases would be issued. If, as part of this preleasing NEPA analysis, the BLM determines that leasing and subsequent development of the oil shale resources would cause significant impacts, for example, to ACECs or important wildlife habitat, the BLM can require the applicant to: (1) mitigate the impact so that it is no longer significant, (2) move the proposed lease location, or if neither of these options resolves the anticipated conflicts, (3) the BLM can decide that development of the oil shale resource outweighs protection of the on-site resources and approve the application. This preleasing NEPA analysis would include opportunities for public involvement and comment that are part of the PEIS process and every other planning and NEPA process the BLM undertakes.

52837-041: Site- and species-specific analyses will be conducted for any proposed project. The purpose of these analyses is, in part, to identify any habitats or species that warrant special consideration during project siting, design, construction, operation, and decommissioning. The scope and approach for these analyses, as well as any particular species or habitats to be evaluated and additional mitigation measures to be incorporated as project stipulations, will be determined on a project-by-project basis in conjunction with input from federal, state, and local agencies and interested stakeholders.

52837-042: The BLM acknowledges the commentor's preference for Alternative A.

52837-043: It is important to recognize that the plan amendment being analyzed in the PEIS merely allocates certain land for future consideration of applications for commercial development of oil shale and tar sands resources. There is no commitment of resources or granting of any leases; therefore, there is no "irrevocable commitment" of resources made in the PEIS.

The FLPMA directs the BLM to manage public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use." Wildlife resources, although important, do not necessarily have an absolute priority over other authorized uses of public lands.

At such time as applications to lease are accepted, and as additional information becomes available, an interdisciplinary team of resource specialists, with on-the-ground knowledge of the area, will analyze the current management situation, desired conditions, and the uses and activities to create alternatives or mitigation measures to resolve any issues raised or conflicts identified. That interdisciplinary team will use a balanced approach consistent with FLPMA's principles of multiple use and sustained yield. Furthermore, the BLM will seek the participation of CDOW and other agencies as cooperating agencies for providing the analyses required under NEPA.

52837-044: The definitions of moderate and large impacts have been modified in Tables 4.8.1-1, 4.8.1-2, 5.8.1-1, and 5.8.1-2 of the Draft PEIS, and some of the potential magnitude of impacts have also been changed to indicate that a number of impacts to wildlife species could be large if not mitigated. The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. The potential for the Piceance Basin to meet the capacity requirements for infrastructure, power, or water would be determined at the project-specific level (i.e., on a lease-by-lease basis).

52837-045: The BLM is conducting a phased decision-making process—proceeding from land use planning to leasing to operational permitting. The land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases, and potential impacts to wildlife resources will be one of the areas addressed in any analysis. Part of that NEPA analysis will be to determine the cumulative impacts

of the decisions, including determination of the potential cumulative impacts to wildlife populations. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. Specific mitigation measures, management prescriptions, and the best available practices will be applied to minimize or eliminate impacts as a result of the NEPA analysis.

52837-046: While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. It was determined that the three alternatives provided a reasonable range because the allocation decisions, as being proposed in the PEIS, had a very narrow and limited scope—to allow certain lands to be considered for future leasing. This approach is in full compliance with NEPA since the purpose and need of the PEIS serves as the basis to determine the reasonable range of alternatives in a NEPA document. A broad "statement of need" may necessitate a wider range of alternatives, while a more limited and narrow scope would have a limited number of alternatives. The "No Action Alternative is the "no change" from current management direction or level of management intensity. Alternative B was structured to make the most geologically prospective lands available. Alternative C was structured to apply existing land use plan decisions to the planning area.

52837-047: The potential level of oil shale development that could occur in the near future is unknown and has made it impossible to prepare a nonspeculative assessment of the cumulative effects of ongoing oil and gas development. The cumulative impact analysis for the PEIS does include the potential oil and gas development being analyzed in the WRFO RMP amendment as well as other activities forecasted for BLM-administered lands.

Section 6.1.5.2 and 6.1.5.3 have been revised to acknowledge the potential for oil shale development on nonfederal (e.g., private, state, Tribal) lands. However, the extent and impacts of such development, just as on public land, are unknown at this time. It is assumed that development of oil shale or tar sands facilities on nonfederal lands would have impacts similar to such facilities located on federal lands, as described in Chapters 4 and 5 of the PEIS.

52837-048: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. The impact analyses provided in the PEIS qualitatively indicate the types of impacts that could occur to wildlife, including the greater sage-grouse, based on BLM experience with other types of mineral development. Sections 6.1.5 (oil shale) and 6.2.5 (tar sands) provide an overview of impact-producing factors and potential cumulative impacts, including cumulative impacts to ecological resources (see Sections 6.1.5.3.7 and 6.2.5.3.7).

Tables 6.1.5-4, 6.1.5-5, and 6.1.5-6 of Section 6.1.5.2.1 summarize potential oil and gas development that could occur within the oil shale and tar sands region of the three states.

Quantitative analyses of potential impacts to greater sage-grouse and other wildlife species would be conducted for any proposed project. Project-specific NEPA analyses would also identify and assess any cumulative impacts that are beyond the scope of the cumulative impacts addressed in the PEIS. Policies and BMPs that would be implemented at the project-specific level are expected to avoid sage grouse habitat and, where not possible, minimize and mitigate impacts to sage grouse to the extent practicable. Sage grouse mitigation would be incorporated as project stipulations, as needed. The need for these mitigation measures would be determined on a project-by-project basis in conjunction with input from federal, state, and local agencies and interested stakeholders. Mitigation of impacts to sage grouse would include recommendations included in the BLM's National sage grouse habitat conservation strategy, as well as those contained in state-wide and regional sage grouse conservation strategies and management plans that have been prepared by state agencies.

52837-049: Chapters 4 and 5 of the PEIS contain substantial discussion of the types of impacts that might occur to both wildlife and water resources from commercial oil shale or tar sands development, including discussions of effects of displacement of big game from winter range and impacts to sensitive and threatened and endangered fish species.

52837-050: The impact analyses provided in the PEIS qualitatively evaluate the water quality impacts mentioned in the comment to fish and wildlife species based on BLM experience with other types of mineral development (see Sections 4.8.1.1, 4.8.1.3, 5.8.1.1, and 5.8.1.3).

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. Therefore, the specific number and locations of projects within the Piceance Basin or elsewhere cannot be identified within the PEIS. Sections 6.1.4.7 and 6.2.4.7 of the PEIS compare potential impacts of the allocation decisions on ecological resources but are based on a comparison of lands available for leasing among alternatives with key aquatic and terrestrial habitats that overlap the lease areas. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. These will include quantitative analyses of water quality impacts to fish and wildlife species that occur within the project area, including considerations of direct, indirect, and cumulative effects (including other infrastructure required to support oil shale and tar sands development), reasonable alternatives, and possible mitigation measures to protect fish and wildlife habitats. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders.

52837-051: Tables 4.8.1-1 and 5.8.1-1 of the Draft PEIS have been modified to add water depletion as an impact category that could potentially affect wildlife. A paragraph has been added to the discussion of habitat disturbance (Sections 4.8.1.3.1 and 5.8.1.3.1) that qualitatively assesses the impacts of water depletions to wildlife.

52837-052: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on migratory or other wildlife species.

Cumulative impacts to wildlife species (including migratory species) are discussed qualitatively in Sections 6.1.5.3.7 and 6.2.5.3.7 of the PEIS. At this time, it is not possible to provide a quantitative evaluation of cumulative effects as requested in the comment because there are many uncertainties regarding the amount of development that is reasonably foreseeable, the types of technologies that might be deployed, and the locations of potential projects. These details would be needed to perform the type of analysis requested in the comment. Cumulative impacts will be evaluated in greater detail in project-specific NEPA assessments and consultations conducted prior to leasing and development. These cumulative impact analyses will take into consideration other reasonably foreseeable oil shale and tar sands developments.

52837-053: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. Therefore, it is justifiable that the evaluation of specific occurrences of resources and supporting facilities, analyses of the environmental consequences of oil shale or tar sands development, and the assessment of the cumulative effects of oil shale and tar sands development together with the other factors mentioned in the comment be included in subsequent project- or site-specific NEPA documents rather than in this PEIS.

As stated in Sections 6.1.5 and 6.2.5 of the PEIS, for the purposes of analysis the cumulative impacts assessment looks at the incremental impacts of a single oil shale facility and a single tar sands facility, recognizing that there may be more than one of each type of these facilities brought into operation during the study period. This cumulative analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decision and the uncertainty of oil shale and tar sands development on private lands. Most of the topics identified in the comment are addressed in the PEIS. Section 3.7.3 describes existing wildlife resources in the study areas. Section 4.8.1.3 describes the types of impacts that are known to affect or that could affect wildlife resources. Sections 6.1.1.7, 6.1.2.7, 6.1.3.7, 6.2.2.7, and 6.2.3.7 present maps showing crucial habitats relative to oil shale basins and STSAs. Sections 6.1.5.2 and

6.2.5.2 present an inventory of other disturbances that could contribute to cumulative impacts to wildlife species. Other requested items (e.g., overlays of areas to be developed, an assessment of the magnitude and extent of crucial habitat that will be affected) are not sufficiently well known at this time.

A more specific analysis of cumulative impacts of oil shale and tar sands facilities in the study area may be conducted at a future step in the assessment process, when an RFDS for oil shale and/or tar sands development would be included. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. An RFDS at a future step in the assessment process would be based on a clear set of supportable assumptions associated with a leasing or development proposed action. Information pertinent to developing an RFDS will be gained from RD&D projects.

Additionally, the NEPA analyses at the leasing and development stages will consider effects from Reasonably Foreseeable Future Actions (RFFAs) (40 CFR 1508.7). If the proposed action would impact a particular resource that one or more RFFAs would also impact, the impacts of those RFFAs would be included in the cumulative effects analysis for the proposed action. At the leasing or development stage, the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects. For example, the geographic extent of a cumulative effects analysis for leasing or for a proposed development project will reflect not only the geographical limits of the proposed lease/projects, but also the geographical limits of the resource being affected (e.g., elk winter range).

52837-054: The comment expresses concern for impacts on a number of federally protected species or other species of national concern. The impacts of leasing and development on these species are presented and discussed in the PEIS. The text box on greater sage-grouse presented in both Sections 4.8.1.3.1 and 5.8.1.3.1 has been modified to include reference to state and regional greater sage-grouse conservation and management plans that contain mitigation measures to minimize potential impacts to the species. Additional information pertaining to the occurrence and distribution of fish species (especially sensitive native fish species) within the Piceance Oil Shale Basin has been added to Sections 3.7.1 and 3.7.1.1.4 of the PEIS, including information about Colorado River cutthroat trout, roundtail chub, bluehead sucker, flannelmouth sucker, and mountain sucker. The existence of conservation agreement documents for these species has been noted and referenced in these sections as well. Appendix F of the PEIS identifies conservation measures that would be applied to listed and sensitive species.

The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. These documents will evaluate specific occurrences of the species mentioned in the comment, analyze the environmental consequences of leasing (including consideration of direct, indirect, and cumulative effects) to these species, evaluate reasonable alternatives, and consider mitigation measures to protect the species and their habitats.

52837-055: The PEIS is a programmatic-level document, analyzing allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale leasing. Depending on the situation in the area being considered for future leasing, wildlife- and landscape-level issues may be included in subsequent NEPA analysis. At that time, the BLM will strive to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified, such as carrying capacity, water rights, and impacts to wildlife and wildlife habitat.

52837-056: An evaluation of reclamation success following oil shale development is presented in Section 4.8.1.2. The PEIS acknowledges that reestablishment of some vegetation types (e.g., shrubland communities) may require several decades. The PEIS also states that reestablishment of native plant communities in particularly arid regions (e.g., Uinta Basin Floor ecoregion in Utah and portions of the Rolling Sagebrush Steppe and Salt Desert Shrub Basins ecoregions in Wyoming) may not be successful. The loss of intact native plant communities could result in increased habitat fragmentation, even with the reclamation of impacted areas.

52837-057: The presence of non-native invasive species in potential oil shale lease areas and the potential introduction and spread of such species into uninfested areas as a result of oil shale development are discussed in Section 4.8.1.2 of the PEIS.

52837-058: The BLM is preparing a programmatic-level document analyzing land use allocation decisions. Information needed to support those decisions is general in

nature. The BLM has disclosed in the PEIS information regarding potential impacts of commercial development on wildlife populations. At this time, however, there is no way to accurately predict those impacts or the magnitude of those effects.

Nevertheless, there is sufficient information at the programmatic level to make a reasoned choice among the alternatives when considering lands open or closed for consideration of commercial leasing. The PEIS analyzes the environmental consequences of this allocation decision in sufficient detail for the decision maker to choose which lands would be available for further consideration for leasing. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development nor do they create any development rights. When applications to lease are received and additional information becomes available, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and possible mitigation measures, as well as what level of development may be anticipated.

52837-059: Thank you for your comment. The BLM looks forward to continuing its strong working relationships with the Department.

52837-060: Please see the response to Comment 52837-040. Additionally, although decisions regarding whether or not public lands will be available for application for commercial oil shale leasing and development, all three RMPs mentioned will, as part of the planning and NEPA process, include an analysis of the cumulative effects of actions relevant to each of the plan areas. This cumulative analysis would include analysis of the effects of other RFFAs, such as local oil and gas exploration and development, anticipated oil shale development, and any actions associated with the proposed actions.

52837-061: Geologic resources in Colorado's Piceance Basin are described in general in Section 3.3.1.5. Resources at the local scale are not addressed in the PEIS. Seismic risk is described in Section 3.3.1.4 as fairly low. Whether operations would increase seismic risk would be addressed in leasing and project-specific NEPA analyses, including the analysis of the key aspect of any potential permitted deep injection of wastewater. If significant impacts are identified as part of these NEPA analyses, mitigation, in the form of constraints on leasing and/or operations, would be applied to lessen or eliminate those impacts.

52837-062: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures that any commercial oil shale program meets the intent of Congress and takes advantage of the best available information and practices to minimize impacts and offer opportunities for states, Tribes, local communities, and the public to be involved at each decision point. At future stages of environmental evaluation (i.e., leasing and/or plan of development), a landscape-level analysis will be performed if appropriate.

This analysis would consider effects from Reasonably Foreseeable Future Actions, including other oil shale/tar sands leases/projects. Please also see the response to Comment 52837-027. The BLM notes the State of Colorado's preference for Alternative A.

The BLM is aware of the requirements of the Energy Policy Act of 2005. Consistent with those mandates, the BLM is moving forward with this broad-scale PEIS that reviews the reasonably available information. As pointed out by the cooperating agencies, the BLM cannot acquire information at this time to project the number, locations, or technologies of future commercial oil shale operations. Congress has not authorized the BLM to delay this PEIS until technologies have been proven commercially viable. Thus, this PEIS supports the programmatic decisions to amend land use plans to open certain lands to further consideration of oil shale or tar sands leasing and to close other lands to such leasing.

52837-063: The sources of projected demands and water uses are from the states of Utah and Wyoming in their water plan documents (see footnotes of Tables 3.4.1-2 to 3.4.1-4) and the *Statewide Water Supply Initiative* study of Colorado (CWCB 2004). These documents provide information on water demands of different sectors over the next 20 to 40 years. The PEIS uses the best available information for its analyses. Any pending, planning, or ongoing study results would not be included unless they formally have been made publicly available.

52837-064: Section 3.4.1.4 of the PEIS describes Colorado's tributary and non-tributary groundwater nomenclature. The discussions of potential impacts and cumulative effects do not distinguish whether groundwater at a potential commercial site is tributary or non-tributary, because that is site-specific information, and the document is programmatic in its coverage. Instead, the document considers groundwater use as a whole. Groundwater usage, whether pumped for mine dewatering, in situ zone dewatering, operations support, or other purposes, would affect cumulative water impacts whether the groundwater is tributary or non-tributary.

52837-065: This PEIS is a programmatic-level document, analyzing allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and possible mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

The amount of water to be needed for oil shale development, if it occurs, would depend on the scale of the development, technologies, economy, acceptable environmental impacts, and many other factors. Subsequent NEPA assessments will also consider the results of the needs assessments cited in the comment.

52837-066: Additional power needs for in situ oil shale development are considered in the cumulative impact assessment (e.g., the ground disturbance and water needs for power generation are included in estimates for individual in situ oil shale facilities; see Section 6.1.5.3). However, at this time it was considered too speculative to assume that the coal used would be mined within the study area (e.g., it could come from northeast Wyoming). More specific data would be available when NEPA documents are prepared to analyze the environmental consequences of leasing and future exploration and development.

52837-067: The types and amounts of hazardous waste that would be generated vary with the various oil shale technologies and would also depend on the scale of the development. The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts, including hazardous waste generation and management.

This PEIS is a programmatic-level document, analyzing allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. These analyses will incorporate new technology-specific data where available.

52837-068: Thank you. The “units” were omitted by accident. The text has been appropriately modified.

52837-069: Injection is permitted by the EPA, as noted in the text. The text in the PEIS has been modified to include mention of the possibility of induced seismicity due to injection.

The potential mitigation measures (Sections 4.3.2 and 5.3.2) have been modified to recommend literature studies focused on faulting; however, specific faults are not mentioned. A recent publication by the Colorado Geological Survey shows no faults in northwest Colorado. See B.L. Widmann, R.M. Kirkham, M.L. Morgan, W.P. Rogers, 2002, *Colorado Late Cenozoic Fault and Fold Database and Internet Map Server Part I*, Colorado Geological Survey, IS-60A, with mapping updated in 2007, available at http://geosurvey.state.co.us/Portals/0/co_eq_map_2006v7.pdf. This map marks the estimated location of the 1882 earthquake as a location in central Colorado, 150 miles east-northeast of the Dudley Bluffs of the Piceance. Also, the Cimarron fault is 70 miles southeast of the portion of the Piceance under consideration.

Regarding the seismic hazard, the 2005 USGS reference cited in the PEIS does not support the commentor's claim of 20–30% g accelerations with a 2% probability, but rather 14–16%. The 2% probability information has been added to the seismic description of each of the four basins.

52837-070: The commentor has echoed many of the potential impacts identified in Section 4.5 of the PEIS, including mining-enhanced groundwater movement, mine dewatering, spring source water, drainage modification, increased porosity and permeability, changes in groundwater/surface water interaction, and changes in groundwater and surface water flow patterns. The commentor would like discussion of the magnitude and mitigation of these potential impacts. The PEIS is a programmatic-level document, and it cannot address or quantify issues at the site-specific level. It is expected that groundwater monitoring at the RD&D sites will provide information at a pilot scale on the degree of impact from different technologies and that this information would be used to determine mitigation measures and also decisions regarding possible future developments. It should be noted that an in situ approach relying on freeze wall technology would require dewatering within the treated volume only, rather than throughout the much larger volume that would be affected by a cone of depression. Also, note that the drawdown associated with typical dewatering (without bounding freeze walls) is dependent on the pumping rate and hydrogeological factors. The theoretical extent of drawdown is unbounded, although the drawdown is practically immeasurable at increasing distances from a pumping well.

If the policy of oil shale development is adopted, a development plan for each project would be prepared. At the project levels, specific infrastructure, roads, and facilities are better defined. Project locations, technologies to be deployed, and anticipated activities would be specified. With this information, more detailed environmental impact analyses would then be conducted. The results would be reported in project-specific NEPA documents.

52837-071: This PEIS is programmatic in scope. The document provides a range of water availability estimates, options (surface water and groundwater), and demands (varied with technologies) and potential impacts. The magnitudes of various impacts and specific types of impacts, would be provided at project-specific NEPA documents in the next phase.

52837-072: The PEIS is a programmatic-level document that analyzes allocation decisions and their consequences. The PEIS does not commit any resources or grant any lease rights. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures, as well as what level of development may be anticipated.

The water estimates used in the PEIS are what an oil shale project plan could use, based upon today's knowledge of oil shale development and assumed plant

capacity. Although the PEIS estimates water availability, water rights are not evaluated as that issue is outside the scope of the PEIS. Water rights are also tradable and are going to change with time. They are more appropriately addressed in site- and project-specific NEPA documents.

The Upper Colorado River Endangered Fish Recovery Program uses instream flow water rights to protect endangered fish species. CWCB is the sole agent administrating the instream flows and has acquired water rights to maintain instream flows since the program started. The potential oil shale developers need to follow applicable laws and adhere to existing instream flow water rights to acquire enough water resources for their uses.

52837-073: The comment appears to deal with specific compliance with state water law. The BLM has stated in the PEIS in many places that "commercial development of oil shale or tar sands resources on public lands will be subject to existing federal, state, and local laws and regulatory requirements as well as established BLM policies" (e.g., see Section 2.2 of the PEIS). Appendix D has been amended to include the referenced CRS citations.

52837-074: Please see Comment 52837-081 regarding the level of information required for this PEIS. To reiterate, the BLM is committed to preparing the appropriate level of analysis prior to the issuance of any oil shale or tar sand lease or approval of a plan of development in full compliance with the requirements of NEPA. The BLM will work with any cooperating agencies to determine a reasonable range of alternatives that best address the issues, concerns, and alternatives identified by the public such that a balanced mix of uses results.

52837-075: The PEIS is a programmatic-level document that analyzes allocation decisions and their consequences. The PEIS does not commit any resources or grant any lease rights. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures, as well as what level of development may be anticipated. Such analysis covers the impacts on water resources.

The *Statewide Water Supply Initiative Phase I* study was one of many references used to prepare the PEIS. Based on the study, the projected and current water availabilities in Colorado are evaluated. As the water allocation of Colorado under the Colorado River and Upper Colorado River Basin Compacts is dictated by the compacts, the allocation would not be affected by oil shale development.

Oil shale and/or tar sand development is at the very beginning stage. The water use is going to change with developing technologies. Similarly, the landscape of water use and demand in the Upper Colorado River basin changes with time. Any evaluation of impacts on water resources must consider supply, demand, and legal issues. By the time a leasing application is submitted, it would be at least 3 to

5 years away. At that time, the water use environment will have changed. Any elaborate evaluation based on today's water use conditions and the many uncertain assumptions used in the development eventually would produce results with questionable reliability. Therefore, it is better to make such evaluation at the project level later when there is less uncertainty.

52837-076: Water availability is discussed in Section 3.4.1 by hydrologic basins and by states in the oil shale and tar sand regions. The range of water needed for oil shale and tar sands development and the water remaining available to a state under the compacts are described in Sections 4.5.2 and 5.5.2 and summarized in Tables 4.5.2-1 and 5.5.2-1.

This PEIS assumes that 6,000 thousand ac-ft per year is available for use in the Upper Colorado River Basin. The same amount was used in Colorado's *Statewide Water Supply Initiatives* study (CWCB 2004). It was based on long-term historical hydrologic data with a mean undepleted flow at Lees Ferry of about 15,000 thousand ac-ft/year and was confirmed by another CWCB study (2007). The data were collected from 1906 to 2005 within which wet and drought years existed. Other studies (Kuhn 2005, Tipton 1965) suggested that a mean undepleted flow of 13,500 thousand ac-ft/year be used. The Tipton study was based on historical data from 1930 to 1964. A tree-ring study supported the 13,500 thousand ac-ft/year figure (Kuhn 2005).

The assumed 6,000 thousand ac-ft/yr is the amount legally available for the Upper Basin states and has to be consistent with the flow at the Lees Ferry site. For example, the Lees Ferry is 15 million ac-ft; at least 7.5 million ac-ft has to be sent to Lower Basin states and 0.75 million ac-ft to Mexico. The maximum water available to the Upper Basin states has to be less than 6.75 million ac-ft (15 million ac-ft minus 7.5 million ac-ft minus 0.75 million ac-ft) to meet the requirements of various compacts of the Colorado River. The legal entitlement issue has been discussed in Section 3.4.

To evaluate the water supply of the Colorado River Basin, the BLM prefers the use of long-term historical data over relatively short-term data. Historically, we learned that short-term historical data fluctuates and is less reliable than long-term data, resulting in biased assumptions. That happened in the Colorado River Compact of 1922 that assumed a mean flow of 16,400 thousand ac-ft/year (Smerdon et al. 2007). Similarly, if we select the drought years of early 2000s data for our evaluation, we would likely produce another kind of biased results.

The shares of the Colorado River Basin states are specified in the various compacts of the Colorado River. It is inappropriate for the PEIS to speculate on the outcome of future compact development and consider that outcome to evaluate water availability.

The most geologically prospective areas of oil shale are shown in Figure 2.3-1. The water resources of various oil shale basins are described in Section 3.4.2 and shown in the maps of that section.

Water rights ownership is quite dynamic and is changing rapidly in the last several years. By the time an oil shale and/or tar sand project is developed, the ownership may differ greatly from what we have today. Therefore, the issue is more appropriately addressed in subsequent project-specific NEPA documents.

See also response to Comment 52837-075.

52837-077: The PEIS is a programmatic-level document that analyzes allocation decisions and their consequences. The PEIS does not commit any resources or grant any lease rights. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures, as well as what level of development may be anticipated.

Development of oil shale and/or tar sand projects could create local sources of salts for water resources through ground disturbance and soil erosion, generally in the vicinity of project sites, access roads, and rights-of-way. Salinity impacts are closely related to the types of project activities and would be evaluated in subsequent project-specific NEPA documents. Specific BLM salinity control projects and measures to protect these projects near oil shale and/or tar sand sites would be addressed.

The development of oil shale and/or tar sand projects would require compliance with existing applicable regulations, including NPDES. It is described in Section 3.4.1. In Section 4.5.1.3, the PEIS showed that surface runoff at a mining site could be exempted from NPDES permits, provided that the runoff not be contaminated by contact with any overburden, raw material, intermediate product, finished product, by-product, or waste product located on the site of operation. Surface runoff not intercepted at these sites could create a non-point source of contaminants.

52837-078: The Upper Colorado River Endangered Fish Recovery Implementation Program and conservation measures to protect the Colorado River endangered fish species are discussed in Appendix F of the PEIS.

52837-079: The stream segments with instream flow water rights in Water Divisions 5 (Colorado River Basin) and 6 (White River Basin) have been listed in Appendix I. Unfortunately, we could not show their locations on a map because their graphical location information is not available. Specific impacts on instream flows of these streams would be evaluated in subsequent project-specific NEPA documents.

52837-080: Increase in flooding potential resulting from oil shale development is unlikely, as works in streams are very limited. Under the arid and semiarid environment, flooding is more likely triggered by thunderstorms and snowmelts.

52837-081: As is described in Chapter 1 of the PEIS, commercial leasing will not be authorized by this PEIS. Lands are only being identified as available for application for leasing. Monitoring of the RD&D activities is an ongoing activity that is required as part of the RD&D EA approvals.

52837-082: At this time, it is neither required nor possible for this PEIS to present a cumulative effects analysis showing the impacts of leasing and development of these resources across the entire landscape of these three states. First, the decisions to be made on the basis of this PEIS are limited in character, consisting as they do only of planning/allocation of lands where nominations to lease can be considered. Second, the locations, scope, and scale of future oil shale and tar sands development are highly speculative, and because there will be additional NEPA prior to leasing. These points have been clarified in the introduction to the cumulative impacts sections (Sections 6.1.5 and 6.2.5).

A more specific analysis of cumulative impacts of multiple oil shale and tar sands facilities in the study area may be conducted at a future step in the assessment process, when an RFDS for oil shale and/or tar sands development would be included. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. An RFDS at a future step in the assessment process would be based on a clear set of supportable assumptions associated with a leasing or development proposed action. Such an analysis may include comparison of impacts with and without consolidation of infrastructure development.

The projected water needs for population growth related to oil shale development have been included in PEIS water needs projections (see Table 4.5.2-1). Oil shale project sites generally have facilities to treat sewer on-site. The need for new infrastructure in communities is addressed qualitatively in the socioeconomics sections (Sections 4.11 and 5.11) of the PEIS. The overall impacts of oil shale/tar sands development on water resources are difficult to evaluate at the programmatic level because of the dependence on the scale of development but would be addressed in more detail (possibly including numeric modeling) in future NEPA assessments.

52837-083: The comment addresses issues that must be dealt with at the site-specific level. Since this PEIS is programmatic in nature, the information provided is general, but Section 4.5 provides extensive discussions on water demands and water

quality associated with oil shale technologies and also addresses water demands that arise from the coincident growth of support industries and communities.

52837-084: The PEIS cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

This PEIS does include in the cumulative impacts analysis a discussion of the possibility of land disturbance and other impacts from planned power lines, both those required for oil shale/tar sands facilities and those planned for other purposes (e.g., the transmission and pipeline rights-of-way are included in the total acreage estimate of 14,000 acres for an oil shale facility [Table 6.1.5-9 of the PEIS]), and the potential impacts from other energy corridors are also acknowledged in Section 6.1.5.3.1

A more specific analysis of cumulative impacts of oil shale and tar sands facilities in the study area may be conducted at a future step in the assessment process, when an RFDS for oil shale and/or tar sands development would be included. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. An RFDS at a future step in the assessment process would be based on a clear set of supportable assumptions associated with a leasing or development proposed action and could include numeric modeling of surface and groundwater impacts as suggested in the comment.

52837-085: As the scale of development and project locations associated with oil shale and tar sands resource and ancillary development are not known, the analysis described in the PEIS was limited to estimating impacts for a region-of-influence in each state based on the likely residential location of project workers. As described in Section 4.11.1.1 of the PEIS, the in-migrating population assumed with each facility was assigned to local communities in each ROI based on a facility's direct workforce, community population, and intervening distances. Expenditure levels to support the in-migrating population at existing levels of service are then estimated for each community and aggregated for each ROI. Estimates of the impact of oil shale and tar sands development on local government expenditures are presented in Section 4.11.1.2 of the PEIS.

When commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken, where project locations, employment levels, and the number of in-migrating workers in each phase of development would be known, enabling a detailed analysis of oil shale and tar

sands and ancillary facility impacts on local tax revenues, facility and infrastructure capacity, and expansion costs, and on the state and local government expenditures required to maintain different levels of service.

52837-086: The water from major rivers (and reservoirs along the rivers) has multiple uses, including as drinking water supplies. Any impacts on the major rivers, as described in this PEIS, have implications on drinking, agricultural, and industrial water supplies. Treating drinking water supplies differently becomes artificial and unnecessary.

The PEIS is a programmatic-level document that analyzes allocation decisions and their consequences. The PEIS does not commit any resources or grant any lease rights. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures, as well as what level of development may be anticipated.

52837-087: Our apologies. CDPHE was included in the list in Chapter 1 but was inadvertently not included in Chapter 7. The text has been corrected in Chapter 7.

52837-088: The sentence has been changed to state that the discharge of wastewater or the discharge of spent leachate into waters of the United States or a state will require an NPDES permit or state equivalent.

52837-089: This section of the PEIS is designed to provide a summary level discussion of the categories of possibly applicable legal requirements. The suggested addition provides detailed information, which would be more appropriate during a site-specific NEPA analysis.

52837-090: The source of selenium in the Colorado River Basin is from Mancos Shale, which is stratigraphically much lower than the Green River Formation (the productive zone of oil shale). Mancos Shale is not exposed in the Piceance Basin or other oil shale prospective basins examined in this PEIS. It does occur in Gunnison Basin south of the Piceance Basin. Given the above situation, the issue of selenium is not emphasized in the PEIS.

Low levels of selenium are found in a few streams. These streams impaired with selenium are shown in Table 3.4.1-1, which lists all impaired streams in the three states in the Upper Colorado River Basin.

52837-091: The most recent 303(d) streams within the oil shale and tar sands regions are listed in Table 3.4.1.3. Because the locations of potential project sites are still uncertain under alternatives B and C, potential impacts on specific 303(d) streams due to oil shale development, therefore, could not be evaluated. Such evaluation would be provided in project-specific NEPA documents. Similarly, impacts on future (303)d river segments would be addressed in the NEPA documents.

52837-092: Colorado, Utah, and Wyoming have been granted NPDES implementation authorization. The states' NPDES programs must be at least as stringent as the federal program. Text has been added to the PEIS to reflect this.

The nonpoint source runoff and sedimentation impacts are described qualitatively in Section 4.5. At this time, such impacts cannot be quantified, because the locations, scope, and scale of future oil shale and tar sands development are highly speculative. However, because the decisions to be made on the basis of this PEIS are limited in character, consisting as they do only of allocation of lands where applications to lease can be considered, and because there will be additional NEPA analyses prior to leasing, a quantitative analysis of the cumulative impacts of nonpoint source runoff and sedimentation is not required at this time. These points have been clarified in the introduction to the cumulative impacts sections (Sections 6.1.5 and 6.2.5).

52837-093: The bullets in Section 4.5.1 have been clarified.

The surface disturbances in the two bullets are referring to disturbances associated with access roads and rights-of-way.

Airborne dust from various disturbed areas and vehicle traffic could be nonpoint sources of sediment and dissolved salt to surface water bodies.

52837-094: If commercial development were to take place, groundwater withdrawals would take place for various purposes to support the various oil shale technologies. The cumulative effect of this pumping on the hydrologic cycle would depend on a combination of the site-specific conditions across all commercial lease areas and the choice of technology at each lease area, as well as other past, present and reasonably foreseeable use of the groundwater. Because the level of development is unknown and highly speculative, only a generic analysis can be provided on the effects of groundwater pumping (see Sections 4.5.1.4 and 5.5.1.4).

52837-095: Colorado has been delegated permit authority for the NPDES permit program including stormwater permits for all areas except Indian lands and federal facilities. Therefore, the State of Colorado has the permitting authority for point sources on BLM lands. The state has also been delegated authority for the §404 dredge and fill program. However, in the 1987 amendments to the CWA, Congress explicitly excluded stormwater runoff from the definition of a point source. Runoff from mining operations or oil and gas exploration, production, or treatment operations is exempt from the NPDES permit program if that runoff is composed entirely of flows from conveyances or conveyance systems used for collecting and transporting precipitation runoff. To qualify for the exemption, however, the runoff must not be contaminated by contact with any overburden, raw material, intermediate product, finished product, by-product, or waste product

located on the site of operation. (Source: BLM, Western States Water Laws, available at: http://www.blm.gov/nstc/WaterLaws/Chap2.html, accessed 4/11/08.)

In the text, it has been clarified that Colorado, Utah, and Wyoming have been granted NPDES authorization. The states' NPDES programs must be at least as stringent as the federal program.

52837-096: The text in Section 4.5.1.3 has been modified to reflect the differing UIC approach in the three states. Regarding the concern about Colorado's groundwater contaminant list, each state has its own limits on particular contaminant concentrations, and these details would be appropriate for a project-level NEPA analysis rather than this PEIS.

52837-097: In Section 4.5.1, the PEIS describes the commentor's concerns about increased permeability and the potential for groundwater contamination. It is expected that the monitoring of results from RD&D projects would be useful in future, site-specific NEPA decisions regarding any developments.

52837-098: The extent of mine dewatering necessary would be subject to site-specific factors (e.g., the location of saturated zones relative to mine access shafts and adits (and how well they are sealed) and the portion of the formation being actively mined) and, while it is safe to assume that dewatering would occur throughout the period of active mining, it is highly speculative to attempt to identify the extent to which it would take place or the associated power requirements. At the leasing or plan of development stage, when site-specific information is available and when the scope of the proposed action is determined, the appropriate level of additional analysis will be performed, including assumptions on power use for mine dewatering, if applicable.

52837-099: Please see Comment 52837-081 regarding the level of information required for this PEIS.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands within Colorado without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA processes. The Energy Policy Act of 2005 requires BLM to finalize this PEIS, knowing that results from the RD&D program would probably not be available for inclusion in this document. It is not necessary to await the results from the RD&D program prior to amending the land use plans under analysis in this PEIS.

52837-100: This section of the PEIS is designed to provide a summary level discussion of the categories of possibly applicable legal requirements. The suggested addition provides detailed information, which would be more appropriate during a site-specific NEPA analysis.

52837-101: See response to Comment 52837-100.

52837-102: Thank you for your comment. Section A.3.2.2 discusses the advantages and disadvantages of in situ retorting. Contamination of groundwater aquifers by heavy metals leaching from spent shales and residual organic pyrolysis products not recovered from the retort zone is noted as a potential problem. Using solvents to recover the retort products could introduce additional contamination potential. Section 4.5 provides additional discussions on possible impacts to groundwater resources. Future applications for oil shale processing must include detailed plans for avoiding or mitigating groundwater contamination, irrespective of the aquifer's proximity to drinking water supplies; such plans must specifically address protection of drinking water supplies that lie within or proximate to the potential area of impact.

52837-103: Thank you for your comment. Compliance with drinking water standards is implicit for "potable" water being delivered to an oil shale facility for consumption.

52837-104: As noted in the introductory material of Appendix D, the citations in the tables are only those of general statutory authority; they do not convey which states have primacy.

52837-105: As noted in the introductory material of Appendix D, the citations in the tables are only those of general statutory authority. The tables do not list any state or federal regulations.

52837-106: Thank you for your comment. Section 2.2 provides, in very general terms, an overview of existing federal, state, and local laws and regulatory requirements for, as well as established BLM policies that would be associated with, oil shale and tar sands development. Additional information on some of the statutes and regulatory requirements was provided in Appendix D for a limited number or resources. It was not meant to be all inclusive.

52837-107: Although examples of potential types of mitigation measures to protect water resources are provided for consideration (see Sections 4.5.3 and 5.5.3), this discussion is fairly general in nature, because the appropriate place to develop specific BMPs to protect environmentally sensitive areas is at the time that site-specific NEPA evaluations are performed, whether that is at the lease or plan of development stage as a result of those evaluations. In all such cases, the BLM will involve the state, local communities, and the public throughout the NEPA processes. The comment also raises regulatory issues that may be answered in

final regulations governing oil shale leasing and operations but are not within the scope of this PEIS.

52837-108: Please see the response to Comment 52837-097 regarding contamination of groundwater.

Groundwater contamination resulting from oil shale and tar sands development is a key concern identified in the PEIS. Section 4.5.1.2 includes a discussion of changes in permeability and leaching potential, and Section 4.5.1.3 contains a discussion of the organic contaminants that are possible from in situ processes based on field and lab studies. It is expected that groundwater monitoring at the RD&D sites will provide information at a pilot scale on the degree of impact from in situ technologies, and that this information would be used to determine mitigation measures and also decisions regarding possible future developments.

Coordination on water issues would take place in at least two ways. First, the BLM's NEPA process is an open process that encourages participation by stakeholders, similar to the current process with the PEIS. These formal processes are initiated whenever there is a new proposed action requiring NEPA analysis, such as any future commercial lease applications. Second, the BLM encourages ongoing, informal coordination between the various levels of government in the normal day-to-day implementation of our respective responsibilities.

52837-109: The BLM has specific policies and guidelines for the establishment and management of ACECs (BLM 1600 Planning Handbook and 1612 Manual). Local BLM offices, during the land use planning process, designate areas as ACECs, as well as develop specific management prescriptions to protect the relevant and important values of the ACECs. The specific management prescriptions in the local RMP guide the day-to-day management of the areas.

52837-110: The format of the PEIS allows readers to easily find information about the purpose and need for the action (Chapter 1), the alternatives (Chapter 2), the study area (Chapter 3), and the potential impacts (Chapters 4, 5, and 6). All elements required under NEPA are included (e.g., cumulative impact analysis, presentation of alternatives, and addressing irreversible and irretrievable commitment of resources, if any). The .pdf format of the electronic versions is searchable by key terms, allowing readers to quickly locate topics of interest.

52837-111: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues

associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52837-112: See response to Comment 52837-111.

52837-113: See response to Comment 52837-111.

Speculation regarding the quantity and potential impacts from “Community Exposure to Hazardous Air Pollutants” is premature at this stage in the process.

52837-114: The discussion of additional power requirements is consistent with the needs of the PEIS to identify lands as available for application for leasing. Chapter 4 of the PEIS in Section 4.1.6 contains information on the size of a power facility needed to support an assumed 100,000 bbl/day in situ oil shale operation. This information and information on expected water needs, employment, and land needed for plant construction are included to disclose the general magnitude of the impacts of this size plant on the resources listed.

Please see Comment 52837-008 regarding the extent of future NEPA analysis that would be required to consider such a development.

52837-115: See response to Comment 52837-111.

52837-116: It would be useful to conduct additional background meteorology and air quality related values monitoring throughout the study area. The BLM would like to meet

with the states of Colorado, Utah, and Wyoming (along with other federal land management agencies) to pursue how such monitoring could be financed and conducted. All air quality and climate data gathered by the BLM is made available to the public upon request.

Table 3.5.3-2 in Section 3.5.3 provides a detailed list of representative criteria air pollutant concentrations. All values are cleaner than the ambient air quality standards applicable when the analysis was prepared, although as indicated in Table 3.5.3-2, certain ozone and particulate matter values were greater than 50% of the applicable standard (up to 93% of the 8-hour ozone standard based on CASNET monitoring at the Mesa Verde, Canyonlands, and Gothic stations). EPA has recently lowered the ambient ozone standards and will make formal determinations as to whether or not the study area continues to achieve the applicable National Ambient Air Quality Standards. The BLM will not conduct activities that would be in violation of the air quality standards, and will require lessees to obtain and to abide by all necessary permits and to abide by all other applicable laws and regulations. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process.

52837-117: When applications to lease are received and additional information regarding technologies and impacts becomes available, the BLM will conduct further NEPA analysis, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures, as well as what level of development may be anticipated.

The BLM's NEPA process is an open process that encourages participation by stakeholders, similar to the current process with the PEIS. These formal processes are initiated whenever there is a new proposed action requiring NEPA analysis, such as any future commercial lease applications. Additionally, the BLM encourages ongoing, informal coordination between the various levels of government in the normal day-to-day implementation of our respective responsibilities.

52837-118: See response to Comment 52837-008.

52837-119: Permitting for future oil shale and tar sands projects would require compliance with state and federal regulations and programs, including any mandatory Renewable Portfolio Standard Programs in effect at that time. Currently, estimating the impacts of power requirements is very speculative because the amount of power required varies with the technology to be implemented, and also because the source of the power (and therefore the impacts) is unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. The commentor should note also that there are limits to the BLM's authority to impose requirements on activities taking place off federal

lands. An example would be that the BLM has no regulatory authority over electric generating facilities located outside of the BLM's lands.

52837-120: Figure 3.5.1-1, Section 3.5.1.1, provides both prevailing wind information at several monitoring locations throughout the study area, and a citation for where the information was obtained. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process.

52837-121: Thank you for your comment.

52837-122: The future NEPA analysis described in Comment 52837-001 will consider the relative resource values present in any proposed lease area and will be used by the BLM to support a decision on whether to offer specific parcels of land for lease. As the specific alternatives associated with the lease sale NEPA document are formulated, areas identified to be offered for leases would be overlaid with other existing program decisions in the RMP. Inconsistencies or conflicts would be identified and alternatives formulated so that ultimately a balanced mix of areas to be offered for leases and protection of natural resource values or uses result. While there are many possible management options, the BLM will use the scoping process to determine a reasonable range of alternatives that best address the issues, concerns, and alternatives identified by the public.

52837-123: See responses to Comments 00007-002 and 00036-013.

52837-124: The potential emissions of any air pollutant (including mercury) would not result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources. Site-specific NEPA review would be the appropriate stage for analysis of mercury emissions.

52837-125: The statement in Section 6.1.1.5 is an accurate summation of the EAs for the RD&D projects. The summaries of the EAs are provided for information. The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. Site-specific NEPA analysis will address air quality impacts of particular proposals.

52837-126: Thank you for your comment. Revisions of the RD&D leases is outside the scope of this PEIS. The state offices of the BLM are always willing to work with operators and other regulating agencies to promote improvement of environmental performance on BLM leases.

52837-127: Speculation regarding the quantity and potential impacts from "Community Exposure to Hazardous Air Pollutants" is premature at this stage in the process. The commentor is invited to submit estimates and data in the NEPA process for specific proposals.

52837-128: Although the commentor concludes that Alternative A is environmentally preferable, the PEIS adequately supports a decision in the Record of Decision to allow future consideration of certain federal lands for leasing oil shale or tar sands. The NEPA analysis for proposals that can be analyzed as to location and technologies will address regional air quality impacts.

52837-129: Project-specific NEPA will be done before any leases are issued. The NEPA process will be open pursuant to applicable regulations. The BLM state offices will be willing to meet with state, local, and federal government agencies to discuss concerns and to share information. If the State of Colorado is seeking establishment of a Federal Advisory Board, that is beyond the scope of this PEIS.

52837-130: One of the major reasons that the decision to offer specific parcels for lease was dropped from consideration in the PEIS is the uncertainty related to future power requirements needed to supply the industry. The allocation decisions now being made in the PEIS do not approve immediate leasing and consequently do not have any indirect effects associated with power generation. At the time commercial lease or development applications are considered in subsequent NEPA analysis, information regarding power sources, including their type, location, and size, will be considered. Renewable energy sources could also be considered at that time.

52837-131: Thank you for your comment. All future analysis will be performed in full compliance with NEPA, CEQ's regulations implementing NEPA, and the BLM's land use planning regulations and policies. Also note that the proposed leasing regulations would not require the BLM to accept applications for leasing that were not responsive to a call for nominations.

52837-132: See response to Comment 52837-118.

52837-133: Table 3.5.3-2 in Section 3.5.3 provides a detailed list of representative criteria air pollutant concentrations. All values are cleaner than the ambient air quality standards applicable when the analysis was prepared, although as indicated in Table 3.5.3-2, certain ozone and particulate matter values were greater than 50% of the applicable standard (up to 93% of the 8-hour ozone standard based on CASNET monitoring at the Mesa Verde, Canyonlands, and Gothic stations). EPA has recently lowered the ambient ozone standards, and will make formal determinations as to whether or not the study area continues to achieve the applicable National Ambient Air Quality Standards. The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans.

Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process.

It would be useful to conduct additional background meteorology and air quality related values monitoring throughout the study area. The BLM would like to meet with the states of Colorado, Utah, and Wyoming (along with other federal land management agencies) to pursue how such monitoring could be financed and conducted. All air quality and climate data gathered by the BLM is made available to the public upon request.

52837-134: Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources. Also, no conclusions regarding the potential significance of climate change air pollutants as compared to local or regional emissions were made.

52837-135: Thank you for your comment. The PEIS is analyzing the environmental consequences of an allocation decision. As a result, the ROD will not commit any resources or grant any lease rights. This process provides an opportunity for a subsequent level of NEPA analysis of specific parcels that may be offered for lease and to develop specific mitigation measures to protect the resources and resource values present.

Only those ACECs that are open to mineral entry can be considered for leasing; however, management prescriptions are crafted to protect the relevant and important values. The site-specific NEPA analysis would consider any impact on ACECs before any leases would be issued. If, as part of this NEPA analysis, the BLM determines that leasing and subsequent development of the oil shale or tar sands resources would cause significant impacts to ACECs, the BLM can require the applicant to: (1) mitigate the impact so that it is no longer significant, (2) move the proposed lease location, or if neither of these options resolves the anticipated conflicts, (3) the BLM can decide that development of the oil shale or tar sands resources outweighs protection of the on site resources and approve the application. This NEPA analysis would include opportunities for public involvement and comment that are part of the NEPA process.

52837-136: In the Energy Policy Act of 2005, Congress directed the Secretary of the Interior to make lands available to conduct research and development activities with respect to technologies for the recovery of liquid fuels from oil shale and tar sands resources. This provision of the Energy Policy Act is specifically referring to a research and development program and not the establishment of commercial oil shale or tar sands leasing program. The CEQ regulations (40 CFR 1502.1) require the BLM to consider reasonable alternatives, including the No Action Alternative. Each alternative in the PEIS will be given equal consideration by the decision maker.

52837-137: The BLM acknowledges the commentor's policy preference, but critique of the policy choices embodied in the Energy Policy Act of 2005 is beyond the scope of this PEIS.

52837-138: The description of the existing RD&D leases and their relationship to each of the alternatives has been clarified in the Final PEIS (see Sections 1.2, 1.4.1, and 2.3). The RD&D leases are valid existing rights and will be administered under the terms and conditions of the existing leases. The obligations of both parties are spelled out in those leases. As stated previously, approval of conversion of any RD&D lease to a commercial lease with preference right acreage would be subject to review under NEPA.

52837-139: Permitting for future oil shale and tar sands projects would require compliance with state and federal regulations in effect at that time.

52837-140: The BLM notes the preference of the State of Colorado for Alternative A, the No Action Alternative. The BLM is amending the land use plans in compliance with the provisions of the Energy Policy Act and the intent of Congress as clarified in the responses to Comment 52837-011. As explained in the PEIS itself, the proposed amendment of the land use plans only effectuates an allocation—opening or closing lands to further consideration of the possibility of leasing for commercial development of these resources. As set forth in this PEIS, the BLM concludes that the available information is sufficient for amending the land use planning decisions. As required by the NEPA regulations, the BLM will analyze no action alternatives in subsequent NEPA documents for actual proposed developments.

52837-141: The BLM does recognize that additional NEPA analysis will be required, and is committed to preparing the appropriate level of analysis prior to the issuance of any oil shale lease. (See page 2-19 of the Draft PEIS for the description of additional NEPA requirements.) A supplemental EIS as defined under the CEQ regulations, 40 CFR 1502.9, however, would not be appropriate for such additional NEPA analysis. This is because the nature and scope of the proposed action (i.e., leasing) will be different from the plan amendment action analyzed in the PEIS. Supplemental EISs are prepared when the agency makes substantial changes to a proposed action analyzed in an EIS or when there are significant new circumstances or information bearing on a proposed action analyzed in an EIS. Supplemental analyses focus on only those parts of the EIS that require updating before a decision on that proposed action is actually made. Since leasing will be an entirely different decision, a new NEPA analysis will be required. It is inappropriate to speculate at this stage whether such NEPA analysis will be programmatic in nature.

52837-142: The BLM agrees that a piecemeal or segmented approach to analysis of the environmental effects resulting from several projects without consideration of other past, present, or reasonable foreseeable future projects that may

cumulatively affect the quality of the human environment should be avoided to the extent possible. At the leasing or development stage, however, the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects. As a result, the BLM believes that "piecemealing" or "segmenting" is unlikely to occur.

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. As stated in Sections 6.1.5 and 6.2.5 of the PEIS, for the purposes of analysis the cumulative impacts assessment looks at the incremental impacts of a single oil shale facility and a single tar sands facility, recognizing that there may be more than one of each type of these facilities brought into operation during the study period. This cumulative analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decision and the uncertainty of oil shale and tar sands development on private lands.

A more specific analysis of cumulative impacts of oil shale and tar sands facilities in the study area may be conducted at a future step in the assessment process, when an RFDS for oil shale and/or tar sands development would be included. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. An RFDS at a future step in the assessment process would be based on a clear set of supportable assumptions associated with a leasing or development proposed action. Information pertinent to developing an RFDS will be gained from RD&D projects.

52837-143: The promulgation of regulations on environmental protection standards (i.e., setting royalty rates and addressing bonding, establishing standards for diligent development, and determining the allowable size of leases) is outside the scope of the PEIS.

The BLM published a proposed rule for the management of a commercial oil shale leasing program in the *Federal Register* on July 23, 2008. This process has its own public comment period.

52837-144: The BLM acknowledges the commentor's preference for Alternative A.

52837-145: Thank you for your comments. You are correct that characterization of wastes and estimations of their volumes will be critical to their proper management. At this point in time, the experiences of ongoing research efforts give some general indications of the types of wastes that can be expected. However, a much more detailed analysis of waste types and volumes will be required as part of a detailed

plan of operation for commercial-scale operations that applicants will be required to provide. On-site waste management strategies, as well as identification of final treatment and disposal facilities to be used, will all need to be specified, and all necessary permits will need to be secured. As for concerns related to the original RD&D projects, it is important to remember that the RD&D projects are outside the scope of this PEIS and were analyzed in separate NEPA documents. However, those same waste management issues have relevance in those instances where the RD&D efforts evolve to commercial scale operations and will be addressed by separate NEPA analyses when and if those transitions occur for any of the RD&D projects.

52837-146: Thank you for bringing this error to our attention. Yes, regulatory constraints are applicable to RD&D projects and thus are applicable under Alternative A (No Action). Table 2.3.2-1 has been revised to show how Alternative A varies compared to the other alternatives.

52837-147: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is primarily a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on public or worker health.

When actual exposure doses due to a process are known or can be estimated, it is possible to conduct quantitative health risk assessments that estimate the probability of health effects such as cancer, or provide an indicator of the likelihood of other types of health effects. Because the locations of residences and populations with respect to future oil shale and tar sands development are unknown, and the type and quantity of emissions to air and water from future facilities are also unknown, such a quantitative risk assessment is not possible as a part of this PEIS, which supports amending land use plans to allow certain lands to be considered for future leasing. Quantitative risk assessment would likely be possible as a part of NEPA analyses conducted for site- and technology-specific plans of development.

52837-148: The BLM is conducting a phased decision making process—proceeding from land use planning, to leasing, to operational permitting—as the BLM does for other resources such as oil and gas. This first step—RMP amendment to allow the BLM to consider applications for leasing—may be followed by the subsequent steps of leasing and plans of development. As explained in the PEIS, the proposed amendment of the land use plans is a land allocation decision—opening or closing lands to further consideration of the possibility of leasing for commercial development. Development of lease stipulations will occur in the subsequent NEPA analyses that are evaluating proposed commercial leases or plans of operations.

52837-149: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is primarily a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on public or worker health.

When actual exposure doses due to a process are known or can be estimated, it is possible to conduct quantitative health risk assessments that estimate the probability of health effects, such as cancer, or provide an indicator of the likelihood of other types of health effects. Because the locations of residences and populations with respect to future oil shale and tar sands development are unknown, and the type and quantity of emissions to air and water from future facilities are also unknown, such a quantitative risk assessment is not possible as a part of this PEIS, which supports amending land use plans to allow certain lands to be considered for future leasing. Quantitative risk assessment would likely be possible as a part of NEPA analyses conducted for site- and technology-specific plans of development.

52837-150: The assessment of potential health and safety impacts of oil shale and tar sands development provided in the PEIS is a preliminary discussion of the types of health effects associated with likely types of contaminants, and general safety issues associated with mining and in situ production. This is appropriate for the proposed action, which is primarily a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on public or worker health. The technology-specific type of health effects data analysis requested in the comment would be included as a part of NEPA analyses conducted for site- and technology-specific plans of development.

52837-151: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on public or worker health. Operators would be subject to all applicable worker safety and health regulations.

When actual exposure doses due to a process are known or can be estimated, it is possible to conduct quantitative health risk assessments that estimate the probability of health effects such as cancer, or provide an indicator of the likelihood of other types of health effects (i.e., systemic effects). Because the locations of residences and populations with respect to future oil shale and tar sands development are unknown, and the type and quantity of emissions to air and water from future facilities are also unknown, such a quantitative risk assessment is not possible as a part of this PEIS, which supports amending land use plans to

allow certain lands to be considered for future leasing. Quantitative risk assessment would likely be possible as a part of NEPA analyses conducted for site- and technology-specific plans of development.

52837-152: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action is a land use allocation and does not commit any resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on public or worker health.

When actual exposure doses due to a process are known or can be estimated, it is possible to conduct quantitative health risk assessments that estimate the probability of health effects, such as cancer, or provide an indicator of the likelihood of other types of health effects. Because the locations of residences and populations with respect to future oil shale and tar sands development are unknown, and the type and quantity of emissions to air and water from future facilities are also unknown, such a quantitative risk assessment is not possible as a part of this PEIS, which supports amending land use plans to allow certain lands to be considered for future leasing. Quantitative risk assessment would likely be possible as a part of NEPA analyses conducted for site- and technology-specific plans of development.

52837-153: The items the reviewer cites as not being addressed in the document are not addressed because the BLM has no statutory or regulatory oversight relative to the licensing, inspection, and enforcement specific to labor camps (man camps), retail food establishments, wholesale food firms, schools, childcare, mobile home parks, public accommodations (hotels/motels), and campgrounds. The document does state in Section 2.2 that, “Commercial development of oil shale or tar sands resources on public lands will be subject to existing Federal, state, and local laws and regulatory requirements as well as established BLM policies.”

52837-154: To reiterate the response from previous comments, the BLM is analyzing the effects of amending land use plans to identify public lands available for application for future commercial oil shale development, and this land allocation decision does not authorize the immediate leasing of lands for commercial development nor does it create any development rights. The PEIS analyzes the environmental consequences of this allocation decision and has determined that with the possible exception of an effect upon property values, there are no adverse environmental effects of this decision, including other socioeconomic effects. If and when applications to lease are received and additional information becomes available, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and possible mitigation measures, as well as what level of development may be anticipated. Potential socioeconomic impacts will be an important part of this future analysis.

52837-155: Uncertainty over the amount and timing of future commercial leasing has prevented development of an RFDS for oil shale and tar sands development which would project the level of activity over the life of the RMP based on estimates of the amount of resources that might be developed. Therefore, a reasonable assumption was made to analyze one hypothetical project of specified size for all three primary technologies considered in the PEIS. This analysis provides the decision maker with the requisite level of detail associated with the environmental consequences with a likely commercial development to make an informed decision.

52837-156: Text has been added to the PEIS describing in more detail the nature of temporary housing. It should be noted that the analysis of impacts of construction of temporary housing in each ROI is not dependent on its location, and assumes a generic housing construction type.

When commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken to analyze in detail the extent of regional economic impacts, including impacts on housing markets and applicable mitigation measures. Site-specific reviews would take into account actual worker residential locations by county, the extent of wage and salary spending, and equipment material and service procurement patterns in each county by housing developers when these details are known. If it is determined that additional impacts may occur in other counties outside each ROI, particularly with regard to workforce commuting patterns and the impacts on local housing markets, these counties would be included in any future site-specific assessment.

52837-157: The text in the PEIS has been changed to address the issues raised in the comment.

52837-158: Given the programmatic nature of the PEIS, the purpose of the analysis of socioeconomic impacts is to provide an overview of the type and magnitude of impacts that would likely occur with the construction and operation of oil shale and tar sands facilities. As the scale of development and project locations associated with oil shale and tar sands resource and ancillary development are not known, the analysis described in the PEIS was limited to estimating impacts for a region-of-influence in each state, based on the likely residential location of project workers. As described in Section 4.11.1.1 of the PEIS, the in-migrating population assumed with each facility was assigned to local communities in each ROI based on a facility's direct workforce, community population, and intervening distances. Expenditure levels to support the in-migrating population at existing levels of service are then estimated for each community and aggregated for each ROI.

If commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken, where project locations, employment levels, and the number of in-migrating workers in each phase of

development would be known, enabling a detailed analysis of oil shale and tar sands and ancillary facility impacts on local tax revenues, facility and infrastructure capacity and expansion costs, and on the local government expenditures required to maintain different levels of service.

52837-159: Please see response to Comment 52837-085.

52837-160: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, it is justifiable that the evaluation of specific occurrences of resources and supporting facilities, analyses of the environmental and socioeconomic consequences of oil shale or tar sands development, and the assessment of the cumulative effects of oil shale and tar sands development be included in subsequent project- or site-specific NEPA documents rather than in this PEIS.

As stated in Sections 6.1.5 and 6.2.5 of the PEIS, for the purposes of analysis the cumulative impacts assessment looks at the incremental impacts of a single oil shale facility and a single tar sands facility, recognizing that there may be more than one of each type of these facilities brought into operation during the study period. This cumulative analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decision and the uncertainty of oil shale and tar sands development on private lands.

A more specific analysis of cumulative impacts of oil shale and tar sands facilities in the study area may be conducted at a future step in the assessment process, when an RFDS for oil shale and/or tar sands development would be included. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. An RFDS at a future step in the assessment process would be based on a clear set of supportable assumptions associated with a leasing or development proposed action.

52837-161: As the scale of development and project locations associated with oil shale and tar sands resource and ancillary development are not known, the analysis described in the PEIS was limited to estimating impacts for a region-of-influence in each state, based on the likely residential location of project workers. As described in Section 4.11.1.1 of the PEIS, the in-migrating population assumed with each facility was assigned to local communities in each ROI based on a facility's direct workforce, community population, and intervening distances. Expenditure levels to support the in-migrating population at existing levels of service are then estimated for each community and aggregated for each ROI. Estimates of the impact of oil shale and tar sands development on local government expenditures are presented in Section 4.11.1.2 of the PEIS.

The comment that the localities have significantly different socioeconomic conditions is well taken. That is one reason why it would be speculative to assume precise socioeconomic impacts before there is a leasing of development proposal with locations, proposed technology, and scale of operation.

52837-162: As the technologies, scale of development, and project locations associated with oil shale and tar sands and ancillary development are not known, the analysis described in the PEIS was based on a series of assumptions regarding the retention of wages associated with housing construction, facility construction, and operation are presented in Section 4.11 of the PEIS. These assumptions were based on publicly available NEPA reviews, past experience with oil shale and tar sands and other energy-related projects, and industry data on power generation and coal mining. These assumptions are reasonable for a programmatic review of potential socioeconomic impacts.

If commercial-scale development occurs, additional NEPA analyses would be undertaken to analyze in detail the extent of regional economic impacts, including impacts on local wholesale and retail price inflation. Site-specific reviews would take into account actual worker residential locations by county, the extent of wage and salary spending, and equipment material and service procurement patterns in each county by oil shale and tar sands resource developers and operators when these details are known.

The BLM is also aware that changes in local wages and prices as a result of any oil shale and tar sands development projects will depend in part on the local supply of labor and materials, and that those supplies may change between the date of this PEIS and issuance of any commercial lease or approval of any plans of development.

52837-163: In the analysis reported in the PEIS, the “induced” effect resulting from household spending is included in the “indirect” effect.

Data on indirect employment losses resulting from the closure of the Colony Project were stated in Gulliford (1989) and were not estimated as part of the analysis undertaken for the PEIS. Multiplier estimates used in the PEIS for OSTS developments reflect the assumptions regarding the ability of each ROI to retain procurement and wage and salary spending, and as a result may differ from the estimates stated in the comment.

52837-164: The role of tax revenues in attempts to diversify local economies and reduce dependency on natural resource extraction industries, thereby reducing the susceptibility of local communities to the boom-and-bust economic cycle associated with energy development in rural areas, is included in the Sections 4.11.2 and 5.11.2 covering potential mitigation measures.

As the analysis included in the PEIS is intended only to support land allocation decisions, not leasing decisions, additional analysis addressing the risk and impacts of a "bust" and the appropriate mitigation measures will occur as part of future NEPA assessments.

52837-165: Text has been added to Section 4.10 and 5.10 of the PEIS covering the impact of oil shale and tar sands developments on the diversification of local economies and their attempts to reduce dependency on natural resource extraction industries, thereby reducing the susceptibility of local communities to the boom-and-bust economic cycle associated with energy development in rural areas. The role of tax revenues in attempts to diversify local economies away from natural resource development is included in Sections 4.11.2 and 5.11.2 covering potential mitigation measures.

52837-166: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 in the Draft PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

References:

CWCB (Colorado Conservation Board), 2004, *Statewide Water Supply Initiative*, Colorado Department of Natural Resources, Denver, Colo., Nov.

CWCB (Colorado Conservation Board), 2007, *Statewide Water Supply Initiative—Phase 2*, Colorado Department of Natural Resources, Denver, Colo., Nov.

Kuhn, E., 2005. "Science and the Future of Colorado River Policy and Compact Issues." Powerpoint slideshow presented at the 2005 USGS Drought Workshop. Available at co.water.usgs.gov/drought/workshop200501/pdf/Eric_Kuhn.pdf.

Smerdon, E.T., 2007, *Colorado River Basin Water Management: Evaluating and Adjusting to Hydroclimatic Variability*, The National Academies, Feb.

Thank you for your comment, Georgette Theotig.

The comment tracking number that has been assigned to your comment is OSTSD52839.

Comment Date: March 20, 2008 13:26:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52839

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Attachment:

Comment Submitted:

I strongly OPPOSE Alternative B, and I SUPPORT Alternative A, the "No Action" alternative. I believe that oil shale and tar sand development in the proposed areas would cause unrepairable damage and cannot be mitigated. Please accept my comments in the Public Record. | 52839-001

Response for Document 52839

52839-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Steven Hansen.

The comment tracking number that has been assigned to your comment is OSTSD52840.

Comment Date: March 20, 2008 13:28:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52840

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Comment Submitted:

I appreciate the opportunity to comment on the Oil Shale and Tar Sands Programmatic Environmental Impact Statement (OSTS PEIS).

Ten years ago, I purchased a ranch in Nine Mile Canyon, Utah for the purpose of preserving and protecting this archaeologically rich and significant treasure for future generations to enjoy and learn from. The Hopi Tribe has determined Nine Mile Canyon to be a very significant place to them, in that they have identified clan symbols left by their predecessors in the canyon that provide insights into migration patterns and life ways of their people dating back many thousands of years ago.

Development of tar sands or oil shale in the Argyle Canyon STSA would be disastrous to Nine Mile Canyon, which has been determined eligible for, and nominated to, the National Register of Historic Places. Nine Mile Canyon is so significant to the historic and prehistoric record, that in 2004, the National Trust for Historic Preservation listed the canyon on their annual list of America's 11 Most Endangered Historic Places, in order to draw public attention and action to the threats energy development in the region poses on the cultural values of the canyon. Relatively undisturbed for thousands of years, Nine Mile Canyon provides a prehistoric museum in its original place, the context of which would otherwise be lost if tar sands and oil shale development to be allowed in the Argyle Canyon STSA. 52840-001

The Nine Mile Canyon National Scenic Back Country Byway would be ruined by tar sands development in the Argyle Canyon STSA, and is a direct conflict with the OSTS PEIS which supposedly eliminates areas around National Scenic Highways (OSTS PEIS 4-130). It appears that the development of the PEIS intentionally excluded the Nine Mile Canyon Back Country Byway from the maps in order to hide this fact and confuse the public (table 3.1.2-1). 52840-002

As a land owner in Nine Mile Canyon, I am acutely aware of the fragility and tenuous health of the 52840-003

perennial Nine Mile (also known as Minnie Maud) and Argyle Creeks. The Argyle Canyon STSA in located in an extremely arid region, and drought conditions are frequent and can be very severe. I rely on these water sources for irrigating my crops and replenishing my culinary/potable ground water. Oil Shale and tar sands extraction methods are known to be disastrous to water quality. Development of these energy resources would impact water quality from Argyle and Nine Mile Canyons, all the way through the Colorado River basin, impacting water users in Utah, Arizona, Nevada, California and Mexico. Such development would render my agricultural property useless. 52840-003 (cont.)

I agree with the positions of the Colorado Plateau Archaeological Alliance (CPAA), the Utah Rock Art Research Association (URARA), and the Nine Mile Canyon Coalition, and therefore urge you to withdraw the Argyle Canyon STSA from consideration in the OSTS PEIS. 52840-004

Sincerely, Steven C. Hansen

Responses for Document 52840

52840-001: Nine Mile Canyon is acknowledged by the BLM as an important area containing a rich collection of cultural resources. Section 3.9 provides a general overview of cultural resources present in the oil shale and tar sands regions of Colorado, Utah, and Wyoming. The section does not go into any detail about any specific locations within the study area, such as Nine Mile Canyon or specific TCPs. The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. The PEIS provides an adequate description of environmental resources in areas that would be made available for lease application to enable a decision among alternatives. Detailed site-specific surveys for sensitive and protected resources in project areas would be required prior to any leasing or development decisions.

It is also acknowledged that additional data will become available on a regular basis and that future NEPA analysis and the appropriate level of compliance and consultation as required in the National Historic Preservation Act and other regulations specific to Native American concerns will need to take place. Potential impacts to cultural resources that could result from leasing and development of oil shale and tar sands resources and possible mitigation measures that the BLM could require in lease stipulations are discussed in Sections 4.10 and 5.10. However, cultural resource issues are site-specific and would need to be evaluated at later stages of analysis if and when leases are applied for.

52840-002: The PEIS does not eliminate “areas around National Scenic Highways” from consideration from leasing. Instead, as noted in Section 5.9.2, the Draft PEIS states that tar sands-related development and operation activities near National Scenic Byways, All American Roads, and state-designated scenic highways should conform to VRM Class II or Class III objectives depending on the distance of the development/activity from the designated roadway. As indicated by the Official Designations page of the National Scenic Byways Program web site (http://www.byways.org/explore/byways/15780/designation.html), the Nine-Mile Canyon Backcountry Byway is officially designated as a BLM Backcountry Byway. It is not a National Scenic Byway, All-American Road, or state-designated scenic highway. It therefore would not be subject to this mitigation measure; however, it would still be subject to mitigation measures for visual resources and the requirements of the VRM Class designation for that area as specified in the RMP.

52840-003: The BLM recognizes that water is a major constraint in developing oil shale and/or tar sands and currently is not committing to development in this PEIS. The PEIS is a programmatic-level document that analyzes allocation decisions. These allocations do not authorize the immediate leasing of the lands for commercial development, nor do they authorize commercial development.

The water needed for oil shale and/or tar sands development depends on many factors, including scale of development, technologies used in the development, national agricultural economy, and the locations and hydrologic conditions of project sites. Many of these factors are still undefined. To reduce these uncertainties, the BLM has initiated a phased approach to oil shale development. The first phase is an RD&D leasing program that the BLM believes will significantly enhance the collective knowledge regarding commercial technologies and associated impacts. The environmental impacts would be evaluated by individual projects in NEPA documents at subsequent leasing and plan of development stages. The results would be presented in project-specific NEPA documents.

52840-004: The PEIS analyzes the environmental consequence of land use allocation decisions that do not commit any resources or grant any lease rights. In addition, prior to any commercial leasing and development, additional NEPA analysis will be required, as well as the compliance with and appropriate consultation as required by the National Historic Preservation Act and other authorities specific to Native American concerns. Also see documents 00053, 52748, and 52874 for responses to CPAA, URARA, and Nine Mile Canyon Coalition comments.

Thank you for your comment, Thomas Bida.

The comment tracking number that has been assigned to your comment is OSTSD52841.

Comment Date: March 20, 2008 13:43:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52841

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Attachment:

Comment Submitted:

To: Oil Shale and Tar Sands Public Comment Review Group

I'm writing in comment on the PEIS for the proposed oil shale and tar sands development program. I'm very concerned that this program is being rushed towards lease approval without proper consideration of the long-term impacts of oil shale and tar sands development on water resources, air quality, wildlife habitat, and the irreversible damage to public lands.

I was a resident of Colorado when the oil shale program in that state shut down in 1982, and recall how devastating that was to the communities formed to support the project. Too often, local American communities are subject to the impacts of high-paced energy resource development, only to be left holding the bag when the industry decides to pull out if the economics of development aren't sufficiently profitable. The rural residents of our country deserve local industries that are sustainable for the long term, such as recreation-based industries.

The oil industry does not currently possess the technology to extract oil from these deposits without significant environmental impact, so the need to lease these lands for development now is premature at best. Canada's example of severe impact in this industry should serve as an example of why the US should not rush into such development.

52841-001

In conclusion, I endorse Alternative A, the no action alternative, of the OSTS PEIS, as the only acceptable alternative for oil shale and tar sands development at this time.

52841-002

Thank you for the opportunity to comment on this process.

Thomas A. Bida Flagstaff, AZ

Responses for Document 52841

52841-001: Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sands resources among other unconventional fuels, if it can be done in an environmentally sound manner. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives when considering whether lands should be opened or closed for application for commercial oil shale or tar sands leasing. The PEIS analyzes the environmental consequences of this allocation decision. The PEIS also describes the requirement for additional site-specific NEPA analysis prior to both issuance of commercial leases and approval of a proposed exploration or development project.

The BLM believes that this phased or staged approach ensures that commercial oil shale and tar sands development programs meet the intent of Congress and make areas available for oil shale and tar sands development while taking advantage of the best available practices to minimize impacts and offering opportunities for states, local communities, and the public to participate in the process.

52841-002: The BLM acknowledges the commentor’s preference for Alternative A.

Thank you for your comment, Ronald Cloninger.

The comment tracking number that has been assigned to your comment is OSTSD52842.

Comment Date: March 20, 2008 13:58:29PM
Oil Shale and Tar Sands
Comment ID: OSTSD52842

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Privacy Preference: Don't withhold name or address from public record
Attachment: Comment to BLM on OSTSPEIS, Mar 20, 2008.pdf

Comment Submitted:

If possible please replace prior comment letter that was attachment with current attached letter (to correct an error). Prior comment letter was tracking # OSTSD52813See Attachment.

Ronald Cloninger, P.E.
5485 County Road 309
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Tel: 970-625-0278

March 19, 2008

Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Subject: *Draft* Oil Shale and Tar Sands Programmatic Environmental Impact Statement (OSTSPEIS)

I appreciate the opportunity to review and comment on the subject draft PEIS. I have lived and worked in this community for 28 years and have experienced the personal and family hardship resulting from the Exxon pull out, May 2, 1982. My family and I suffered severe setbacks in the years that followed; Denver area consulting engineering partners I had considered close friends and associates turned their back on us after the bust. We came to realize during this time that the only ones you could really count on for support were your neighbors. Continuing the good neighbor tradition, I consider it a responsibility to comment on gross deficiencies in the oil shale part of the plan as it relates to the Piceance Basin in particular.

The 1982 bust was the direct result of a government intervention termed *The Synfuels Project*. Historically, the later half of the 1970's and the resulting *Synfuels Project* are judged severely, a period when leadership actions were out of proportion to the problem at hand.

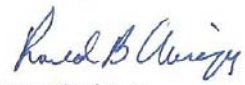
Before *Synfuels* there was *The Plowshares Project* and generations of similar failed public-private oil shale ventures that stretch back a century. Some of these public-private ventures were spectacular failures—like the Rulison Blast and the Project Rio Blanco Blast—where (scientist) neglected the consequences of making natural gas radioactive (and therefore useless). *The Plowshares Project* (scientist) actually hatched plans to detonate about 30 nuclear bombs per day for decades in the oil shale deposits for production of shale oil—complete hubris! This seems humorous until you remember this area is our home, we live here, as do many other hard working and decent tax paying citizens. We can only hope this sort of thing is now considered by our government as illogical and nonsensical.

Contrasted with the above examples of public-private hubris consider the natural gas industry that has developed in this area over the last 20 years. This industry is driven entirely by the private (corporations) sector. Advances in the technology to extract gas in this field have come slow but steadily. My neighbors and I have kept up the pressure on these gas companies to do a better job on many fronts and we are proud to report that innovations have been made that include surface owner agreements as common practice, minimized wasteful gas flaring, flex pads and directional drilling, cooperation in public road maintenance, synthetic pit liners—all now standard practice and not insignificant. There was a time when we could not imagine a future for us and our neighbors living with gas wells on every 10 or 20 acres (mud tracked-in a foot thick on the paved roads, gas flaring for weeks at a time) but with the innovations that have been made and the prospect of more to come, we are now once again (cautiously) believing in our future here.

A few points are evident from this contrasted history that bear directly on the Piceance portion of the oil shale PEIS as follows:

1. Good things emerge from careful examination of things close at hand and when acted on locally. The contrasted stories are very local and reveal something important about effective resource extraction. The private sector process of resource extraction is painful but in the end it can be tolerable. The public or public-private process of resource extraction is not tolerable at any stage and is not effective. Resist the temptation to fund this oil shale endeavor with direct government partnerships or direct government price support as is authorized in the ENERGY POLICY ACT OF 2005. 52842-001
2. Go slow. Be patient. Liquid (strategic) fuels are a commodity and oil shale development will proceed orderly according to the flexible price structure. Revenue needed already exist with the oil companies. The Task Force report to Congress (required by the Energy Policy Act of 2005) should recommend an orderly development of the Piceance Basin Oil Shale. Enable oil shale development first at the demonstration level before proceeding to full scale, all with private funding according to market forces as much as possible. 52842-002
3. With respect to BLM land use changes being contemplated in the Piceance Basin enabling direct oil shale development: make no further changes enabling oil shale development until specific information is known from the demonstration projects. Proceed orderly and sensibly based on what is actually known and knowable.
4. With respect to additional leasing: The Task Force report to Congress should report that market forces and technology are not properly staged at this time. If the large production level tracts are leased at auction under current conditions the successful bidders will likely not be able to comply with the 'Diligent Development Requirements' of Paragraph (f) of the Energy Policy Act of 2005 and the United States will be virtually assured of unfairly low bid prices and unfairly low royalty rates—all in strict non-compliance with the Energy Policy Act of 2005. 52842-003
5. Render more time for public review and comment on the PEIS. The oil shale resource extraction effort is likely to extend for more than twenty centuries (2,000 years); this is a very long period of time and preparations for such a metaphorical journey should be with very deliberate and unhurried actions if the trip is to be successful. Resist the normal 20-year study period mind set. 52842-004
6. Comments on the Piceance Basin Oil Shale are thought to have significant application to the other Oil Shale resources and Tar Sands resources of the PEIS. 52842-001 (cont.)

Sincerely,



Ron Cloninger

Responses for Document 52842

52842-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52842-002: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has a tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005 Congress recognized the importance of encouraging research and development, as well as establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated in the Energy Policy Act of 2005 that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52842-003: The comment appears to be addressing a finding of the Unconventional Fuels Task Force Report, not the PEIS. Thank you for the comment but the Task Force Report is outside the scope of the PEIS.

52842-004: The comment period for the Draft PEIS was extended for an additional period from March 20th until April 21st.

Thank you for your comment, Jerry Jackson.

The comment tracking number that has been assigned to your comment is OSTSD52843.

Comment Date: March 20, 2008 14:17:02PM
Oil Shale and Tar Sands
Comment ID: OSTSD52843

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Attachment: Oil Shale and Tar Sands Comments.pdf

Comment Submitted:

See Attachment.

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VIENNA

March 20, 2008

Bureau of Land Management
BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory
EVS/900
9700 S. Cass Avenue
Argonne IL 60439

Re: Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement, PES 07-60

Dear Sir or Madam:

Oil Shale Exploration Company, LLC ("OSEC") would like to take this opportunity to provide the following comments on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement ("PEIS").

OSEC executed an Oil Shale Research, Development and Demonstration Lease ("RD&D Lease") with the BLM encompassing 160 acres at the White River Mine, Uintah County, Utah, effective July 1, 2007. OSEC was awarded the only RD&D lease in the State of Utah and was selected over seven other applicants in the state. The RD&D Lease has an initial term of ten years and may be converted, at OSEC's request and upon approval of the BLM under certain conditions, including the production of commercial quantities of oil, into a commercial lease encompassing an additional 4960 contiguous acres. The property subject to the RD&D Lease combined with the property which would be subject to such preferential lease contains an estimated 440 million recoverable barrels of shale oil.

With limited exceptions, discussed in more detail below, OSEC supports BLM's proposal to adopt Alternative B, the Preferred Alternative, and OSEC urges BLM to adopt such alternative, particularly in Utah, without delay. 52843-001

Oil shale is one of the world's largest energy resources. The United States Geological Survey has estimated that of the 2.8 trillion barrels of shale oil resources worldwide, 2 trillion barrels are located in the United States, containing an estimated 556 billion barrels of recoverable shale oil. This compares with an estimated 1.3 trillion barrels of conventional oil

resources globally, of which less than 5% are located in the United States. The United States currently produces only 3% of the world's oil while consuming 25%.

Emerging market economies are experiencing strong economic growth, especially China and India, which is raising the global demand for energy to historically high rates. Average daily global oil demand, now at over 80 million barrels per day, has grown 14 million barrels since 1995, roughly twice the amount it grew from 1980 to 1995. Worldwide demand for crude oil is projected to increase by almost 50% between 2003 and 2030.

During the past four to five years, the demand for oil and natural gas has outstripped supply, causing oil and gas prices to increase. Between 2002 and 2005, the average price of oil increased over 110%. Between the end of February 2007 and the end of February 2008 the spot price of crude oil in the United States increased by 71%.

The total volume of crude oil and petroleum products imported by the United States has increased by almost 70% between 1992 and 2007.

This is the reality of the energy market in which the United States and its economy participates. America must develop new sources of domestic oil in order to ensure continued economic prosperity. Increasing domestic sources of oil is vital to national security. The development of domestic oil shale reserves will make a significant contribution to that goal.

Accordingly, OSEC supports the proposed action evaluated in the PEIS (Alternative B) and urges BLM to adopt that proposal as soon as possible.

Nonetheless, OSEC takes issue with following matters addressed in the PEIS.

Preference Leasing

OSEC believes that the PEIS is confusing and inconsistent with respect to the description of preference leasing in Sections 2.3.3 and 2.3.3.1. The preference leasing provided in OSEC's RD&D Lease is a critical component of the commercial development of oil shale resources.

The OSEC RD&D Lease defines a prescribed area of 4960 acres which is outside of the RD&D Lease Area and which the Lease defines as the "Preference Lease Area." The Lease states in the definitions section that this area is "reserved for leasing during the term of this lease" and that OSEC "may earn a preference lease right" to this specific area set forth in the Lease. Section 23(a) of the OSEC Lease provides: "The Lessee [OSEC] shall apply for conversion of the research, development and demonstration lease to a commercial lease no later than 90 days after the commencement of production in commercial quantities. The Lessee shall have the exclusive right to acquire any or all portions of the preference lease area for inclusion in the commercial lease, up to a total of 5,120 contiguous acres, upon (1) documenting to the satisfaction of the authorized officer that it has produced commercial quantities of shale oil from the lease." The RD&D Lease defines "Commercial Quantities" to mean "production of shale oil

52843-002

quantities in accordance with the approved Plan of Development for the proposed project through the research, development and demonstration activities conducted on the lease, based on and at the conclusion of which a reasonable expectation exists that the expanded operation would provided a positive return after all costs of production have been met, including the amortized costs of the capital investment."

Preference leasing is important to the commercial development of oil shale for two reasons. First, the preference leasing rights established in the OSEC RD&D Lease are inseparable from commercial development of oil shale. For companies which cannot draw on the financial reserves of a major petroleum company, the preference right is essential to acquiring financing required for RD&D operations as well as for commercial development. Put simply, a 160-acre RD&D Lease provides an inadequate basis for obtaining financing sufficient for RD&D operations or commercial development. Commercial development rights and the revenues to be generated by such development are the "asset" needed to obtain sufficient capital to finance even the comparatively limited venture of RD&D operations. The primary purpose of the oil shale RD&D program is to demonstrate in the field the adequacy of technology to develop the resource in a manner that is economically feasible and which provides adequate environmental protection. Without the preference lease rights, funding cannot be realistically raised to develop the RD&D operations, and, as a result, the entire purpose of the RD&D program is defeated.

Second, OSEC believes that the provisions in the RD&D Lease described above grant to OSEC a legally enforceable right to the 4960-acre area specifically defined in the Lease as the Preference Lease Area. The Lease provides certain conditions precedent to the establishment of that right (including NEPA compliance) but once those objectively defined conditions are met, OSEC not only has the exclusive right to be eligible to lease such area, OSEC will in fact be entitled as a matter of law to such a lease. Based on the language in the RD&D Lease, we believe that any discretion on BLM's part with respect to leasing the Preference Lease Area is limited (at most) to whether the objective conditions precedent set forth in the Lease are met.

52843-002 (cont.)

The discussion of commercial leasing in Section 2.3.3 is completely inconsistent with the concept of preference leasing rights already granted by the RD&D Lease. For example, the PEIS (p. 2-20) describes the proposed commercial leasing program as follows: "Leasing would occur utilizing a lease-by-application process. Under this process, the BLM would issue a call for applications for commercial leases. In response, companies would be required to identify the specific lands that they are interested in as part of their lease application package." This procedure directly contradicts the provisions of the RD&D Lease already executed by the United States which, as described above, give OSEC an exclusive preference right to the lands so defined in the Lease and give OSEC the right to a commercial lease for such lands upon meeting certain objective criteria clearly established in the Lease. The Lease does not include any language reserving to BLM the right to impose any additional impediments to commercial leasing on those lands, other than the conditions precedent that are spelled out in the Lease. The Lease does not include any language describing a procedure for making such lands available for commercial leasing or requiring OSEC to apply, through the procedure described in this portion

of the PEIS, for a commercial lease for the lands defined by the Lease as within OSEC's Preference Lease Area.

Moreover, the description of the commercial leasing process in Section 2.3.3 is directly contradicted by the description of preference leasing in Section 2.3.3.1 (p. 2-25). OSEC requests that BLM revise Section 2.3.3 in the final EIS to state that lands within the Preference Lease Area defined by the OSEC RD&D Lease will not be subject to the procedure for commercial leasing described in that section nor will OSEC be required to undergo such procedure in order to obtain its rights to such Preference Lease Area. 52843-002 (cont.)

Finally, the preference lease issue is tied to BLM regulations for commercial leasing which have yet to be published in proposed form. One of the conditions of OSEC's right to a commercial lease under the preference lease provisions is the payment of Fair Market Value which is to be determined under regulations to be adopted by the Department of the Interior under Section 21 of the Mineral Leasing Act. This is a key component of OSEC's commercial preference lease right which is in turn critical to the RD&D program for the reasons stated above. Accordingly, OSEC urges BLM to publish the proposed regulations for the commercial oil shale leasing program as soon as possible so that realistic economic planning can occur for both RD&D and commercial development. 52843-003

Proposal to Withdraw Certain Lands from OSEC's Preference Lease Area

In the PEIS BLM appears to be proposing to exclude a 0.5 mile-wide corridor centered on Evacuation Creek from the Preference Lease Area defined in the OSEC RD&D Lease (p. 2-25 and n. 8). However, the description of the proposed exclusion is unclear. The PEIS states (pp. 2-19 and 2-20) that "additional areas would be closed and not available for future opportunity to lease for commercial development of oil shale resources" and includes in this category "segments of rivers that have been determined to be potentially eligible for WSR [Wild and Scenic River] status by virtue of a WSR inventory. These river segments and a corridor extending at least 0.25 mi from the high water mark on either side of these segments would be excluded from commercial leasing." With respect specifically to OSEC, the PEIS states (p. 2-25): "For the OSEC RD&D project in Utah . . . portions of the preference right lease areas are not available for application for commercial leasing under Alternative B because of the presence of potentially eligible WSR, Evacuation Creek (see Section 2.3.3)." This latter sentence is immediately followed by footnote 8 which appears to contradict it: "OSEC will not be able to locate other surface facilities within 0.25 mi of the creek during commercial operations if the creek has been determined to be suitable for designation as a WSR at the time the commercial lease is issued." [emphasis added]. The PEIS first appears to take the position that part of the proposed preferred alternative (the proposed decision under review) is the exclusion of this corridor from commercial oil shale leasing. However, the footnote seems to postpone the decision of whether to exclude this area until "the time the commercial lease is issued," which would imply that such proposed exclusion is not part of the proposed action under NEPA review in this PEIS. 52843-004

OSEC believes that it is premature for BLM to decide to make this exclusion at this time. Adoption of mitigation measures to protect the creek should await OSEC's proposal of an operations plan on the Preference Lease Area. Moreover, measures to protect the creek should be limited to those specifically necessary to protect the creek from specific proposed OSEC operations, rather than simply the adoption of a blanket half-mile wide exclusion.

52843-004 (cont.)

Accordingly, OSEC urges BLM to withdraw from the final EIS the assertion that such a corridor will be excluded from the Preference Lease Area defined in the OSEC RD&D Lease.

Climate Change

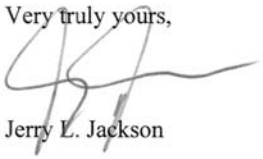
OSEC agrees with BLM that it is prudent to include a discussion of climate change in a PEIS which addresses proposed energy development. However, the discussion of climate change in Sections 3.5.1.1 and 4.6.1.1 is somewhat limited with respect to the potential for commercial oil shale development to contribute to carbon dioxide and other greenhouse gas emissions. We recommend that BLM should attempt to develop estimated greenhouse gas emissions for the types of commercial projects which may be authorized on the lands being evaluated and to include such estimates in the final EIS in Sections 4.1.2 and 4.6.1.1. We note that such estimates were made in the Environmental Assessment for the White River mine and that other retorts or methods of extracting oil from shale could have different CO2 emission profiles than those of the White River mine analysis.

52843-005

* * *

OSEC appreciates the opportunity to comment upon the PEIS and we respectfully submit for your consideration these comments.

Very truly yours,



Jerry L. Jackson

Responses for Document 52843

52843-001: The BLM acknowledges the commentor's preference for Alternative B.

52843-002: In general, valid existing rights are considered administrative actions by the BLM and do not require a specific planning decision to implement. This is a planning criterion and, as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decisions are subject to valid existing rights. With respect to the federal government's commitment to issue commercial leases on the preference right lease areas (PRLAs) to the RD&D lease holders, a lease will be issued only if the terms and conditions of the lease are met. This includes evaluation pursuant to the National Environmental Policy Act that concludes that commercial-scale operations of the applicant's technology at that site do not pose environmental or social risks unacceptable to the BLM. The discussion of the PRLAs in the PEIS, however, has been revised to reflect the language in the lease and clarified to show that this is a component of all of the PEIS oil shale alternatives.

52843-003: Thank you for your comment. The BLM published a proposed rule for the management of a commercial oil shale leasing program in the *Federal Register* on July 23, 2008, which has a separate comment period.

52843-004: Please see the response to Comment 52843-002

52843-005: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

Thank you for your comment, Paul Swartzinski.

The comment tracking number that has been assigned to your comment is OSTSD52844.

Comment Date: March 20, 2008 14:29:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD52844

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Comment Submitted:

In light of the global warming issues and the relationship with CO2, development of Oil Shale for our energy needs seems to be looking backwards instead of forwards for our national energy policy. Alternative technologies that do not rely on a carbon input need to be developed to lessen our dependence on oil. With oil prices at the highest prices ever there is increased demand from the oil companies to exploit hard to reach oil reserves within our own country. Though this may seem reasonable at the surface the absolute truth is that the oil companies see an opportunity to increase their profits. Further expanding leasing opportunities on public lands will only incur further environmental damge to these fragile ecosystems. Until the enegry industry develops methods that will not involve strip mining these areas there should not be in any discussion in expanding exploratory leases. We all know oil is present in these basin,it's there, this Alternative B would only pave the way for complete exploitation. I encourage Alternative A to be considered and selected

52844-001

Response for Document 52844

52844-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Stuart Sanderson.

The comment tracking number that has been assigned to your comment is OSTSD52846.

Comment Date: March 20, 2008 14:38:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52846

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Privacy Preference: Don't withhold name or address from public record
Attachment: Statement EIA adm.pdf

Comment Submitted:

Re: Comments on Oil Shale Programmatic EIS

The Colorado Mining Association (CMA) is pleased to submit comments on the Programmatic Environmental Impact Statement (PEIS) for Oil Shale issued by the Bureau of Land Management. The CMA is an industry association composed of 700 companies and individuals that explore for, produce, and refine metals, coal, oil shale, and industrial minerals and firms that provide goods and services to the industry.

Even as we aggressively pursue energy conservation, our nation requires an ever-growing amount of transportation fuel, feedstock for manufacturing, and source of electricity generation. We currently import nearly 60% of our petroleum and liquid fuels from foreign sources, many of which are hostile to our interests. This number is projected to remain over 50% based on the Energy Information Administration's projections out to 2030. Our nation cannot continue on this path of dependence on foreign resources. We must develop our own resources and move forward to develop alternative energy supplies including oil shale. We have long known that the kerogen contained in oil shale could meet a portion of our energy needs for jet fuel, #2 diesel and other high value by-products. The Green River formation in Colorado, Wyoming and Utah are believed to contain the equivalent of 1.8 trillion barrels of oil.

Colorado's history with oil shale enjoyed resurgence in the 1980's, only to die out when the cost of crude oil dropped. We must again move forward to develop this resource in a prudent, but determined manner; we cannot and must not wait until the country is literally "running out of gas" for either lack of available supply or exorbitant cost in the international market.

Of the alternatives presented in the PEIS, Alternative B is the only realistic option if we are to develop oil shale in a responsible manner instead of waiting for a national crisis. Alternative A (the no action alternative) does not allow for commercial leasing of oil shale on federal lands and thus

52846-001

is inconsistent with our goal of less foreign dependence. Alternative C, although allowing for leasing, is infeasible because it would allow development only on small non-contiguous parcels. Alternative C would make efficient development of the resource impossible, given the large acreages required to justify the investment in technology and infrastructure. Argonne National Laboratory March 20, 2008 Page 2

52846-001 (cont.)

Requiring two or three NEPA reviews is unduly cumbersome and would lead to delay and financial risk. The multiple reviews are not an efficient use of time and resources. The long, complex process leading to commercial leasing presents financial risk to operators who have made significant investment in proprietary technology who would be required to disclose that proprietary technology before obtaining a least. The risk only increases with delay of leasing. In considering risks to operators, we are also concerned that the PEIS is inconsistent in its recognition of valid rights to convert previously granted RD&D leases to commercial leases.

52846-002

52846-003

Potential impacts resulting from commercial leasing are overestimated in the PEIS because the document fails to recognize the many regulatory processes in place to evaluate and mitigate risks. Federal requirements, along with state environmental protection programs and local land use controls all serve to mitigate environmental and socioeconomic risks. Some of the mitigation measures in the PEIS are inappropriate at the programmatic stage of review and should be deferred until site-specific NEPA review is conducted for specific proposed projects. That way, the mitigation measures could be tailored to the project under evaluation.

52846-004

The CMA appreciates the opportunity to provide these comments and urges your adoption of Alternative B.

Sincerely,

Stuart A. Sanderson President

See Attachment.

STATEMENT OF GUY CARUSO

ADMINISTRATOR

ENERGY INFORMATION ADMINISTRATION

U.S. DEPARTMENT OF ENERGY

before the

COMMITTEE ON ENERGY AND NATURAL RESOURCES

UNITED STATES SENATE

March 4, 2008

Mr. Chairman and Members of the Committee:

I appreciate the opportunity to appear before you today to discuss the long-term outlook for energy markets in the United States.

The Energy Information Administration (EIA) is the independent statistical and analytical agency within the Department of Energy. We do not promote, formulate, or take positions on policy issues. Our mission is to produce objective, timely, and relevant data, projections, and analyses that are meant to assist policymakers, help markets function efficiently, and inform the public. The energy projections that I will discuss today are widely used by government agencies, the private sector, and academia as a starting point for their own energy analyses. However, our views are strictly those of EIA and should not be construed as representing those of the Department of Energy or the Administration.

The *Annual Energy Outlook 2008* (*AEO2008*) reference case discussed today includes the impact of the Energy Independence and Security Act of 2007 (EISA2007) that was enacted in December and replaces the early release version issued shortly before that enactment. The specific EISA2007 provisions that are modeled in *AEO2008* include updates to the renewable fuel standard (RFS) and to the corporate average fuel economy (CAFE) standard for new light-duty vehicles; updated and new appliance energy efficiency standards for boilers, dehumidifiers, dishwashers, clothes washers, and walk-in refrigerators and freezers; lighting energy efficiency standards; provisions to reduce energy consumption in Federal buildings; and industrial electric motor efficiency standards. Consistent with the general approach used in the *AEO*, the reference case does not consider those sections of EISA2007 that require appropriations for implementation or sections with highly uncertain impacts on energy markets. The updated reference case also includes additional revisions that reflect: historical data issued after the early release version of the *AEO2008* was completed, the EIA *Short-Term Energy Outlook* released in January 2008, a more current economic outlook, and updates to correct modeling problems in the early release version.

The *AEO2008* is intended to represent an energy future based on given technological and demographic trends, current laws and regulations, and consumer behavior as derived from known data. EIA recognizes that projections of energy markets are highly uncertain and subject to political disruptions, technological breakthroughs, and other unforeseeable events. In addition, long-term trends in technology development, demographics, economic growth, and energy resources may evolve along a different path than expected in the projections. The complete *AEO2008*, which EIA will release in April, includes a large number of alternative cases intended to examine these uncertainties. The following discussion summarizes the highlights from the *AEO2008* reference case.

Energy Prices

EIA has raised the reference case path for world oil prices in *AEO2008*, although the upward adjustment is smaller than the last major adjustment, introduced in *AEO2006*. In the *AEO2008* reference case, real world crude oil prices (defined as the price of light,

low-sulfur crude oil delivered in Cushing, Oklahoma, in 2006 dollars) decline gradually from current levels to $57 per barrel in 2016 ($68 per barrel in nominal dollars), as expanded investment in exploration and development brings new supplies to the world market. After 2016, real prices begin to rise (**Figures 1 and 2**), as demand continues to grow and higher cost supplies are brought to market. In 2030, the average real price of crude oil is $70 per barrel in 2006 dollars, or about $113 per barrel in nominal dollars.

In developing its oil price outlook, EIA explicitly considered four factors: (1) growth in world liquids consumption, (2) the outlook for conventional oil production in countries outside the Organization of the Petroleum Exporting Countries (OPEC), (3) growth in unconventional liquids production, and (4) OPEC behavior. With the forces driving demand outside the United States as strong or stronger than previously expected and with global supply projections somewhat weaker, trends in total world liquids production are similar to those in the *Annual Energy Outlook 2007* (*AEO2007*) reference case but the oil prices are higher.

Current oil prices are above EIA's reference case estimate of the long-run equilibrium price, driven by recent strong global economic growth, shortages of experienced personnel, equipment, and construction materials in the oil industry, and political instability in some major producing regions. EIA's expectations regarding the ultimate size of both conventional and unconventional liquid resources have not changed since the *AEO2007*. Of course, geopolitical trends, the adequacy of investment and the availability of crude oil resources and the degree of access to them, and the market behavior of key OPEC producers are all inherently uncertain. To evaluate the implications of uncertainty about world crude oil prices, the *AEO2008* includes alternative high and low price cases (**Figure 2**).

The price of natural gas also is higher in the *AEO2008* reference case. The real wellhead price of natural gas (in 2006 dollars) declines from current levels through 2016, as new supplies enter the market. After 2016, real natural gas prices rise to $6.56 per thousand cubic feet ($10.52 per thousand cubic feet in nominal dollars) in 2030 (**Figure 1**). The higher prices reflect an increase in production costs associated with trends that were discussed in *AEO2007* but not fully reflected in its reference case. The higher natural gas prices also are supported by higher oil prices.

Minemouth coal prices in the *AEO2008* reference case, both nationally and regionally, are generally similar to those in the *AEO2007* reference case. Average real minemouth coal prices (in 2006 dollars) fall from $1.21 per million British thermal unit (Btu) ($24.63 per short ton) in 2006 to $1.14 per million Btu ($22.51 per short ton) in 2020, as prices moderate following a substantial run-up over the past few years. After 2020, prices rise due to demand growth, reaching $1.19 per million Btu ($23.24 per short ton) in 2030 (**Figure 1**). In nominal terms, the average minemouth price of coal in the *AEO2008* reference case is $1.91 per million Btu ($37.29 per ton) in 2030.

Electricity prices follow trends in the delivered prices of fuels to power plants. From a peak of 9.3 cents per kilowatthour (2006 dollars) in 2009, average delivered electricity prices in the *AEO2008* reference case decline to 8.5 cents per kilowatthour in 2016 and

then increase to 8.8 cents per kilowatthour in 2030. In nominal dollars, the average delivered electricity price reaches 14.1 cents per kilowatthour in 2030.

Energy Consumption

Total primary energy consumption grows by 19 percent between 2006 and 2030 (**Figure 3**), at a rate of 0.7 percent per year or less than one-third the rate of growth in gross domestic product (GDP) (2.4 percent per year). Energy intensity, as measured by primary energy use per dollar of GDP (2000 dollars), declines at an average annual rate of 1.7 percent from 2006 to 2030. Since 1992, the energy intensity of the U.S. economy has declined on average by 2.0 percent per year, in part because the share of industrial shipments accounted for by the energy-intensive industries has fallen from 30 percent in 1992 to 21 percent in 2006. In the *AEO2008* reference case, the energy-intensive industries' share of total industrial shipments continues to decline, although at a slower rate, to 18 percent in 2030.

Population is another key determinant of energy consumption, influencing demand for travel, housing, consumer goods, and services. Since 1990, population has increased by about 20 percent and energy consumption by 18 percent. Population in the reference case increases by 22 percent from 2006 to 2030, compared to the aforementioned 19 percent growth in energy consumption. The rest of this section reviews consumption trends for each major energy source.

Total consumption of liquid fuels grows at an average annual rate of 0.4 percent in the *AEO2008* reference case, from 20.7 million barrels per day in 2006 to 22.8 million barrels per day in 2030 led by growth in transportation uses, which account for 68 percent of total liquid fuels demand in 2006, increasing to 73 percent in 2030 (**Figure 4**). Improvements in the efficiency of vehicles, planes, and ships are more than offset by growth in travel.

EISA2007 requires new light-duty vehicles, including both cars and trucks, to reach an average fuel economy of 35 miles per gallon (MPG) by 2020, based on the Environmental Protection Agency (EPA) test value used to measure compliance with the CAFE standard. The EPA CAFE test value generally differs from the estimated MPG value on the fuel economy label and typically exceeds the actual on-the-road fuel economy of a new vehicle by a significant margin. Despite these differences, the higher fuel economy standards in EISA2007 significantly improve the in-use fuel economy of the stock of light-duty vehicles. In the reference case, the average in-use fuel economy for the stock of light-duty vehicles in 2030 increases to 28.0 miles per gallon, 38 percent above its 2006 level. EISA2007 also results in a shift in the mix of transportation vehicle fuels. Total biofuel consumption reaches 2.8 quadrillion Btu (29.7 billion gallons) in 2030 in the revised *AEO2008* reference case, 2.3 quadrillion Btu (24.4 billion gallons) more than in 2006. This represents about 11.3 percent of total motor vehicle fuel, on a Btu basis, in 2030.

Total consumption of natural gas increases from 21.7 trillion cubic feet in 2006 to 23.9 trillion cubic feet in 2016, then declines to 22.7 trillion cubic feet in 2030 (**Figure 5**).

Industrial natural gas use is lower than in previous *AEO*s because of the higher delivered natural gas prices, lower economic growth, and a reassessment of natural gas use in the energy-intensive industries in *AEO2008*. Under current laws and regulations, natural gas is expected to lose market share to coal in the electric power sector as result of a continued increase in natural gas prices in the latter half of the projection and slower growth in electricity demand.

Total coal consumption increases from 22.5 quadrillion Btu (1,114 million short tons) in 2006 to 30.1 quadrillion Btu (1,557 million short tons) in 2030, growing by 1.2 percent per year. Coal consumption grows at a faster rate toward the end of the projection period, particularly after 2020, as coal use for new coal-fired generating capacity grows rapidly. About 91 percent of the coal is currently used for electricity generation. Coal remains the primary fuel for electricity generation and its share of generation (including end-use sector generation) is expected to increase from about 49 percent in 2006 to 54 percent in 2030. Growth in coal use by coal-to-liquids (CTL) plants is lower than in previous *AEO*s as a result of EISA2007. Investment dollars that would have previously gone into CTL capacity now flow to biomass-to-liquids (BTL) capacity. However, there is a great deal of uncertainty about this projection.

Total electricity consumption, including both purchases from electric power producers and on-site generation, grows from 3,814 billion kilowatthours in 2006 to 4,974 billion kilowatthours in 2030, increasing at an average annual rate of 1.1 percent (**Figure 6**). In comparison, electricity consumption grew by annual rates of 7.3 percent, 4.2 percent, 2.6 percent, and 2.3 percent in the 1960s, 1970s, 1980s, and 1990s, respectively. The most rapid growth (1.7 percent per year) occurs in the commercial sector, as building floorspace is expanded to accommodate growing service industries. Growing use of electricity for computers, office equipment, and small electrical appliances is partially offset in the *AEO2008* reference case by improved energy efficiency.

Total marketed renewable fuel consumption grows by an average of 3.0 percent per year in the reference case, from 6.8 quadrillion Btu in 2006 to 13.7 quadrillion Btu in 2030. About 45 percent of the demand for renewables in 2030 is for grid-related electricity generation (including combined heat and power), and the rest is for dispersed heating and cooling, industrial uses, or transportation uses.

The rapid growth in the use of renewable fuels for transportation in *AEO2008* reflects the updated RFS in Section 211(o) of the Clean Air Act as amended by EISA2007. The updated RFS sets a requirement for 36 billion gallons of total renewable fuels by 2022, including 21 billion gallons of advanced biofuels. Included are requirements for 1 billion gallons of biodiesel by 2012 and 16 billion gallons of cellulosic biofuels, both of which count toward the advanced biofuels requirement. The remaining 4 billion gallons of advanced biofuels may come from any source. The difference between advanced biofuels and total renewable fuels may be met by corn ethanol. Diesel fuels that are derived from biomass feedstocks count 1.5 times their physical volume as credits towards meeting the RFS requirements owing to diesel's higher energy content relative to ethanol.

While the situation is very uncertain, the current state of the industry and our present view of projected rates of technology development and market penetration of cellulosic biofuel technologies suggest that available quantities of cellulosic biofuels prior to 2022 will be insufficient to meet the new RFS targets for cellulosic biofuels, triggering both waivers and a modification of applicable volumes as provided for by paragraphs 7(D) and 7(F), respectively, of Section 211(o) of the Clean Air Act as amended by EISA2007. The modification of volumes reduces the overall target in 2022 from 36 billion gallons to 32.5 billion gallons. The modified cellulosic biofuel requirement is projected to be met by a combination of domestic cellulosic ethanol, imported cellulosic ethanol, and biomass-to-liquids diesel, but the specific mix is again highly uncertain.

Ethanol use grows from 5.6 billion gallons in 2006 to 24.3 billion gallons in 2030 (over 16 percent of total gasoline consumption by volume) (**Figure** 7). Ethanol use for gasoline blending grows to 13.3 billion gallons and E85 consumption to 11.0 billion gallons in 2030. The ethanol supply is expected to be produced from both corn and cellulosic feedstocks, with corn accounting for 15.0 billion gallons of ethanol production in 2030. The *AEO2008* reference case also expects strong growth in ethanol imports after 2010, reflecting the pending expiration of the tariff on imported ethanol in January 2009. Biodiesel use reaches 1.3 billion gallons in 2030 (about 1.6 percent of total diesel consumption by volume). Consumption of diesel liquids produced from biomass (BTL) grows to 4.2 billion gallons in 2030, 4.9 percent of total diesel consumption by volume.

Excluding hydroelectric power, renewable energy consumption for electric power generation grows from 0.9 quadrillion Btu in 2006 to 3.1 quadrillion Btu in 2030. The higher level of nonhydroelectric renewable energy consumption in the *AEO2008* reference case primarily reflects a revised representation of State renewable portfolio standard (RPS) programs, which require that specific and generally increasing shares of electricity sales be supplied by renewable resources such as wind, solar, geothermal, and sometimes biomass or hydropower. Previous *AEO*s placed more weight on the "escape clauses" incorporated in many State RPS programs, given that the consumer costs of these programs would increase significantly if the Federal production tax credit (PTC) for qualifying renewable energy expired as provided for under current law. The new representation, which assumes that the State RPS goals will be met absent a clear contrary indication, results in significant additional growth of renewable generation from wind, biomass, and geothermal resources.

Energy Production and Imports

Net imports of energy are expected to continue to meet a major share of total U.S. energy demand. The increased use of biofuels resulting from EISA2007, much of which is domestically produced, and the reduction in transportation fuel demand due to the new fuel economy standards both serve to moderate growth in energy imports. Higher fuel prices over the projection period also spur increased domestic energy production and moderate energy demand growth, also tempering growth in imports. Furthermore, the net import share of total U.S. energy consumption in 2030 is 27 percent, a decline from the 30-percent share in 2006.

Liquids and Other Petroleum Products. U.S. crude oil production grows from 5.1 million barrels per day in 2006 to a peak of 6.3 million barrels per day in 2018, primarily due to increased production from the deep waters of the Gulf of Mexico and from the expansion of enhanced oil recovery operations in onshore areas supported by higher crude oil prices. Domestic production subsequently declines to 5.6 million barrels per day in 2030, as increased production from new smaller discoveries is inadequate to offset the declines in large fields in Alaska and the Gulf of Mexico (**Figure 8**) Total domestic liquids supply, including crude oil, natural gas plant liquids, refinery processing gains, and other refinery inputs (e.g., ethanol, biodiesel, BTL, and liquids from coal) grows from 8.3 million barrels per day in 2006 to 10.5 million barrels per day in 2030.

The net import share of total liquids supplied, including crude oil and refined products, drops from 60 percent in 2006 to less than 51 percent in 2022, and then increases to 54 percent in 2030 as crude oil imports grow rapidly at the end of the projection to meet liquids demand (**Figure 9**). Net crude oil imports in 2030 are 11.1 million barrels per day in 2030 and net product imports (including net ethanol imports) are 1.3 million barrels per day in 2030.

Natural Gas. Total domestic natural gas production, including supplemental natural gas supplies, increases from 18.6 trillion cubic feet in 2006 to 20.1 trillion cubic feet in 2022 before declining to 19.6 trillion cubic feet in 2030 in the *AEO2008* reference case. While onshore conventional production declines steadily from 6.6 trillion cubic feet in 2006 to 4.4 trillion cubic feet in 2030, lower-48 offshore production grows from 3.1 trillion cubic feet in 2006 to a peak of 4.5 trillion cubic feet in 2017 as new resources come online in the Gulf of Mexico. After 2017, lower-48 offshore production declines to 3.5 trillion cubic feet in 2030. Lower-48 production of unconventional natural gas, particularly gas from shale, is expected to be a key contributor to growth in U.S. natural gas supplies, increasing from 8.5 trillion cubic feet in 2006 to 9.5 trillion cubic feet in 2030. The Alaska natural gas pipeline is expected to be completed in 2020, later than previously anticipated, because of delays in the resolution of issues between Alaska's State government and industry participants.

Net pipeline imports of natural gas fall from 2.9 trillion cubic feet in 2006 to 0.3 trillion cubic feet in 2030 in the *AEO2008* reference case (**Figure 10**), reflecting both resource depletion in Alberta and Canada's growing domestic demand. Total net imports of liquefied natural gas (LNG) to the United States increase from 0.5 trillion cubic feet in 2006 to 2.8 trillion cubic feet in 2030. U.S. LNG regasification capacity increases from 1.5 trillion cubic feet in 2006 to 5.7 trillion cubic feet in 2009 with the addition of six new regasification facilities that are currently under construction (four along the Gulf Coast and two off the coast of New England). Given global LNG supply constraints, overall capacity utilization at the U.S. LNG import facilities is expected to remain below 50 percent through 2030. The future direction of the global LNG market, with many new international players entering LNG markets and strong competition for available supply, is one of the key uncertainties in the *AEO2008* reference case.

Coal. As coal demand grows in the *AEO2008* reference case, U.S. coal production increases at an average rate of 1.0 percent per year (**Figure 11**). On a Btu basis, 60

percent of domestic coal production originates from States west of the Mississippi River in 2030, up from an estimated 49 percent in 2006.

Electricity Generation

Absent new environmental policy initiatives that would serve to accelerate the retirement of existing coal-fired power plants, the slowing rate of electricity growth reduces the need for new generating capacity. In the *AEO2008* reference case, the natural gas share of electricity generation (including generation in the end-use sectors) remains between 20 percent and 21 percent through 2017, before falling to 14 percent in 2030 (**Figure 12**). The coal share remains between 48 percent and 49 percent through 2018, before increasing to 54 percent in 2030. Net additions to coal-fired generating capacity in the *AEO2008* reference case total 103 gigawatts from 2006 to 2030, including 4 gigawatts at CTL plants and 30 gigawatts at integrated gasification combined-cycle plants. Given the assumed continuation of current energy and environmental policies in the reference case, carbon capture and sequestration (CCS) technology does not come into use during the projection period.

Nuclear generating capacity in the *AEO2008* reference case increases from 100.2 gigawatts in 2006 to 114.8 gigawatts in 2030. The increase includes 16.4 gigawatts of capacity at newly-built nuclear power plants and 2.7 gigawatts expected from uprates of existing plants, partially offset by 4.5 gigawatts of retirements. Total electricity generation from nuclear power plants grows from 787 billion kilowatthours in 2006 to 917 billion kilowatthours in 2030 in the *AEO2008* reference case, accounting for about 18 percent of total generation in 2030. Additional nuclear capacity is built in some of the alternative *AEO2008* cases, particularly those that project higher demand for electricity or even higher fossil fuel prices.

The use of renewable technologies for electricity generation is stimulated by improved technology, existing State RPS programs, the availability of the renewable production tax credit for eligible generation placed in service before the end of 2008, and higher fossil fuel prices. Total renewable generation in the *AEO2008* reference case, including combined heat and power (CHP) and end-use generation, grows by 2.2 percent per year, from 385 billion kilowatthours in 2006 to 654 billion kilowatthours in 2030 (**Figure 13**).

Energy-Related Carbon Dioxide Emissions

Carbon dioxide emissions from energy use in the *AEO2008* reference case increase from 5,890 million metric tons in 2006 to 6,859 million metric tons in 2030, an average annual increase of 0.6 percent **(Figure 14)**. The energy-related carbon dioxide emissions intensity of the U.S. economy falls from 520 metric tons per million dollars of GDP in 2006 to 339 metric tons per million dollars of GDP in 2030, an average decline of 1.8 percent per year. Increases in carbon dioxide emissions primarily result from a continued reliance on coal for electricity generation and on petroleum fuels in the transportation sector.

Conclusion

As I noted at the outset, while EIA does not take positions on policy issues, its data, analyses, and projections are meant to assist policymakers in their energy policy deliberations. In addition to the work on baseline projections that I have reviewed this morning, EIA has also recently responded to requests from this Committee and others for analyses of the energy and economic impacts of alternative proposals to limit greenhouse gas emissions and other policy proposals. We look forward to providing whatever further analytical support that you may require on energy-related topics. We believe that such analyses can help to identify both potential synergies and potential conflicts among different energy-related objectives that are currently under discussion in this Committee and elsewhere.

This concludes my testimony, Mr. Chairman and members of the Committee. I would be happy to answer any questions you may have.

Figure 1. Energy prices are expected to decline in near term, then rise.

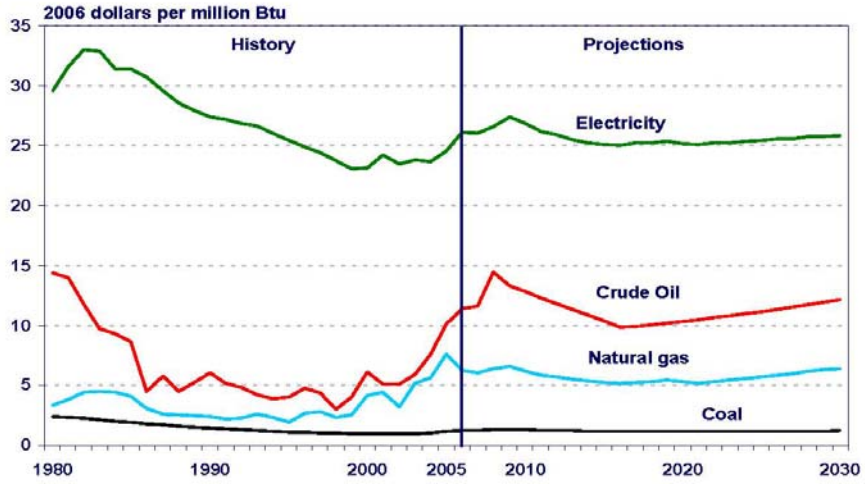


Figure 2. World oil prices are higher in all *AEO2008* cases.

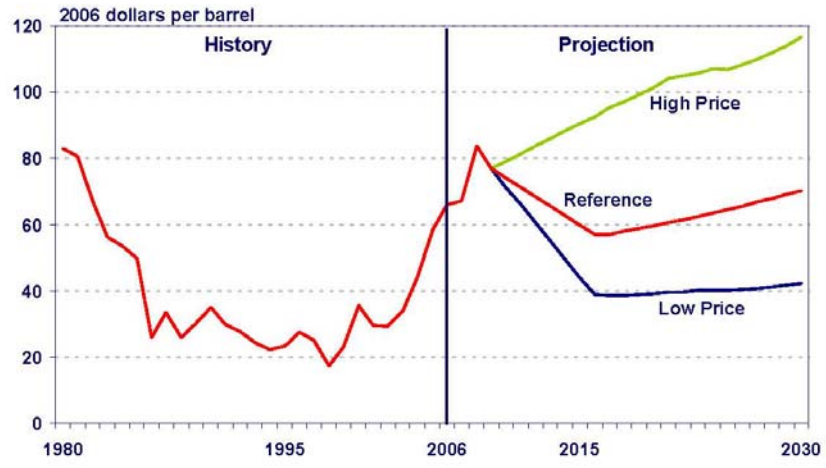


Figure 3. U.S. energy consumption grows slowly.

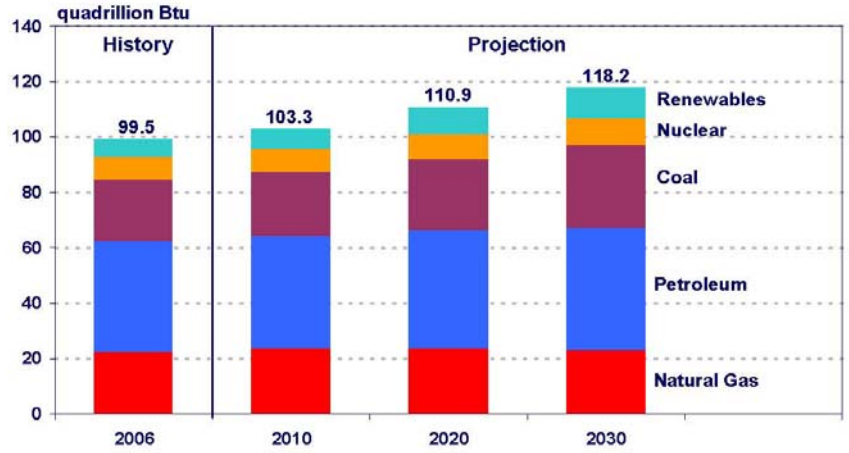


Figure 4. The transportation sector dominates liquid fuel consumption.

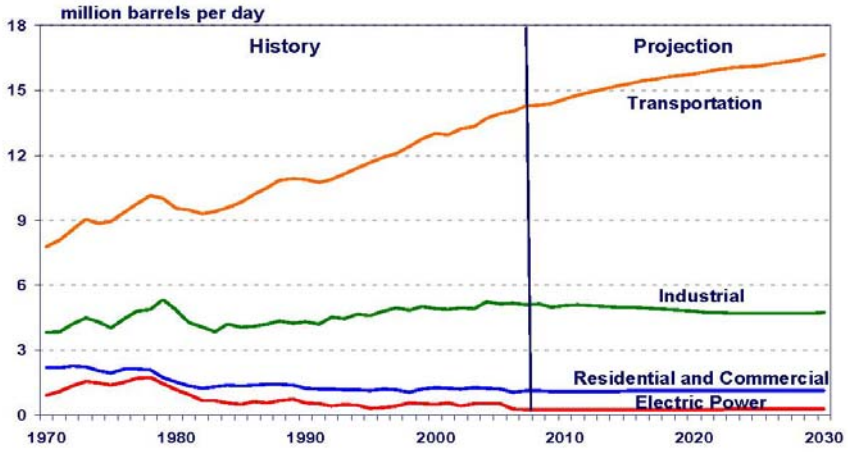


Figure 5. Natural gas consumption grows over the next decade, then declines slowly.

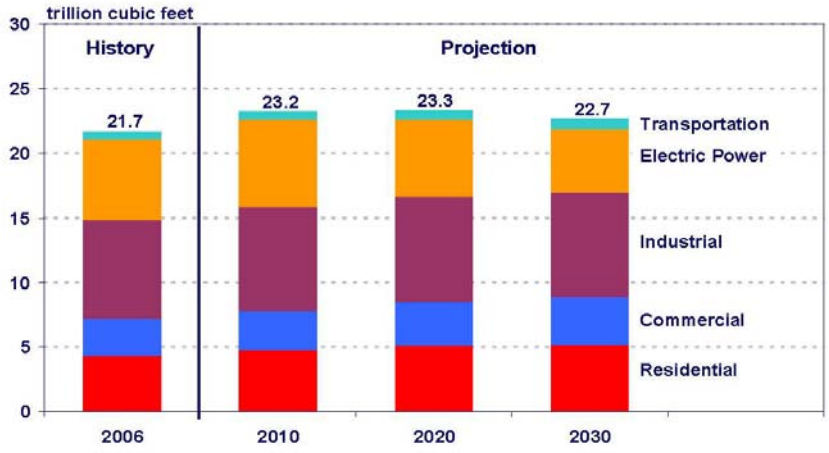


Figure 6. U.S. electricity consumption grows slowly in all sectors.

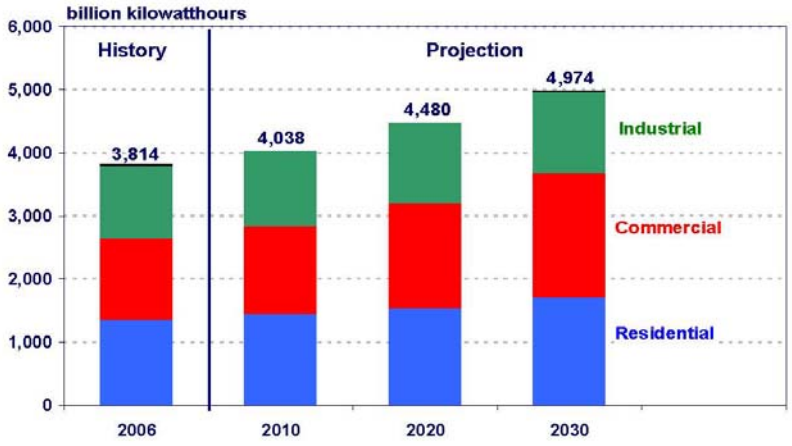


Figure 7. A variety of fuel sources support the renewable fuel standard in EISA2007.

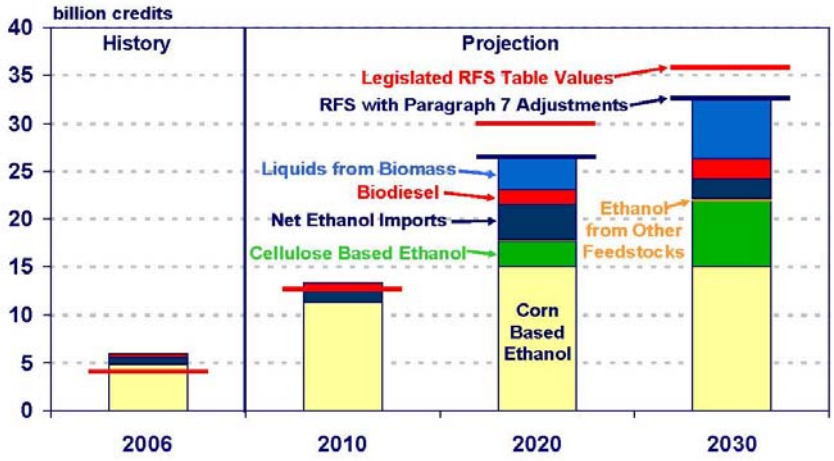


Figure 8. Domestic crude oil production grows in the near term.

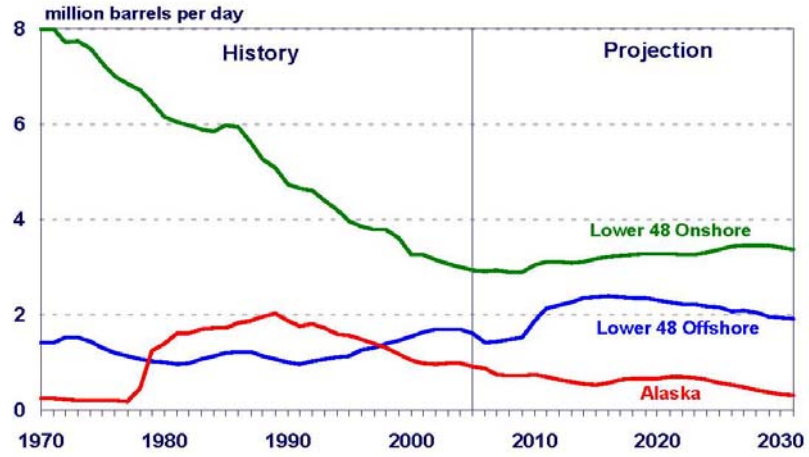


Figure 9. The import share of net liquids use falls from it current level.

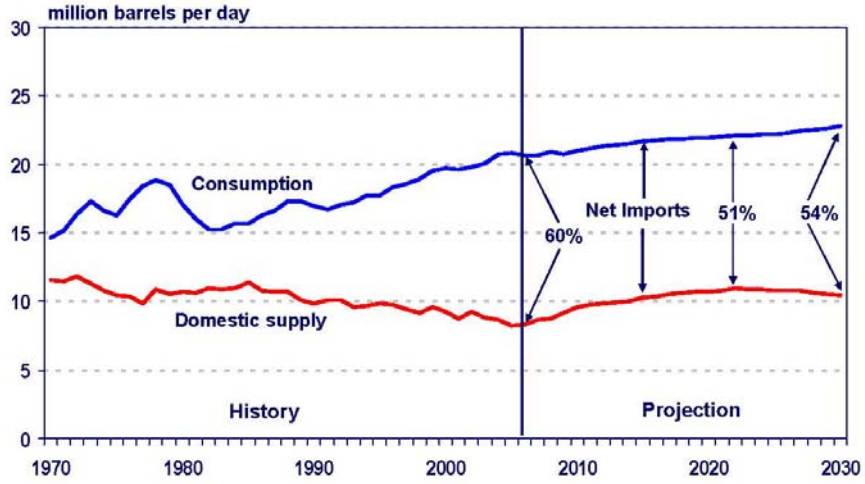


Figure 10. Net pipeline imports decline and LNG imports grow.

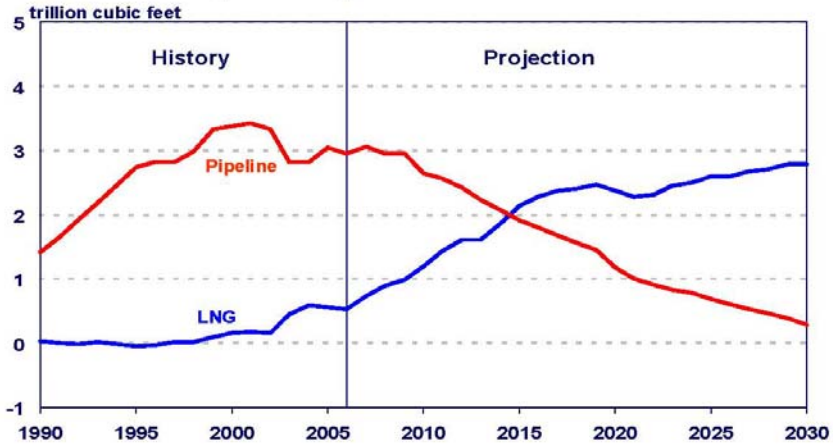


Figure 11. U.S. coal production continues to shift to the West.

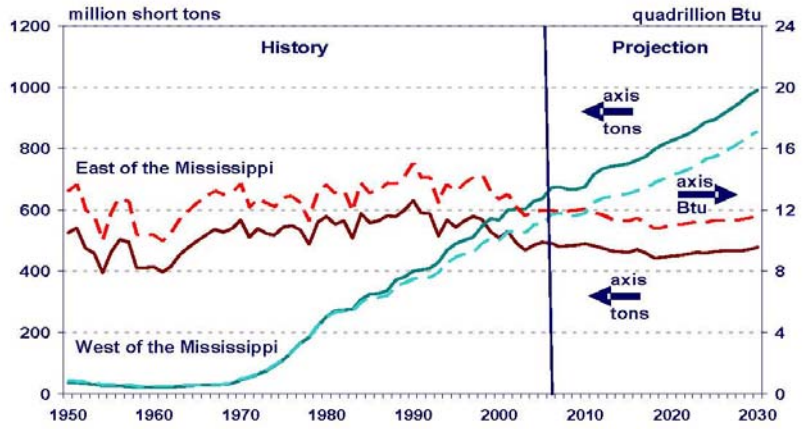


Figure 12. Natural gas generation offset by growth in coal, nuclear and renewables.

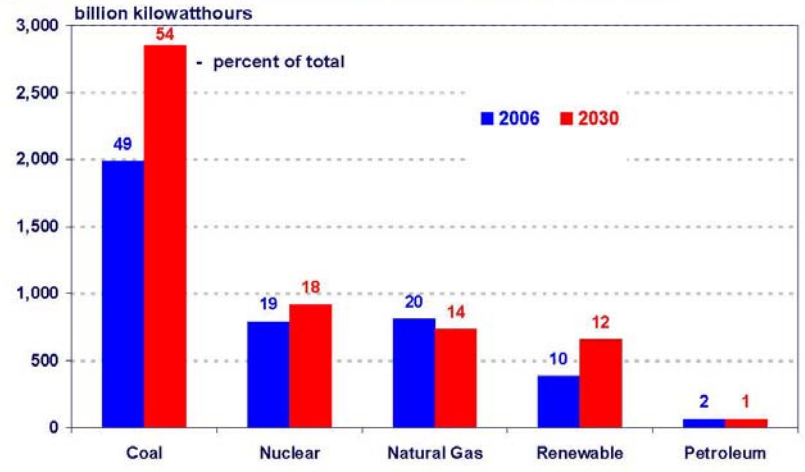


Figure 13. The strongest growth in renewable generation is in biomass and wind.

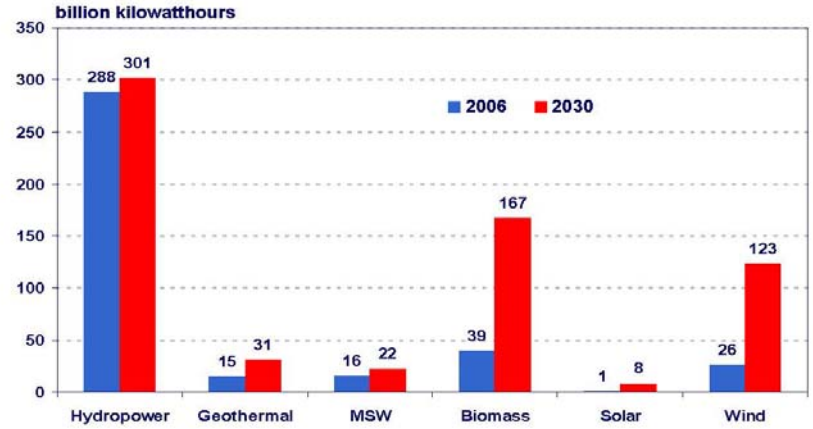
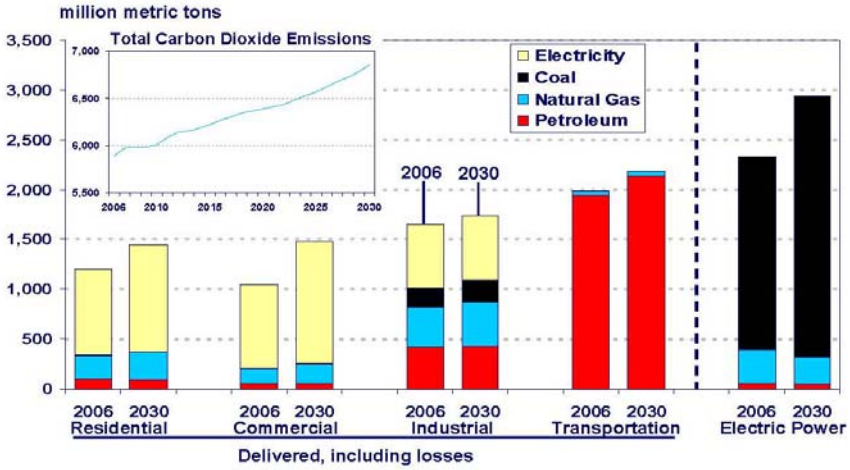


Figure 14. Total CO_2 emissions grow at slower rate.



Responses for Document 52846

52846-001: The BLM acknowledges the commentor's preference for Alternative B.

52846-002: As stated in the Energy Policy Act, the development of oil shale, tar sands, and other strategic unconventional fuels, for research and commercial development, should be conducted in an environmentally sound manner, using practices that minimize impacts. The BLM believes that analyzing an allocation decision provides the opportunity to build on scientific, governmental, or industry research in order to analyze, in a general way, the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale exploration, and development, further analysis will be carried out and documented in accordance with NEPA, to support any decisions in this regard. That NEPA analysis will evaluate the environmental impacts of the oil shale exploration and development, and develop specific measures to mitigate or eliminate the identified impacts. The BLM believes that such a phased approach will ensure that commercial oil shale development programs meet the intent of Congress and take advantage of the best available practices to minimize impacts and will offer opportunities for states, local communities, and the public to participate in the process. While uncertainty is an inherent part of planning in accordance with FLPMA's multiple-use mandate, and delays are possible in bringing any new resource into commercial development, the BLM is committed to managing the public lands in compliance with the Federal Land Management Policy Act's principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

52846-003: The description of the existing RD&D leases and their relationship to each of the alternatives has been augmented in the Final PEIS. The RD&D leases are valid existing rights and will be administered under the terms and conditions of the existing leases.

52846-004: The proposed action being evaluated in the PEIS—to identify public lands that would be made available for application for leasing for oil shale and tar sands development—does not authorize the immediate leasing of these lands for commercial development. Project-specific NEPA evaluations will be prepared prior to leasing and development decisions. These evaluations will include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important resources in the project area. These mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders and would be in addition to compliance with applicable federal and state regulations.

A series of possible mitigation measures were suggested in the PEIS. Regulations with regard to commercial-scale oil shale developments have not yet been

promulgated. Sections 4.1 and 5.1 of the PEIS provide examples of potential mitigation measures that the BLM may consider adopting if site-specific analysis warrants. The measures are not proposed as a final or a comprehensive list of required stipulations or management prescriptions.

Thank you for your comment, Jeff Eisenberg.

The comment tracking number that has been assigned to your comment is OSTSD52847.

Comment Date: March 20, 2008 14:42:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52847

First Name: Jeff
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Last Name: Eisenberg
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Privacy Preference: Don't withhold name or address from public record
Attachment: Oil shale comments.pdf

Comment Submitted:

See Attachment.

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NATIONAL CATTLEMEN'S BEEF ASSOCIATION
1301 Pennsylvania Ave., NW, Suite #300 • Washington, DC 20004 • 202-347-0228 • Fax 202-638-0607

Bureau of Land Management:
Oil Shale & Tar Sands Programmatic EIS

The Public Lands Council (PLC) and National Cattlemen's Beef Association (NCBA) support Alternative B in the Bureau of Land Management's Programmatic Environmental Impact Statement (PEIS) that will begin to establish a framework for the eventual development of a commercial oil shale leasing program. As organizations representing ranchers who use public lands for grazing, we believe multiple uses can be achieved in an environmentally responsible manner and support the exploration/development of natural resources as part of the multiple use guidelines for federal land. 52847-001

According to a Rand Corporation study, the oil shale resource in Colorado, Utah, and Wyoming is estimated at between 1.2 and 1.8 trillion barrels of oil in place and between 500 billion and 1.1trillion barrels recoverable. The average amount of the assumed recoverable reserves, 800 billion barrels, is more than triple the proven oil reserves of Saudi Arabia.

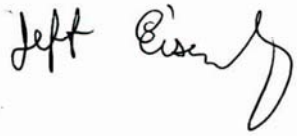
Oil shale represents a significant domestic energy resource that has the potential to increase supplies, jobs and economic activity while being developed in an environmentally responsible and socially sustainable manner.

With oil at record high prices and demand for energy increasing every year our nation must develop unconventional energy sources. Like many in the agriculture industry, our PLC and NCBA members operate with thin margins. Thus, we depend on lower prices for inputs, including energy, to keep our businesses economically sustainable. The PEIS plays a critical role in moving towards a potential commercial leasing program and allows companies to continue their research in the development of a domestic alternative to foreign oil and plan for the future.

Alternative B provides the only realistic opportunity to develop oil shale. We ask that you coordinate with and accommodate private landowners who use BLM land by including requirements to minimize surface damage. Alternative C is overly restrictive and would only allow development on small non-contiguous parcels…making Alternative C a non-development alternative. Alternative A is a no action alternative and does not provide for oil shale leasing on federal lands. 52847-002

It is our position that cumbersome rules and requirements for acquiring and operating a lease only discourage the significant investments necessary to pioneer this important new technology.

Sincerely,



Jeff Eisenberg
Executive Director, Public Lands Council
Director, Federal Lands, National Cattlemen's Beef Association

Responses for Document 52847

52847-001: The BLM acknowledges the commentor's preference for Alternative B.

52847-002: Thank you for your comment. BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52849.

Comment Date: March 20, 2008 14:54:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD52849

First Name: [Withheld by requestor]
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Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

"NO ACTION": THE ONLY ACCEPTABLE ALTERNATIVE 52849-001

Response for Document 52849

52849-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Michael Braaten.

The comment tracking number that has been assigned to your comment is OSTSD52850.

Comment Date: March 20, 2008 14:57:05PM
Oil Shale and Tar Sands
Comment ID: OSTSD52850

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Attachment:

Comment Submitted:

March 20, 2008

BLM Oil Shale and Tar Sands PEIS Argonne National Laboratory EVS/900 9700 S. Cass Avenue Argonne, IL 60439

Submitted electronically at osts.anl.gov.

As a participating coordinating agency, the City of Rifle maintains its position of recommending No Action on oil shale leasing and recommends Alternative A of the Draft Oil Shale Programmatic Environmental Impact Statement. The City's preferred alternative allows activities on the existing research, development and demonstration leases to continue, but precludes industry expansion at this time. 52850-001

The City's reasons for continued opposition of oil shale leasing at this time is that there remains a lack of understanding of proposed extraction technology or true environmental and social impact data because of the unknowns associated with oil shale development.

Federal mandate or not, the preparation of this Programmatic Environmental Impact Statement for the sake of letting oil shale leases at this time makes no sense, especially as the RD&D projects are on-going and far from completion. Until the City can reasonably understand how it will be impacted by the development of oil shale, it cannot support an alternative that allows leasing. Comments specific to the Draft PEIS document's contents from the City will not be submitted. 52850-002

As noted above, this position is consistent with past recommendations made as a coordinating agency and the City continues to believe that it is necessary to wait for the outcomes of the RD&D projects before making additional oil shale resources available for commercial lease applications.

Respectfully submitted on behalf of the City Council of the City of Rifle,

Keith Lambert, Mayor City of Rifle

Responses for 52850

52850-001: The BLM acknowledges the commentor's preference for Alternative A.

52850-002: The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands.

As explained in the document itself, this PEIS analyzes the environmental consequences of allocating certain lands for the possible commercial exploration and development of these resources. The allocation decisions to be made do not commit any resources or grant any lease rights. Therefore, in addition to the analysis of direct and indirect effects of these land allocation decisions, including consideration of alternative ways of making these decisions, the PEIS presents a cumulative impact assessment based on the nature and scope of this proposed action and on available nonspeculative information. Programmatic EISs such as this one are considered adequate without site-specific analysis when the federal action proposed, as here, does not involve a site-specific or critical decision. As explained in the document itself, as well as in responses to other comments (see, e.g., response to Comment 52837-018), prior to any commercial leasing, additional NEPA analysis will take place. Because it is still a matter of speculation as to whether leasing and development will ever take place, and because there will be additional environmental analysis prior to leasing, a cumulative analysis associated with the effects of the land use allocation decision contemplated here need not analyze the impacts of leasing and development.

Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to avoid or mitigate short-term and long-term adverse impacts.

Thank you for your comment, Kathleen Zimmerman.

The comment tracking number that has been assigned to your comment is OSTSD52851.

Comment Date: March 20, 2008 14:58:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD52851

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Attachment: NWF WWF CWF comments OSTS DPEIS with attachment.pdf

Comment Submitted:

See Attachment.

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March 20, 2008

Submitted electronically at ostseis.anl.gov

Bureau of Land Management Oil Shale and Tar Sands Programmatic Environmental Impact Statement
Argonne National Laboratory EVS/900
9700 South Cass Avenue
Argonne, Illinois 60439

Re: Comments on the *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement*

The following comments on the *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement* (OSTS DPEIS) are submitted on behalf of the National Wildlife Federation, the Wyoming Wildlife Federation, and the Colorado Wildlife Federation (Wildlife Federations). As an organization, the National Wildlife Federation (NWF) represents the power and commitment of four million members and supporters joined by affiliated organizations in 47 states and territories. NWF and its affiliates have a long history of working to conserve the wildlife and wild places on federal public lands in the West. Many members of NWF and its affiliates use the lands and resources that will be impacted by the oil shale and tar sands extraction discussed in the OSTS DPEIS. The Wildlife Federations appreciate this opportunity to submit these comments to the Bureau of Land Management.[1]

INTRODUCTION

The National Environmental Policy Act (NEPA) does not specifically address programmatic environmental impact statements (EISs). Council on Environmental Quality (CEQ) regulations at 40 CFR §1502.4(b) refer to EISs for broad actions. However, CEQ regulations and guidance discuss this topic only briefly and in very general terms. Courts, therefore, have played a significant role in fleshing out these concepts over time. While many major unresolved issues remain regarding the precise components of programmatic NEPA documents, there is a legal consensus that these EISs perform at least two important functions. First, programmatic EISs, by taking a broad view avoid segmenting environmental analyses of common concerns by analyzing them in the entire program or suite of related or similar actions. Second, programmatic NEPA documents can also be the most effective tool for addressing cumulative environmental impacts. Such programmatic documents thus have a global focus on environmental concerns that cut across programs and/or are shared by related or similar actions or plans.[2] Unfortunately, the OSTS DPEIS performs neither of these programmatic functions, particularly with respect to its treatment of the potential wildlife impacts of opening two million acres of public land to oil shale and tar sands development. The OSTS DPEIS contains almost no discussion of the cumulative impacts of the potential total loss of these lands to wildlife. Moreover, it invites the Bureau of Land Management (BLM) to segment its environmental analysis of those impacts by indicating that any assessment of those impacts will be done only when individual leases for oil shale or tar sands projects are issued.

52851-001

[1] In addition to these comments, NWF joins in those filed by Western Resource Advocates.

[2] Programmatic EISs may be followed by site- or mission-specific documents. The follow-on NEPA documents do not have to provide detailed analyses of the shared environmental concerns addressed in the programmatic documents. The time, effort and resources for the follow-on documents can, thus, focus principally on smaller elements of the program or an individual action of concern but only if the programmatic document adequately and thoroughly addresses cumulative and connected impacts.

Because the OSTS DPEIS fails to perform either function of a programmatic EIS, the document also fails to provide guidance for any meaningful policy decisions. The document itself acknowledges that BLM lacks sufficient information on oil shale and tar sands extraction technologies to craft a commercial leasing policy. The agency has deferred that decision. The OSTS DPEIS instead proposes to amend twelve federal land and resource management plans in Colorado, Utah, and Wyoming to make lands available for whatever commercial leasing policy is adopted in the future. Unfortunately, the document provides insufficient information to support the proposed plan amendments as well. 52851-002

RESOURCE MANAGEMENT PLANNING

According to BLM "a plan-level decision to open the lands to mineral leasing represents BLM's determination, based on the information available at the time, that it is appropriate to allow development of the parcel consistent with the terms of the lease, laws, regulations, and orders, and subject to reasonable conditions of approval." BLM Handbook H-1601-1, Appendix C at 24. However, the OSTS DPEIS contains no such determination with respect to oil shale and tar sands. BLM's current guidance on oil shale leasing and land use planning requires its Resource Management Plans (RMPs) specifically to identify the following:

1. Areas open to leasing, subject to existing laws, regulations, and formal orders; and the terms and conditions of the standard lease form.
2. Areas open to leasing, subject to moderate constraints such as seasonal and controlled surface use restrictions. (These are areas where it has been determined that moderately restrictive lease stipulations may be required to mitigate impacts to other land uses or resource values.)
3. Areas open to leasing, subject to major constraints such as no-surface-occupancy stipulations on an area more than 40 acres in size or more than 0.25 mile in width. (These are areas where it has been determined that highly restrictive lease stipulations are required to mitigate impacts to other lands or resource values. This category also includes areas where overlapping moderate constraints would severely limit development of fluid mineral resources.) 52851-003
4. Areas closed to leasing. (These are areas where it has been determined that other land uses or resource values cannot be adequately protected with even the most restrictive lease stipulations; appropriate protection can be ensured only by closing the lands to leasing.) Identify whether such closures are discretionary or nondiscretionary; and if discretionary, the rationale.
5. Resource condition objectives that have been established and specific lease stipulations and general/typical conditions of approval and best management practices that will be employed to accomplish these objectives in areas open to leasing.
6. For each lease stipulation, the circumstances for granting an exception, waiver, or modification. Identify the general documentation requirements and any public notification associated with granting exceptions, waivers, or modifications.

> 7. Whether the leasing and development decisions also apply to geophysical exploration.
> 8. Whether constraints identified in the land use plan for new leases also apply to areas currently under lease.
> 9. Long-term resource condition objectives for areas currently under development to guide reclamation activities prior to abandonment.

52851-003 (cont.)

BLM Handbook H-1601-1, Appendix C at 23-24. The RMP amendments proposed in the OSTS DPEIS contain none of this information. In fact, there is no description of lease terms at all because those decisions have been deferred. OSTS DPEIS at 2-15 to 2-16.

Of course, it is understandable that BLM is unable to make these determinations at this time since it lacks the relevant information to do so. For example, after consulting with cooperating agencies, BLM concluded that, because it lacked sufficient information regarding the commercial viability of extractive technologies for both oil shale and tar sands, trying to anticipate a certain level of development would be too speculative. However, a detailed description of Reasonably Foreseeable Development (RFD) is precisely what is required by BLM's own land use planning guidance before RMPs can be adopted that open lands to mineral leasing. *See, e.g.*, BLM Handbook H-1601-1, Appendix F-4 at 18 (In the chapter on environmental consequences, draft and final RMPs/EISs must include "reasonably foreseeable development scenarios" for all uses.).

52851-004

Without any information on the level of oil shale or tar sands development the opening of these lands will set in motion, it is impossible to determine whether the other management goals set forth in these RMPs can be met.[3] Resource Management Plans, however, are required to provide adequate information not just on the plan's objectives but also on how those objectives will be reached. BLM's Land Use Planning Handbook states that "[l]and use plan decisions establish goals and objectives for resource management (i.e. desired future conditions), the measures needed to achieve those goals and objectives, and the parameters for using BLM lands. They identify lands that are open or available for certain uses, including any applicable restrictions, and lands that are closed to certain uses." BLM Handbook H-1601-1 at 11. "Land use plans must identify the actions needed to achieve desired outcomes, including actions to maintain, restore or

[3] With respect to wildlife management goals, however, the OSTS DPEIS explicitly admits that these goals will not be met under Alternative B, BLM's Preferred Alternative:

> To identify those lands that would be excluded on the basis of existing land use plan decisions, the BLM considered the possible impacts associated with individual commercial oil shale development projects. On the basis of these impact analyses, described in Chapter 4, it was determined that commercial oil shale development could be in conflict with existing land use plan decisions that require surface-disturbance restrictions or seasonal limitations on activities in order to adequately protect a specific resource. It was decided to exclude from Alternative C all lands where such surface-disturbance and seasonal limitations are in place to protect known sensitive resources.

OSTS DPEIS at 2-27 to 2-28.

protect land health." *Id.* at 13. The RMPs amended by this document cannot meet these requirements. 52851-004 (cont.)

Consistency with State Plans and Policies

FLPMA requires that BLM's land use plans be consistent with officially approved resource related plans of State and local governments as well as Indian tribes. 43 U.S.C. § 1712(c)(9); *see also* 43 C.F.R. § 1610.3-2; BLM Handbook H-1601-1 11 ("Land use plans must be consistent with state and local plans to the maximum extent consistent with Federal law."). There is no discussion in the OSTS DPEIS as to whether the proposed RMP amendments are consistent with the resource management goals of the impacted states and local governments. For example, it is the official policy of the Wyoming Game and Fish Commission that crucial habitat for wildlife species within the State should be managed to prevent "any loss of habitat function." Wyoming Game and Fish Commission Policy No. VII H (April 28, 1998) at 138. Some modification of crucial habitat is permitted but only if "habitat function is maintained (i.e., the location, essential features, and species supported are unchanged)." *Id.* Pursuant to the RMP amendments proposed in Wyoming, 362,792 acres of mule deer crucial winter habitat and 262,273 acres of elk crucial winter habitat will be opened to oil shale development. Pursuant to FLPMA, the OSTS DPEIS must include a discussion of how that development will be conducted in a manner that results in no net loss of those habitats. 52851-005

WILDLIFE

BLM has a duty to protect the diversity of all native wildlife on public lands.[4] Habitat fragmentation, connectivity and other factors affecting biological diversity are inherently landscape-level considerations. Protecting biological diversity can only be dealt with appropriately at the programmatic or planning level. This is the only way to ensure biological diversity is preserved and that ecosystem attributes are not "nickel and dimed" to death by individually small but cumulatively significant site-specific projects. The project level is simply too small a scale for adequate exploration of impacts to the health of large ecosystems. Yet, this is precisely the course of action BLM proposes in the OSTS DPEIS. 52851-006

[4] FLPMA requires public land management to protect ecological and other values, and also requires that the lands be managed for multiple use and sustained yield. 43 U.S.C. §§ 1701(a)(7)-(8). NEPA requires BLM to fulfill its trustee obligation for future generations, assure productive surroundings, avoid environmental degradation, preserve important natural aspects of our national heritage, and enhance the quality of renewable resources. 42 U.S.C. §§ 4331(b)(1)-(6). The Clean Water Act establishes the objective of restoring and maintaining the chemical, physical, and biological integrity of the Nation's waters. 33 U.S.C. § 1251. The Endangered Species Act establishes the purpose of conserving the ecosystems upon which threatened and endangered species depend. 16 U.S.C. § 1531(b). BLM's livestock grazing standards and guidelines establish measures of ecological health applicable not only to livestock grazing, but to resource management generally. *See* 43 C.F.R. subpt. 4180. Read together, these and other legal standards establish that BLM must ensure the ecosystems it manages are fully protected so as to enhance biological diversity.

Because it lacks any usable information on the number of oil shale and tar sands projects industry might choose to pursue over the next twenty years or what technologies industry might use to conduct individual projects or where those projects might take place, BLM has deferred any meaningful analysis of the potential landscape-level impacts of that development. The discussion of impacts on wildlife consists of nothing more than a list of the "kinds" of impacts that an individual oil shale and tar sands project might cause, such as loss of habitat and mortality, without any analysis of the cumulative effect all oil shale and tar sands development, together with oil and gas drilling, livestock grazing and recreational uses, will have on wildlife. The OSTS DPEIS has instead relegated any such analysis to future decisions regarding the issuance of individual leases. 52851-007

With respect to big game, for example, the document admits that mortality from a single oil shale or tar sands project may be "large" defined as an impact that "would extend beyond the project area, could affect more than 50% of a local population, and result in a large measurable change (50% or more) in carrying capacity or population size in the affected area." OSTS DPEIS, Table 4.8.1-1 at 4-67. However, because the OSTS DPEIS provides no information on the projected number or locations of such projects, there is no way of knowing how many "areas" will be "affected" or how many "local populations" of big game will suffer these huge declines. 52851-008

According to the OSTS DPEIS, most oil shale and tar sands projects will disturb 100 percent of the leased surface. See OSTS DPEIS, Table 4.1.1-1 at 4-4, Table 4.1.2-1 at 4-8, Table 4.1.3-1 at 4-11.[5] In other words, these projects will completely eliminate the value of those lands as wildlife habitat.[6] In the arid environs where oil shale and tar sands development is being proposed, "reclamation to functional systems similar to that found pre-disturbance will take in excess of 50 years (Baker 2006)." Comments submitted by A. William Alldredge, Ph.D. at 4. Therefore, habitats disturbed by oil shale and tar sands development would be unavailable for decades even after reclamation has been initiated."[7] *Id.* Moreover, contrary to the suggestion of the OSTS DPEIS, impacts on most wildlife are not proportional to the amount of habitat lost. *Id.* "Habitat is not all created equal, some areas of habitat are simply more valuable that others." *Id.* Winter 52851-009

[5] With respect to both surface mines and in situ projects, "[i]t is assumed that the entire lease area will be disturbed during the 20-year time frame analyzed" in the DPEIS. With respect to underground mines, it is assumed that 1650 acres, or more than a quarter of each leased area will be covered by surface facilities and spent shale disposal.

[6] A common misconception is that wildlife just moves somewhere else. The truth is that most wildlife habitat is already occupied and cannot support refugees displaced from other locations. *See* Comments submitted by A. William Alldredge at 6.

[7] The OSTS DPEIS's attempt to suggest that impacts on wildlife will be mitigated by reclamation is unavailing at best and disingenuous at worst. *See, e.g.,* OSTS DPEIS at 4-66. Neither the life of the project nor the extent of the surface disturbance is stated. The length of time required for full reclamation is not discussed nor is the full extent of the projected spatial disturbance within important wildlife habitats. Moreover, "industry has yet to demonstrate that they can and will successfully reclaim habitats disturbed by energy development." Comments of A. William Alldredge at 6.

range, for example, is considered a limiting factor for big game species.[8] According to the OSTS DPEIS, at least 735,000 acres of mule deer winter habitat, including 78,093 acres of mule deer critical winter range; 31,479 acres of mule deer migration corridors; 649,700 acres of elk winter habitat; and 190,478 acres of elk production area is at risk. *See, e.g.*, OSTS DPEIS, Table 6.1.2-6 at 6-52; *see also* Comments submitted by the Colorado Department of Natural Resources.

Over half a million acres of identified sage-grouse habitat is also at risk.[9] Sage-grouse are on the verge of requiring listing under the Endangered Species Act. They have declined precipitously range-wide. Declines have been estimated at over 50% in occupied area and up to 80% decline in bird abundance, with complete extirpation in several states. A federal court recently concluded that energy development in the eastern reaches of sage-grouse range, including Wyoming and Colorado, poses a significant threat to sage-grouse. *Western Watersheds Project v United States Fish and Wildlifet Service,* No. CV-06-277-E-BLW, slip op. at 13 (D. Id. December 4, 2007). Leks, nesting habitat, and winter concentration areas are all vital to the continued viability of sage-grouse. 52851-009 (cont.)

Based upon the information that is contained in the OSTS DPEIS, oil shale and tar sands development poses a huge threat to wildlife, including species that already are on the verge of disappearing. Hundreds of thousands of acres of vital wildlife habitats may be "occupied" by oil shale and tar sands projects to the exclusion of all other uses, including wildlife, perhaps for generations. Reclamation does not address this loss because habitat functions will not be restored for decades. Moreover, none of the other mitigation measures discussed in the OSTS DPEIS will reduce the impact of this loss because none of the measures currently in BLM's toolbox were designed to redress a use that destroys and then occupies such vast amounts of land surface.

Wildlife Mitigation Measures Are Inadequate

The discussion of wildlife mitigation in the OSTS DPEIS is inadequate. First, it consists of nothing more than a list of measures that might be employed. *See* OSTS DPEIS at 4-103 to 4-106. Second, these measures simply are not up to the task of mitigating the impacts of oil shale and tar sands development on wildlife.[10] With respect to the impacts of human activities on big game, for example, BLM traditionally has relied on seasonal restrictions such as limiting human access to winter ranges from mid-November to the 52851-010

[8] The mule deer die-off in Gunnison, Colorado this past winter provides a real-life example of what happens when big game are unable to access lands where snowfall does not accumulate and forage remains available.

[9] In Colorado, under Alternative B, 6,506 acres of greater sage grouse leks, with a .6 mile buffer, would be available for commercial leasing. In addition, 125,563 acres of greater sage grouse production areas (with a 4-mile radius from leks) would be open to commercial leasing. *See* Comments submitted by the Colorado Department of Natural Resources.

[10] BLM admits that it has not actually assessed either the "magnitude of impacts" nor "the applicability and effectiveness of mitigation measures". OSTS DPEIS at ES-7.

end of April. *See* OSTS PEIS at 4-106. However, limiting the construction activities associated with oil shale and tar sands projects to the summer months provides no protection for big game. When the animals return to the winter range in November, they will find their habitat has been hauled away, is covered with waste shale, or is devoid of vegetation.

The OSTS DPEIS also references BLM's Best Management Practices (BMPs). OSTS DPEIS at 2-6. However, most of BLM's wildlife BMPs are directed at limiting the surface disturbance associated with oil and gas development. They include such measures as directional drilling and clustering associated infrastructure in order to reduce the footprint of oil and gas development on wildlife habitat. *See also* OSTS DPEIS at 4-104. Yet, BLM assumes that most oil shale and tar sands operations will either drill or mine 100 percent of the surface of the leased area. 52851-010 (cont.)

There simply is no "effective" mitigation for some habitat losses resulting from oil shale, tar sands, and other forms of energy development.[11] For example, BLM states in the Final Environmental Impact Statement for the Jack Morrow Hills Coordinated Activity Plan (JMHCAP FEIS) that it may be impossible to reclaim some sagebrush habitats. JMHCAP FEIS at 4-74. Migration corridors for big game have been lost permanently to development. Animals are driven off of crucial ranges onto lands that will not support them. *See* Comments submitted by A. William Alldredge.

Greater Sage-grouse Protections Are Inadequate[12]

BLM itself has designated the Greater sage-grouse as a "sensitive" species.[13] In doing so, the agency made a commitment to use "all methods and procedures which are necessary to improve the condition of special status species and their habitats to a point where their special status recognition is no longer warranted."[14] BLM Manual 6840 at .01.

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[11] BLM's latest tool for addressing the impacts of intensive oil and gas development is off-site mitigation, essentially an attempt to re-create lost habitat somewhere else. The Wildlife Federations are concerned about the increasing reliance on off-site mitigation and trust accounts as a way to authorize irreparable habitat losses. No off-site mitigation proposal should be accepted without a thorough assessment of: 1) the availability of other habitat, 2) the feasibility of long-term restoration/enhancement/protection of alternative habitat, and 3) the adequacy of funding to sustain the alternative habitat for the life of the project (including time required for final reclamation standards to be achieved). Notably, the OSTS DPEIS contains no such assessment. 52851-011

[12] This discussion focuses on the Greater sage-grouse as just one of many sagebrush-obligate species that are threatened by the potential losses of this habitat type posed by oil shale and tar sands development within Colorado, Utah, and Wyoming. Widespread degradation of the sagebrush ecosystem in the western United States, including the invasion of cheatgrass, has prompted resource managers to consider a variety of approaches to restore and conserve habitats for sagebrush-associated species. *See* Krissman (2006). However, the impacts of oil shale and tar sands development have not been calculated.

[13] Sensitive species are those species that:

> (1) could become endangered in or extirpated from a State, or within a significant portion of its distribution; (2) are under status review by the FWS and/or NMFS; (3) are undergoing significant current or predicted downward trends in habitat capability that would reduce a species' existing

Scientific data has shown that even a minimal level of development within 3-5 km of a sage-grouse lek negatively influences breeding activity. In fact, recent information from a doctoral dissertation on the impacts of oil and gas development to Greater sage-grouse on the Pinedale Anticline in Wyoming revealed that, as development increased, lek activity declined up to 100%. Holloran (2005). Based on these findings, both Holloran (2005) and Connelly *et al.* (2000) recommend implementing at least a 5 km buffer around active sage-grouse leks.

Despite these recommendations, a ¼-mile NSO buffer around known sage-grouse leks remains BLM's mitigation measure of choice.[15] The Wildlife Federations do not believe that this buffer is adequate to conserve Greater sage-grouse and their habitat. The United States Fish and Wildlife Service repeatedly has stated that this ¼-mile buffer should not be considered as appropriate mitigation for sage-grouse.[16]

52851-011 (cont.)

Based upon a memorandum analyzing the most recent research on sage-grouse, no more than one well pad per section should be permitted within two miles of sage-grouse leks. In addition, seasonal restrictions should apply from March through June in mapped breeding habitats or within four miles of active leks and NSO buffers should be applied to wintering habitats. *See* State wildlife agencies ad hoc committee for sage-grouse and oil and gas development. 2008. *Using the best available science to coordinate conservation actions that benefit greater sage-grouse across states affected by oil and gas development in Management Zones I-II (Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming).* Unpublished report. Colorado Division of Wildlife, Denver; Montana Fish, Wildlife and Parks, Helena; North Dakota Game and Fish

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distribution; (4) are undergoing significant current or predicted downward trends in population or density such that federal listed, proposed, candidate, or State listed status may become necessary; (5) typically have small and widely dispersed populations; (6) inhabit ecological refugia or other specialized or unique habitats; or (7) are State listed but which may be better conserved through application of BLM sensitive species status.

BLM Manual 6840 (Glossary of Terms at 8).

[14] Approximately half of the remaining sage-grouse habitat is under BLM jurisdiction and management; therefore, BLM land plays a significant role in the conservation of sage-grouse and other sagebrush-dependent wildlife species. BLM, National Sage-Grouse Habitat Conservation Strategy (November 2004) at 7.

[15] The Wildlife Federations strongly suggest that BLM review the sage-grouse mitigation measures proposed in other western states. For example, the State of Colorado is revising its sage-grouse conservation strategy. The ¼-mile NSO buffer for leks is not part of that proposal.[15] Instead, Colorado's Division of Wildlife has proposed a buffer of 0.6 miles. *See* Draft Colorado Greater Sage-grouse Conservation Plan, Appendix B at B-6 (June 15, 2007) [available at http://wildlife.state.co.us/WildlifeSpecies/SpeciesOfConcern/Birds/GreaterSagegrouseConservationPlan.htm]. The State of Montana's Fish Wildlife and Parks Department has pushed to expand closed areas to four miles for the seasonal restrictions and one mile for the year-round closures.

[16] *See* Comments filed by the United States Fish and Wildlife Service on the Decision Record for the Red Rim POD (Quarter mile NSO "should not be considered a mitigation measure.").

Department, Bismarck; Utah Division of Wildlife Resources, Salt Lake City; Wyoming Game and Fish Department, Cheyenne. BLM has no such mitigation measures for sage-grouse. However, even if BLM were to adopt the recommendations developed by multi-state committee of wildlife agencies, the use of seasonal restrictions in breeding habitats impacted by oil shale or tar sands development would be of little efficacy.

Pursuant to BLM policy, "[l]and use plans shall be sufficiently detailed to identify and resolve significant land use conflicts with special status species without deferring conflict resolution to implementation-level planning." BLM Manual 6840 at .21J. The RMP amendments proposed in the OSTS DPEIS fail to meet this requirement. In fact, they specifically defer resolution of the obvious conflicts between sage-grouse and oil shale and tar sands development until the leasing or project approval stage.

52851-011 (cont.)

Alternative C and Wildlife

In the OSTS DPEIS, Alternative C is presented as BLM's attempt to:

> identify those lands that would be excluded on the basis of existing land use plan decisions, the BLM considered the possible impacts associated with individual commercial oil shale development projects. On the basis of these impact analyses, described in Chapter 4, it was determined that commercial oil shale development could be in conflict with existing land use plan decisions that require surface-disturbance restrictions or seasonal limitations on activities in order to adequately protect a specific resource. It was decided to exclude from Alternative C all lands where such surface-disturbance and seasonal limitations are in place to protect known sensitive resources. The BLM made the determination that the most effective means of identifying lands that should be excluded on this basis was to exclude those lands within each field office where stipulations for no surface disturbance or seasonal limitations are in place for oil and gas leasing. Under this alternative, the BLM would place a priority on protecting known sensitive resources within each field office by excluding certain lands from application for leasing.

52851-012

OSTS DPEIS at 2-27 to 2-28. While the Wildlife Federations welcome this attempt and agree that the lands identified in the tables on pages 2-33 and 2-49 should be off-limits to commercial oil shale and tar sands leasing, the list of lands is incomplete. Resource managers and the public have had no opportunity to consider whether oil shale or tar sands extraction would be incompatible with other land management objectives. For example, many lands designated as Areas of Critical Environmental Concern (ACECs) are not closed to all surface-disturbing activities. At the time of designation, it was assumed that the sensitive resources within these ACECs could withstand some level of disturbance from oil and gas drilling or other human activity. Oil shale and tar sands

development represents quite a different level of surface disturbance, one that is irreconcilable with the protection of most other resource values.[17]

With respect to sage-grouse, much of the vital habitat has not been identified and mapped by either BLM or state wildlife agencies. *See, e.g.*, OSTS DPEIS, Table 6.1.2-6 at 6-52. With respect to many other wildlife species, there is simply no usable data regarding the location and condition of important habitats. As for big game, winter range traditionally has been considered the limiting factor, however, significant losses of summer and/or transitional ranges as a result of oil shale and tar sands projects could also pose threats to the continued vitality of big game populations. Because the OSTS DPEIS contains no information regarding the migration and use patterns of big game herds, it is impossible to estimate those impacts. *See* Comments submitted by A. William Alldredge. However, conservation of big game populations and distributions may require additional ranges be set off-limits.[18]

52851-012 (cont.)

CONCLUSION

It is only impossible for BLM to make any predictions regarding how and where future oil shale and tar sands development will occur because the agency refuses to exert the authority it has to control the pace and direction of private activities on the lands it manages. Nothing in the Mineral Leasing Act or the Energy Policy Act of 2005 requires BLM to issue oil shale and/or tar sands leases wherever industry might choose. The leases it issues can contain stipulations on the time, place, and manner of both exploration and development. BLM has the power to suspend existing leases or to re-acquire the mineral rights under lease. It has the authority to condition its approval of mining and drilling permits. The public lands are subject to the whims of industry and the market only because BLM has chosen to make them so.

52851-013

FLPMA demands that BLM develop its own vision for the public lands, one that includes sustainable wildlife populations. The policy set forth in the OSTS DPEIS of allowing the industry to nominate and then lease and develop lands helter-skelter across federal public lands should be abandoned.[19] Instead, a revised draft of this document should examine alternatives that call for staged development in which some blocks of lands are open to leasing, some are permanently off-limits, and others are temporarily withdrawn from

[17] The Wildlife Federations assert that all "special management areas", including all ACECs should be off-limits to oil shale and tar sands leasing, in the absence of an affirmative finding by BLM that oil shale or tar sands extraction would be compatible with the current management objectives for those areas.

[18] Colorado, Utah, and Wyoming all have game management plans as well as population goals and Memoranda of Understanding (MOUs) with the Department of the Interior regarding the achievement of those goals. The OS DPEIS should address how the proposed RMP amendments are consistent with those management plans and MOUs.

[19] This appears to be the one policy determination the OSTS DPEIS makes and it does so on the basis of no supporting documentation with respect to potential impacts on the environment of allowing oil shale and tar sands development to be undertaken in such a chaotic manner.

leasing and development until a later time.[20] In addition, the RMP amendments should impose reasonable measures to minimize adverse impacts to other resources, including placing sensitive wildlife habitats off-limits to leasing. In the absence of better information about potential impacts, the revised document should require a cautious approach to development with monitoring adequate to ensure that predicted impacts to environmental resources have not been exceeded and that mitigation measures are sufficient.[21] 52851-013 (cont.)

The sole alternative supported by the analysis contained in the OSTS DPEIS is Alternative A. 52851-014

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[20] *See Northern Plains Resource Council v. U.S. Bureau of Land Management*, No. CV 03-69-BLG-RWA (D. Mt. Feb. 25, 2005) ("BLM's failure to analyze a phased development alternative renders the [BLM's Final Statewide Oil and Gas Environmental Impact and Proposed Amendments to Resource Management Plans in Montana] inadequate.").

[21] The Wildlife Federations note that, while it was recommended that BLM adopt an alternative grounded in the carrying capacity of the public lands and resources, the agency refused to do:

> A number of commentors suggested that the BLM consider the potential impacts of oil shale development within the context of the carrying capacity of the regional and local environment and economies. The carrying capacity of a system is the maximum level of activity that can be sustained within a specific area without significant, detrimental impact. The White River RMP (BLM 1997b) established carrying-capacity thresholds specific to oil shale development and potential impacts on air quality, socioeconomic impacts, big game habitat, and water quality. Carrying-capacity thresholds have not been established anywhere else within the three-state study area. Although the programmatic alternatives do not explicitly consider carrying-capacity thresholds nor propose that commercial leasing levels be constrained in the future by these thresholds, they do require that additional site-specific NEPA analyses be conducted prior to the issuance of commercial leases. At that time, when complete information is available defining the location of the commercial development, technologies to be employed, scale of operations, and time line for development, analyses can more reliably define appropriate carrying-capacity thresholds and evaluate potential impacts.

OSTS DPEIS at 2-53. Still, BLM left those thresholds in place within the White River Resource Area. The Wildlife Federations believe similar thresholds should be in place for all of the Resource Areas potentially impacted by oil shale and tar sands development before any leases are issued.

Attachment

Using the Best Available Science to Coordinate Conservation Actions that Benefit Greater Sage-Grouse Across States Affected by Oil & Gas Development in Management Zones I-II (Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming)

Background

Greater Sage-grouse are widely considered in scientific and public policy arenas to be a species of significant conservation concern. Loss, degradation and fragmentation of important sagebrush grassland habitats have negatively impacted sage-grouse populations. Much of this loss of habitat function is occurring in Sage-grouse Management Zones (MZ) 1 and 2 (Stiver et al. 2006) in Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming as a result of oil and gas development (Connelly et al. 2004). Oil and gas development is rapidly increasing within these areas. In response to those concerns, states and provinces are in various stages of completing or updating management plans in order to provide for long-term sage-grouse conservation. Special emphasis is being placed on oil and gas development as it rapidly spreads across much of the eastern range of sage-grouse.
The recent decision by B. Lynn Winmill, Chief U.S. District Judge (2007), which remands the original 2005 not warranted decision back to the USFWS for reconsideration, has highlighted the need for States to coordinate their application of best available science. Representatives from the state agencies with authority for managing fish and wildlife from the major sage-grouse and energy producing states comprising MZ 1 and 2 and sage-grouse researchers who have published new findings, met on January 8 and 9, 2008 in Salt Lake City. The objectives of the meeting were to better understand the application of most recent peer-reviewed science within the context of oil and gas development and coordinate and compare implementation of conservation actions utilizing that information.

Review Process

The participants at this meeting represented technical science and management advisors from each of the states. Researchers having the most recently peer reviewed and published articles concerning sage grouse and oil and gas development were invited to present their findings and answer questions. State agency participants agreed that the goal was not to establish state or regional policy or to determine the management actions that will be implemented in any or all states within MZ 1 or 2. Rather, the goal was to reach agreement on the conservation concepts and strategies related to oil and gas development that are supported by current published peer-reviewed and unpublished literature. If implemented, these concepts and strategies likely will not eliminate impacts to sage-grouse populations that result from energy development. However, when used in combination with other conservation measures, these actions may enhance the likelihood that sage-grouse populations will persist at levels that allow historical uses such as grazing and agriculture and maintain their current distribution and abundance, thereby avoiding the need to list sage-grouse under the federal Endangered Species Act.

Each researcher was invited to present their findings and to answer questions posed by the states. Following this, each state provided an overview of their review of the science and their resulting management actions and recommendations. The group then collectively reviewed, debated and agreed on the concepts and strategies supported by that science. The focus of the meeting was on five key issues: core areas, no-surface-occupancy zones, phased development, timing stipulations, well-pad densities, and restoration. Scientific data are available to inform many other issues related to sage-grouse management and conservation that were not reviewed (e.g., BMPs).

Core Areas

Identification and protection of core areas, sometimes also referred to as crucial areas, will help maintain or achieve target goals for populations including distribution and abundance. Full field energy development appears to have severe negative impacts on sage-grouse populations under current lease stipulations (Lyon and Anderson 2003, Holloran 2005, Kaiser 2006, Holloran et al. 2007, Aldridge and Boyce 2007, Walker et al 2007, Doherty et al. 2008). Much of greater sage-grouse habitat in MZ 1 and 2 has already been leased for oil and gas development. These leases carry stipulations that have been shown to be inadequate for protecting breeding and wintering sage-grouse populations during full field development. (Holloran 2005, Walker et. al. 2007, Doherty et al. 2008) New leases continue to be issued utilizing these same stipulations. To ensure long-term persistence of populations and meet goals set by the states for sage-grouse, identifying and implementing greater protection within core areas from impacts of oil and gas development is a high priority.

In order to conserve core areas it is essential that they be identified and delineated. Sage-grouse populations occur over large landscapes comprising a series of leks and lek complexes with associated seasonal habitats. Therefore, core areas should capture the range required by a defined population to maintain itself. This concept is consistent with Crucial Wildlife Habitats recently endorsed by the Western Governor's Association (2007). Criteria that could be used to identify and map core areas include, but are not limited to: (1) lek densities, (2) displaying male densities, (3) sagebrush patch sizes, (4) seasonal habitats (breeding, summering, wintering areas), (5) seasonal linkages, or (6) appropriate buffers around important seasonal habitats.

Research indicates that oil or gas development exceeding approximately 1 well pad per square mile with the associated infrastructure, results in calculable impacts on breeding populations, as measured by the number of male sage-grouse attending leks (Holloran 2005, Naugle et al. 2006). Because breeding, summer, and winter habitats are essential to populations, development within these areas should be avoided. If development cannot be avoided within core areas, infrastructure should be minimized and the area should be managed in a manner that effectively conserves sagebrush habitats within that area.

No Surface Occupancy (NSO)

At the scale that NSOs are established, they alone will not conserve sage-grouse populations without being used in combination with core areas. The intent of NSOs is to maintain sage-grouse distribution and a semblance of habitat integrity as an area is developed.

Breeding Habitat - Leks

Research in Montana and Wyoming in coal-bed methane natural gas (CBNG) and deep-well fields suggests that impacts to leks from energy development are discernable out to a minimum of 4 miles, and that some leks within this radius have been extirpated as a direct result of energy development (Holloran 2005, Walker et al. 2007). Walker et al. (2007) indicates that the current 0.25-mile buffer lease stipulation is insufficient to adequately conserve breeding sage-grouse populations in areas having full CBNG development. A 0.25-mi. buffer leaves 98% of the landscape within 2 miles open to full-scale energy development. In a typical landscape in the Powder River Basin, 98% CBNG development within 2 miles of leks is projected to reduce the average probability of lek persistence from 87% to 5% (Walker et al. 2007). Only 38% of 26 leks inside of CBNG development remained active compared to 84% of 250 leks outside of development (Walker et al. 2007). Of leks that persisted, the numbers of attending males were reduced by approximately 50% when compared to those outside of CBNG development (Walker et al. 2007).

The impact analyses provided in Walker et al. (2007) are based on a 7-year dataset where probability of lek persistence is strongly related to extent of sagebrush habitat and the extent of energy development within 4 miles of the lek and the extent of agricultural tillage in the surrounding landscape. The estimated probabilities of lek persistence are only reliable for the length of the dataset, and it is not understood how other stressors (e.g., West Nile virus [Naugle et al. 2004], invasive weeds [Bergquist et al. 2007]) will cumulatively impact sage-grouse over longer time periods. While increased NSO buffers alone are unlikely to conserve sage-grouse populations, results from Walker et al. 2007 suggest they will increase the likelihood of maintaining the distribution and abundance of grouse and should increase the likelihood of successful restoration following energy development.

Additional information provided in Walker et al. (2007) allows managers and policy makers to estimate trade-offs associated with allowing development within a range of different distances from leks (Figures 1a and 1b). These probabilities will also need to be applied over larger landscapes in future analyses to better understand projected region- and state-wide population impacts under current and future development scenarios. Walker et al. (2007) studied lek persistence from 1997-2005 in relation to coal bed natural gas (CBNG) development in the Powder River Basin. These models are based on projected impacts of full-field development within (a) 2 miles and (b) 4 miles of the lek. We present results from these models (rather than models with impacts at smaller scales)

because development within 2 and 4 miles of leks are known to decrease breeding populations as measured by the number of displaying males (Holloran et al. 2005, Walker et al. 2007), and 52% and 74-80% of hens are known to nest within 2 and 4 miles of leks, respectively (Holloran and Anderson 2005, Colorado Greater Sage-Grouse Conservation Plan Steering Committee 2008). Sizes of NSO buffers required to protect breeding populations may be underestimated because leks in CBNG fields have fewer males per lek and a time lag occurs (avg. 3-4 years) between development and when leks go inactive. As a result, it is expected that not only will lek persistence decline, the number of males per lek will also decline. In contrast, sizes may be overestimated where high lek densities cause buffers from adjacent leks to overlap. Additional time is required to develop models demonstrating the probabilities of lek persistence at well-pad densities less than full development.

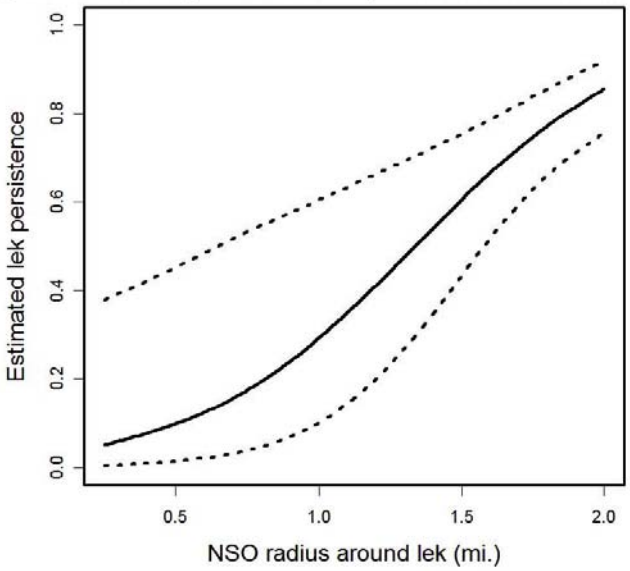

Figure 1a. Estimated probability of lek persistence (dashed lines represent 95% CIs) in fully-developed coal-bed natural gas fields within an average landscape in the Powder River Basin (74% sagebrush habitat, 26% other habitats types) with different sizes of no-surface-occupancy (NSO) buffers around leks, assuming that only CBNG within 2 miles of the lek affects persistence. Buffer sizes of 0.25 mi., 0.5 mi., 0.6 mi., and 1.0 mi. result in estimated lek persistence of 5%, 11%, 14%, and 30%. Lek persistence in the absence of CBNG averages ~85%.

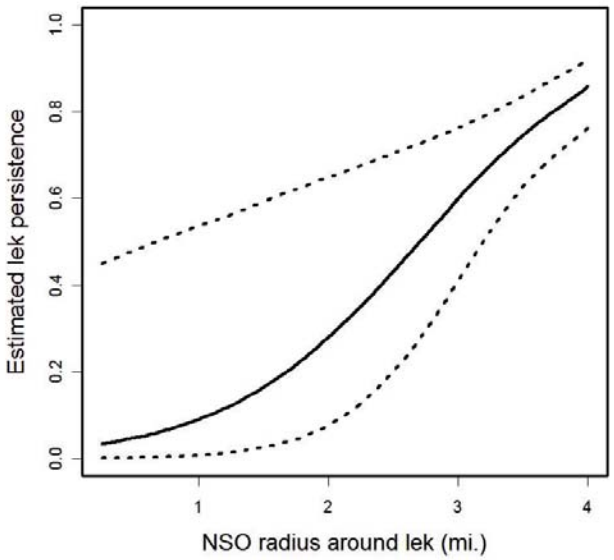

Figure 1b. Estimated probability of lek persistence (dashed lines represent 95% CIs) in fully-developed2 coal-bed natural gas fields within an average landscape in the Powder River Basin (74% sagebrush habitat, 26% other habitats types) with different sizes of no-surface-occupancy (NSO) buffers around leks, assuming that only CBNG within 4 miles of the lek affects persistence. Buffer sizes of 0.25 mi., 0.5 mi., 0.6 mi., 1.0 mi., and 2.0 mi. result in estimated lek persistence of 4%, 5%, 6%, 10%, and 28%. Lek persistence in the absence of CBNG averages ~85%.

Figures 1a and 1b provide an illustration of the trade-offs between differing NSO buffers in relation to lek persistence in developing CBNG fields. The group does not offer a specific NSO recommendation but provides these graphs to guide decision-making.

Breeding Habitat - Nesting and Early Brood-rearing

Yearling female greater sage-grouse avoid nesting in areas within 0.6 miles of producing well pads (Holloran et al. 2007), and brood-rearing females avoid areas within 0.6 miles of producing wells (Aldridge and Boyce 2007). This suggests a 0.6-mile NSO around all suitable nesting and brood-rearing habitats is required to minimize impacts to females during these seasonal periods. In areas where nesting habitats have not been delineated, research suggests that greater sage-grouse nests are not randomly distributed. Rather, they are spatially associated with lek location within 3.1 miles in Wyoming (Holloran and Anderson 2005). However, a 4-mile buffer is needed to encompass 74-80% (Moynahan

2004, Holloran and Anderson 2005, Colorado Greater Sage-Grouse Conservation Plan Steering Committee 2008). These suggest that all areas within at least 4-miles of a lek should be considered nesting and brood-rearing habitats in the absence of mapping.

Winter Habitat

NSO or other protections may also need to be considered for crucial winter range. Survival of juvenile, yearling, and adult females are the three most important vital rates that drive population growth in greater sage-grouse (Holloran 2005, Colorado Greater Sage-Grouse Conservation Plan Steering Committee 2008). Although overwinter survival in sage-grouse is typically high, severe winter conditions can decrease hen survival (Moynahan et al 2006). Crucial wintering habitats can constitute a small part of the overall landscape (Beck 1977, Hupp and Braun 1989). Doherty et al. (2008) demonstrated that sage-grouse avoided otherwise suitable wintering habitats once they have been developed for energy production, even after timing and lek buffer stipulations had been applied (Doherty et al. 2008). For this reason, increased levels of protection may need to be considered in crucial winter habitats.

Phased Development

Population-level impacts and avoidance associated with energy development have been documented (Braun et al. 2002, Lyon and Anderson 2003, Holloran 2005, Kaiser 2006, Holloran et al. 2007, Aldridge and Boyce 2007, Walker et al 2007, Doherty et al. 2008). Phased development maximizes the amount of area within a landscape that is not being impacted by development at any one time, and can occur at multiple spatial scales (e.g., phased development of separate fields in a landscape, phased development of infrastructure within a single unit or field, or phased development within a single lease). Unitization, clustering, and geographically staggered development are all forms of phased development. As a tool to minimize impacts to sage-grouse, developing oil and gas resources by employing one of these phased methods may help maintain large, functional blocks of sage-grouse habitat.

Timing Stipulations

As with NSOs, at the scale that timing stipulations are established, they alone will not conserve sage-grouse populations without being used in combination with core areas. The intent of timing stipulations is to help maintain sage-grouse distribution and a semblance of habitat integrity as an area is developed. Timing stipulations are of lesser value at the scale of full-field development.

Breeding Habitat - Leks

Traffic during the strutting period when males are on a lek results in declines in male attendance when road-related disturbance is within 0.8 miles (Holloran 2005). The distance traveled by males from the lek during the breeding season has been reported in varying ways but generally averages 0.6 miles from a lek (Colorado Greater Sage-Grouse

Conservation Plan Steering Committee 2008 - see Appendix B). Additionally, females breeding on leks within 1.9 miles of natural gas development had lower nest initiation rates and nested farther from the lek compared to non-impacted individuals (Lyon and Anderson 2003), suggesting disturbance to leks influence females as well. Local variations may influence the application of specific dates, which are typically within a window of March 1 and May 31.

Breeding Habitat - Nesting and Early Brood-rearing

Often, timing stipulations (periods where no activity that creates disturbance are allowed) for breeding habitat have been applied using a radius around a lek. However, nesting and brood-rearing habitat is not uniformly distributed around the lek. Mapping of habitat would allow for more accurate application of this stipulation. Research on the distribution of nests relative to leks and on the timing of nesting indicates that timing stipulations to protect nesting hens and their habitat should be in place from March through June in mapped breeding habitat or (when nesting habitat has not been mapped) within 4 miles of active lek sites (Moynahan 2004, Holloran et al. 2005, Colorado Greater Sage-Grouse Conservation Plan Steering Committee 2008).

Winter Habitat

Research suggests that no surface occupancy should also be applied to important wintering habitats (Doherty et al. 2008), but if development occurs, impacts would be reduced if development activities were avoided between December 1 and March 15.

Well-Pad Densities

Leks tend to remain active when well-pad densities within 1.9 miles of leks are less than 1 pad per square mile (Holloran 2005) but leks tend to go inactive at higher pad densities (Holloran 2005, Naugle et al. 2006).

Restoration

The purpose of restoration in sage-grouse habitat should be the removal of infrastructure associated with energy development from the land surface and subsequent re-establishment of native grasses, forbs, and shrubs, including sagebrush, to promote natural ecological function. Restoration should reestablish functionality of seasonal habitats for sage-grouse. Thus a field should not be considered restored until sagebrush-grassland habitats have been reestablished.

Future Needs

Time did not allow for a detailed discussion of specific Best Management Practices for oil and gas development and restoration, seasonal habitat mapping, or future research. These topics are all recognized as needing action in the immediate future.

1 Defined as entire area outside the NSO buffer, but within 2 miles, being within 350 meters of a well.

2 Defined as entire area outside the NSO buffer, but within 4 miles, being within 350 meters of a well.

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Appendix 1.

Participants (Alphabetical)

Dr. Tony Apa, Colorado Division of Wildlife
Mr. Joe Bohne, Wyoming Game and Fish Department
Mr. Tom Christiansen, Wyoming Game and Fish Department
Mr. Jeff Herbert, Montana Department of Fish, Wildlife and Parks
Mr. Bill James, Utah Division of Wildlife Resources
Mr. Rick Northrup, Montana Department of Fish, Wildlife and Parks
Mr. Dave Olsen, Utah Division of Wildlife Resources
Mr. Aaron Robinson, North Dakota Game and Fish
Ms. Pam Schnurr, Colorado Division of Wildlife
Mr. T.O. Smith, Montana Department of Fish, Wildlife and Parks
Mr. Brett Walker, Colorado Division of Wildlife

Invited Guests

Dr. Matt Holloran, Wyoming Wildlife Consultants, LLC
Dr. David Naugle, University of Montana

Responses for Document 52851

52851-001: The BLM agrees that a piecemeal or segmented approach to analysis of the environmental effects resulting from several projects without consideration of other past, present, or reasonable foreseeable future projects that may cumulatively affect the quality of the human environment should be avoided to the extent possible. At the leasing or development stage, however, the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects. As a result, BLM believes that "piecemealing" or "segmenting" is unlikely to occur.

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. As stated in Sections 6.1.5 and 6.2.5 of the PEIS, for the purposes of analysis the cumulative impacts assessment looks at the incremental impacts of a single oil shale facility and a single tar sands facility, recognizing that there may be more than one of each type of these facilities brought into operation during the study period. This cumulative analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decision and the uncertainty of oil shale and tar sands development on private lands. Most of the topics identified in the comment are addressed in the PEIS. With respect to impacts of loss of lands to wildlife, Sections 6.1.1.7, 6.1.2.7, 6.1.3.7, 6.2.2.7, and 6.2.3.7 of the PEIS present maps showing crucial habitats relative to oil shale basins and STSAs. Sections 6.1.5.2 and 6.2.5.2 present an inventory of other disturbances that could contribute to cumulative impacts to wildlife species.

A more specific analysis of cumulative impacts of oil shale and tar sands facilities in the study area may be conducted at a future step in the assessment process, when an RFDS for oil shale and/or tar sands development would be included. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. An RFDS at a future step in the assessment process would be based on a clear set of supportable assumptions associated with a leasing or development proposed action. Information pertinent to developing an RFDS will be gained from RD&D projects.

52851-002: The PEIS is a programmatic-level document, analyzing allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the

alternatives on whether lands are suitable for future consideration for commercial oil shale leasing.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. This specific analysis, if plant species of concern are present, may include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to sensitive resources.

52851-003: Although the Land Use Planning Handbook refers the reader to the Fluid Minerals section, the allocation decision being made in the PEIS is different than the oil and gas leasing decisions made in RMPs; therefore, Appendix C, Section II.H, does not apply. As a result of the maturity of the oil and gas industry, the BLM is usually able to include sufficient site-specific analysis in its NEPA documentation for amendments to RMPs, so that an additional NEPA analysis is not required for issuing an oil and gas lease in conformance with the RMP. In contrast, the present experimental state of the oil shale and tar sands industries does not provide sufficient site-specific to support the issuance of a lease.

This PEIS 1) identifies the most geologically prospective oil shale resources on public lands in Colorado, Utah, and Wyoming; 2) supports amendment of certain land use plans to identify areas as available for application for commercial leasing in the future; 3) supports amendment of certain land use plans to identify areas as off-limits to application for commercial leasing in the future; 4) supports amendment of land use plans to specify that BLM will consider and give priority to the use of land exchanges to facilitate oil shale development; and 5) discloses what is known about oil shale development as well as what information and data must be obtained in order to be able to complete the NEPA analysis necessary to lease. This PEIS clarifies, to the extent possible, how potential oil shale development could proceed on public lands and stipulates that site-specific NEPA analysis will be required prior to leasing and to development.

52851-004: As the comment recognizes, it is not currently possible to construct an accurate RFDS. It is partly for that reason that BLM, in consultation with its cooperating agencies, chose to not further consider leasing as part of the action analyzed in the PEIS but to consider land allocation decisions that would identify lands available for application for future commercial leasing. The goals and objectives of this PEIS could now be described as identifying lands that are both open and closed to future application for commercial leasing. BLM believes it is in full compliance with the requirements outlined in the BLM Planning Handbook.

The BLM has concluded that subsequent NEPA analysis at the leasing stage will be required to determine the extent of the effect of oil shale and tar sands development when more specific information is known about the technology and associated environmental consequences. The BLM is committed to doing the appropriate level of analysis at the leasing stage.

52851-005: It is true that the FLPMA requires that BLM's land use plans be consistent with state, local, and Tribal plans "to the extent practical," and where these plans conflict with federal law, there will be an inconsistency that cannot be resolved. The BLM identifies these conflicts so that state, local, and Tribal governments have a complete understanding of the impacts on their management options. In preparing the PEIS, the BLM invited state, local, and Tribal governments to participate as cooperating agencies to ensure that full consideration was given to any specific aspects of state, local, and Tribal plans that were germane to the development of the PEIS and to help resolve any inconsistencies between the federal and nonfederal plans.

The 14 cooperating agencies brought an important local perspective and expertise to the process, resulting in the modification of the PEIS's scope from a leasing decision to an allocation decision. This new allocation decision does nothing more than to remove an administrative barrier preventing the BLM from accepting applications. The amendment of the land use plans does not authorize any ground-disturbing activities and is not an irreversible or irretrievable commitment of resources under NEPA. Moreover, the amendment does not constitute the granting of any property right. In this respect, the allocation decision does not conflict with any state, county, or Tribal land use plan. However, the BLM looks forward to the participation of state, local, and Tribal governments in providing information about the state, local, and Tribal plans during subsequent NEPA analysis when specific technical and environmental information is available for analysis. At that time, the consistency or conflicts with the Wyoming Game and Fish Commission official policy concerning no-net-loss crucial habitat for wildlife species within the state would be addressed.

Thus, the extent to which the referenced Wyoming Game and Fish Commission policy qualifies as a state land use plan for purposes of FLPMA is beyond the scope of this PEIS. It should be noted, though, that federal statutes authorize the Secretary to lease federal oil shale resources.

52851-006: We agree that a piecemeal analysis of the environmental effects resulting from several projects, without consideration of other past, present, or reasonable foreseeable future projects that cumulatively could cause a significant impact, may not adequately identify effects that are individually insignificant but cumulatively significant. CEQ guidance has identified piecemeal analysis as a potential weakness in NEPA analysis. The issues identified as significant and the scope of the analysis will help determine what projects, areas, and resources should be the primary focus of the NEPA analysis. However, when subsequent

actions are too speculative to be reasonably analyzed or will need a distinct decision, BLM often does an incremental analysis, which is an analytical process that considers only one increment or step of a possible sequence of actions. At some point, connected actions or other future actions may become speculative. Incremental analysis is appropriate when subsequent steps of the sequence of actions are not directly tied to the plan or projects being analyzed and will require a separate NEPA analysis and decision. Incremental analysis is also appropriate when subsequent actions are so speculative as to preclude reasonable analysis. In these cases, an incremental analysis will be done, and subsequent NEPA analysis will be completed when the actions are not so speculative.

52851-007: In the PEIS, cumulative impacts analysis at a programmatic level has been conducted to the extent possible. The cumulative impacts analysis in the PEIS summarizes the extensive current and planned other activities (for example, oil and gas development, coal mining, livestock grazing, and recreational use) for the study area and does a preliminary qualitative assessment of the impacts of those activities, combined with possible future oil shale and tar sands development, including but not limited to air, water, wildlife, and communities in the study area. Because of the limited character of the decision to be made on the basis of this PEIS (planning/allocation of lands where nominations to lease can be considered), because the locations and magnitude of future oil shale and tar sands development are highly speculative, and because there will be additional NEPA analysis prior to leasing, in this PEIS, it is neither required nor possible to present a detailed cumulative effects analysis showing the impacts of leasing and development.

This point has been clarified in the introduction to the cumulative impacts sections (Sections 6.1.5 and 6.2.5).

52851-008: It is important to note that the allocations addressed in the PEIS do not authorize the immediate leasing of the lands for commercial development. Therefore, subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. This will include an evaluation of the specific occurrences of key wildlife habitats. The specific number and locations of projects cannot be identified within the PEIS. Analyses of the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects (including those of other existing or reasonably foreseeable future oil shale and tar sands leases), reasonable alternatives, and mitigation measures to protect wildlife habitats, as well as what level of development may be anticipated. Project-specific NEPA analyses would also include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important wildlife habitats. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders.

52851-009: See response to Comment 52851-008.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, the specific number and locations of projects cannot be identified within the PEIS. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. This will include an evaluation of the specific occurrences of key wildlife habitats, analyses of the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects (including those of other existing or reasonably foreseeable future oil shale and tar sands leases), reasonable alternatives, and possible mitigation measures to protect wildlife habitats, as well as what level of development may be anticipated. Project-specific NEPA analyses would also include mitigation such as best management practices (BMPs), specific protections, or avoidance to mitigate or eliminate impacts to important wildlife habitats. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders. These would include development and reclamation procedures such as rolling footprints where reclamation occurs on a mined-out portion as processing proceeds to a different portion of a lease. Mitigation of impacts to sage grouse would include recommendations included in BLM's national sage-grouse habitat conservation strategy, as well as those contained in statewide and regional sage grouse conservation strategies that have been prepared by state agencies.

52851-010: The list of mitigation measures presented in Chapters 4 and 5, as well as the conservation measures presented in Appendix F, are not meant to be a final list of measures to be employed for an oil shale or tar sands lease. Mitigation and conservation measures would be subject to modification on the basis of consultation with federal, state, and local agencies and interested stakeholders at the project-specific lease and development stage. This would include the recommendations to conserve wildlife species and habitats detailed within the applicable state's wildlife action plan or conservation strategy within which a proposed oil shale or tar sands project would be located. Mitigation of impacts to sage grouse (including loss of sagebrush habitats) would include recommendations included in BLM's national sage grouse habitat conservation strategy, as well as those contained in statewide and regional sage grouse conservation strategies that have been prepared by state agencies.

52851-011: Analyses of potential sage grouse impacts will be conducted for any proposed oil shale or tar sands project on BLM-administered lands. The scope and approach of the analyses will be determined on a project-by-project basis. Through this process, project-specific siting, design, construction, and operation stipulations for sage grouse will be developed.

Policies and BMPs would be implemented at the project-specific level to avoid impacts to crucial greater sage-grouse habitat to the extent practicable and, where not possible, minimize and mitigate impacts to the species. Mitigation measures for greater sage-grouse would be incorporated as project stipulations, as needed.

The need for these mitigation measures would be determined on a project-by-project basis in conjunction with input from federal, state, and local agencies and interested stakeholders. Mitigation of impacts to sage grouse would include recommendations included in BLM's national sage grouse habitat conservation strategy, as well as those contained in statewide and regional greater sage-grouse conservation assessment and management plans. Aspects of the Wyoming Game and Fish report [Using the Best Available Science to Coordinate Conservation Actions That Benefit Greater Sage-grouse across States Affected by Oil & Gas Development in Management Zones I-II (Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming)] would also be considered on a project-by-project basis. These would include increasing the size of buffer areas designated as no surface occupancy used in combination with the identification and protection of core (or crucial) areas and having temporal and spatial stipulations placed on project development. Reestablishment of seasonal sage grouse habitats would also be considered during site restoration after project development and following decommissioning.

Should the greater sage-grouse become listed as threatened or endangered, the lease applicant would be required to conduct a Section 7 consultation with the Fish and Wildlife Service, and if needed, additional mitigation actions or mandatory terms and conditions will be developed to address any potential incidental take.

52851-012: The information presented in the PEIS for wildlife is of sufficient detail for the purposes of the PEIS. The PEIS identifies basic life history and population information, existing threats, and the potential for the species to be affected by commercial oil shale and tar sands development.

It is important to note that the allocations addressed in this PEIS do not authorize the immediate leasing of the lands for commercial development. Therefore, the specific number and locations of projects cannot be identified within the PEIS. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. This will include an evaluation of the specific occurrences of key wildlife habitats, analyses of the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects (including those of other existing or reasonably foreseeable future oil shale and tar sands leases), reasonable alternatives, and mitigation measures to protect wildlife habitats, as well as what level of development may be anticipated. Project-specific NEPA analyses would also include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important wildlife habitats. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders. Mitigation of impacts to sage grouse would include recommendations included in BLM's national sage-grouse habitat conservation strategy, as well as those contained in statewide and regional sage grouse conservation strategies that have been prepared by state agencies.

52851-013: The BLM exercises its full authority for the exploration, development, and utilization of oil shale and tar sands resources on the public lands in full compliance with the Mineral Leasing Act of 1920, the Energy Policy Act of 2005, and the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands for use by wildlife, and to provide for domestic sources of minerals. To the extent that the comment addresses matters covered in the BLM's proposed leasing regulation, it is beyond the scope of this PEIS. Nothing in this PEIS constrains the Secretary of Interior's discretion to control the scale, pace, and timing of development of federal oil shale and tar sands resources.

The BLM is conducting a phased decision-making process, proceeding from land use planning to leasing to operational permitting. The land use planning or allocation decision does nothing more than to remove an administrative barrier preventing the BLM from accepting applications. The amendment of the land use plans does not authorize any ground-disturbing activities and is not an irreversible or irretrievable commitment of resources under NEPA. Moreover, the amendment does not constitute the granting of any property right. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases. The scope of the subsequent phases would be dependent upon the number of applications received and the type and size of operations proposed by the applicant(s). Hypothetically, the proposal in subsequent NEPA documents could offer for commercial lease a limited number of parcels and identify areas closed to leasing to protect sensitive resources. The subsequent analysis will take into consideration the best available practices to minimize impacts and develop mitigation measures to mitigate or eliminate impacts to affected resources. Examples of potential mitigation measures are provided to inform the public and industry about the types of mitigation that may be required. It is premature, at this time, to determine the type or nature of the analysis, the alternatives required, or the outcome of such analysis without knowing the scope and nature of the proposed action.

52851-014: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, John Emmerich.

The comment tracking number that has been assigned to your comment is OSTSD52852.

Comment Date: March 20, 2008 15:25:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52852

First Name: John
Middle Initial:
Last Name: Emmerich
Organization: Wyoming Game and Fish Department
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Privacy Preference: Don't withhold name or address from public record
Attachment: wer11311.00a_signed letter.pdf

Comment Submitted:

See Attachment See Attachment.

WYOMING GAME AND FISH DEPARTMENT

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March 20, 2008

WER 11311
Bureau of Land Management
Draft Resource Management Plan Amendments
Oil Shale and Tar Sands
Land Use Allocations
Programmatic Environmental Impact Statement

BLM Oil Shale and Tar Sands Resources
Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

To Whom It May Concern:

The staff of the Wyoming Game and Fish Department has reviewed the Notice of Availability for the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah and Wyoming and Programmatic Environmental Impact Statement.

We provided comments during scoping in a letter dated January 30, 2006. Our concerns are still valid and we have no additional concerns.

Thank you for the opportunity to comment.

Sincerely,

JOHN EMMERICH
DEPUTY DIRECTOR

JE:VS:gfb

cc: USFWS

WYOMING
GAME AND FISH DEPARTMENT
Dave Freudenthal, Governor — Terry Cleveland, Director
"Conserving Wildlife - Serving People"

January 30, 2006

WER 11311
Bureau of Land Management
Notice of Intent
Programmatic Environmental Impact Statement and
Plan Amendments for Oil Shale and Tar Sands
Leasing in Colorado, Utah and Wyoming

BLM Oil Shale and Tar Sands Resources
Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

To Whom It May Concern:

The staff of the Wyoming Game and Fish Department has reviewed the Notice of Intent to Prepare an Environmental Impact Statement and Plan Amendments for Oil Shale and Tar Sands Resources Leasing on Lands Administered by the Bureau of Land Management In Colorado, Utah and Wyoming. We offer the following comments.

1) RE: Statutory and regulatory compliance with federal land management principles. Section 369(b)(2) of the Energy Policy Act of 2005 states, "The development of oil shale, tar sands, and other strategic unconventional fuels … should be conducted in an environmentally sound manner, using practices that minimize impacts". 43 CFR 1701(a)(8) states, "The Congress declares that it is the policy of the United States that … the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use;" 43 CFR 1712(a) states, "The Secretary [of Interior] shall … develop, maintain, and, when appropriate, revise land use plans which provide by tracts or areas for the use of public lands" … "in the development and revision of land use plans, the Secretary shall: use and observe the principles of multiple use and sustain yield set forth in this and other applicable law …". 43 CFR 1702(c) stipulates, "The term 'multiple use' means … a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including but not limited to wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration given to the relative values of the resources and not necessarily the combination of uses that will give the greatest economic return or the greatest unit output." 52852-001

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30 CFR 226(g) [Lease of Oil and Gas Lands] states, "The Secretary of Interior … shall regulate all surface disturbing activities conduct pursuant to any lease issued under this chapter, and shall determine reclamation and other actions as required in the interest of conservation of surface resources." 43 CFR 3101.1-3 [Onshore Oil and Gas Leasing] provides, "The authorized officer may require stipulations as conditions of lease issuance. Stipulations shall become part of the lease and shall supersede inconsistent provisions of the standard lease form." 43 CFR 3162.5-1(a) states, "The operator [of a surface drilling operation] shall conduct operations in a manner which protects … natural resources and environmental quality …[and] … In that respect, the operator shall comply with the pertinent orders of the authorized officer and other standards and procedures as set forth in the applicable laws, regulations, lease terms and conditions, and the approved drilling plan or subsequent operations plan." 43 CFR 3591.1(b) states, "Lessees, licensees or permittees [of solid minerals other than coal] shall take such action as may be needed to avoid, minimize or repair: …(4) pollution of surface or ground water; (5) damage to vegetation; (6) injury to or destruction of fish or wildlife and their habitats; … and (9) Damage to recreation, scenic, historical and ecological values of the lands."

52852-001 (cont.)

Comment: The oil shale and tar sands leasing and development regulations must be consistent with the environmental protection provisions of the statutes and regulations cited above, as well as other environmental standards and policies of the BLM. The programmatic EIS must contain a detailed analysis of each of these statutory and regulatory provisions and policies, and must demonstrate how the oil shale and tar sands leasing and development regulations and the leasing program are in compliance.

2) RE: Limitation of extraction methods. In light of Section 369(b)(2) of the Energy Policy Act of 2005, 43 CFR 1701(a)(8), and 43 CFR 1712(a), the programmatic EIS should acknowledge there are no known methods for extraction of oil from oil shale and tar sands that are consistent and compliant with the environmental protection standards, Congressional directives, and the principals of multiple use and sustained yield under which the BLM manages resources on public lands. The EIS should disclose that surface or underground mining and surface retorting are not permissible extraction methods to develop oil shale reserves. Given the extremely high densities of wells required to extract oil by in-situ methods (a few hundred feet between wells), and the high potential for groundwater pollution, the EIS should also state that individually-drilled wells are not a permissible method for in-situ extraction. If the surface density of drilling sites can be reduced to not more than 4 per section by using directional drilling technologies, this may be an acceptable method, provided groundwater pollution issues can be resolved.

52852-002

3) RE: Lease stipulations. 30 CFR 226(g) [Lease of Oil and Gas Lands] states, "The Secretary of Interior … shall regulate all surface disturbing activities conduct pursuant to any lease issued under this chapter, and shall determine reclamation and other actions as required in the interest of conservation of surface resources." 43 CFR 3101.1-3 [Onshore Oil and Gas Leasing] provides, "The authorized officer may require stipulations as conditions of lease

52852-003

issuance. Stipulations shall become part of the lease and shall supersede inconsistent provisions of the standard lease form."

Comment: Historically, the failure to attach appropriate stipulations to leases has been a very significant impediment to the effective mitigation of environmental impacts caused by conventional oil and gas development. Once a lease is issued, a property right and a right to develop the resource are conveyed. Although BLM regulations provide for terms and conditions necessary to minimize environmental impacts and protect surface resources at the time a well is permitted, companies often argue that mitigation prescribed at the permitting stage constitutes a "regulatory taking." Oil shale and tar sands leasing is a new program affording the opportunity to address legitimate mitigation needs up front, at the leasing stage. Lease stipulations inform prospective bidders of potential operating costs that may be incurred to develop a particular resource consistently with multiple use mandates and protection of other surface resources. At a minimum, leases should be stipulated as follows:

a. Oil shale and tar sands resources shall be developed only by the use of in-situ technologies designed to avoid/minimize environmental impacts. Surface or underground mining and surface retorting methods shall not be permitted.
b. The maximum density of well drilling sites permitted for in-situ extraction of oil from oil shale shall not exceed 4 sites per 640 acres of land. Higher densities of wells, where necessary, shall be achieved using directional drilling technologies such that the maximum number of surface drilling sites does not exceed 4 per 640 acres.
c. All standard wildlife stipulations (seasonal stipulations) defined by the State wildlife agency and the U.S. Fish and Wildlife Service that pertain to conventional oil and gas drilling and development shall also be applied to oil shale development, including the drilling, fracturing, and heating processes.
d. Appropriate measures shall be taken to minimize disturbances within crucial wildlife habitats throughout both the drilling and the production phases of any oil shale development project. Measures implemented during the production phase may include removing raw products by underground pipes, remote instrumentation, minimizing densities of roads and ancillary facilities, minimizing vehicle travel within wellfields, environmental education for employees, avoidance of construction within the most crucial areas, and so forth.
e. All disturbances within important and crucial habitats defined by the Wyoming Game and Fish Department shall be mitigated. Disturbances to be mitigated shall include both the direct loss of habitat, and the loss of habitat effectiveness due to noise, dust, visual disturbances, equipment activity, structures, habitat fragmentation, and other causes. Appropriate mitigation shall be determined by the BLM after consultation with the Wyoming Game and Fish Department, or by an activity plan working group in consultation with the Wyoming Game and Fish Department. If effective mitigation is not feasible within the project or lease area, then off-site mitigation shall be required.

52852-003 (cont.)

4. RE: Alternatives considered in the analysis. 40 CFR 1502.14(d) requires lead agencies to analyze the alternative of "no action," and (f) to include appropriate mitigation measures not

52852-004

already included in the proposed action or alternatives. Thus, we request the programmatic EIS describe and analyze a "no action" alternative and a "conservation" alternative. 52852-004 (cont.)

5. RE: Affected environment. 40 CFR 1502.15 requires lead agencies to describe the environment of the area(s) to be affected. We request BLM to include both a general description of wildlife resources and ecological communities throughout the Green River and Washakie basins of Wyoming, as well as locations of all big game seasonal ranges, migration corridors, sage grouse leks and brood rearing habitats, and habitats of protected, sensitive, threatened and endangered species throughout the areas that will be offered for lease. This information is available from databases and maps maintained by the Wyoming Game and Fish Department, the U.S. Fish and Wildlife Service, Wyoming BLM offices, and research reports and theses maintained by the University of Wyoming and other institutions. We also request the BLM prioritize the areas that are likely to be impacted based on their potential for commercial-scale development. 52852-005

6. RE: Cumulative effects analysis. 40 CFR1502.16 requires the lead agency to analyze the environmental impacts of each alternative including direct effects and their significance, indirect effects and their significance, and possible conflicts between the proposed action and the objectives of Federal, regional, State, and local land use plans and policies and controls for the area concerned. 40 CFR 1508.8 defines "effects" to mean direct effects, which are caused by the action and occur at the same time and place [and] indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. "'Cumulative impact' is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

   Comment: We request the BLM thoroughly and quantitatively analyze direct, indirect, and cumulative impacts of oil shale leasing and development on wildlife and other environmental and ecological values throughout the areas that will be opened to lease sales. This analysis must also consider the impacts of ongoing and reasonably foreseeable, conventional oil and gas developments, coal, trona, and other mining, highways, fences, grazing, subdivisions, and other factors that may contribute to fragmentation and degradation of wildlife habitats on a landscape scale. 40 CFR 1508.27(b)(7) further states, "Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts." Thus, the cumulative effects analysis must be done at the broadest level of NEPA, which in this case is the programmatic leasing EIS. Deferring this analysis to smaller component parts, such as project specific plans of operation or wellfield development plans, does not afford a landscape scale analysis that is necessary to detect whether significance exists, and is therefore a violation of the CEQ regulations under NEPA. 52852-006

7. RE: Categorically excluded activities. Section 390 of the Energy Policy Act of 2005 defines 5 categories of activities that are categorically excluded under NEPA if the activities are conducted pursuant to the Mineral Leasing Act for the purpose of exploration or development of oil or gas. Some of the categorically excluded activities (individual surface disturbances of less than 5 acres, cumulatively totaling less than 150 acres per lease holding and drilling additional oil or gas wells within a developed field or "infill drilling") are contingent upon the activity having been analyzed by a prior NEPA document. While it is unclear whether these categorically excluded activities also apply to in-situ development of oil shale reserves, we can assume that they will. Accordingly, the programmatic EIS must contain an affirmative statement declaring the analyses in the programmatic EIS are not sufficiently detailed to constitute an authorization for any of the categorically excluded activities defined in Section 390 of the Energy Policy Act, and such site-specific analyses will be completed in a subsequent NEPA document prepared to authorize wellfield development or individual well permitting. 52852-007

8. RE: Existing State plans and policies. 40 CFR1502.16 requires the lead agency to analyze the environmental impacts of each alternative including possible conflicts between the proposed action and the objectives of Federal, regional, State, and local land use plans and policies and controls for the area concerned. We request this analysis be completed with respect to the following document approved by the Wyoming Game and Fish Commission: 52852-008

   Wyoming Game and Fish Department. 2004. Recommendations for development of oil and gas resources within crucial and important wildlife habitats. Cheyenne, WY. 183pp. http://gf.state.wy.us

   The above document should also be used to provide direction for the analysis of impact significance, and to identify appropriate mitigation practices and lease stipulations.

Thank you for the opportunity to comment.

Sincerely,

Vern Stelter

for BILL WICHERS
DEPUTY DIRECTOR

BW:VS:gbe
cc: Mary Flanderka, Governors Planning Office
USFWS

Responses for Document 52852

52852-001: The BLM is currently in the process of developing the regulations for oil shale leasing and development. However, the BLM rulemaking process is separate and apart from the drafting of the PEIS, and outside the scope of the PEIS. The PEIS discusses and evaluates the proposed action (to identify lands available for application for commercial oil shale and tar sands leases) in relationship these existing statutes and regulations.

52852-002: Thank you for your comment. This PEIS was intended to provide the basis for federal land allocation for future oil shale developments. The environmental acceptability of those developments must be ascertained on a project-specific basis at the time an application for lease is received.

52852-003: The BLM believes that it is premature to identify required mitigations for leases at this time given the evolving nature of oil shale and tar sands development technologies. Mitigation measures are identified during the lease sale NEPA analysis to address specific adverse impacts. Some potential mitigation measures are identified in the PEIS (e.g., Sections 4.8.2 and 5.8.2), but mitigation measures will be developed on a project-specific basis dependent on the location of the proposed project, the resources that could be affected, and the technologies to be deployed. These mitigations would be developed in consultation with involved federal and state agencies.

52852-004: The PEIS includes evaluation of the no action alternative (Alternative A) and Alternative C, which identifies areas that are known to contain or support important natural and cultural resources. Although not identified as such in the PEIS, Alternative C could be considered a “conservation alternative.” Alternative A meets CEQ’s definition of a no action alternative because it describes BLM’s existing oil shale program. This existing program includes the six existing RD&D leases and the lands in Utah and Colorado that have already been identified (in existing RMPs) as being available for oil shale lease application. Under Alternatives A and B, no ground disturbing activities are authorized. However, potential mitigation measures are provided, which could be used to mitigate adverse impacts during the subsequent NEPA analysis.

52852-005: The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs and provide an effective analytical foundation for subsequent project-specific NEPA documents. There is sufficient information pertaining to the affected environment and impacts to ecological resources on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, the specific number and locations of projects cannot be identified within the PEIS. Subsequent project-specific NEPA documents will be prepared that will evaluate the specific technology to be used to process oil shale or tar sands, gather and use area-specific baseline information of the ecological resources upon which to assess actual impacts, analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects (including those of other existing or reasonably foreseeable future oil shale and tar sand leases), reasonable alternatives, and mitigation measures to protect ecological resources, as well as what level of development may be anticipated. Project-specific NEPA analysis would also include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important ecological resources. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders.

52852-006: Since leasing will be an entirely different decision than the allocation decision being made in the PEIS, a new NEPA analysis will be required. It is inappropriate to speculate at this stage whether such NEPA analysis will be programmatic in nature.

This new NEPA analysis will analyze whether to offer for lease parcels of land for commercial oil shale exploration and development, and under what conditions or stipulations. The analysis will also contain any new information or circumstances relevant to the technology, the affected environment, and any associated environmental consequences. This information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands.

As required under NEPA, all subsequent NEPA documents will analyze the cumulative effects from other reasonably foreseeable future actions. The scope and nature of the specific proposed action will drive the type of NEPA analysis the BLM performs. Also as required by NEPA, the cumulative effects analysis would consider the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) federal and nonfederal actions, taking into account the relationship between the proposed action and these reasonably foreseeable actions.

The affected environment of the action could vary greatly from a large regional area to a small discrete area. The scope of the analysis in the NEPA document would be dependent upon the number of applications received, and the type and size of operations proposed by the applicant(s). This could result in a statewide, regional, basin-wide or a site-specific impact analysis. Overall, the geographic extent of the analysis would be limited to those areas that could experience a change in the pattern of land use as a consequence of a direct impact or other

induced effects on the natural resources. The nature of the action can also vary greatly based on the type of technology or mining method. Another critical factor would be the type of infrastructure needed to support the operation, in particular, the source of electrical power.

Hypothetically, the proposals in subsequent NEPA documents could offer for commercial lease 1) only a limited number of parcels, 2) parcels located in a geologic basin, or 3) parcels located throughout a state. Estimated oil shale exploration and development activities assumed to occur as a result of issuing the leases would be based on actual applications, therefore analyses of proposed operations, hypothetical development scenarios or even an RFDS could be developed. Depending on the information included in the applications, technologies whose impacts would be analyzed could include any or all of underground and surface mining with surface retort operations and/or in situ operations.

Based on the nature of the proposed action, existing sources of electrical power may be sufficient to power the operation, or electrical power may need to be generated on lease using either conventional energy sources like natural gas or renewable energy sources like wind or solar. A third hypothetical analysis may include the expansion of existing power plants or the construction of additional power plants (coal, gas, nuclear). In each case, the NEPA analysis would be limited to the extent of the direct and indirect effects from activities described in an RFDS

Thus, while the BLM is committed to performing NEPA analyses prior to leasing, we cannot commit to a certain type of NEPA analysis (regional, planning area, or local). The proposed action will drive what analysis must be done to comply with the requirements of NEPA.

52852-007: Section 390 of the Energy Policy Act of 2005 establishes statutory categorical exclusions (CX) under the NEPA that apply to five categories of oil and gas exploration and development on federal oil and gas leases. The use of the new statutory CXs is not dependent on the CEQ process for approving new CXs. Additionally, the CXs established by Section 390 are not subject to the requirement in 40 CFR 1507.3 that would preclude their use when there are extraordinary circumstances. Because the CXs addressed in this guidance are established by statute and not under the CEQ procedures pursuant to 40 CFR 1507.3 and 1508.4, they are outside the scope of this PEIS.

52852-008: The proposed action being evaluated in the PEIS—to identify public lands that would be made available for leasing for oil shale and tar sands development—does not authorize the immediate leasing of these lands for commercial development. Therefore, the specific number and location of projects and possible conflicts between projects and the objectives of federal, regional, state, and local land use plans and policies cannot be fully evaluated at this time. Specific

mitigation measures cannot be identified at this time, therefore, examples of potential mitigation measures have been provided in Chapter 4 and Chapter 5.

Project-specific NEPA evaluations will be prepared prior to leasing and development decisions. These evaluations will include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important resources in the project area. These mitigation measures would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders. The Wyoming Game and Fish Department document mentioned in the comment has been cited in the mitigation sections for oil shale and tar sands (Sections 4.8.2.3 and 5.8.2.3) as guidance that the lessee would follow to mitigate impacts on wildlife habitats in the state.

Thank you for your comment, Mark Maslyn.

The comment tracking number that has been assigned to your comment is OSTSD52853.

Comment Date: March 20, 2008 15:27:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD52853

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Last Name: Maslyn
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Country: USA
Email: ronaldk@fb.org
Privacy Preference: Don't withhold name or address from public record
Attachment: energy-ocs-updated08.0320.pdf

Comment Submitted:

See Attached. See Attachment.

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March 20, 2008

Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Responsible Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

The American Farm Bureau Federation (AFBF) is pleased to submit comments on the Bureau of Land Management (BLM) Request for Comments on the Programmatic Environmental Impact Statement (PEIS) for Oil Shale and Tar Sands resources on land administered by BLM in Colorado, Utah and Wyoming. Expanded access to our domestic resources is vitally important to American energy independence and American agriculture.

Our business is to grow abundant food and fiber for America and people around the world. Experts say that food production will need to double in the next 20 years to meet rising global demand. But today, tight gasoline supplies have driven U.S. farm input and energy prices to all time highs, cutting farm income. The U.S. farm sector is being weakened by constraints on onshore and offshore energy development, even as global demand for food is growing every year.

Development of Unconventional Fuels such as oil shale, tar sands and heavy oil in addition to a strong focus on renewable energy is a key element of a sound energy policy. There is no doubt that we need secure, affordable oil and natural gas produced in America. The farm sector depends on significant amounts of energy for food processing, irrigation, crop drying, heating farm buildings and homes and the production of crop protection chemicals. 52853-001

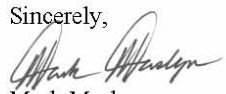
Government estimates conclude that portions of Colorado, Utah and Wyoming contain at least 800 billion barrels of recoverable oil from oil shale and 12 billion to 19 billion barrels of tar sands oil. With today's technology, this enhanced development can be conducted in an environmentally responsible manner. There is a great need to develop unconventional fuels, such as fuel from oil shale and tar sands, in ways that reduce environmental impacts and increase socio-economic benefits for the community.

Developing new supplies of oil in America is essential to economic growth and our nation's energy security. As an energy consumer, AFBF urges BLM to allow responsible

access to national oil shale and tar sands resources. AFBF appreciates this opportunity to comment on this vitally important program. If you have any questions, please contact Anne Steckel, director of congressional relations at 202-406-3666.

52853-001 (cont.)

Sincerely,



Mark Maslyn
Executive Director
Public Policy

Response for Document 52853

52853-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, gabriel lipetz.

The comment tracking number that has been assigned to your comment is OSTSD52854.

Comment Date: March 20, 2008 15:28:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD52854

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Attachment:

Comment Submitted:

dont explor for oil fusil fuels or any other meterials!!!!

leave the land alone

52854-001

Response for Document 52854

52854-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, John Weibel.

The comment tracking number that has been assigned to your comment is OSTSD52855.

Comment Date: March 20, 2008 15:40:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD52855

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Last Name: Weibel
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Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I appoligize for any gramatical errors. I had intended to check for those prior to submission, however, I had other tasks that came up which diverted my focus from this project.

The proposed Oil Shale development should impose bonds upon this develpment to insure that all negative impacts of the proposed project are mitigated. Any unintended burdens placed upon society as a whole should be internatlized to this project. Issues I have concerns should not be the only areas where that the total burden of this project should be reflected as a cost of production.

Given the history of government intervention, in absolving natural gas producers from having to conform with environmental rules and regulations, this project should require that these requirements be adheard with in their entirety and any undue hardships which occur for others are mitigated by either the Oil Shale or Tar sands developers. 52855-001

The PEIS, shows how there will in all likelyhood be a reduction in the ground water level and its quality. What actions will be taken in the event that an individuals water source is drained to levels which require new wells to be drilled. Without these projects, it would be unlikely that those wells would go "dry". As such some mechanism needs to be incorporated into this project to facilitate the drilling of new wells, in this case.

The lowering of these water levels will also create some instances where springs existed prior to development and no longer exist. This will alter the landscape, potentially forever, as wildlife which had depended upon these sources of water no longer have it. In addition to wildlife, ranching operations, which utilized these sources of water will no longer have this availability. Thus they will either have to drill wells to provide livestock water sources, or discontinue their operations. These fainancial hardships should be mitigated by the Oil Shale or Tar Sands developers. 52855-002

The issue of pollutants entering the water is a much longer term issue and is not as readilly 52855-003

definable, as is the lowering of the water table. These impacts will have a much larger cost in addressing, and may pose much longer term problems as the disturbance of the oil shale sites will permanently alter water flows allowing for greater infiltration and exposure to the mine tailings in the mine shafts.

The imediate impact to the individuals who drink water from these aquifers may be great and are unknown. Those that face exposure to waterever new toxins enter their water sources need to be assured that they will be protected. Their is a proven track record that the government will side with the oil industry and eliminate protection from anthor contaminating their water source. As this has happened with the frac drilling for natural gas in the nearby area, with the 2005 energy policy bill. 52855-003 (cont.)

How can we obtain guarantee that the will of the extracting entities to forego the environmental responsibilities, as discussed within the PEIS are upheld? Those individuals who may be impacted by this development that they will be provided with a way of purifying their water, if there is a contamination with their primary water sources.

This process as shown in the documentation will be a large emitter of carbon dioxide into the environment, while at the same time reducing the availability of water to be used in agriculture. This increase in emissions from these operations and their power providers will most likely coincide with the reduction in carbon sequestration from agricultural activity within the region. 52855-004

By utilizing these water resources in the extractive process of Oil Shale or Tar Sands development, they will be unavailable for other uses, which would reduced the amount of carbon dioxide within the environment. This process should be looked at not on the basis of strictly what impact does this have upon the environment. But also, is there a better use of the resources involved.

When looking at the whole of what these resources could be used for. The water resources from one 200,000 bbl would consume about 30,000 acre/ft of water. This water could be put to use by producing an organic material for ethanol or biodiesel production. These process' would have a negative carbon footprint, and be sustainable both environmentally and for the local population base creating an environment which does not create a ghost town in the future. 52855-005

In addition to utilizing biofuels, the proposed for development of oil shale in Wyoming is in an excellent location for the production of wind energy. This technology would also create work for the local population base for the long term, not creating a town based upon the extraction of a finite resource. This will help to build stronger communities, finanacially and environmentally.

The PEIS addressed most sources of air pollution created by this technology. However, it does not address how to deal with this polution. We have set guidelines upon how much of a pollutant can be emitted. However, we fail to address the tax born by society for the use of these technologies.

The PEIS shows how those involved in the extraction process will be exposed to diesel and other pollutants. These individuals, their insurers and in the end the US government will face higher expenses as a result of this operation. These costs are externalized from those entities which etract the oil from these resources and born by others. These costs should be internalized prior to approval, as it has been shown that they most likely will be born by society as a whole. 52855-006

These operations will not only increase demands upon the water resource base but will cause their to be less water available and/or making it available at a different time of year. The increase in CO2 emissions has been show to have an impact towards the warming of the general climate. This warming will cause water the snowpack to melt earlier. 52855-007

The PEIS also has shown that these area will also create dust, of which, a portion will make its way to areas of snowpack. This particulate matter will in turn reduce the reflective capabilities of the

snowpack. This will in turn cause the snowpack to melt earlier in the season and potentially at an accelerated rate. This has the potential of creating flooding, and also will alter when water is available. An altering of water availability without additional water storage, for current users, could cause economic hardships for those farming and ranching in the uppoer Colorado river basin. These factors should be at addressed by increasing impact fees of the developer, which then are passed onto local communities to build addtional storage for their water resources. 52855-007 (cont.)

Without safeguarding the public interest, this project should not go forward. Bonds should be obtained to ensure that any negative effects of this project are compensated for by the responsible parties.

John Weibel

Responses for Document 52855

52855-001: Thank you for your comment. The BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedure to implement a commercial leasing program. The BLM published a proposed rule for the management of a commercial oil shale leasing program in the *Federal Register* on July 23, 2008. The BLM rulemaking process is separate and apart from the drafting of the PEIS. The PEIS is analyzing the environmental consequences of an allocation decision, and therefore comment concerning the regulatory process is outside the scope of the PEIS.

52855-002: These comments relate to the important issues of water availability and water rights, which would be handled at the state level for any proposed developments.

52855-003: Please see response to Comment 52964-003.

52855-004: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA

analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 of the Draft PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

52855-005: Although renewable energy sources are an important part of a diverse domestic energy supply, oil shale and tar sands on the public lands are among our best prospects to supply our country's future energy needs. With the passage of the Energy Policy Act of 2005, Congress instructed the Secretary of the Interior to prepare a PEIS to establish a commercial leasing program. The BLM is conducting a phased decision-making process—proceeding from land use planning, to leasing to operational permitting. The land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases to assess impacts of those actions. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. Specific mitigation measures, management prescription, and the best available practices will be applied to minimize or eliminate impacts as a result of the NEPA analysis.

52855-006: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. The limited action of amending the RMPs will not cause emissions of air pollutants or result in risks to the environment or society. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct and indirect effects, reasonable alternatives, and possible mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

52855-007: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

Thank you for your comment, Claire Moseley.

The comment tracking number that has been assigned to your comment is OSTSD52856.

Comment Date: March 20, 2008 15:41:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52856

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Address 3:
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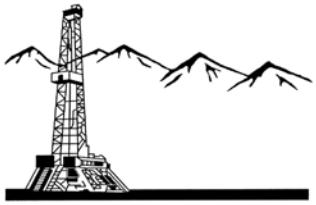
Email: claire@publiclandsadvocacy.org
Privacy Preference: Don't withhold name or address from public record
Attachment: pla oil shale comments.doc

Comment Submitted:

Attached are comments prepared by Public Lands Advocacy regarding the Programmatic Draft Environmental Impact Statement on Oil Shale and Tar Sands.

Claire M. Moseley Executive Director Public Lands Advocacy See Attachment.



PUBLIC LANDS ADVOCACY

CLAIRE M. MOSELEY
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March 20, 2008

Department of the Interior
Bureau of Land Management
Attn: BLM Oil Shale and Tar Sands Resources Draft PEIS Comments
9700 South Cass Avenue
Argonne, IL 60439

VIA Comment Portal

RE: Oil Shale and Tar Sands Draft Programmatic Environmental Impact Statement (EIS)

Dear Sirs:

On behalf of Public Lands Advocacy (PLA) and the Petroleum Association of Wyoming (PAW), UPA & CPA, following are comments on the Draft Programmatic Environmental Impact Statement (DEIS) on Oil Shale and Tar Sands. PLA is a nonprofit trade association whose members include independent and major oil and gas producers as well as nonprofit trade and professional organizations that have joined together to foster environmentally sound exploration and production on public lands. PAW is Wyoming's largest and oldest oil and gas trade organization whose members account for over ninety percent of the natural gas and over eighty percent of the crude oil produced in the State. As noted by Congress in Section 369 of the Energy Policy Act of 2005, "*oil shale and tar sands (and other unconventional fuels) are strategically important domestic energy resources that should be developed to reduce the nation's growing dependence on oil from politically and economically unstable foreign sources*." This recognition is based upon the fact that trillions of barrels of domestic oil have been deemed recoverable from oil shale and tar sands deposits. Members of PLA, UPA, CPA and PAW have direct interest in developing our capacity for extracting these valuable resources.

LEASING

We are concerned by the discussion beginning on page 2-15 where BLM indicates it *"initially intended the Final PEIS to provide the NEPA analysis and documentation not only for the amendment of the land use plans to add the development of oil shale resources to the allowable uses of the public lands in these areas, but also for the issuance of leases for the commercial development of oil shale*." However, BLM has capitulated to cooperating agencies' objections that BLM's analysis would be "*too speculative to support a decision to issue leases on the basis of a 15-project scenario*." Consequently, BLM has indicated that "*if and when applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and possible mitigation measures, as well as what level of development may be anticipated. On the basis of this NEPA analysis to be conducted at the lease stage, the BLM will consider further amendment* 52856-001

of one or more plans, including, but not limited to, the establishment of general lease stipulations and BMPs."

As currently drafted, the DEIS fails to meet Congressional intent as put forth in the Energy Policy Act of 2005 because it does not establish a commercial oil shale leasing program. Instead, the DEIS is only the first of several protracted delays in leasing decisions and subsequent development analyses. The proposed multiple layers of NEPA analyses are not only unnecessarily costly and time consuming, the process described by BLM would also pose a significant financial burden on operators who have already made significant investments in technological advances in anticipation of a viable leasing program. As drafted, the process is not only exceedingly tedious and costly but will also require potential lessees to disclose their proprietary technology before the agency will actually issue a lease.

We recommend that BLM reconsider its approach to making the subject leasing decisions. First, this current analysis is the appropriate vehicle for making leasing decisions. It has addressed the fifteen most likely scenarios for oil shale and tar sands development, which provides the proper foundation for making leasing decisions. This is particularly relevant since any future development will be subject to site-specific NEPA compliance that will serve to address any issues not identified in the programmatic document. Second, BLM is the lead agency on this project and therefore reserves the right to make decisions as it sees fit taking into account the concerns of cooperators. The mere fact that the cooperators opposed the intent to use this document to make leasing decisions is not justification to delay the entire leasing process, particularly since many are single-use agencies that do not have the knowledge or experience needed to manage public lands for multiple-use activities. It would appear the goal of some cooperators is to stymie development of these valuable energy resources rather than to facilitate an efficient leasing and development program.

52856-002

ANALYSIS

It is our finding that the DEIS improperly analyzes the potential impacts of oil shale and tar sands development. The DEIS exaggerates potential impacts because it fails to acknowledge the existence of current regulatory and permitting programs at the county, state and federal levels. Analysis of the proposed action without incorporating or acknowledging current and/or site specific mitigation is tantamount to requiring the use of a worst case scenario as the basis of analysis. It is crucial that available mitigation measures be acknowledged in the effects analysis to clarify that the potential effects of proposed activities would be mitigated through the use of stipulations, conditions of approval and best management practices. Only by incorporating these measures in the effects analysis can the correct impacts of a proposed action be illustrated.

52856-002

Having pointed out the flawed approach to the effects analysis, we are also concerned that the DEIS outlines excessive mitigation and conservation measures that would be used for development projects. Given the indication that the document will not be used to make leasing decisions, it is inappropriate for such comprehensive measures to be contemplated in a programmatic document. However, since the analysis does outline thorough mitigation measures that could be used in development projects, it supports our contention that this analysis is adequately specific for use as a leasing decision document.

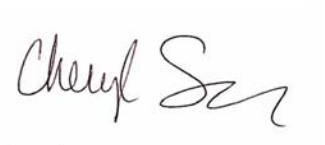
52856-003

ALTERNATIVES

The DEIS analyzes three separate management alternatives for amending existing resource management plans where oil shale reserves are located, including a no action alternative which would prevent oil shale and tar sands leasing from occurring. If BLM retains its decision not to use this document as a vehicle for leasing these resources, we support adoption of Alternative B, the Preferred Alternative, because it represents a step, albeit slight, in the right direction to provide critically needed opportunities to develop oil shale and tar sands resources. We oppose adoption of the No Action Alternative or Alternative C as the Preferred because neither provides the access required to sufficiently develop these energy resources. 52856-004

We appreciate this opportunity to provide you with our comments and recommendations regarding BLM's proposed approach to oil shale and tar sands development. Please do not hesitate to contact Claire Moseley if you have any questions or would like to discuss our views in greater detail.

Sincerely,



Claire Moseley
Executive Director
Public Lands Advocacy

Cheryl Sorensen
Vice President
Petroleum Association of Wyoming

Responses for Document 52856

52856-001: Thank you for your comments. The BLM is working diligently to comply with the requirements of the Energy Policy Act of 2005 to (1) complete a programmatic environmental impact statement for a commercial leasing program for oil shale and tar sands resources on public lands, and (2) publish a final regulation reestablishing such a program. The BLM is conducting phased decision making—proceeding from land use planning, to leasing, to operational permitting—as BLM does for other resources such as oil and gas. This first step—RMP amendment to allow BLM to consider applications for leasing—may be followed by the subsequent steps of leasing and plans of development. Secondly, the BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedures to implement a commercial leasing program.

52856-002: A series of mitigation measures was suggested in the PEIS. Regulations with regard to commercial-scale developments have not yet been promulgated. As discussed in Sections 4.1 and 5.1, the PEIS provides examples of mitigation measures which the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final, or comprehensive, list of required stipulations or management prescriptions.

The proposed action being evaluated in the PEIS—to identify public lands that would be made available for leasing for oil shale and tar sands development—does not authorize the immediate leasing of these lands for commercial development. Project-specific NEPA evaluations will be prepared prior to leasing and development decisions. These evaluations will include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to important resources in the project area. These mitigation measures would be determined in conjunction with input from federal, state, and local agencies, and interested stakeholders, and would be in addition to compliance with applicable federal and state regulations.

52856-003: Please see response to Comment 52856-002.

52856-004: The BLM acknowledges the commentor’s preference for Alternative B.

Thank you for your comment, Larry Wooten.

The comment tracking number that has been assigned to your comment is OSTSD52857.

Comment Date: March 20, 2008 15:49:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD52857

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City: Raleigh
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Privacy Preference: Don't withhold name or address from public record
Attachment: Energy -- Oil Shale and Tar Sands Comments.pdf

Comment Submitted:

See Attachment.

NORTH CAROLINA FARM BUREAU FEDERATION

PO Box 27766, Raleigh, NC 27611 Phone: 919-782-1705 Fax: 919-783-3593 www.ncfb.org

March 20, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

RE: Allow Access to National Oil Shale and Tar Sands Resources

Dear Ms. Thompson:

Thank you for providing North Carolina Farm Bureau the opportunity to express our support for the environmentally responsible development of oil shale and tar sands resources in Utah, Colorado, and Wyoming.

Agriculture is North Carolina's number one industry, accounting for $66 billion in annual economic activity. As the state's largest general farm organization, North Carolina Farm Bureau is deeply concerned about the negative impact of high-energy costs on North Carolina's farm families and agribusinesses. In particular, the high cost of crude oil and diesel fuel has effectively canceled any benefit North Carolina farmers may have received from this current period of high commodity prices.

Considering the tenuous state of world politics, it is critical that the U.S. implement a sound energy policy that makes the most of our own energy resources. Part of that sound energy policy includes the development of national oil shale and tar sands reserves. These reserves can be responsibly and efficiently produced on U.S. federal lands. According to government estimates, the U.S. has enough oil shale deposits on public lands to supply America with 1.23 trillion barrels of oil. 52857-001

Based on the options provided in the BLM's Draft PEIS, Alternative B would best promote an active oil shale program and protect the local environment. Alternative A would not enable the U.S. to take advantage of this important domestic energy source, which will continue to perpetuate our dependence on imported oil from unfriendly nations. Alternative C will not produce adequate supplies of oil from oil shale and tar sands resources, nor will Alternative C provide for efficient program management.

Farm Bureau and Agriculture...
We keep North Carolina growing!

North Carolina's farmers and agribusinesses, like the rest of the nation's oil consumers, are dependent on foreign energy sources to keep their operations in business. Alternative B will enable the U.S. to develop these critical national energy resources while protecting the environment and local communities. 52857-001 (cont.)

Thank you for providing NCFB an opportunity to comment on this important proposal.

Sincerely,

Larry B. Wooten

Larry B. Wooten
President

Response for Document 52857

52857-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Richard Ball.

The comment tracking number that has been assigned to your comment is OSTSD52858.

Comment Date: March 20, 2008 15:54:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52858

First Name: Richard
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Last Name: Ball
Organization:
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Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Comments on OSTS DPEIS on Oil Shale and Tar Sands leasing.

This PEIS utterly fails to deal substantively or honestly with one of the most important impacts expected from development of oil shale and tar sands. Release of greenhouse gas emissions, especially carbon dioxide, would be massive if even a small fraction of the oil shale and tar sands resources under consideration were to be exploited. One of the major purposes of a programmatic EIS is to examine the potential cumulative impacts of the program. EIS analyses for individual leasing projects look at only the incremental impacts of that project, so the PEIS is the appropriate place to examine potential cumulative impacts of the overall program. A PEIS should estimate the cumulative impacts of GHG emissions that might be released from maximum potential development that could ensue from the action under consideration and provide estimates or ranges of estimates of the impacts of those emissions on global climate using widely accepted models of climate change (which already exist). A PEIS that fails to do that fails to fulfill the intended purposes of a PEIS. 52858-001

Sections 4.6.1 and 5.6.1 discuss global climate change impacts from oil shale and tar sands development, respectively. They are essentially identical discussions, concluding with the statement (for oil shale) that "The direct emissions of climate change air pollutants from oil shale development facilities are likely to be a small fraction of global emissions. [Sec. 4.6.1, p. 4-45]. The same conclusion is made about tar sands on p. 5-41. Those statements are factually quite incorrect and totally misleading. In fact, if a substantial fraction of the resources in the proposed lease areas were to be exploited the amount of CO2 released would be enormous and would be large compared with total global emissions with a consequent major impact on global warming. I shall give a very rough, order-of-magnitude estimate below to demonstrate that point. 52858-002

It should also be pointed out that a small project with small output tends to have small impacts, so

even if the extent of ultimate development of the oil shale and tar sands resources is not known, one should still estimate the impacts per unit of production for comparison of the benefits and disbenefits of such development with other alternatives for producing the same functional purposes. It is not valid from either the unit perspective or the total impact perspective to assume that only a small amount of the resources in the leasing area will be developed if the overall program decision sets in motion a program that ultimately could result in very large exploitation of the resources in place with consequent very large impacts.

52858-002 (cont.)

While I could not find figures for the amount of carbon material in the proposed lease areas in the PEIS, many other references estimate the total resources in the general area. For example, a DOE document estimates that of the total global resources of shale oil of about 2.6 trillion barrels, 2.0 trillion are in the United States and 1.5 trillion barrels are in the Green River Formation. That estimate is broadly consistent with the recent USGS estimate of 213 billion tons of shale oil in the combined Piceance Creek, Uinta and Green River Basins of 7900 km2. That represents an enormous amount of carbon in the ground that could potentially be released through production of shale oil and disturbance of resources in the ground. Furthermore, production of shale oil is estimated to result in releases of several tons of carbon releases from production processes and wastes for every ton of carbon in the produced oil. Green Peace estimates those excesses as 4 to 6 times the carbon released from conventional petroleum production. Gruenwald estimates that 40 to 60% of the total resource might be exploitable for a total of 0.5 to 1 trillion barrels, comparable to world total petroleum resources. If half the USGS estimated shale oil of 200 billion tons were exploited and the excess carbon released is only two tons per ton of carbon in the shale oil product, that would still amount to several hundred billion tons of CO2 releases. That can be compared with cumulative releases from the entire span of the industrial revolution estimated at about 550 billion tons Carbon (2 trillion tonnes CO2) through 2000. Hence it appears that exploitation of the entire shale oil resource represents a very large amount of emissions, comparable in magnitude with all of mankind's past emission or to the potential emissions from all remaining conventional petroleum resources. How can that be considered small?

52858-003

Responses for Document 52858

52858-001: The PEIS cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

The impacts of greenhouse gas emissions from oil shale, tar sands, and ancillary facilities are not assessed in this PEIS, because the lack of scientific tools designed to predict climate change on regional or local scales limits the ability to quantify potential future impacts (see Sections 4.6.1 and 5.6.1).

52858-002: As stated in the Draft PEIS, direct emissions of climate change air pollutants "are likely to be a small fraction of global emissions." Speculation regarding potential air pollutant emissions associated with burning of developed petroleum products is beyond the scope of this programmatic analysis.

As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale

and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no conclusions regarding the potential significance of Climate Change Air Pollutants as compared to local or regional emissions were made.

52858-003: See response to Comment 52858-002.

Thank you for your comment, Bill Day.

The comment tracking number that has been assigned to your comment is OSTSD52859.

Comment Date: March 20, 2008 15:57:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD52859

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Attachment:

Comment Submitted:

Thank you for allowing us to comment. We believe that only Alt A is appropriate for the following reasons: There isn't enough information available to warrant amending the RMPs. 52859-001

The impacts on local water are too severe. 52859-002

The impacts on wildlife habitat are too great, especially if this is to be the dominant use, rather than the usual legally mandated multiple use. There doesn't seem to be reason to believe that the expensive and damaging power requirements can pay for themselves in terms of taxpayers' money or energy spent, global warming, or regional air pollution. 52859-003

We need to see the cumulative effects of the required powerplants and additional coal mining required

We do not want our local water, air, agricultural and tourist economies, open space and wildlife habitat damaged over such a large area without a much more promising and well understood public benefit. 52859-002 (cont.)

Sincerely,

Bill Day, BCAS Conservation Chair

Responses for Document 52859

52859-001: The BLM acknowledges the commentor's preference for Alternative A.

52859-002: The BLM prepared this PEIS in compliance with a direct mandate from Congress. The BLM acknowledges the commentor's concern for other uses of the lands analyzed in this PEIS, and for possible indirect effects. Leasing oil shale, however, is consistent with federal statutes. Amending RMPs is also consistent with federal statutes.

The proposed action of this PEIS is a land allocation decision and does not authorize or require the BLM to undertake any action that would result in direct environmental impacts. The BLM believes that there is sufficient information to support this decision at this time and has concluded, based on the analysis in the PEIS, that with the possible exception of potential impacts on property values, there are no impacts associated with this decision. Any subsequent oil shale or tar sands leasing and development would require additional NEPA analysis, and that analysis would assess the potential environmental impacts resulting from these actions, along with appropriate mitigation measures to reduce or minimize those impacts.

The BLM is managing the public lands in compliance the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public lands through its land use planning process to achieve a balance among a variety of uses and resource protection such as those listed in the comment. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

52859-003: Requirements for power and/or additional coal mining for oil shale/tar sands development are too speculative for analysis at this time; the amount of power required varies with technology to be implemented, and because the source of the power (and therefore the impacts) is unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. At the leasing or plan of development stage (when site-and project-specific information is available) and when the scope of the proposed action is determined, the appropriate level of additional analysis will be performed, including a cumulative analysis.

Thank you for your comment, Terry Shepherd.

The comment tracking number that has been assigned to your comment is OSTSD52860.

Comment Date: March 20, 2008 16:08:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD52860

First Name: Terry
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Country: USA
Email: terry@redrockforests.org
Privacy Preference: Don't withhold name or address from public record
Attachment: RRF Oil Shale PEIS Comments.pdf

Comment Submitted:

See attached file. See Attachment.

RED ROCK FORESTS
90 W. Center Street • Moab, Utah 84532 • 435-259-5640
redrockforests.org

March 20, 2008

Oil Shale and Tar Sands Programmatic EIS
Bureau of Land Management

Online Submittal at http://ostseis.anl.gov/involve/comments/index.cfm

Please note: These comments are being submitted in addition to the comments provided earlier with other organizations.

Red Rock Forests, based in Moab, Utah, has approximately 420 members nationwide. Red Rock Forests' mission is the preservation of the forested habitats of Southeastern Utah. Red Rock Forests relies on sound biological principles to guide its policy, goals, and decision-making, with a particular emphasis on conservation biology. Red Rock Forests uses citizen action, community organizing, and collaborative agreements, as well as legal challenges, to further its conservation mission.

The PEIS does not consider the impacts of climate change as it relates to water supplies.

NEPA requires all federal agencies to discuss in an EIS a reasonable range of alternatives to the proposed action. 42 U.S.C. §4332(2)(C)(iii);(2)(E). NEPA also requires federal agencies to take a "hard look" at the environmental consequences of a proposed action. *See, Idaho Sporting Cong. v. Rittenhouse*, 305 F.3d 957, 973 (9th Cir. 2002) (*quoting Marsh v. Ore. Natural Res. Council*, 490 U.S. 360, 374 (1989)). In addition, NEPA requires an EIS to include an analysis of the likely cumulative environmental impacts of proposed actions. *See* 40 C.F.R. §1508.7; 1508.25(a)(2). 52860-001

BLM's analysis of Oil Shale development, therefore, must contain discussions of the effects of climate change on the water and other resources impacted by the mine. This is based on the fact that climate change is a phenomenon now accepted by most experts and, therefore, falls within the guise of BLM's duty to assess the impact of its activities on the environment.

In fact, a recent study suggests that human-caused global warming has been shrinking the snowpack across the mountain ranges of the West for five decades, suggesting that the region's long battle for water will only get worse, according to a computer analysis. *See*, Tim P. Barnett, David W. Pierce, et al, Scripps Institution of Oceanography, University of California, San Diego, La Jolla, CA 92093, USA; Lawrence Livermore National Laboratory, Livermore, CA 94550, USA; Land Surface Hydrology Research Group, Civil and Environmental Engineering, University of Washington, Seattle, WA

98195, USA; National Institute for Environmental Studies, 16-2, Onogawa, Tsukuba, Ibaraki 305-8506, Japan. (Climate Change Study) (Attached as Exhibit C).

In addition, "Cumulative impact" is defined as:

> the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

40 C.F.R. § 1508.7.

BLM must, therefore, provide useful analysis not only of the effects of the proposed action, but also of these effects in combination with past, present, and future actions. *City of Carmel-By-The-Sea v. U.S. Dept. of Transp.*, 123 F.3d 1142, 1160 (9th Cir. 1997). In addition, the D.C. Circuit Court has held that the fact that a project may result in even a small, incremental increase in the overall impacts to a resource is meaningless if "there is no way to determine . . . whether [this small increase] in addition to the other [impacts], will 'significantly affect' the quality of the human environment." *Grand Canyon Trust*, 290 F.3d at 346. The Court in *Grand Canyon Trust* further stated that: "While the factual settings differ in some respects from the instant case, the consistent position in the case law is that, depending on the environmental concern at issue, the agency's [NEPA analysis] must give a realistic evaluation of the total impacts and cannot isolate a proposed project, viewing it in a vacuum." *Id.* at 342. 52860-002

Further, a multivariable climate-change detection and attribution study lead by Scripps Institution of Oceanography at University of California, shows that the hydrological cycle of the western U.S. changed significantly over the last half of the twentieth century. *See*, Climate Change Study. Using a high-resolution hydrologic model and global climate models, the study focuses on the changes that have already affected primarily arid regions in the West with a large and growing population. *Id.* The results show up to 60% of the climate related trends of river flow, winter air temperature and snow pack between 1950-1999 are human-induced and that "[t]hese results are robust to perturbation of study variates and methods. They portend, in conjunction with previous work, a coming crisis in water supply for the western United States." *Id.*, at Executive Summary.

In part, as a result of such studies, the U.S. Supreme Court recently agreed with the State of Massachusetts and ordered the Environmental Protection Agency to consider greenhouse gases a pollutant. *Massachusetts v. EPA*, No. 05-1120 U.S. Supreme Court (2007). In reaching this conclusion, the court stated:

> The harms associated with climate change are serious and well recognized. The Government's own objective assessment of the relevant science and a strong consensus among qualified experts indicate that global warming threatens, *inter alia*, a precipitate rise in sea levels, severe and irreversible changes to natural ecosystems, a significant reduction in winter snowpack with direct and important economic consequences, and increases in the spread of disease and the ferocity of weather events. That these

> changes are widely shared does not minimize Massachusetts' interest in the outcome of this litigation.

Id., at 2, *citing Federal Election Comm'n* v. *Akins*, 524 U. S. 11, 24.

Finally, a district court recently held that failure to consider the effects of climate change in making a "no jeopardy" determination for a large water project in California renders the determination arbitrary and capricious under the Administrative Procedure Act. In *Natural Resources Defense Council v. Kempthorne*, Case No. 1:05-CV-01207 OWW TAG (E.D. CA, May 25, 2007), the Court held that the U.S. Fish and Wildlife Service biological opinion on the effects of the Central Valley Project (CVP) on threatened Delta smelt was arbitrary and capricious, in part, because it failed to discuss the effects of climate change. The CVP and the State Water Project (SWP) are water diversion, storage and delivery projects in the Sacramento and San Joaquin watersheds that affect several listed species, including Delta smelt and three listed species of salmon and steelhead. It is one of the world's largest water development projects, with 20 reservoirs, 500 miles of major canals and aqueducts, and 12 million acre-feet of storage capacity. The combined watersheds encompass an area approximately 500 miles wide.

After conservationists challenged both FWS and NOAA Fisheries Biological Opinion's claiming that the agencies ignored the effects of climate change on listed species, in its order, the Court cited Plaintiff's evidence that climate change could result in hydrological patterns and water temperature changes that would adversely affect the Delta smelt. The Court said "FWS acted arbitrarily and capriciously by failing to address the issue of climate change in the [biological opinion]. This absence of any discussion in the [biological opinion] of how to deal with any climate change is a failure to analyze a potentially important aspect of the problem." *Id* at 84.

Utah and Colorado Water Rights are Over-Appropriated

The PEIS fails to address the Fact that Colorado and Utah Water Rights are Already Over Appropriated. Except for some scattered and remote non-tributary aquifers, and some large ideas about desalinization and Canadian rivers, there are not substantial "new" water resources to develop. In the words of Colorado Supreme Court Justice Greg Hobbs "We are no longer developing the resource; we are learning how to share the developed resource." George Sibley, *"Post-Appropriation" Water Management, Colorado's Water for the 21st Century Act*, The Water Report Issue # 42, p. 20 (August 15, 2007).

In most of the West today, the problem of water supply translates into the challenge of finding more water for urban and suburban growth. Often the logical, if not the only, place to look is to irrigated agriculture. Agriculture still uses more than 80 percent of the water in many western basins. Under these circumstances, doubling urban-suburban use alone (a matter of 20 years in the faster growing areas) would reduce agriculture water availability by around 10 to 15 percent. This does not even account for the huge amount of water that the PEIS proposed alternative would take away from agriculture. 52860-003

In addition, wherever, the reallocated water comes from for the water needed to implement the preferred alternative, due to the amount of water called for the process will requires an entirely new political and legal infrastructure. Similarly, the PEIS relies too heavily on the tradition versions of "Prior Appropriations" that emphasizes water use

and waste over conservation and environmental protection.

Refinement of the Prior Appropriations Doctrine, in fact, began at least 85 years ago with the Colorado River Compact of 1972. This Compact came into being to avoid an all-out "appropriation race" among the seen Colorado River states and became the model for other interstate river compacts throughout the arid region. The refining process continued through the 1960s and 70s as environmental legislation place more controls and containments around the appropriation process in the interests of water quality and environmental sustainability.

52860-003 (cont.)

The transition to "post-appropriation era" in water administration allocation in Colorado began in earnest in 1990, when the federal government nixed the Denver metropolitan area's Two Forks project on environmental grounds, despite the thorough work Denver Water and the suburban utilities had done in lining up water rights. Regardless of the BLM's contentions during public meetings, therefore, the Two Forks situation illustrates that the BLM has the authority to limit the amount of water used and impacted by the Oil Shale development.

The PEIS is Contrary to the Purpose of the Central Utah Project

Based on the unrealistic estimates of the amount of water use proposed by the preferred alternative and the archaic legal doctrines upon which such water rights would be acquired, the PEIS undermines the principles upon which the Central Utah Water Project (CUP) is based. The CUP was adopted by the state legislature to enable the state to use a substantial portion of its allotted share of Colorado River water under the Colorado River Compact. Since 1992, when the Central Utah Project Completion Act (CUPCA) became law, the Central Utah Water Conservancy District (District) has responded to a federal mandate to produce Water Management improvement Studies, including a Water Pricing Policy Study and the Water Conservation Credit Program. The District, therefore, is in the unique position of having funding resources and broad perspective that can assist communities with their very real water conservation challenges.

Studies conducted under the CUP have shown conclusively that the growth of Utah's population will outstrip it water supply before 2050. Nancy Hardman, *Central Utah Water Conservation District, Central Utah Water Conservation*, The Water Report, Issue # 22, p. 13 (December 15, 2005). These findings factor in the development of all known raw water sources, but without including Utah's recurring droughts or the preferred alternative in the PEIS. *Id.* Further, in direct contrast to the water use called for in the PEIS, only by reducing per capita water consumption by 25% over the intervening years can Utah reasonably expect to have adequate water for its burgeoning population. *Id.*

52860-004

In 1992 as part of the CUPCA, Congress took the unprecedented step of establishing a comprehensive water conservation program and in stream flow obligation for the Bonneville Unit of the CUP. Section 207(b)(5) (CUP Completion Act, 19923) states that the "District shall establish a continuous process for the identification, evaluation, and implementation of water conservation measures." The Act further clarifies that it is through this process that the District is to achieve its water conservation goal. The process must be applied to proposed conservation measures in order for the amount to be credited toward achievement of the goal. Meeting this obligation has resulted in the development of a Credit Program.

Moreover, the Utah Governor's Office has established water conservation goals consisting of a 12.5 percent reduction in per capita water use by 2020 and a 25 percent reduction in per capita water use by 2050, using 200 water use as a comparison basis. District planning for the Utah Lake Drainage Basin Water Delivery System (ULS) now being readied for construction, has included water conservation as both a purpose and a need, and builds on the State water conservation goals, the CUPCA Credit Program, and the success of other municipalities.

The joint-lead Agencies for the ULS project (the District, the US Department of the Interior and the Utah Reclamation, Mitigation and Conservation Commission) have establish an average daily "Municipal and Industrial" water usage ranging from 180 to 220 gallons per capita per day to be eligible for Bonneville Unit Water. One of the criteria for receiving Bonneville Unit water under the ULS project is that entities requesting water must develop and implement an acceptable water conservation plan. Water petition contracts incorporating water conservation measures with South Utah Valley Municipal Water Association Jordan Valley Water Conservancy District and Metropolitan Water District of Salt Lake and Sandy have been negotiated. *Utah Water Conservation* at 14.

52860-004 (cont.)

It is clear, therefore, that the colossal amount of water usage proposed by the PEIS' and process for obtaining this water would, not only take water away from unadjudicated and adjudicated senior water right holders and preempt Indian tribal water rights, but it would undermine the complex system of water conservation, protection of fishery needs and instream flows, and other measures for reducing Utah's water crises that have been painstaking developed by the state legislature and the public.

The PEIS Fails to Address Impacts to Tribal Water Rights

The PEIS fails to address the impact of the massive amounts of water needed for oil shale production on the adjudicated or un-adjudicated water rights on affected Indian Tribes. This is contrary to language in Treaties entered into between the United States and the Utah Tribes which implicitly reserved water needed for the "absolute and undisturbed occupation" by such Tribes, as provided in *Winters v. United States,* 207 U.S. 564 (1908). In *Winters*, the United States brought suit on behalf of the Gros Ventre and Assiniboine tribes of the Fort Belknap Reservation in Montana to halt upstream diversions by non-Indians who had been using the water running through the Tribe's land since 1900. The Fort Belknap Reservation was established under the terms of an 1888 treaty that, as in the case of the Fort Laramie Treaty, generally described the purpose of the reservation as the provision of a permanent home for the tribes and to encourage the Indians to engage in agricultural pursuits, but did not mention water rights. *Id.* at 656.

52860-005

The non-Indian diverters, in *Winters*, contended that their diversions, which were prior in time to those by the Indians, gave them a superior right. Mark A. McGinnis & Jason P. Alberts, "Southwest Water Decisions: The Law of Federal Reserved Water Rights," The Water Report: p. 2 (October 15, 2005). That argument was rejected by the Supreme Court, which stated,

> The case, as we view it turns on the agreement of May, 1888, resulting in the creation of the Fort Belknap Reservation.... The reservation was part of a very much larger tract which the Indians had the right to occupy and use and which was adequate for the

> habit and wants of a nomadic and uncivilized people. It was the policy of the Government, it was the desire of the Indians, to change those habits and to become a pastoral and civilized people. If they should become such the original tract was too extensive, but a smaller tract would be inadequate without a change in conditions. The lands were arid and without irrigation, were practically valueless. And yet, it is contended, the means of irrigation were deliberately given up by the Indians and deliberately accepted by the Government ... The power of the Government to reserve the waters and exempt them from appropriation under the state laws is not denied and could not be.

207 U.S. at 575–76 (1908), citing, *United States v. Rio Grande Dam and Irrigation. Company*, 174 U.S. 690, 702 (1899).

In dramatic contrast to the water grab represented by the PEIS, the fundamental principles of Indian law attempt to reserve sufficient water for the needs of the Tribes. After *Winters,* for example, the federal courts refined the definition of tribal sovereignty in relation to water rights, beginning with the U.S. Supreme Court's decision in *Arizona v. California*, 373 U.S. 546 (1963). In that case, the special master appointed to resolve certain preliminary questions settled on the notion of quantifying reserved water rights based upon practicably irrigable acreage (PIA). Under this test, an Indian tribe is legally entitled to as much water as is needed to irrigate all the PIA within its reservation. The water so reserved "was intended to satisfy the future as well as the present needs of the Indian Reservation." 373 U.S., at 600. In other words, the water was reserved "to make the Reservation viable." *Id.*, 599, *cited with approval in Montana v. United States*, 450 U.S. 544, 566 n. 15 (1981). 52860-005 (cont.)

Ultimately, this approach developed into the 'permanent homeland' concept, which originated in *In Re General Adjudications of All Rights to use Water in the Gila River System and Source*. 201 Ariz. 307, 315, 35 P.3d 68, 76 (2001) (Gila V). In that case, the Arizona Supreme Court, in keeping with the standard established in *Arizona*, reviewed the decision of Judge Goodfarb of the Maricopa County Superior Court holding that all federal reserved rights for Indian reservations were to be measured based upon the PIA standard. *Id.* This standard provided that the tribes should receive enough water to irrigate all land on the reservation that is: 1) arable; 2) physically irrigable; and 3) economically irrigable.

On review of Judge Goodfarb's decision, the Arizona Supreme Court rejected the PIA as the sole standard for determining the "essential purpose" of the tribal reservation and instead found that such purpose "is to provide Native American people with a 'permanent home and abiding place, that is 'a livable' environment." *Id.* The court held that the general purpose of providing a home for Indians must be broadly construed to provide tribes with the ability to achieve self-determination and economic self-sufficiency and that limiting tribes to a PIA standard denies them the opportunity to evolve. *Id.* This, in turn, limits tribes to an agrarian standard in a largely non-agrarian modern world. The *Gila V* court mandated that proposed uses be "reasonably feasible." *Id.*, at 80. To determine if a use is reasonably feasible, a project must be: 1) achievable from a practical standpoint; and 2) economically sound. *Id.* at 81.

In addition, the PEIS violates the Tribes' rights to fish and wildlife resources that are protected by the Treaties. The discussion related to the protection of natural resources that fall under the scope of treaty rights started with a decision that was ultimately overturned by the 9th Circuit on procedural grounds, for example, after enumerating the list of human caused factors sponsored by governmental entities that have resulted in the rapid decline of the Columbia River salmon, the U.S. District Court for the Western District of Washington held that "implicity incorporated in the treaties' fishing clause is the right to have the fishery habitat protected from man-made despoliation." *United States v. State of Washington*, 506 F.Supp. 187, 203 (Dist. WA 1980). In reaching this conclusion, the court made the logical assumption that the "most fundamental prerequisite to exercising the right to take fish is the existence of fish to be taken." *Id.* Following *U.S. v. Washington*, other courts have recognized the tribal interests in protecting environmental resources. In *United States v. Washington*, Phase II, the initial lower court decision applied the "moderate living needs" standard. *See also*, *United States v. Adair*, 723 F.2d 1394 (9th Cir. 1983), *cert. Denied*, 467 U.S. 1252 (1984), requiring a revival of wetlands that had been decimated by non-Indian stream withdrawals. In *United States v. Anderson*, 736 F.2d 1358 (9th Cir. 1984), the court upheld a lower court ruling requiring non-Indians to maintain a minimum stream flow necessary for the survival of a tribal fishery.

52860-005 (cont.)

Thank you for your consideration of these additional comments.

Sincerely,

Terry Shepherd
Executive Director
Red Rock Forests
90 West Center Street
Moab, UT 84532
435-259-5640

Responses for Document 52860

52860-001: Regarding climate change, different models use different assumptions and algorithms, and it is difficult to justify that one model result is better than another. Because of that, we chose to use long-term hydrologic data (from 1906 to 1986) of the Colorado River to evaluate long-term average water supply of the river (see Section 3.4.1) that may fit the landscape of potential long-term development of oil shale and/or tar sands in the region. Meanwhile, we recognize prolonged drought in the region could reduce water supply (see Section 3.4.1).

Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

The cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). Potential cumulative impacts are addressed in Sections 6.1.5 and 6.2.5 in the PEIS.

52860-002: The PEIS cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS, i.e., amending land use plans to allow certain lands to be considered for future leasing. This allocation decision does not authorize any ground-disturbing activities and is not an irreversible or irretrievable commitment of resources under NEPA (see 40 CFR 1502.16), and therefore no significant adverse impacts are anticipated.

As explained in Sections 6.1.5 and 6.2.5, in order that the decision maker might have sufficient information to make a reasoned choice among the alternatives, the BLM has developed a general analysis of the potential incremental impacts from all past, present, and reasonably foreseeable actions, in conjunction with a single hypothetical oil shale or tar sands facility, with the understanding that there might be more than one or even many oil shale/tar sands. A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

52860-003: The PEIS is a programmatic-level document that analyzes allocation decisions and their consequences but does not commit any resources or grant any lease rights. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

The BLM recognizes that transferring water from agricultural use to municipal uses is a trend. The potential impacts of transferring water from agricultural use to oil shale or tar sands development have been added in the revised PEIS (see Section 4.5.1). In the past several years, energy companies also acquired water rights in the regions from the agricultural sector as well as ranchers. Such trends are likely to continue and to be driven by market forces. Whether enough water is physically available for oil shale development remains unclear, as oil shale development technologies, scale of the development, economy, and locations of development project sites remain undefined and are evolving with time.

52860-004: The PEIS is a programmatic-level document that analyzes allocation decisions and their consequences but does not commit any resources or grant any lease rights. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated. The water estimates used in the PEIS are what an oil shale project plan could use, based upon today's knowledge of oil shale development and assumed plant capacity. Although the PEIS estimates water availability, water rights are not evaluated as that issue is outside the scope of the PEIS.

However, in the past several years, Royal Dutch Shell has been buying land and water rights from western Colorado, including a 30,000-ac-ft reservoir (Free Republic 2008). Based on what is happening on the ground, using acquired water rights for potential oil shale development is potentially realistic at least in western Colorado. This PEIS estimates Utah's water availability in the oil shale basins and tar sands special area, based on allocations specified in the Upper Colorado River Basin Compact and Utah's water plans for the Uintah Basin, Southeast Colorado River Basin, and West Colorado River Basin. All of these basins are in the oil shale and tar sands prospective areas and within the Upper Colorado River Basin. These water plans are unlikely to undermine the principles of the Central Utah Water Project.

Water rights are tradable in the Colorado River Basin. Any oil shale and/or tar sands developer would need to follow applicable laws and adhere to existing water rights, including instream flow water rights, to protect endangered fish species and recreation, and the Tribal water rights, to acquire enough water resources for their uses.

Reference:
Free Republic, 2008, Colorado's Oil Shale Lures Shell. Available at: http://www.freerepublic.com/focus/f-news/2015446/posts. Accessed June 10, 2008.

52860-005: The PEIS is a programmatic-level document that analyzes allocation decisions and their consequences. The PEIS does not commit any resources or grant any

lease rights. When applications to lease are reviewed, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

The water estimates used in the PEIS are what an oil shale project plan could use, based upon today's knowledge of oil shale development and assumed plant capacity. Although the PEIS estimates water availability, water rights are not evaluated as that issue is outside the scope of the PEIS. Any oil shale and/or tar sands developer would, however, need to follow applicable laws and adhere to existing Tribal water rights to acquire enough water resources for their uses.

Thank you for your comment, Gregory Cohen.

The comment tracking number that has been assigned to your comment is OSTSD52861.

Comment Date: March 20, 2008 16:20:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52861

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Privacy Preference: Don't withhold name or address from public record
Attachment: BLM letter.pdf

Comment Submitted:

Please see attachment See Attachment.

March 20, 2008

Ms. Sherri Thompson
Bureau of Land Management
Oil Shale and Tar Sands Draft Programmatic EIS Comments
9700 South Cass Avenue
Argonne, IL 60439

Dear Ms. Thompson:

The American Highway Users Alliance (The Highway Users) is pleased to submit comments expressing support for the environmentally-responsible development of our domestic oil shale and tar sands resources in Utah, Colorado, and Wyoming, as outlined by the Bureau of Land Management (BLM) in its Draft Oil Shale and Tar Sands Programmatic EIS (PEIS).

The Highway Users is a nonprofit organization that represents the united interests of motorists and businesses who depend on safety and mobility. We consider it extremely important that our country adopts an energy policy that lowers fuel costs for all families and businesses.

If current trends continue, it is highly likely that the price of crude oil and gasoline will reach prohibitively high levels. Already diesel fuel costs average $4.00 per gallon and analysts predict that gasoline will cost more than $4.00 per gallon by this summer, which will cause significant harm to people throughout the country and our economy.

52861-001

If the U.S. is to seek a solution to such crippling gasoline and diesel prices, we will need to expand access to our domestic energy sources. National reserves of oil shale and tar sands are vital sources of energy. In fact, an enormous domestic supply of oil shale and tar sands can be safely and efficiently produced on federal lands. We have enough oil shale to provide for transportation needs for at least 180 years and, according to government estimates, oil shale deposits on public lands hold the equivalent of 1.23 trillion barrels of oil.

From the options provided in the BLM's PEIS, it appears that **Alternative B** successfully promotes energy production by balancing a robust and active oil shale program with the necessary and comprehensive environmental protections. The Highway Users believes that Alternative B strikes a good balance between safeguarding the natural environment while ensuring that consumers and businesses across the country receive an adequate supply of oil.

Sincerely,

Gregory M. Cohen
President and CEO
American Highway Users Alliance

1101 14th Street NW, Suite 750, Washington, DC 20005, 202-857-1200, 202-857-1220 (fax), www.highways.org

Response for Document 52861

52861-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Thomas Bida.

The comment tracking number that has been assigned to your comment is OSTSD52862.

Comment Date: March 20, 2008 16:27:41PM
Oil Shale and Tar Sands
Comment ID: OSTSD52862

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Attachment:

Comment Submitted:

This note contains a second set of my comments on the PEIS for the oil shale and tar sands development program, specifically addressing regions slated for leasing and development.

As a resident of the Rocky Mountain states, I find it extremely alarming that the areas slated for lease and mineral extraction include lands directly adjacent to two Utah National Parks, Canyonlands and Capitol Reef, two true crown jewels in our National Parks system. In addition, the San Rafael Swell is targeted, a canyon system that is deserving of national park status as well. Development of these lands will have a direct and irreversible impact on air and water quality, wildlife, and the quality of visitor experiences to those national parks, not to mention destruction of the pristine, unique red rock country of the Swell. 52862-001

There is no possible benefit to the American people in developing these lands, rather, the benefit will only be a temporary one to the oil industry. No amount of oil extracted can compensate for loss of such important public lands to all future generations.

Again, this PEIS is very premature and rushed for the magnitude of the proposed development on these public lands in Utah, Colorado, and Wyoming. Alternative A (no action) is the only acceptable alternative on this PEIS. 52862-002

Thank you for the opportunity to comment on the OSTS PEIS.

Thomas A. Bida Flagstaff, AZ

Responses for Document 52862

52862-001: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. The limited action of amending the RMPs will not make the areas mentioned in the comment available for application for leasing and, therefore, will not result in environmental impacts, with the possible exception of impacts to property values. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct and indirect effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

52862-002: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Terry O'Connor.

The comment tracking number that has been assigned to your comment is OSTSD52863.

Comment Date: March 20, 2008 16:29:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD52863

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Attachment: BLM Oil shale and Tar Sands Draft.PDF

Comment Submitted:

Attached please find comments submitted on behalf of "Shell." A duplicate with original signature is also in the mail to you today. See Attachment.

Shell Frontier Oil and Gas Inc.

March 20, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory EVS/900
9700 S. Cass Ave.
Argonne, IL 60439

RE: Comments on Draft Oil Shale and Tar Sands Resource Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS) December 21, 2007 (BLM-WO-GI-08-005-3900) (DOI No. DES07-60)

Dear Sir or Madam:

On December 21, 2007, the Bureau of Land Management ("BLM") issued a draft PEIS, which examines alternatives for making BLM-administered lands available for future commercial leasing of oil shale and tar sands resources. Shell Frontier Oil and Gas, Inc. and Shell Exploration and Production Unconventional Oil Directorate ("Shell") thank the BLM for the opportunity to comment on the PEIS. As holders of three Research, Development and Demonstration ("RD&D") oil shale leases in northwestern Colorado within the BLM's White River Field Office's jurisdiction, Shell submits these comments pursuant to 40 C.F.R. §§ 1503.1(a)(3) and 1506.6(d). Shell requests that this comment letter and the attached appendices be included in the administrative record pertaining to this matter. *See County of Suffolk v. Secretary of Interior*, 562 F.2d 1368, 1384 & n.9 (2d Cir. 1977) (addressing scope of NEPA administrative record), *cert. denied*, 437 U.S. 1064 (1978); *Silva v. Lynn*, 482 F.2d 1282, 1283 (1st Cir. 1973).

Introduction

Oil shale deposits in the United States are estimated to contain over a trillion barrels of oil in place. Congress declared in Section 369(b) of the Energy Policy Act of 2005 that such deposits are "strategically important resources that should be developed to reduce the United States' growing dependence on politically unstable sources of foreign oil" and mandated that the development of oil shale should occur, with an emphasis on sustainability, to benefit the United States.

Shell supports the goals set forth in the Energy Policy Act of 2005 to establish a viable and sustainable commercial oil shale leasing program. There is a strong likelihood that global conventional oil production will decline in the coming decades. Further, global demand for oil exceeding conventional supplies makes a strong case for development of the U.S.'s oil shale resources. If not quickly addressed, these deteriorating global market conditions, could, and likely will, result in even higher oil prices and reduced availability of oil resources. 52863-001

The importance of energy-related projects has been recognized in Executive Order 13212, which states that the "increased production and transmission of energy in a safe and environmentally sound manner is essential to the well-being of the American people." Further, the Executive Order establishes the policy that "agencies shall take appropriate actions, to the extent consistent with applicable law, to expedite projects that will increase the production, transmission, or conservation of energy." *Id.* This policy forms the backdrop against which BLM should consider access to oil shale as a key energy resource.

52863-001 (cont.)

America's rich and concentrated oil shale resources, if developed in a timely and economically efficient manner, offer the potential to help offset the anticipated global production declines of conventional oil, reduce oil imports and their economic costs, stimulate domestic employment and economic activity, and provide a reliable domestic source of liquid transportation fuels. Oil shale development can also play a vital strategic role, providing the military with long-term, secure access to domestic fuels.

Mindful of these challenges and Congress' mandate, Shell has been (1) advancing its research toward developing oil shale in the United States to promote energy self-reliance, and (2) working with the BLM and other federal, state, and local agencies to pursue future commercial oil shale development in an economically feasible, environmentally responsible, and socially sustainable manner.

The PEIS analyzes BLM's proposal to amend twelve resource management plans ("RMPs") in Colorado, Utah and Wyoming to describe the most geologically prospective areas administered by the BLM and to decide which areas will be open for potential commercial leasing, exploration and development. The National Environmental Policy Act ("NEPA") requires federal agencies to prepare a detailed statement on the environmental impacts of and alternatives to their proposed actions. 42 U.S.C. § 4332(2)(B). Compliance with NEPA's procedural and analytical requirements is designed to foster both informed decision making and informed public participation. *See Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989). The PEIS satisfies NEPA's twin aims requiring that BLM take a "hard look" at the impacts of the project and that the document inform the public of the potential impacts while explaining how these impacts will be addressed.

52863-002

The purpose for amending the RMPs is to identify areas for potential oil shale or tar sands leasing. There is sufficient data and analysis in the PEIS for BLM to make an informed decision on whether to amend the RMPs. However, because the PEIS cannot yet address more particularized considerations arising from commercial oil shale and tar sands leasing, the NEPA analysis does not evaluate or approve specific projects that would develop the oil shale resources. Accordingly, the PEIS correctly notes throughout the document that a site or project-specific NEPA analysis will occur in the future. This approach is consistent with the Council on Environmental Quality's ("CEQ") regulations, which provide that "[f]or projects directly undertaken by Federal agencies, the environmental impact statement shall be prepared at the

52863-003

feasibility analysis (go-no go) stage and may be supplemented at a later stage if necessary." 40 C.F.R. § 1502.5(b).

Under the CEQ regulations, a subsequent NEPA analysis may be "tiered" to a prior NEPA analysis. Tiering "refers to the coverage of general matters in broader environmental impact statements (such as national program or policy statements) with subsequent narrower statements or environmental analyses (such as … site-specific statements) incorporating by reference the general discussions and concentrating solely on the issues specific to the statement subsequently prepared." 40 C.F.R. § 1508.28. Tiering is entirely appropriate for a project-specific program. *See id.* To encourage efficiency, "[a]gencies are encouraged to tier their environmental impact statements to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review." 40 C.F.R. § 1502.20. 52863-003 (cont.)

The PEIS reflects the broad effects of amending twelve RMPs in three western states and provides a solid foundation that will allow future NEPA documents to tier from its analysis and to incorporate its findings by reference. The approach adopted by BLM is consistent with the CEQ regulations, and, to promote efficiency, any subsequent NEPA analysis taking place at a later stage may be tiered from the PEIS.

Organization

Part I summarizes Shell's overall position on the PEIS. Part II identifies and describes substantive issues of critical importance to Shell in the PEIS that need to be addressed and revised. Part III addresses specific technical issues and provides ways in which BLM can revise the PEIS to ensure technical accuracy with regard to specific topics. In addition, for BLM's convenience, Appendix A contains technical clarifications that require little or no explanation and examples of comments providing additional support to this letter.

Appendix B contains a partial list of potentially required permits for oil shale development, which may be helpful in understanding the role that permitting and regulatory programs will play in minimizing and managing impacts. This list is intended to supplement Appendix D of the PEIS, entitled "Federal, State, and County Regulator Requirements Potentially Applicable to Oil Shale and Tar Sands Development Projects." Appendix C is a document entitled "Special Stipulations to Protect Rights of Owner(s) of Oil Shale Estate(s)," which contains stipulations applicable to multi-mineral development. Appendix D contains stipulations provided in federal oil and gas leases governing conflicts between oil shale and oil and gas leases. Finally, to facilitate review, the following is a table of contents outlining the major topics discussed in this letter.

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Part I

Shell commends the BLM for its work in drafting this important document. Given the research nature of the information that is currently available regarding potential oil shale development technologies, the BLM's analysis is thorough and provides a solid basis for moving forward not only on further research but also on regulatory details and commercial leasing.

The federal government is best situated to institute a national energy strategy to meet our short, medium and long-term energy needs. Shell's family of companies are active participants in the global oil market. Nevertheless, Shell recognizes that the United States has a strong national interest in domestic energy production. Part of the solution to bridging the gap between today's reliance on conventional energy resources and a renewable energy future is the development of the United States' vast unconventional oil resources. There is need for a prudent and comprehensive federal program that assures these resources are developed in a manner that is economically viable, environmentally responsible and socially sustainable; this PEIS sets the stage to assure that happens.

In assessing the perceived and real impacts of developing oil shale resources and providing a sampling of mitigation measures that might apply at an appropriate time in the future, BLM should also evaluate the positive impacts that will result with such development and how to enhance such benefits, as well as reviewing the negative impacts to the United States incurred by not developing these resources. To that end, the PEIS should recognize that oil shale will assist in alleviating several of America's energy concerns.

- Development of oil shale resources in the United States is critical to strengthening America's national energy security.
- There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the United States to offset the decline of traditional oil production.
- Energy prices are based on supply and demand. Expanding supply is the best strategy for keeping gasoline prices affordable.
- Increasing domestic oil supplies would improve the U.S. balance of trade.
- The development of oil shale resources in western Colorado will provide for significant economic development in the region.
- Taxes and royalties that would result both directly and indirectly from oil shale and tar sands development would be a substantial revenue stream for the federal and state governments and would also provide great benefit to the socioeconomic infrastructure of the nation and the region.

52863-004

- A growing oil shale and tar sands industry would provide great employment opportunities in the region, including many new and expanding businesses.
- Through careful planning, management, mitigation and reclamation, we can achieve the multi-use purpose intended for these lands. The coal mining industry has shown that surface reclamation can now be performed in a manner that restores biological productivity and restores the surface to as good or better condition as it existed prior to the commencement of mining operations.

52863-004 (cont.)

Although the PEIS is more limited in scope than was originally contemplated by the Energy Policy Act of 2005, it thoroughly analyzes a broad range of potential issues, and it leads the way forward for prudent development. By managing oil shale development through RMPs, the United States stands to select leasing sites that are most favorable for the preservation and enhancement of environmental resources.

Part II

A. Failure to Recognize Existing RMP Characterizations and Preference Right Leases ("PRLs")

1. Shell's RD&D Leases

Shell holds three RD&D leases, which authorize Shell to construct and operate its in situ recovery technology for oil shale development on three separate parcels of BLM land managed by the White River Field Office. Each RD&D lease encompasses a 160-acre tract associated with a PRL of up to an additional 4,960 acres. The BLM issued a draft environmental assessment ("EA") in August 2006, and a finding of no significant impact ("FONSI") for each of Shell's RD&D leases. The BLM approved the leases on December 15, 2006, and the leases became effective January 1, 2007.

Each RD&D lease grants Shell the "exclusive right and privilege to prospect for, drill, mine, extract, remove, beneficiate, concentrate, process and dispose of the oil shale and the products of oil shale contained within the Leased Lands as proposed in the nomination submitted in response to the Federal Register notice of June 9, 2005." *See* RD&D Lease, at § 2. Each lease has been issued for a term of ten years with an option to extend the lease term for up to five more years upon demonstration of its diligent pursuit of a process leading to the production of commercial quantities of oil shale.

Under each RD&D lease agreement, Shell has the "exclusive right to acquire any or all portions of a preference lease area for inclusion in the commercial lease, up to a total of 5,120 contiguous acres," in part, upon (1) documenting to the satisfaction of the authorized officer that it has produced commercial quantities of oil shale from the RD&D lease; (2) payment of a bonus based on the fair market value of the lease; (3) documentation of Shell's consultation with state and local officials to develop a plan for mitigating the socioeconomic impacts of commercial

52863-005

development on communities; (4) an adequate bond to cover all reclamation and abandonment costs; and (5) BLM's determination following a NEPA analysis that commercial-scale operations can be conducted without unacceptable environmental consequences. Once those conditions have been met, under the RD&D lease terms, the "lessee *shall* have the exclusive right" to a PRL (emphasis added). *See* RD&D Lease, at § 23(a). Thus, once the RD&D leaseholders have met the conditions necessary for conversion listed in the RD&D lease agreement, BLM must grant a PRL. The RD&D lease language is the authoritative source of the standard to be applied to conversion. Indeed, Part 1 of the RD&D lease agreement notes that "[t]o the extent the provisions of this lease are inconsistent with the requirements of any regulation or order, the lease terms govern."

The PEIS correctly notes that further environmental analysis will be necessary in the future as a condition precedent to converting an RD&D lease into a PRL, but the PEIS incorrectly states the conversion standard for a PRL. According to the PEIS, there must be an "evaluation pursuant to the NEPA that concludes that commercial-scale operations of the applicant's technology at that site *does not result in significant adverse environmental or social impacts*...." PEIS, at 1-9 (emphasis added). In contrast, the lease agreement states that BLM must determine that "commercial-scale operations can be conducted, subject to mitigation measures to be specified in stipulations or regulations, *without unacceptable environmental consequences*." RD&D Lease, § 23(a)(4); *see also* 70 Fed. Reg. 33753, 33757 (June 9, 2005) (emphasis added). As noted above, to the extent any inconsistencies are present between the lease agreement and the PEIS, the terms of the lease agreement govern the conversion process. The PEIS should rectify this inconsistency and note that the RD&D lease terms govern the conversion process for a PRL. 52863-005 (cont.)

2. Alternative A's Treatment of the PRLs under the White River RMP

The current White River RMP was finalized in July 1997. Its Record of Decision ("ROD") explicitly carries forward management decisions from the March 1985 Piceance Basin RMP. Under the current RMP,

> [a]t the discretion of the Secretary of the Interior, research scale lease tracts will be considered within lands available for oil shale leasing. Approval of research tracts will be based on the merits of the technology proposed. The Secretary of the Interior could also propose research tract development to further the goals of a federal energy policy. No definitive limits on research tract size will be set forth at this time. No commercial-scale operations will be permitted on a research tract lease. However, if the research tract technology successfully demonstrated an adequate reserve recovery, the Secretary of the Interior will have the discretion of expanding the research tract into a commercial mineral lease.

White River RMP ROD, at 2-6. Specifically, a total of 223,860 acres are available for oil shale leasing under the current White River RMP. *See id.* Accordingly, because the current White River RMP recognizes the possibility of an RD&D leasing program, which is the basis for 52863-006

BLM's award of RD&D leases to Shell and others, Shell's PRL areas are covered by the current RMP and have already been categorized as available for oil shale leasing.

Alternative A, which is the "no action alternative," contemplates only the impacts of the RD&D leases and does not contemplate commercial leasing. As currently written, this alternative is somewhat confusing. It might be read as discontinuing all commercial leasing RMP designations. This would be changing the status quo as opposed to providing a continuation of the current White River RMP, which already classifies the PRL areas as suitable for commercial oil shale leasing. Such a mischaracterization would interfere with Shell's existing rights as contained in its RD&D lease agreement. Instead, Alternative A should be clarified to acknowledge the conversion rights established under the RD&D leases, as well as the fact that the White River RMP already designates areas for commercial leasing. This is the true status quo, and Alternative A should recognize this situation. 52863-006 (cont.)

Of course, NEPA requires a no-action alternative as a baseline against which to compare the other proposed alternative actions. *See* 40 C.F.R. §§ 1502.14(d); 1502.16(d). This NEPA requirement can be satisfied even if Alternative A acknowledges the opportunity to convert to PRLs and existing commercial leasing areas in RMPs, because no commercial-scale activity can occur on those tracts without additional NEPA analysis.

3. Contractual Rights

It is BLM's policy to recognize valid, existing rights and that all decisions made in a new or amended RMP will be subject to valid existing rights. *See* BLM Manual, Land Use Planning, §1601.06 (noting that all decisions made in land use plans will be subject to valid existing rights, including leases); *see also* 43 C.F.R. § 1610.5-3(b). Thus, as specified in the BLM Manual, all decisions made in a new or amended RMP will be subject to "valid existing rights." The PEIS should note that the proposed amendments of the White River RMP will not affect any valid existing rights, including RD&D leases. 52863-007

Pages 2-28 and 6-69 of the PEIS discuss the RD&D leases in the context of Alternative C and recognize the BLM's commitment to grant RD&D leaseholders PRL areas upon meeting the requirements of their lease agreements. The PEIS notes that

> under the terms of the RD&D program, the Federal Government has a commitment to grant the RD&D companies leases for commercial development within the preference right lease areas, provided that all conditions of the program are met.... As a result, all lands within the preference right lease areas would be available for issuance of commercial leases to the RD&D companies under Alternative C if they meet all conditions of the program. For commercial oil shale development to occur on lands excluded by Alternative C, the specific land use plans would need to be amended to consider the excluded area for potential

52863-008

leasing. The Federal Government is not under any obligation to grant leases for commercial development within these areas to any other applicants.

PEIS, at 2-28; 6-69. The PEIS correctly states that the government is obligated to comply with the lease terms and to grant PRLs when the conversion requirements are met. But, like Alternative A, Alternative C incorrectly implies that the White River RMP will need to be amended prior to commercial development. BLM should correct this misconception, and the PEIS should recognize that 223,860 acres are already open to commercial development, as reflected in the current White River RMP. 52863-008 (cont.)

B. Discussion of Alternatives

1. Alternative A: the No Action Alternative

Aside from failing to recognize PRLs, Alternative A would clearly not follow the BLM's mandate or allow for all of the benefits of domestic energy development discussed above and is, therefore, not a viable option to meet the requirements set forth in the Energy Policy Act of 2005. Alternative A does not provide for commercial oil shale leasing on federal lands and does not promote or allow development of this important domestic energy resource. 52863-009

2. Alternative B: the Preferred Alternative

Shell supports Alternative B, the BLM's preferred alternative. Alternative B provides the only viable opportunity to potentially develop oil shale in the future. Shell supports BLM's efforts to make "the largest amount of potential oil resources available for application for leasing while still providing for an environmentally sound program." Only Alternative B provides BLM with "the greatest flexibility in locating future development." *See* PEIS, at 2-1. Shell further supports BLM's determination that "the amendment of land use plans to designate lands as available for application for commercial leasing would have no impact on the environment," as the amendments "do not commit the BLM to a particular course of action" and allow only for more thoughtful consideration of potential future leasing decisions. *See* PEIS, at ES-5.

Alternative B provides the best opportunity to develop the critical energy supplies America needs. Shell's research is focused on finding a way to develop oil shale that is environmentally and socially responsible. It is important that areas for potential development not be arbitrarily eliminated at this early stage. As technology develops and more is known about geology and hydrology, areas for potential development may change, so it is important not to reduce areas for potential development at this time. This document outlines an unprecedented broad range of potential mitigation and conservation measures, but these measures should not be applied until the project-specific NEPA stage, as appropriate, to protect other resources. 52863-010

The areas proposed for inclusion under Alternative B are appropriate. Lands within the most geologically prospective areas for oil shale in the Piceance Basin are not suitable for wilderness 52863-011

and contain oil shale resources with high potential for development. In the PEIS, the BLM notes that "oil and gas and other mineral development is intensive within the White River Field Office boundary on both public and nonfederal lands, and much of this development is coincident with the oil shale resources." PEIS, at 3-9. Oil and gas development continues to be prominent in the Piceance Basin, with more than 21,000 wells planned in the area in the next 20 years. The area included in Alternative B does not have wilderness characteristics and is managed for multiple use by BLM, including extensive energy development.

Shell does agree, however, that certain types of land designations are appropriate for exclusion at the outset. Accordingly, Shell supports the exclusion of existing wilderness areas, National Landscape Conservation System units, and other land types excluded from commercial leasing under Alternative B. These are truly special areas that have merited an elevated degree of protection in contrast to the more widespread and less significant land areas identified for exclusion by Alternative C. In making its land use plans, BLM is to "consider the relative scarcity of the values involved . . . ." Federal Land Management and Policy Act ("FLPMA") § 202 (c)(7) codified at 43 U.S.C. § 1712(c)(6). The resources excluded by Alternative C are not characterized by "relative scarcity." 52863-011 (cont.)

The treatment of Alternative B in the PEIS, however, does not appear to consider seriously the land management systems that already are in place, and, rather, fosters the notion that the preferred alternative would open up all lands with oil shale to development except for a few exclusion zones. RMPs are fluid, adaptive documents that can employ resource offsets, relocations, land trades, habitat enhancements, and other measures to support multiple uses of federal lands. Alternative B does not adequately consider the already-existing drivers for individual RMPs to limit and/or to preclude development inside key areas.

3. Alternative C

Alternative C is not a viable alternative and is essentially a non-development alternative for several reasons. First, Alternative C excludes substantial portions of acreage already included in PRL areas. This would impermissibly interfere with Shell's contractual rights to convert its RD&D leases into PRLs, as described above. Although the text of Alternative C, at page 2-32, recognizes Shell's PRLs, these areas are not reflected correctly on the relevant map depicting Alternative C's coverage in Colorado, at page 2-29 of the PEIS. This map should be corrected. 52863-012

Second, Alternative C allows oil shale development on small, non-contiguous parcels. To illustrate, Alternative C drastically reduces the amount of acreage available for oil shale development from 359,798 acres in Alternative B to 40,325 acres in Alternative C. Similarly, although Shell disagrees with this quantification, the amount of oil shale potentially available for leasing under Alternative C is limited to approximately 2 billion barrels. 52863-013

The area made available for leasing under Alternative C is not enough to allow development of a sufficient base to foster economic development of oil shale. The areas identified as the location

of the oil shale resource are far from uniform in richness, quality, depth, or geologic structures suitable for production using different technologies. Looking at acreage alone does not give an accurate picture of the resource. Alternative C provides a large amount of acreage for leasing but most severely limits leasing in Colorado, which appears to have the richest resource. The area where most of the attention was focused in the 1970s and 1980s would be largely unavailable under Alternative C.

To take oil shale technology to the level of a commercial facility requires access to a relatively consolidated area of land so that power inputs, surface equipment, pipelines, roads, and other facilities can be located efficiently. Alternative C provides little contiguous acreage deemed suitable for oil shale leasing. Given the reduction of available surface area and available resources, Alternative C is overly restrictive and unnecessarily confines potential oil shale development opportunities.

Further, the total area that will actually be developed will likely be even smaller and more fragmented than the area potentially available for leasing under the current Alternative C because regulatory and land management factors that will reduce the acreage will be applied in the future. For example, the pre-leasing NEPA process will provide BLM an opportunity to exclude areas that are environmentally sensitive and cannot be reasonably mitigated to protect resource values. In addition, areas may be restricted (even after leasing) by Endangered Species Act ("ESA") requirements, National Historic Preservation Act requirements, and the effect of various BLM stipulations. While not directly on point, the consideration and analysis of effects of post-leasing factors, like those on public lands available for natural gas, is illustrative. *See* National Petroleum Council, Balancing Natural Gas Policy, Vol. IV, p. 6-7 (2003) (finding that 17 percent of areas open to natural gas leasing in the Uintah-Piceance Basin were, nevertheless, undevelopable because they were subject to "prohibitive conditions of approval"). Thus, a significant percentage of acreage that is actually leased may never be developed.

52863-013 (cont.)

Third, Alternative C is at odds with the Congressional mandate of the Energy Policy Act of 2005. Although the technology of oil shale development has not been completely defined, it is reasonable to assume that commercial project economics must be based on large-scale operations to support the initial development of project infrastructure. The Energy Policy Act of 2005, Section 369, recognizes this fact since it defined an oil shale lease as up to 5,760 acres. In general, Alternative C would allow development on generally small, fragmented parcels that are unlikely to be explored or developed because of the impracticality of operating in noncontiguous areas.

52863-014

Fourth, there are a variety of business factors that, as a practical matter, restrict the acreage that would be developed. Once a company acquires a lease, it must learn more about the tract's environmental factors, subsurface geology and hydrology. Different oil shale recovery technologies may operate better in one type of geology than in another, and in-depth analysis may reveal that there are geologic or hydrologic factors that affect the choice of technology, which may also modify proposed project plans. There may be economic or environmental

52863-010 (cont.)

benefits to locating facilities in one location rather than another, which could at least affect the sequence in which areas would be developed, as well as the siting of facilities or the proposed project plot plan. These, and other factors, will tend to restrict the amount of development that actually occurs, even if a large amount of land is potentially available under Alternative B; this is one reason that Alternative B is preferable to Alternatives C or A.

52863-010 (cont.)

Fifth, Alternative C appears to be defined by a premise that oil shale cannot be developed in a multiple land-use scenario. Alternative C automatically excludes major portions of federal lands at a very early stage without considering whether BLM can accommodate multiple use development at a future time. Because an additional site-specific NEPA analysis will be conducted before any commercial leases are issued, BLM may decide on a case-by-case basis at a later stage whether an area should be open to commercial leasing and, if so, which protective measures should be instituted to protect sensitive areas. Accordingly, BLM should not automatically exclude large areas to commercial leasing at this early stage. Instead, tools such as adaptive management may be used by BLM in instances, like the present situation, where project details are currently unknown but will be developed in the future.

In the current circumstances of dealing with emerging technology, limited information about environmental impacts and unknown future project details, an adaptive management approach is desirable. This approach could inform many aspects of the current PEIS and proposed RMP amendments and fits well with a modified version of BLM's proposed process for commercial leasing.[1]

52863-015

Section 202(c) of FLPMA, 43 U.S.C. § 1712, provides that BLM should use a multiple-use approach in its land use plans. This means that BLM must grapple with how to balance its many important surface resources with providing the energy America needs. Here, a massive oil shale resource—the largest in the world—is found in a relatively small area, and this nationally important resource should be given significant weight.

Adaptive management is ordinarily used on a comparatively small scale, but its principles also apply to the current situation. The commercial leasing process envisioned in the PEIS would require environmental analysis at the pre-leasing stage and at the plan-of-development stage. Both of these stages would precede any significant land-disturbing activities and, thus, provide an opportunity to evaluate environmental protection measures based on information then available to BLM. The technology for efficiently producing oil shale is likely to progress over time, and the body of knowledge concerning oil shale production impacts will increase as well. As new information becomes available, BLM will be have an increasingly clear basis for making decisions that are currently veiled by uncertainty.

52863-016

[1] *See* detailed discussion of the leasing process in Section II.D, *infra*.

This adaptive management-based leasing process provides a clear basis for making Alternative B the most desirable alternative. Alternative B allows the broadest range for future decision-making and potential resource development. Nevertheless, it fully protects environmental resources because no resources can be disturbed without further environmental analysis and administrative action. Alternative C, in contrast, inappropriately prejudges whether vast tracts containing vast energy resources are suitable without any site-specific analysis. 52863-016 (cont.)

The following sections provide specific examples and the reasons explaining why lands should not be excluded as "unsuitable" from potential oil shale leasing in Alternative C. Instead of automatically excluding lands from consideration for commercial oil shale development at the RMP stage, the decision should be specifically addressed on a site or project-specific basis through a NEPA analysis.

a. Fish, Wildlife and Wild Horses

Over time, federal and state agencies have been developing more sophisticated techniques for managing fish, wildlife and bird populations. Under the ESA, USFWS evaluates threatened or endangered species, and does this through research, regional studies and project-specific evaluations of potential impacts to a species. Through the section 7 consultation process, USFWS evaluates the impacts of projects on populations of endangered or threatened species and tailors mitigation measures to the specific needs of the wildlife populations.

Increasingly, wildlife management is being conducted on a regional basis, considering all potential influences on wildlife from multiple activities. These efforts include coordination between federal and state agencies that manage wildlife resources. The BLM and other parties have been coordinating regional strategies to protect and manage habitat of sensitive species such as sage-grouse. These strategies incorporate principles such as adaptive management that allow management practices to accommodate new knowledge about species, address new threats to species, or encourage new population recovery initiatives. In addition, State wildlife management agencies manage aquatic species, such as Colorado River Cutthroat Trout, as a whole population, and as management plans are developed and more research and experience becomes available, better overall management techniques are developed. 52863-017

Wild horse management plans have been developed for wild horses in the West. These plans are based on the multiple-use concept, which takes into account regional and project-specific considerations and, in some cases, these plans cross several RMPs based upon the large range of these species.

This evolution of management techniques makes it critical that environmental evaluation of effects on wildlife habitat be done on a project-specific basis taking into account how regional management techniques can best be applied to specific project impacts. Through a NEPA analysis, direct and indirect wildlife effects will be evaluated as well as potential cumulative impacts from regional activities that may affect a particular species. This will allow BLM to use

very effective and creative tools, such as adaptive management, to manage and enhance multiple use of lands. It will also allow BLM to evaluate whether a particular project has a large or a minimal effect on the habitat available for a specific species. Thus wildlife strategies can be better addressed with site-specific information, consideration of cumulative effects, and specifically tailored mitigation that are better determined at the later stages of the commercial leasing process. 52863-017 (cont.)

b. Vegetation and Soils

Within the White River RMP, several ACECs allow oil and gas leasing with no-surface occupancy stipulations. These were excluded from oil shale leasing under Alternative C. These ACECs possess plant species that are candidates for listing as threatened or endangered, BLM-sensitive plants, cultural resources, paleontological resources, and/or fragile soils. BLM has identified other areas of sensitive plants or remnant vegetation associations but already provides for on-the-ground surveys prior to authorization of surface-disturbing activities through RMPs. The RMP provides the management framework for development of these areas while providing appropriate protection. Surface disturbance is not precluded in the current stipulations. Protection of mapped plants is achieved through restriction of surface occupancy or protection through reclamation of disturbed areas with native species or by reproducing sensitive species on their disturbed habitat. Site-specific studies and design of project-specific reclamation and mitigation measures already drives the protection of sensitive plants and remnant vegetation associations. 52863-018

There is no basis for entirely excluding these areas from oil shale development at this stage. Site-specific project plans and mitigation will be analyzed through a site and project-specific NEPA analysis to address specific mitigations needed if areas of sensitive plants or remnant vegetation, cultural or paleontological resources or fragile soils are included in the proposed project areas. As with oil and gas technologies, in situ oil shale technologies may someday allow production of subsurface energy resources without surface disturbance. Accordingly, BLM should evaluate protection of these resources at a later stage of the leasing process (as Alternative B contemplates) rather than entirely prohibiting consideration of oil shale leasing in these areas (as Alternative C proposes).

c. Visual Resource Management ("VRM") Class II Areas

VRM areas are currently managed on a project-specific basis. As implemented, management actions and projects are evaluated for consistency with VRM classification objectives. A variety of mitigation measures are available to BLM and permitted land users, such as project design to blend with the landscape, location of facilities, use of earth tone colors, visual screening and other visual mitigation measures. BLM has adequate tools to implement the visual resource management objectives for a region. Exclusion of VRM Class II lands for development is not appropriate at this stage. Instead, a proposed project with mitigation meaures should be evaluated through a specific NEPA analysis once project specifics are known. 52863-019

d. Riparian Zones and Wetlands

Development in riparian zones and wetlands is regulated under Section 404 of the Clean Water Act by the U.S. Army Corps of Engineers. To obtain a 404 permit, a permit applicant must develop site-specific plans, including environmental protection and mitigation measures. The 404 permit process has protected riparian zones and wetlands for many decades. Exclusion of oil shale development in these areas contemplated in Alternative C is not needed because of the long-standing environmental protection program already applied. The Section 404 process is appropriate for site-specific consideration of oil shale development because it would consider particular locations, impacts, and wetland values. The 404 regulatory process is a more preferable mechanism for addressing wetland issues compared to the broad-brush approach currently identified in Alternative C to exclude all wetland and riparian areas from leasing. 52863-020

C. The Effect of Amending RMPs

The PEIS affirmatively states that "the amendment of land use plans to designate lands as available for application for commercial leasing would have no impact on the environment." PEIS, at ES-7. Although this assertion might not be universally true in other contexts, it is an appropriate determination here. Because BLM has decided that no areas will be open for competitive commercial leasing without further environmental analysis and that no commercial-scale projects will be constructed without further review, the assertion is true here. There is no commitment of federal resources, irretrievable or otherwise, until a later phase.

At the land-use planning stage, it is too premature to analyze the site-specific effects of future projects that may or may not be proposed. The CEQ's NEPA regulations require that NEPA documents "focus on the actual issues ripe for decision." 40 C.F.R. § 1502.20. While the NEPA analysis must occur at an early stage in the planning process, "[t]his requirement is tempered … by the statutory command that we focus on a proposal's parameters as the agency defines them [and] … further … by the preference to defer detailed analysis until a concrete development proposal crystallizes the dimensions of a project's probable environmental consequences." *California v. Block*, 690 F.2d 753, 761 (9th Cir. 1982). "The critical inquiry in considering the adequacy of an EIS prepared for a large scale, multi-step project is not *whether* the project's site-specific impact should be evaluated in detail, but *when* such detailed evaluation should occur." *Id.* (emphasis added). "[S]ite-specific impacts need not be fully evaluated until a 'critical decision' has been made to act on site development"—when "the agency proposes to make an 'irreversible and irretrievable commitment of the availability of resources' to a project at a particular site." 52863-021

Shell agrees with BLM's assessment in Section 2.6 and Table 2.6-1—that there may be potential indirect effects of BLM's decision to amend the RMPs to allow commercial leasing but that no direct effects will occur solely as a result of amending the RMPs. Further, a more quantitative impact analysis, including the identification of the magnitude and extent of potential impacts on

the environment, can only be conducted at the project-specific level when more information is available on commercial oil shale development. 52863-021 (cont.)

D. Leasing Application Process

Page ES-3 and 2-20 of the PEIS note that commercial oil shale leasing would occur by utilizing a lease-by-application process in which BLM would "issue a call for applications for commercial leases," and in response, "companies would be required to identify the specific lands that they are interested in as part of their lease application process." Alternatively, "it is also possible that the BLM would identify specific tracts to be leased in the call for applications." The PEIS states that the process would require that NEPA analyses be conducted prior to lease issuance and that information collected as part of the lease application process would be incorporated into the NEPA analysis.

Moreover, "applicants would be required to identify key information regarding aspects of the proposed development needed to support a complete NEPA review (*e.g.*, technologies to be employed, level of planned development, anticipated off-site impacts, strategies to comply with regulatory requirements, and so forth)." *Id.* at 2-20. During the NEPA review for commercial leases, BLM would identify and establish appropriate lease stipulations to mitigate anticipated impacts. In addition, the subsequent approval of project-specific plans of development would require project-specific NEPA review to (1) consider site-specific and project-specific factors, and (2) identify and require appropriate mitigation measures as needed to control impacts beyond those established in the lease stipulations. *Id.*

The proposed leasing arrangements and NEPA review for commercial leasing are problematic for two reasons. First, the requirements to obtain a commercial lease include significant pre-lease issuance expenses, such as significant environmental, engineering and project design costs. These expenses are substantial, and because a NEPA review will be necessary at the leasing level and again at the project-specific level, incurring significant expenses at the pre-leasing stage is unnecessary. Second, in addition to expending vast sums at a premature stage, the PEIS mentions that operators will need to share information and proprietary technology with competitors bidding on the same parcels.

In laying the ground work for proposed leasing arrangements, it is important for BLM to remember that the development of oil shale technology is still in its early stages and that oil shale development is entirely different from standard commercial oil and gas or coal technologies. Unlike standard technologies used in oil and gas or coal extraction, which have been developed over many years and are generally uniform in their application, oil shale technologies will vary, are still being refined, and are proprietary at this stage. Also, although there are standard operating procedures for other industries, there are no operating practices or procedures for oil shale yet at this stage of industry development. Consequently, it is incumbent upon BLM to set forth a proposed commercial leasing framework that will protect proprietary information. 52863-022

The framework for commercial leasing proposed in the PEIS requires detailed plans of operation to be available at an early stage prior to the authorization of any project activity. Under this framework, in order to develop a detailed plan, an operator would need to conduct exploratory activities, assess the hydrological and environmental aspects of the site, evaluate the resource potential, and consider commercial aspects of marketing the product. Developing the extent of information currently contemplated in the PEIS proposed lease framework would require months, perhaps years, of data gathering and analysis. Moreover, some relevant information cannot be obtained without subsurface work. Consequently, it is unreasonable to assume that the level of detail necessary to accompany a lease application would be available at the pre-leasing stage prior to authorization of any activity because most detailed information would not be readily available. Such burdensome requirements at the pre-leasing stage would require project design, divulgence of proprietary information and monetary risk at a premature stage with no assurance of a land position.

The proposed commercial lease framework announced in the PEIS should be revised to recognize the unique situation commercial oil shale leasing and development presents and to safeguard the resources and proprietary information of operators seeking to obtain such leases. Accordingly, the framework should set forth a plan at the pre-lease stage consistent with applicable RMPs identifying tracts of land available for leasing. In addition, the information contained in the NEPA document at the leasing stage should include available environmental baseline information, should identify in a general way the proposed technology to be used and should require compliance with federal, state and local regulations. Importantly, however, the NEPA review at the pre-leasing stage should recognize that detailed project information may not be available until a later date and that it is unreasonable to require proprietary information when no activity will be authorized until after a project-specific NEPA review has occurred. Instead, the NEPA review at the leasing stage should focus on the effects of setting aside parcels for commercial leasing and the actual lease sale. 52863-022 (cont.)

In exchange for providing information available at the pre-leasing stage, and following the NEPA review for allocating lands available for leasing, the operators should receive an exclusive lease to develop at a later date commercial oil shale for a specified period of time. The commercial lease should also include a rental rate and the production royalty. Upon completion of the NEPA analysis at the leasing stage and the actual issuance of a commercial lease, an operator would likely be in a position to develop its plans of operation and to garner more information and data on its proposed commercial activities. Once such information is known and has been collected, a project-specific NEPA inquiry is appropriate and will yield information on environmental impacts and associated mitigation that would allow actual oil shale development to occur.

Because operators seeking to obtain commercial oil shale leases will not likely have the data or information necessary for an operating plan and because the objective of the analysis at the leasing stage is solely to designate parcels of land suitable for oil shale leases and exploratory

work, the framework for commercial leasing in the PEIS should be revised to lessen the burden of information required to conduct such an inquiry. The framework should also recognize that an in-depth inquiry is only appropriate after the issuance of a commercial lease when more information is known about the actual project activities associated with oil shale development. Recognizing the dichotomy between allocating acreage for oil shale leases and actual development will in turn protect proprietary information and will allow operators to expend funds in a more efficient manner and at an appropriate time. In addition, this will provide BLM with more meaningful information upon which to base mitigation measures to protect other resources and uses as a commercial oil shale project is developed. 52863-022

Page ES-3 of the PEIS recognizes the possibility that, in the future, some operators might be in a position to have gathered sufficient information and data at the pre-leasing stage. Under these circumstances, the PEIS provides an opportunity for a combined review and states that "the NEPA review for the plan of development may be incorporated into the NEPA review conducted for the lease application, if adequate operational data are provided by the applicant(s)." Shell agrees that the option to combine the NEPA review at the leasing stage and at the project-specific stage should be available to operators who have detailed project information available at the pre-leasing stage. Allowing operators to combine the NEPA review at an earlier stage when the appropriate information is available will increase the efficiency of the NEPA process, which, in turn, will potentially lead to increased energy security and will allow the economic benefits of oil shale development to be recognized sooner. Consequently, the commercial leasing framework should also include a provision allowing the combination of the lease application NEPA review and the project-specific NEPA review when project-specific information is available at the pre-leasing stage. 52863-023

E. Existing Regulatory Programs

1. Compliance with Federal, State and Local Requirements

In some instances, the BLM has recognized the existence of specific regulatory programs that will appropriately control the impacts contemplated in the PEIS. For example, Section 2.2. of the PEIS states that

> [c]ommercial development of oil shale or tar sands resources on public lands will be subject to existing federal, state and local laws and regulatory requirements as well as established BLM policies. The purpose of including the following information is to convey that management of public lands is subject to a wide array of requirements that are over and above decisions that will be made in the ROD for this PEIS. These requirements are not subject to decisions in the ROD but serve as sideboards for those decisions.

PEIS, at 2-1. Similarly, Section 2.2.1 sets forth several applicable federal, state and local regulatory requirements that "may provide environmental protection and compliance

requirements for oil shale or tar sands development projects on public lands in Colorado, Utah, and Wyoming." PEIS, at 2-2–2-5. Finally, "[l]ists of specific Executive Orders and federal and state laws are provided in Appendix D [of the PEIS]." *Id.*

A key assumption in the PEIS is that Appendix D will be followed and that all operators will comply with federal, state and local requirements. *See* PEIS, at § 2.2; 4-2; Appx. D. Although the PEIS notes BLM will assume all applicable requirements will be met, BLM has not consistently applied this assumption. Instead, in some instances, the PEIS identifies a list of potential mitigation measures for potential impacts to situations already subject to regulatory programs and permitting requirements. The PEIS should uniformly and consistently apply the key assumption that all applicable regulatory requirements will be met. Also, the existence of stipulations and mitigation measures, especially in Chapter 4 under mitigation measures and in Appendix F, while helpful to predict which mitigation measures may be applied at a later date, is more appropriate for a specific project proposal, as the inclusion of mitigation measures at this preliminary stage lengthens and complicates the PEIS. 52863-024

2. Oil Shale Development is Subject to Regulatory and Permitting Requirements

Any development of commercial oil shale or tar sands will be subject to many regulatory and permitting requirements. Yet, in many of the impact analyses presented in the PEIS, BLM identifies needed mitigation or conservation measures to address the perceived environmental impacts of these projects, but the effects are already covered by existing regulations.[2] BLM further identifies potential environmental impacts that would arise if theoretically there were no federal, state or local regulations in place. Appendix B contains a partial list of permits required for oil shale development, which may be helpful in understanding the role that permitting and regulatory programs will play in minimizing and managing impacts. 52863-025

BLM's analysis should be conducted using the assumptions stated in Chapter 2 of the PEIS—that the projects are subject to existing federal, state and local laws and regulatory requirements as well as established BLM policies.

F. Mitigation Measures, Conservation Measures and Stipulations

It is important for BLM to fully consider the way in which environmental protection measures should be applied to oil shale activities. The adaptive-management approach illuminates a path toward effective use of stipulations and other requirements to guide development of oil shale resources. At the current time, the various stipulations considered in the PEIS are largely derived from experience with oil and gas development. When applied to conventional oil and 52863-026

[2] *See* pages 15–18 of Appendix A for additional examples of areas already subject to state or local regulation.

gas development, there is a decades-long base of experience upon which to judge the value of various stipulations, and to determine appropriate circumstances for waiving these stipulations. In contrast, there is little experience upon which to determine the stipulations suitable for various types of oil shale technology. Stipulations that are more finely tuned to oil shale activities and impacts can and should be determined at the pre-leasing phase or even at the pre-development phase. Site-specific environmental analysis to help design project-specific mitigation measures will work to protect the resources and further BLM's goal of multiple use on federal lands. Accordingly, Shell requests that BLM discontinue or decline to create stipulations for oil shale leasing in the various RMPs (particularly the White River RMP) if those stipulations can be better tailored at a later stage in the leasing and development process. 52863-026 (cont.)

Furthermore, there are many mechanisms for protecting the environment while oil shale is being developed that are regulatory in nature. Again, these regulatory requirements can be best tailored to address oil shale issues when they are considered in the context of an actual project. For example, although the PEIS contains an extensive discussion of wildlife protective measures in Appendix F, these measures may be well suited for some circumstances, but they are not universally applicable. In furthering its multiple-use mission, BLM should apply these measures in the situations where they make sense, but not in those situations that will unduly restrict energy resource development. Furthermore, it is appropriate for the USFWS to consider measures necessary to protect threatened and endangered species, other species at risk, and game animals on a site-specific basis when in-depth information is available.[3] Although this PEIS should properly examine and consider the broad range of mitigation measures that are available as tools for the Department of Interior and other agencies, it is not appropriate to definitively impose these measures without particularized data.

Oil shale development projects, like other long-lived but ultimately temporary projects, will follow a pattern of construction, operation and reclamation. During the construction and operation periods, impacts will be mitigated and managed to meet all existing requirements. During reclamation, the land and other resources will be returned to approved and acceptable contours. Oil shale development uses land transitionally, and, following reclamation, the land will be stable, revegetated, and will support multiple uses when fully reclaimed. 52863-027

The PEIS identifies a full range of potential development impacts, possible conflicts with other resource uses, and identifies mitigation measures that are available. This is done on a broad scale using available information and assumptions but without project or technologically specific proposals for development. Application of project-specific mitigation from the list of possible mitigation measures will help BLM resource managers provide for the required multiple use of the land while maximizing environmental protection of all the public land resources when reviewing specific project proposals. It should be noted, though, that not every oil shale or tar

[3] *See* discussion of specific wildlife protection measures below in Section III.M, *infra*.

sands project will contain all of the potential impacts identified in the PEIS, nor are all of the potential mitigation measures appropriate or necessary for every project.

Throughout the PEIS document, the BLM proposes specific mitigation measures. The mitigation measures should be presented as a toolbox of potential mitigation measures that might apply, dependent upon site-specific conditions and site-specific projects, but should not be included as requirements for part of the general leasing requirements for several reasons.

First, each operator will be required to submit a plan of operations for commercial oil shale development. A NEPA analysis will be required to evaluate and to address environmental impacts. Site-specific mitigation measures are far more productive and practical than broad mitigation measures generally specified in RMPs. Not only are some of the proposed mitigation measures impractical for some operations, the specificity could limit the use of new technologies and innovative management tools. Consequently, Shell recommends that general lease stipulations include a requirement for various environmental management plans (*e.g.*, stormwater management, reclamation plan, spill prevention control and countermeasure plan, wildlife management, cultural resource management) to address specific conditions and requirements rather than identifying specific mitigation measures prior to a project proposal.

52863-027 (cont.)

Second, many of the mitigation measures listed are already required by other programs and should not be presented as new mitigation measures required as part of the RMP amendments. *See e.g.,* PEIS, at 4-101–107. Other measures are included but may be too far-reaching to be effective. A better approach would be to identify areas where site-specific environmental management plans should be developed as part of operating plans. This will not only enable implementation of the best site-specific mitigation measures but will require the operator to design and implement the plans in an efficient, economic and realistic manner.

Third, because the technologies for oil shale and tar sands are still under development, there is ample opportunity for projects to be designed to accommodate multiple use of public land resources and to protect the environment. Shell suggests that, given the unknowns relative to project development plans, mitigation strategies identified in the PEIS continue to remain as suggested mitigations only, to be applied as appropriate based on project-specific proposals through project-specific NEPA analysis and not be used as unilateral stipulations or conditions of approval or lease conditions. The lengthy list of mitigation measures may well be unnecessary or inapplicable at the time a specific project is proposed.

G. Multi-mineral Development

Throughout the PEIS, BLM mentions that a significant portion of the land within the most geologically prospective oil shale resources is already undergoing mineral development, particularly for oil and gas resources. Alternatives B and C note the prohibition of oil shale leasing within the Piceance Creek Dome area because of potential conflicts with oil and gas development. Specifically, Section 4.2.1.1 of the PEIS notes that "commercial oil shale

52863-028

development … is largely incompatible with other mineral development activities and will likely preclude these other activities while oil shale development and production are ongoing" and that "without some accommodation being made between oil shale developers and prior leases [*sic*] holders, oil shale development may not be able to proceed." PEIS, at 4-17. The PEIS further implies that mineral leases that are "first in time have priority" over later-issued oil shale leases. *Id.* Finally, the PEIS also notes that "conflicts between competing mineral interest resource uses will be resolved in the future at the leasing or plan of development stages." *Id.* Shell believes that the foregoing statements, and similar assertions in the PEIS, are inaccurate for a number of reasons.

First, Shell notes that it owns certain fee oil shale properties in western Colorado, referred to as the Ertl-Mahogany claims, amounting to approximately 19,583 acres. The fee oil shale properties were pre-1920 oil shale mining claims, which were litigated with BLM during the patent process but settled pursuant to an agreement dated August 4, 1986, wherein the mining claimants were granted patents on all minerals including the oil shale resources, but BLM reserved an interest in oil, gas and coal. Pursuant to the settlement agreement, any oil and gas leases issued on the patented oil shale lands were to contain certain stipulations, entitled "Special Stipulation to Protect Rights of Owner(s) of Oil Shale Estate(s)" (as set forth in Exhibit C hereto, the "Fee Oil Shale Stipulations").

52863-028 (cont.)

The Fee Oil Shale Stipulations provide that the oil shale deposits are the "dominant mineral estate" and that the oil, gas and coal estates are the "subservient mineral estate." Any application for a permit to drill ("APD") submitted by an oil and gas lessee will, prior to approval by the BLM, be provided by written notice to the owner of the fee oil shale properties, and the oil and gas lessee will be given the contact information for the owner of the fee oil shale properties. The Fee Oil Shale Stipulations require the oil and gas lessee to attempt in good faith to reach an agreement with the fee oil shale properties' owner regarding protective measures to incorporate in an APD. Contrary to the broad statements in the PEIS, oil shale properties with the Fee Oil Shale Stipulations will be dominant to other mineral leases.

Second, Shell notes that in order to protect oil shale resources, all oil and gas leases located in designated oil shale areas are issued with standard stipulations governing conflicts between oil shale and oil and gas (as set forth in Exhibit D hereto, the "Oil Shale Stipulations"). Much of the federal land within the boundaries covered by the PEIS that are prospective for oil shale resources are already designated within oil shale areas. In order to protect oil shale resources within designated oil shale areas, federal oil and gas leases should contain the Oil Shale Stipulations.

52863-029

The Oil Shale Stipulations require oil and gas operators to demonstrate to the satisfaction of the BLM that drilling will not interfere with "mining and recovery of oil shale deposits or the extraction of shale oil by in situ methods." Prior to issuing an APD for an oil and gas well, the BLM must determine how such well might impact the oil shale resources. In addition, oil and gas wells may not be drilled at any location that would result in waste of the oil shale resource or

that would unduly interfere with oil shale operations. The Oil Shale Stipulations also provide that BLM has the right to unitize oil and gas development if necessary in order to prevent waste to promote ultimate recovery of the resource. Presumably, unitization of oil and gas leases would have the primary goal of mandating well spacing patterns and other restrictions (perhaps multiple well drilling pads and/or directional drilling) to minimize disturbance of oil shale resources. The mandate of the Oil Shale Stipulations protect and prioritize oil shale resources, contrary to the broad statement in the PEIS.

52863-029 (cont.)

Third, even in the absence of pre-existing lease stipulations, federal oil shale resources of Colorado, Utah and Wyoming receive protection under various executive orders, public land orders, BLM regulations and planning documents or specific state regulations. Moreover, the policy of the BLM is to encourage multiple mineral development. Accordingly, multiple leases for different minerals on the same lands may be issued by BLM "with suitable stipulations for simultaneous operations." 43 C.F.R. § 3000.7. BLM may attach stipulations to any given oil and gas lease as a condition of issuance, and all such stipulations "become part of the lease and … supersede inconsistent provisions of the standard lease form." 43 C.F.R. § 3101.1-3. The stipulations "may impose reasonable measures … to minimize adverse impacts to other resource values." 43 C.F.R. §§ 3101.1-2; 3101.1-3.

The statement in the PEIS that existing oil and gas leases, or other mineral leases, have priority over later-issued oil shale leases because they are "first in time" is a concept that has no substantive legal basis and has been questioned by the Interior Board of Land Appeals. *See* Order, *In re Yates Petroleum Corp*., IBLA 92-612, at 65 (July 7, 2003). Federal policy, expressed and established in FLPMA and other federal laws, is to manage federal lands to promote multiple uses. If immediate concurrent development of an oil shale lease and an oil and gas lease (or other mineral lease, if applicable) is considered, whichever lease might have been issued first in time, the analysis of allocating priorities will depend on technologies, time horizons for development, estimated yields of resources, probabilities of success, relative economic value of each mineral and a potential host of other facts and factors. The statement in the PEIS that oil and gas leases or other mineral leases automatically get priority for development based on date of lease issuance, ignores the fact that the coordination of multiple mineral development mandated by federal law and policy is a fact-intensive and complex process, which is not subject to any hard and fast rule of "first come, first served."

52863-030

Finally, the implication in the PEIS is that current technologies for development would make concurrent commercial oil shale development and oil and gas development impossible. At this time, it is not clear that this statement is accurate. Future and even current technologies and processes for oil shale development may allow for some coordinated development between oil shale and oil and gas. Also, technologies and knowledge about oil shale development are constantly and rapidly improving and changing. While current technologies may make concurrent development of oil shale and other minerals difficult now, that may change as technologies, processes and knowledge concerning commercial oil shale development improve.

52863-031

Section 4.2.1.1 of the PEIS states in the first paragraph that oil shale development "using any technology under consideration in this PEIS, is largely incompatible with other mineral development activities." The second paragraph expands on the concept that current technologies for oil shale development are inconsistent with oil and gas (or other mineral) development methods. Surface and subsurface mining of oil shale may present more significant conflicts to concurrent development of oil and gas leases (or other mineral leases). However, certain in situ methods of oil shale extraction may not necessarily present as significant or long-term conflicts with oil and gas development, and there may be options for coordinated development with oil and gas operators (or other mineral development). 52863-031 (cont.)

In summary, the PEIS should be revised to note that both development for oil shale and oil and gas may be possible, allowed and encouraged and, that in many instances, oil shale resources may enjoy preference over oil and gas leases (or other mineral leases). The final PEIS should note that stipulations in some existing oil and gas leases (and other mineral leases) may grant preferential development rights to oil shale. Further, the PEIS should clearly state that any potential conflicts involving multi-mineral development should be governed by the terms of pre-existing agreements, such as the Fee Oil Shale Stipulations, if applicable, or by the Oil Shale Stipulations in oil and gas (or other mineral) leases. The PEIS should also be modified to note that even in the absence of stipulations or pre-existing agreements, the coordination and resolution of multiple mineral development conflicts is a fact-intensive analysis based on a number of different and specific factors. The PEIS statement that oil and gas leases (or other mineral leases) that are first in time will have automatic priority should be modified or deleted.

Part III

A. Reasonably Foreseeable Leasing and Development Activity

The CEQ's NEPA regulations require that agencies consider the direct, indirect and cumulative effects of proposed actions. Direct effects are those "caused by the action," which "occur at the same time and place." 40 C.F.R. § 1508.8(a). Indirect effects "are caused by the action," and are "later in time or farther removed in distance, but are still reasonably foreseeable." *Id.* § 1508.8(b). For example, indirect effects may include "growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." *Id.*

The PEIS considers the direct, indirect, and cumulative effects of proposed revisions to twelve RMPs that would open certain areas to potential future oil shale and tar sands leasing. The PEIS points out that the RMP amendments themselves will not have an effect on the environment. However, the amendments may facilitate future leasing and development. Thus, the PEIS considers the effects of potential future leasing and development on a programmatic level, making certain assumptions about the kinds of impacts that might generally occur. 52863-032

The effects analysis for the PEIS is based on the potential impacts of development of a single oil shale project under both Alternative B, which would open 1,991,222 acres to leasing, and Alternative C, which would open 830,296 acres to leasing. *See, e.g.,* PEIS, at 4-66 (wildlife impact analysis assumes construction and operation of "an" oil shale project). As a result, the effects analyses for Alternative B and Alternative C, for wildlife for example, are virtually identical. *See* PEIS, § 6.1.2.7.3, at 6-52; § 6.1.3.7.3, at 6-78. Assuming a single oil shale project may be developed under both alternatives provides no basis for comparison between and choice among alternatives. *See* 40 C.F.R. § 1502.14 (requiring that an EIS present the alternatives "in comparative form, thus sharply defining the issues and providing a clear basis for choice among options").

If possible, BLM should include some estimate of reasonably foreseeable leasing and development under each alternative. *See* 40 C.F.R. § 1508.8(b) (indirect effects). Though the precise amount of development may not be certain, BLM may be able to estimate a range of projects that might be approved during the twenty-year study period. If it is not possible to make a reasonable estimate of how many leases or projects might be proposed, the PEIS should also so state. The PEIS should explain that under either alternative, BLM may choose not to issue any leases or may lease the entire eligible area. As a result, the potential future effects may range from none, if no leases are issued, to significant effects (but difficult to quantify), if the entire acreage is leased. The PEIS should also acknowledge that more than twice as many acres would be available for leasing under Alternative B than Alternative C so that the potential for impacts under Alternative B is greater, even if BLM cannot reasonably predict at this time how much actual development will occur. To the extent possible, BLM should address the potential foreseeable development under each alternative and compare potential effects.

52863-032 (cont.)

B. Wilderness Characteristics and ACECs

In all of the alternatives, BLM excluded ACECs that are currently closed to mineral development, lands within incorporated town and city limits from the oil shale leasing program, wilderness areas, wilderness study areas ("WSAs"), and other areas that are part of the National Landscape Conservation System administered by the BLM (*e.g.*, National Monuments, National Conservation Areas, Wild and Scenic Rivers, and National Historic and Scenic Trails) and the like.

WSAs within the White River RMP include Bull Canyon, Willow Creek and Skull Creek north and west of the Piceance Basin, the Windy Gulch and Black Mountain WSAs to the north and east and the Oil Spring Mountain to the south and west. There is no detailed evaluation of these areas in the impact analysis of the PEIS because they have been excluded from the action alternatives and because the WSAs are not in areas with high potential for oil shale resources.

52863-033

The areas within the Piceance Basin that have been proposed for commercial oil shale leasing under Alternative B do not have wilderness characteristics. The area is already this site of significant natural gas production, nahcolite mining, ranching, and other economic activity.

Alternative B includes ACECs that are open to mineral development and would be available for oil shale leasing in the future. Decisions regarding use of the ACECs are made by local BLM Field Offices utilizing the BLM planning process and NEPA analyses, including environmental baseline information, proposed project development plans and proposed mitigation measures (including avoiding specific areas where appropriate).

The PEIS identified three designated ACECs within the most geologically prospective oil shale resource area (Alternative B) in the Piceance Basin. These include Duck Creek, Ryan Gulch and Dudley Bluffs. All three ACECs are open to mineral development with surface stipulations. Therefore, these ACECs are open to oil shale leasing subject to stipulations and subject to proposed project-development plans and proposed mitigations to be analyzed through a site-specific and project-specific NEPA action, which will evaluate both direct and indirect effects on ACECs and will define appropriate mitigation measures. BLM should be able to determine whether future in situ oil shale technologies can be utilized in a way that is compatible with the resources within the ACECs. We concur with the PEIS recommendations that decisions on ACECs would be made by local BLM Field Offices utilizing the BLM planning process and project-specific NEPA analysis. 52863-033 (cont.)

C. Access to Energy Resources

1. Miscalculation of Energy Resource

Alternatives A and C both unduly restrict access to an energy resource that is important for America's future energy supply. The resource estimates presented by BLM seriously understate the oil shale resource in place. Although there are many factors that limit the amount of oil shale that would ultimately be produced, particularly within the twenty-year time frame covered in the PEIS, it is nevertheless important to place the size of the resource in its appropriate perspective. The U.S. oil shale resource in place is on a par with Alberta's oil sands. It is the largest oil shale resource in the world. The existing resource in the PEIS subject area is estimated at over a trillion barrels; it dwarfs Prudhoe Bay, estimated at 26 billion barrels, and even the entire Gulf of Mexico, estimated at 115 billion barrels. *See* U.S. Geological Survey, Oil and Gas Assessment of Central North Slope, Alaska (2005) (oil previously produced plus technically recoverable undiscovered resources and undiscovered reserves); Minerals Management Service Assessment of Undiscovered Technically Recoverable Resources of the Outer Continental Shelf, 5 (2006) (including cumulative production, reserves, and undiscovered technically recoverable resource). 52863-034

In Alternative B, the PEIS estimates 16 billion barrels of oil is present in Colorado, 28 billion barrels in Utah, and 17 billion in Wyoming. *See* PEIS, at 2-22. For Alternative C, the PEIS estimates 2 billion barrels of oil in Colorado, 21 billion barrels in Utah and 8 billion barrels in Wyoming. *See id.* These PEIS estimates are at significant variance with other sited government estimates. While the combined resource estimates for the Green River Formation in the three-state area varies depending on assumptions and methodology, they are generally greater than one trillion barrels.

According to the BLM's November 2006 press release, there are 800 billion barrels of unconventional oil in the oil shale in western Colorado, southwestern Wyoming, and northeastern Utah. *See* http://www.blm.gov/wo/st/en/info/newsroom/2006/november0/NR0611_03.html. Similarly, according to the Strategic Unconventional Fuels Task Force Fact Sheet, 1.8 TBO of oil shale (>15' thick and 15gpt) are potentially recoverable in the three state region. *See* http://www.unconventionalfuels.org/publications/factsheets/Oil_Shale_Resource_Fact_Sheet.pdf The Rand Report, *Oil Shale Development in the United States, Prospects and Policy Issues,* Bartis *et al.* cites a resource range of 1.5 to 1.8 trillion barrels. The resource potential estimates of Bartis *et al.* (2005) are further supported by Dyni (2006), which cites several publications that estimate substantially greater resources in place in each of the three States:

- Pitman *et al.* (1989) estimate the in-place Piceance Basin, Colorado, oil shale resource at 1 trillion barrels.
- Trudell *et al.* (1983) estimate the in-place Uinta Basin, Utah, oil shale resource at 214 billion barrels.
- Culbertson *et al.* (1980) estimate the in-place Green River Basin, Wyoming, oil shale resource at 244 billion barrels.

52863-034 (cont.)

The U.S. Geological Survey presents the latter studies on its website as the authoritative estimate of oil shale resources. While noted in the PEIS that the resource potential reported in the Executive Summary Table on page ES-1 represents a "minimum estimate," such a low estimate misrepresents the potential of the resource.

2. Definition of "Most Geographically Prospective Area"

For purposes of the PEIS, "the most geologically prospective oil shale resources in Colorado and Utah are defined as those deposits that are expected to yield 25 gal[lons] of shale oil per ton of rock (gal/ton) and are 25 f[ee]t thick or greater." PEIS, at A-4. The definition of the most geologically prospective area, however, seems arbitrary. Maps available to make these estimates are dated and based on a limited data set. Richness estimates for these data sets appear not to have been done consistently (not all Fischer Assay) and not under uniform conditions, which contributes to the arbitrary nature of the definition of the most prospective area. Other factors such as application of a net-to-gross ratio are also important in defining prospective resource areas. The grade and thickness limitation criteria are also impacted by the sodium resource, which must be considered in determining the most prospective area for development.

52863-035

Many oil shale deposits elsewhere in the world (and in Wyoming for this PEIS) that do not meet the 25 foot and 25 gallon per ton limit are currently being considered for research and potential development. For example, the PEIS notes that "[i]n Wyoming, where the oil shale resource is not of as high a quality as it is in Colorado and Utah, the most geographically prospective oil shale resources are those deposits that are expected to yield 15 gal/ton or more shale oil and are

15 f[ee]t thick or greater." PEIS, at A-4. As technologies and understanding of geology and hydrology evolve, and, as economics change, it is likely that oil shale development will be able to occur in areas not currently anticipated.

It is important to recognize that areas not identified as most prospective at this time are not being excluded for any environmental or other specific reason and should probably be considered for leasing at a later time. The economics of oil shale development depend on a variety of factors, including grade and thickness of oil shale, the market value of the resource, local geology, and available technology. Oil shale technology is still in its early stages of development, and it may be possible for operators to extract oil shale from less prospective lands in the future, much like horizontal well technology has advanced to allow access to resources in the oil and gas industry. 52863-035 (cont.)

D. Air Quality

1. Conformance to Air Quality Laws

The PEIS notes that federal agencies cannot authorize any activity that does not conform to applicable air quality laws, regulations, standards and implementation plans but does not indicate that the primary responsibility for ensuring compliance rests with other agencies. PEIS, at 4-47.

BLM should consider supplementing the text to indicate that agencies such as the Colorado Department of Public Health and the Environment, Air Pollution Control Division ("CDPHE-APCD"), Utah Department of Environmental Quality, Division of Air Quality ("UTDEQ-DAQ"), and the Wyoming Department of Environmental Quality, Air Quality Division ("WYDEQ-AQD"), have primary responsibility and authority to ensure compliance with applicable air quality requirements, and the BLM may rely on such agencies to ensure compliance. 52863-036

2. Possible Specific Mitigation Measures

On page 4-50 of the PEIS, BLM sets forth five potential mitigation measures designed to minimize potential air quality impacts. These mitigation measures include, but are not limited to, (1) treating access roads with water or other surfactants to reduce fugitive dust from traffic; (2) reducing vehicle speeds on dirt roads to reduce fugitive dust from traffic; (3) specifying emission control devices on production equipment to reduce potential CO, NO_x, $PM_{2.5}$, PM_{10}, and VOC emissions; (4) specifying low-sulfur content fuels to reduce potential SO_2 emissions; and/or (5) regulating the timing of emissions to reduce the formation of O_3 in the atmosphere from NO_x and VOC emissions. 52863-037

First, BLM should clarify that these mitigation measures will not necessarily apply or be appropriate in all cases and that any such mitigation measures would be specified, if at all, only to the extent necessary to ensure compliance with applicable laws, standards, and regulations.

These applicable measures should be determined by air quality regulators in the course of permit approvals, not by BLM in the RMP.

Second, with respect to items (3) and (4), if emission controls or reductions are necessary and appropriate, the project sponsor should have the ability in most cases to determine how to achieve necessary reductions, rather than being required to use specific emission control devices or specific types of fuel (such as low-sulfur fuels). Third, item (5) refers to regulating the timing of emissions to reduce ozone formation. It is unclear, however, what this means. If this is intended to refer to the possibility of seasonal emission limits on NO_x and/or VOC emissions, due to the seasonal nature of ozone formation, this should be clarified. It should be noted that proposed projects will be subject to appropriate air quality permitting requirements and limits, typically through the Clean Air Act requirements delegated to the individual states by Environmental Protection Agency ("EPA") for administration and enforcement. 52863-037 (cont.)

3. Visibility in Class I Areas

On page 4-46, the PEIS refers to potential long-term regional impacts on visibility and to impacts of nitrogen and sulfur deposition on sensitive lake chemistry. Under the Clean Air Act, these potential impacts are of concern in Class I areas, including designated national parks and wilderness areas, not in all areas, and this should be clarified. 52863-038

4. Climate Change and Carbon Storage

Several sections, including Sections 2.5.3, 3.5.1.2, 4.6.1, and 4.6.2 briefly mention global climate change implications related to oil shale and tar sands development but ultimately defer a substantive impact analysis until site or project-specific NEPA document is prepared. Section 3.5.1.2, entitled "Global Climate Change," should be expanded to encompass a more thorough discussion of the potential impacts of oil shale development on climate change and should provide an explanation of why a quantitative analysis is not possible at this time. 52863-039

Several locations of the PEIS explain that the PEIS only analyzes the impact of amending RMPs to make public lands available for application for leasing and that BLM must defer more detailed and site-specific analyses until the time of leasing and/or review and approval of a project-specific plan of development. In addition, Section 4.6.1 states that "[i]t is not possible to predict site-specific air quality impacts until actual oil shale projects are proposed and designed." Further explanation should be incorporated into Section 3.5.1.2 to clarify that amending the RMPs to make public lands available for application for leasing will not, in and of itself, cause any change in greenhouse gas emissions and that it is not possible to predict the extent of climate change impacts of future oil shale development projects until actual projects are designed and proposed. 52863-040

BLM should incorporate a discussion of the reasonably foreseeable significant adverse effects of oil shale and tar sands development on the human environment. If critical information, such as 52863-041

specific project design specifications, is unavailable or incomplete, BLM should follow the procedure required by the CEQ regulations. *See Mayo Foundation v. Surface Transp. Bd.*, 472 F.3d 545, 555 (8th Cir. 2006); 40 C.F.R. § 1502.22(b).

The PEIS discusses climate change and greenhouse gas emissions in several locations. Some of this material should be discussed in more detail in the PEIS itself. The document cites to leading studies about greenhouse gas emissions and their climate change impacts. The impacts and regional effects of greenhouse gas emissions, though highly uncertain, have been documented by the Intergovernmental Panel on Climate Change ("IPCC"), including changes in precipitation and vegetation. 52863-041 (cont.)

Nevertheless, the IPCC Fourth Assessment Report highlights the difficulty of predicting localized climate change effects.

> Impacts of climate change on North America will not occur in isolation, but in the context of technological, economic, social and ecological changes. In addition, challenges from climate change will not appear as isolated effects on a single sector, region or group. They will occur in concert, creating the possibility of a suite of local, as well as long distance, interactions, involving both impacts of climate change and other societal and ecosystem trends. In some cases, these interactions may reduce impacts of decrease vulnerability, but in others they may amplify impacts of increase vulnerability.

Working Group 2, Chapter 14.4.9, at 635. The IPCC also notes, at chapter 14.8, page 639, that "[p]rojections of climate changes still have important uncertainties; especially on a regional scale. For North America, the greater uncertainty about future precipitation than about future temperature substantially expands the uncertainty of a broad range of impacts on ecosystems, hydrology and water resources and on industries."

The PEIS contains some information about the potential CO_2 emissions from oil shale activities, but this information should be supplemented using information that the U.S. government has published. The Task Force on Strategic Unconventional Fuels issued a report to the President and Congress in September 2006 titled "Development of America's Strategic Unconventional Fuels Resources." Page 25 includes bar charts comparing the energy balance of oil shale mining and in-situ production methods with that of Alberta oil sands mining and in-situ production. The comparison indicates that the greenhouse gas footprint of oil shale operations can be similar to technologies currently utilized in Alberta and for which there is a fair amount of publicly reported data. Some allocation of additional CO_2 emissions may need to be applied to oil shale based on the effects of thermal processing of minerals embedded in the oil shale. An additional adjustment may be required to account for the energy efficiency improvements achieved in the oil sands business over the past decade. 52863-042

On pages A-85 and A-86 of the PEIS, tables A-15 and A-16 estimate greenhouse gas emissions for one type of oil shale project. While we do not have enough data to make accurate predictions of CO_2 emissions at this stage, Shell believes these included estimates appear to be high. It is also important to recognize that CO_2 emissions will vary significantly depending on technologies actually employed. 52863-043

On page 2-52, the PEIS defers consideration of carbon capture and storage ("CCS") until completion of a site-specific analysis. Although any particular storage proposal, and its effect on carbon dioxide emissions from an oil shale facility, would need to be evaluated at that time, Shell submits that climate change impacts associated with oil shale development should not be assumed to be higher than those from the marginal displaced fuel. Although the PEIS includes a description of carbon sequestration, it focuses on its use as a tool for enhanced oil recovery. A fuller discussion of carbon capture's implications should be included in the PEIS, including its potential ability to reduce CO_2 emissions from oil shale facilities.

Carbon storage has been identified as "among the most immediate and viable strategies available for mitigating the release of CO_2 into the atmosphere. *Interstate Oil and Gas Compact Commission, Storage of Carbon Dioxide in Geologic Structures: A Legal and Regulatory Guide for States and Provinces*, 9 (2007). It is believed that very large amounts of CO_2 can be sequestered through underground injection. A recent report by the Pew Center on Climate at page 10, noted, "The United States is fortunate in having a large and diverse set of geologic options for storing CO_2." Depleted domestic oil and gas reservoirs have an estimated storage capacity of 80 gigatons (Gt) of CO_2; unmineable coal seams add another estimated 180 Gt. Deep saline formations, the largest of the CO_2 storage options, contain hundreds of Gt of capacity (NETL, 2007). Assuming the science, public acceptance, regulatory and liability issues that surround geological storage of CO_2 are favorably resolved, there is sufficient capacity to store CO_2 from U.S. coal-fueled electric generation plants in domestic geologic formations for the next several hundred years. *A Program to Accelerate the Deployment of CO_2 Capture and Storage (CCS): Rationale, Objectives, and Costs*, Vello A. Kuuskraa, President, Advanced Resources, Inc. (2007). It should be noted that carbon sequestration could occur near an oil shale facility or at a distant location. 52863-044

A number of efforts are underway to perfect the technology and processes for CCS and to enhance understanding of CO_2 in underground reservoirs. Shell is a participant in one of the most advanced CCS research efforts, the Weyburn-Midale CO_2 project, which is an 8-year, $80 million international project launched in 2000. The Weyburn-Midale project studies CO_2 injection and underground storage in depleted oil fields. Although it is premature to say exactly what role carbon capture and storage would play in a commercial oil shale operation, Shell is supportive of furthering the economic and technical viability of this technology.

E. Water Use

The PEIS describes the Colorado River Compact and correctly notes that the Compact allocated the flows in the Colorado River between the Upper Basin and Lower Basin states. Water use within each state is subject to state law. The PEIS also correctly notes that obtaining water rights for an oil shale project will be a process of negotiation among water right owners, regulatory agencies, and the developers.

In the absence of developed technologies with process measurements, consumptive use data, and the like, BLM has developed input assumptions and calculated theoretical rates and volumes from these assumptions. *See* PEIS, 4-31–4-33; 4-36–42. While these estimates are uncertain, given the research nature of the projects currently considered, Shell believes they are reasonable, that they fully identify the range of features that future oil shale NEPA reviews will need to consider in reviewing potential commercial oil shale applications and are probably the best estimates that can be made at this time. 52863-045

F. Expansion of Electricity-Generating Capacity

The second paragraph of page 4-14 assumes a level of power requirement for in-situ oil shale development and further assumes that this power would be provided by conventional coal-fired power plants. While this assumption is reasonable, given the current state of knowledge regarding future development, it is important to recognize that both the amount of electricity and the method of generation are currently unknown and that a detailed analysis is more appropriate at the site-specific NEPA level. Similarly, estimates for land use, water use and employment in Table 4.1.6.1 are speculative until final technology decisions are made. 52863-046

G. Noise

The EPA noise standards referenced in the PEIS are over thirty years old. More recent EPA information is not available because in 1981, the federal government transferred the primary responsibility for regulating noise to the state and local governments. *See* www.epa.gov/history/topices/noise/01.htm. EPA currently has no regulatory authority over noise, and funding for the EPA Office of Noise Abatement and Control was phased out in 1982. Consequently, the rationale for referencing the thirty-year-old standard and referring to it as a "general practice" for environmental documents is unclear.

The PEIS also references the Colorado noise regulations maximum daytime and nighttime limits for residential areas. Under the statute, a "residential zone" is an area of single family or multifamily dwellings where businesses may or may not be conducted in such dwellings. Colo. Rev. Stat. § 25-12-102. The zone includes areas where multiple-unit dwellings, high-rise apartment districts, and redevelopment districts are located. A residential zone may include areas containing accommodations for transients such as motels and hotels and residential areas 52863-047

with limited office development, but it may not include retail shopping facilities. A "residential zone" also includes hospitals, nursing homes, and similar institutional facilities.

The definition of a residential zone does not fit the areas where commercial oil shale leasing is proposed in Colorado, nor is the site located in a residential area. The closest definition in the Colorado noise regulations that would match an area of commercial oil shale leasing is that of light industrial and commercial. That definition, also from Colo. Rev. Stat. § 25-12-102, provides that a "light industrial and commercial zone" means: (a) an area containing clean and quiet research laboratories; (b) an area containing light industrial activities which are clean and quiet; (c) an area containing warehousing; or (d) an area in which other activities are conducted where the general environment is free from concentrated industrial activity. The commercial oil shale operations will be an industrial activity in an area where the general environment is free from concentrated industrial activity. The Colorado noise standards for light industrial are 70 dBAs daytime and 65 dBA nighttime. Colo. Rev. Stat. § 25-12-103. 52863-047 (cont.)

The regulations that are the most applicable to oil shale development in the White River Resource Area and in Rio Blanco County are those established by Rio Blanco County. Indeed, this standard was recognized by the BLM when it issued a FONSI on Shell's 160 acre RD&D tracts. The Rio Blanco County regulations set a noise standard at 65 dBA and require that site activities meet that standard at the site boundary to minimize off site effects of the activity.

The PEIS noise impact assessment does not address the Rio Blanco County noise standard, or local noise standards in general, even though the application of local standards is appropriate. In addition, although the text states that other appropriate information would be used as a basis for establishing noise standards, the PEIS does not take into consideration that the leases for Shell's 160 acre RD&D tracts were issued with a FONSI based on mitigating noise impacts to below the Rio Blanco County standard of 65 dBA.

The PEIS should use the Colorado light industrial noise standards of 70 dBA daytime and 65 dBA nighttime as well as the Rio Blanco County local noise standard of 65 dBA as opposed to referencing the EPA noise standard, particularly when the EPA does not regulate noise. Although there are limited residences within the oil shale commercial leasing areas, because the land addressed in the PEIS is public, residential protection is not appropriate. Instead, Rio Blanco County is the local entity regulating the site activities, and the County regulations set standards that are based on the appropriate noise levels for this rural county. 52863-048

H. Water Quality

The description of the ground water system in the Piceance Basin, as described in the last paragraph on page 3-74 of the PEIS, is taken almost exclusively from the Colorado Ground Water Atlas ("Atlas"). By design, the descriptions in the Atlas are very general and analyze a scale larger than the area of the proposed oil scale development area. Because of the general descriptions and the large scale, it would be extremely difficult to use this description to establish 52863-049

any meaningful quantification of impacts due to oil shale development. It is understood that, if and when applications to lease are received and additional information becomes available, BLM will conduct NEPA analyses, including consideration of direct, indirect and cumulative effects, reasonable alternatives, and possible mitigation measures, as well as what level of development may be anticipated. *See* BLM White River Field Office, Meeker Colorado, Environmental Assessment for Shell Oil Shale Research, Development, and Demonstration Projects, Rio Blanco County, Colorado August 2006 (CO-110-2006-117-EA).

52863-049 (cont.)

The description of the aquifer systems in the Piceance Basin follows the conventional framework originally established by the U.S. Geological Society in the mid-1970s. To that end, the PEIS should reference the original U.S. Geological Society professional papers that describe the ground water system in the area of potential oil shale development in the northern Piceance Basin.[4]

I. Visual Resources

The Piceance Basin is divided into Class II and Class III VRM Classes. Class II provides for a low level of change that should not attract the attention of a casual observer. *See generally* PEIS, at 4-127–4-131. Class III allows a moderate level of change that may attract attention without dominating the view of the casual observer.

Shell's RD&D leases are within Class III VRM Area. The PEIS suggests multiple-mitigation measures that may be applied to the siting, development and operation of oil shale leases, *as warranted by the result of the lease-stage or plan of development-stage NEPA analyses. Id.* (emphasis added). The presentation of potential mitigation measures in this section acknowledges the need for site and project-specific analyses in order to determine the appropriate mitigation. Accordingly, BLM should refrain from applying these measures at the RMP stage.

52863-050

For mitigation of high-value scenic resources in lands outside of, but adjacent to or near oil shale leasing areas, the PEIS lists mitigation measures that *should be applied to siting, development, and operation of oil shale leases, as warranted by the result of the lease-stage or plan of development-stage NEPA analyses. Id.* (emphasis added). While this visual resources section acknowledges the necessity for site-specific analyses and mitigation, the "should" language

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[4] The U.S. Geological Survey papers describing the ground water system include J.B. Weeks, G.H. Leavesley, F.A.Welder, and G.J. Saulnier, Jr., 1974, *Simulated Effects of Oil-shale Development on the Hydrology of Piceance Basin Colorado*: U.S. Geological Survey Professional Paper 908, p. 84, 1 plate; S.G. Robson and G.J. Saulnier, Jr., 1981, *Hydrochemistry and Simulated Solute Transport, Piceance Basin, Northwestern Colorado*: U.S. Geological Survey Professional Paper 1196, p. 65.

52863-049 (cont.)

implies necessity of implementation of the proposed mitigation measures rather than as a list of potential mitigation measures that may apply following a site-specific NEPA analysis. Mitigation will be required, but the proposed mitigation presented in Section 4.9.2 should be listed as potential mitigation, not as required mitigation, with the determinations made at the project specific NEPA analysis. Page 4-130 should be changed to reflect this.

52863-050 (cont.)

J. Processing/Infrastructure

In Chapter 4, Section 1, the PEIS makes a number of assumptions regarding infrastructure for potential oil shale development. These assumptions appear to be reasonable at this stage of research and development, but it should be noted that actual infrastructure needs may vary and will be analyzed in more detail under NEPA at the project-specific level. A few examples of these assumptions, which need to be considered at a later time, are listed in Appendix A of this letter.

52863-051

K. Plans of Operation

In Section 4.7.1.5, p. 4-55 and Section A.5.3.3 of the PEIS (pages A-65 to 67), the text describes in detail existing Plans of Operation for Shell's RD&D projects. These descriptions should be considered general in nature, rather than prescriptive. Shell, through its research conducted at Shell-owned properties since preparation of these Plans of Operation, has sought to refine and optimize spacings, efficiencies, and to minimize consumptive uses. The number and spacing of heaters, production rates, volumes of disturbance, water requirements, and other metrics expressed in Shell's Plans of Operation all are subject to refinement. It should especially be noted that projects with less impacts could be implemented with BLM agreement. The NEPA reviews for the RD&D projects define the upper limits of the environmental disturbances, but those disturbances could be smaller.

52863-052

L. Mitigation Measures and Vegetation

Mitigation measures are specified in the PEIS and include reclamation or establishment of similar habitats elsewhere as well as exclusive use of native plant species in revegetation. *See* PEIS, at 4-64; 4-103. Other options such as revegetation to specific land uses or maintenance of an edge along a right-of-way, are not evaluated. The second paragraph on page 4-83 of the PEIS states that the best reclamation results would occur if original site topography, hydrology, soils and vegetation patterns were reestablished.

52863-053

While the evaluation and suggested mitigation measures broadly cover plant communities and habitat, the PEIS overlooks some opportunities and site-specific mitigation programs that may be valuable for resource management. With the land management agencies currently undertaking programs to remove trees and shrubs from areas to create better wildlife habitat, the agencies should not overlook opportunities for wildlife habitat and grazing enhancement from oil shale development. Exclusive use of native plant species may not always provide the most rapid

revegetative cover nor provide the best wildlife or grazing habitat. Alternative topography may enable habitat enhancement for wildlife, including threatened, endangered, and sensitive species.

As noted in the PEIS, in the future, site-specific evaluation of plant communities and specific reclamation and mitigation plans will be prepared to address each individual commercial project. The RMPs should not preclude any option for mitigation of plant communities or reclamation of the surface for any potential future use.

52863-053 (cont.)

M. Wildlife and Endangered Species

1. Sage-Grouse

The PEIS identifies concerns relating to the effects of oil shale development on greater sage-grouse by addressing potential impacts associated with reduction, fragmentation and modification of grassland and shrubland habitats. In those areas where there is potential for direct or indirect impacts to the sage-grouse from an oil shale development project, there is a need for site and project-specific wildlife protection planning for protection of the sage-grouse. Protection of the sage-grouse in the context of oil shale development is best done in a project wildlife management plan for a proposed project.

The PEIS suggests fifteen measures for management of greater sage-grouse and their habitats that have pertinence to oil shale projects and associated facilities. These measures include identification of migration routes, siting and timing considerations, reclamation planning and other mitigation measures, many of which are already required by current regulation. Some of the measures, *e.g.*, avoiding attractions for raptors and mammalian predators in sage-grouse habitat, are very dependent upon site and project-specific situations.

52863-054

The PEIS also identifies ten suggested management practices that may be pertinent to energy transmission facilities. The practices also include measures already incorporated into requirements of various regulatory programs. These include control of invasive species, consideration of sage-grouse habitat when developing reclamation plans and initiation of reclamation practices as quickly as possible following land disturbance. Some of the management practices are directed more at the BLM (development of adaptive management strategies, prohibition or restriction of off-highway vehicle activity) than to project proponents.

In its National Sage-Grouse Habitat Conservation Strategy (2004), BLM recognized the need to address the effectiveness of the management framework for addressing conservation needs of sage-grouse, while understanding the resource conditions necessary to prioritize habitat maintenance and restoration and expand partnerships for conservation of the species and its habitat. Implementation of a limited number of national prescriptive mitigation measures do not further the goals of the National Sage-Grouse strategy and may in fact, hinder more creative regional conservation planning that could be part of a project-specific wildlife management plan.

BLM's sage-grouse strategy identifies some of the BLM authorities to address sage-grouse conservation, including:

- Federal Land Policy and Management Act of 1976
- National Environmental Policy Act
- Public Rangelands Improvement Act of 1978
- Sikes Act of 1974
- Wild Horse and Burro Act of 1971
- 43 C.F.R. Subpart C, Mineral Management 3000 Series
- 43 C.F.R. Subpart 4120, Grazing Management
- 43 C.F.R. 4189, Fundamentals of Rangeland Health

Additional programs that are concerned with the sage-grouse or habitat considerations include state mining permit requirements, county land use, noise and noxious weed control programs. In addition, the USFWS announced on February 26, 2008, that it will initiate a status review of the greater sage-grouse as threatened or endangered under the ESA. If the sage-grouse is listed, a Section 7 consultation with the USFWS will be required for projects with potential impacts to the species prior to issuance of any BLM authorization. Detailed mitigation plans would be developed for a project as part of the permit application and consultation process. The mitigation plans may or may not include the measures and practices identified in the PEIS.

52863-054 (cont.)

BLM has acknowledged that sage-grouse protection is a cooperative effort involving many parties. There are well-developed programs to address the complexities of habitat management, land use planning, information collection and sharing and implementation of conservation strategies. We suggest that the formulation and implementation of mitigation plans for oil shale development remain under existing programs that address the complexities of protection. Oil shale developers would then be in partnership with the regional sage-grouse conservation efforts to ensure workable, thoughtful and effective mitigation strategies for project development.

2. Appendix F of PEIS

In Appendix F, BLM proposes conservation measures for Alternative B. These are measures that are recommended by the USFWS to support the conservation of species listed under the ESA. The recommendations are "generally consistent with existing conservation agreements, recovery plans and completed consultations." The USFWS acknowledges that the conservation measures are not applicable to every situation and that oil shale developments are likely to vary in scale and intensity.

52863-055

These proposed conservation measures should not be included as part of any leasing program; rather, they should be used as a toolbox for project planners to use in developing mitigation plans for a project prior to the initiation of the required Section 7 consultation for any endangered species potentially affected by a specific project proposal. These prescriptive conservation

measures have the potential to burden the BLM with inflexible requirements that might not represent the best measures for a given project. Shell recommends that BLM mention these conservation measures as potential mechanisms only, favoring a wildlife management plan tailored to a site and project-specific program that will work within the existing Section 7 consultation program. 52863-055 (cont.)

3. Specific Comments on Recommended Measures in Appendix F

a. Water Production

Water production will be managed to ensure maintenance or enhancement of riparian habitat and surface water quality. While some threatened or endangered species may be dependent upon riparian habitat or surface water quality, others may not be. Water is regulated under many programs, such as those governing water rights, water removal, water discharge, water monitoring, dredge and fill. Permits from state agencies, local agencies and other federal agencies address these concerns. If there is a specific concern relative to the site and project-specific effects to an endangered or threatened species, the Section 7 consultation process will address the concern. This site and project-specific handling of water production, riparian habitat and surface water quality will enable the coordination of the numerous regulatory programs that address these issues and provide the most appropriate environmental protection programs for a project. Thus generic and broad requirements are not necessary. 52863-056

b. Riparian and Wetland Habitats

Oil shale development should avoid loss of riparian and wetlands habitats where possible, and if avoidance with facilities is not possible, the operators will restore wetland and riparian habitat. A Section 404 permit, issued by the U.S. Army Corps of Engineers under the Clean Water Act, addresses riparian and wetland habitats. The Corps has a well-developed program to address the loss of waters of the United States, which includes a requirement for replacement of losses of wetlands and riparian habitats. The PEIS notes that the USFWS would require Section 7 consultation for those threatened or endangered species whose habitats are in riparian areas or wetlands. Takings or potential takings of endangered or threatened species are addressed during the consultation process. 52863-057

4. Species-Specific Conservation Measures

USFWS has prepared recovery plans for most threatened or endangered species that may be affected by oil shale development. These plans are developed regionally in coordination with many stakeholders and are often updated to benefit from research, change in resource uses, improvements in the populations or habitats of a particular endangered or threatened species. The proposed conservation measures identified in Appendix F are "assumed to be generally consistent with existing conservation agreements, recovery plans, and completed consultations." 52863-058

Application of these conservation measures to some oil shale project in the future could cause problems to the project proponent, the BLM, the USFWS and others.

Shell suggests that the USFWS and BLM continue with the site and project-specific Section 7 consultations, as required by the ESA. This will enable the use of the best scientific information as it is developed as part of the recovery plans, will further the BLM goals of multiple use and will encourage creative solutions that will further enhance the recovery of populations of endangered or threatened species. Additionally, inclusion of prescriptive stipulations in the oil shale leasing program eliminates the flexibility of a project proponent to develop creative solutions in endangered or threatened species protection, fails to recognize the potential successes of the USFWS in delisting recovered species and restricts the BLM in efficient processing of oil shale project development requests. 52863-058 (cont.)

a. Colorado River Endangered Fishes (Bonytail, Colorado Pikeminnow, Humpback Chub, and Razorback Sucker)

The Upper Colorado River Endangered Fish Recovery Program is a coalition of agencies and organizations that have been working since 1988 to recover endangered Colorado River Basin fish. They work on recovery strategies including conducting research, improving river habitat, providing adequate stream flows, managing non-native fish and raising endangered fish in hatcheries for stocking. In two decades of involvement, the methods of fish protection have been developed and refined, and the level of knowledge of the species has vastly improved. Shell anticipates that the trend in the future will be the same—more experience will result in better and more effective protection measures.

Every specific conservation measure proposed in Appendix F for the Colorado River Endangered Fishes is already required by regulations. Consultation with the USFWS on a site and project-specific basis is required if there is potential direct or indirect effect on threatened or endangered species. Discharge of selenium (either as a point source or from stormwater) into surface waters is controlled under the Clean Water Act through the EPA, or through state-issued, project-specific permits. Disturbances in wetlands or other waters of the United States are controlled by the U.S. Army Corps of Engineers and authorized by Section 404 of the Clean Water Act. EPA also requires spill-contingency planning for certain pipelines. State Engineer offices in Wyoming, Colorado and Utah control water rights and the use of water within the state. Accordingly, additional RMP requirements are not necessary. 52863-059

b. Colorado River Cutthroat Trout

On June 13, 2007, the USFWS determined that listing of the Colorado River Cutthroat Trout as an endangered or threatened species was not warranted. *See* 72 Fed. Reg. 32589. If the Colorado River Cutthroat Trout is ultimately listed by the USFWS as threatened or endangered, the USFWS and BLM will have Section 7 consultations on projects that may affect the threatened or endangered species or its critical habitat. 52863-060

Evaluation of the potential effects of projects on wildlife species, including aquatic species, is required as part of an environmental evaluation under NEPA. These evaluations are done on a site and project-specific basis and address the real potential effects, not speculative effects. Site and project-specific mitigation measures are developed as part of the project planning and will be more appropriately addressed as part of the NEPA evaluation and project-specific approvals. Shell suggests that a wildlife management plan be developed for a project so that all potentially affected species, not just endangered or threatened species, will be protected during oil shale project developments.

52863-060 (cont.)

c. Mexican Spotted Owl

Many of the conservation measures proposed in Appendix F are not conservation measures so much as a plan of action to expand and further the recovery plan for the spotted owl. For example, one proposed measure suggests that the range of the Mexican spotted owl published in the recovery plan should be extended to include the individuals observed within Dinosaur National Monument. This proposed extension should occur within the proceedings of the ESA and not as part of a NEPA analysis for oil shale leasing. Other proposed measures describe habitat mapping and modeling exercises that are also best conducted outside of a consideration of an oil shale leasing program.

52863-061

For those proposed conservation measures that could be directly applied to actual birds and their habitats, Appendix F proposes that those conservation measures be applied "if project activities occur within 0.5 miles of suitable owl habitat." Shell agrees that site-specific surveys of the Mexican spotted owl be conducted in areas where there may be suitable habitat. However, Shell again recommends that mitigation measures be determined at a later point in time.

d. Southwestern Willow Flycatcher

The southwestern willow flycatcher was listed as endangered in 1995. The first suggested conservation measure proposed in Appendix F for this species is the only one of the six appropriate to apply to the oil shale leasing program. Southwestern willow flycatcher conservation measure 1 would require "in project areas potentially occupied by the southwestern willow flycatcher, surveys for the southwestern willow flycatcher should be conducted." This action is already required under the ESA. Further, if the surveys located individual southwestern willow flycatchers or any of their nests that may be affected by a project, a Section 7 consultation is required. At that time, site and project-specific mitigation measures will be developed for application to an oil shale project.

52863-062

e. Canada Lynx

Twenty suggested conservation measures for the Canada lynx are listed in Appendix F. These conservation measures are appropriate for an endangered species recovery plan and provide useful guidance to wildlife managers as to measures to study and protect the species. They are

52863-063

not, however, appropriate as conditions attached to an oil shale leasing program. If there is risk to the Canada lynx from a specific proposed oil shale project, site and project-specific studies, management planning and Section 7 consultation are appropriate. 52863-063 (cont.)

f. Threatened, Endangered, and Proposed Plants

As with the other suggested conservation measures listed in Appendix F, the twelve measures for threatened, endangered and proposed plants are not necessary in RMPs, and they do not allow the flexibility BLM needs to implement a multiple-use strategy. Instead, they can be used as a toolbox of potential measures for preparing site, project and species-specific plans. Shell agrees with condition 1 that surveys for listed plants should be conducted prior to ground disturbance wherever there is the potential for their occurrence in project areas. The surveys would be required under the ESA as well as NEPA. From the results of the surveys, the appropriate environmental protection plans can be developed. 52863-064

N. Socioeconomics

1. Consultation with Stakeholders

Shell is committed to consult with stakeholder groups possessing an interest that may be potentially affected by oil shale development, including discussions with potentially impacted communities, business interests, governments, surface owners and grazing lease holders and others. Shell has an active program of stakeholder outreach, including public meetings, open houses, and informal contacts with key individuals, officials and organizations. Shell likewise encourages BLM to continue a policy of collaboration and consultation, especially with other multiple-use resource users. For example, consultation with affected cattle ranchers, hunters and local communities may help identify innovative and valuable ways of accommodating oil shale development with local needs and interests.

2. Socioeconomics Analysis

The socioeconomics sections of the PEIS provide a general overview of social and economic conditions in the three Regions of Influence and the potential impacts associated with the defined oil shale and tar sands prototype projects. The assessment, however, relies on dated information and broad generalizations drawn from past social and economic impact research that is, in many instances, not applicable to the current economic and social environment. The assessment and analysis need to further consider critical dimensions of foreseeable impacts (*e.g.*, short-term peak impacts and the spatial distribution of impacts) and to further address the cumulative impacts of multiple projects. Shell's specific comments and proposed revisions to the PEIS's socioeconomics sections appear in Appendix A of the comment letter. 52863-065

O. Cumulative Effects Analysis

An EIS must include a cumulative impact discussion for each environmental resource. 40 C.F.R. § 1508.25(c). The CEQ Regulations define a cumulative impact as:

> the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Id. § 1508.7.

The first step in cumulative impact analysis is to identify the impact area for each resource affected by the proposed agency action. CEQ Guidebook, *Considering Cumulative Impacts Under the National Environmental Policy Act* (January 1997). The CEQ Guidebook suggests that the appropriate scope should be defined by determining the largest geographic area that is occupied by the resources that could be affected by the proposed action. CEQ Guidebook at 15; *see also id.* at 12 (noting that cumulative impact analysis "should be conducted on the scale of human communities, landscapes, watersheds, or airsheds"). For example, air quality might be affected in an area greater than the boundary of the project area.

The PEIS states that cumulative impacts are discussed in the context of other major activities in the "study areas" affected for each resource. PEIS, at 6-107. Study areas vary by resource. *Id.* BLM should ensure that the cumulative impact study area is specifically described for each resource. For example, the cumulative impact study area for wildlife resources is described as the "three-state study area." PEIS, at 6-155. This general description may be overbroad and may not accurately reflect the extent of the resource potentially affected by the proposed RMP amendments. BLM should discuss why a certain study area was chosen for each resource. 52863-066

Further, the cumulative effects analysis, similar to the direct and indirect effects analysis, is based on the construction of a single oil shale project under both Alternatives B and C. PEIS, at 6-107. BLM concludes that "[t]he magnitude of the differences between the cumulative effects of Alternatives B and C cannot be identified." PEIS, at 6-108. The PEIS does not explain why only one project is anticipated during the twenty-year study period or why the cumulative effects of Alternatives B and C cannot be distinguished. Alternative B will open more than twice the number of acres to leasing as Alternative C, and the cumulative impact analysis should discuss this difference. 52863-067

Conclusion

Although the PEIS provides a logical and thorough analysis of the consequences of amending twelve RMPs in Colorado, Utah and Wyoming; complies with the general requirements of

NEPA; and provides a well-reasoned decision-making document, Shell asks that BLM consider implementing the suggestions raised in this comment letter and the appendices when preparing the final PEIS and ROD. Shell thanks BLM and appreciates the opportunity to submit these comments.

Sincerely,

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Shell Comments
Appendix A

Errata and Additional Comments
for Draft Oil Shale and Tar Sands Resource Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS)
December 21, 2007 (BLM-WO-GI-08-005-3900) (DOI No. DES07-60)

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
Table ES-1, p. ES-4, "Alternative A, No Action" column	Alternative A - preferential lease acreage.	Alternative A indicates that only 960 acres total are available for oil shale development. However, the RD&D leases between BLM and the 4 RD&D leaseholders for the 6 oil shale tracts all outline a preferential lease right to additional acreage upon fulfillment of certain RD&D requirements. Shell's investment in their 3 RD&D projects should not be compromised by the implications of this language.	Add preferential lease right acreage to Alternative A.	52863-068
Table ES-1, p. ES-4 to 5, "Alternative A, No Action" column	Clarification.	"Not applicable; no commercial leasing would occur under this alternative."	"Not applicable; no **competitive** commercial leasing would occur under this alternative."	52863-069
Section 2.2.1, pp. 2-1 to 2	Preference right lease size.	"Under the MLA, the lease may not exceed 5,120 acres and may be of an indeterminate period." As stated in footnote c on page 4-8, the Mineral Leasing Act was amended by Section 369(j) of the Energy Policy Act of 2005 to change the lease limit to 5,760 acres, not 5,120 acres.	The new lease size of 5,760 acres should be recognized consistently in the document.	52863-070
Section 2.2.1, p. 2-2	Typo.	"The Secretary of the Interior may impose conditions on the lease, including convents relative to methods of mining, prevention of waste, and productive development."	"The Secretary of the Interior may impose conditions on the lease, including **covenants** relative to methods of mining, prevention of waste, and productive development."	52863-071
Section 2.2.1, p. 2-2	Energy Policy Act of 2005.	The Energy Policy Act of 2005 is missing from the discussion in the "Existing Relevant Statutory Requirements" section. This act is the actual authority for the BLM to conduct this PEIS as indicated at http://ostseis.anl.gov/eis/why/index.cfm. In Section 369 of the Act Congress outlines a number of important steps and policy directions for the BLM which should be summarized here.	Add discussion of Energy Policy Act of 2005 and its policy directions for the BLM.	52863-072

[1] Current PEIS language is identified with quotation marks.
[2] Suggested corrections for PEIS language is identified with quotation marks and changes are emphasized with **bold** and underlined font.

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
Section 2.2.1, p. 2-5	Scope of Clean Water Act ("CWA") jurisdiction.	"According to administrative and judicial interpretation, the navigable waters of the United States encompass any body of water whose use, degradation, or destruction would or could affect interstate or foreign commerce. These bodies of water include, but are not limited to, interstate and intrastate lakes, rivers, streams, wetlands, playa lakes, prairie potholes, mudflats, intermittent streams, and wet meadows. In addition, the CWA requires an NPDES permit or the state equivalent for certain stormwater discharges. Spill Prevention, Control, and Countermeasure plans may also be required to prevent oil spills from reaching navigable waters, adjoining shorelines, intermittent streams, or wet meadows, but only if these are hydrologically connected to the navigable waters of the United States. Discharges of dredged or fill material into waters of the United States or any work in, over, or under navigable waters will require a Section 404 or Section 410 permit, respectively, from the U.S. Army Corps of Engineers (USACE)." Description of scope of CWA jurisdiction may be misleading and should be clarified. Consideration of jurisdiction based on the US Supreme Court's ruling on June 19, 2006 in *Rapanos v. United States*, 126 S. Ct. 2208 (2006) and the Army Corps of Engineers post-*Rapanos* guidance on the definition of regulated waters of the US should be included.	"According to administrative and judicial interpretation, the **scope of the federal Clean Water Act jurisdiction over** waters of the United States depends on technical site-specific factors. **Regulated** bodies of water **may** include, but are not limited to, interstate and intrastate lakes, rivers, streams, wetlands, playa lakes, prairie potholes, mudflats, intermittent streams, and wet meadows. In addition, the CWA requires an NPDES permit or the state equivalent for certain stormwater discharges. Spill Prevention, Control, and Countermeasure plans may also be required to prevent oil spills from reaching **regulated** waters, adjoining shorelines, intermittent streams, or wet meadows, but only if these are hydrologically connected to the navigable waters of the United States. Discharges of dredged or fill material into waters of the United States or any work in, over, or under **regulated surface** waters will require a Section 404 or Section 410 permit, respectively, from the U.S. Army Corps of Engineers (USACE)."	52863-073
Section 2.2.1, p. 2-5	Triennial review of basinwide salinity control policy for the Colorado River Basin.	Text states that the water quality standards to control salinity increases in the Colorado River, including numeric criteria and plan of implementation, are reviewed every 3 years, however actual review may be less frequent.	Change text to: "These standards, including the numeric criteria and plan of implementation, are **scheduled to be** reviewed every 3 years**, however, actual review may be less frequent**."	52863-074
Section 2.3.2, p. 2-16, ¶ 1 in § 2.3.2.	Clarification of Alternative A, the no action alternative.	". . . it does not evaluate future commercial leasing . . ."	". . . it does not evaluate future **commercial-scale activities** . . ."	52863-075

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
Section 2.3.2, p. 2-19	Clarification of Alternative A, the no action alternative.	"For commercial oil shale development to occur in the future, specific land use plans would need to be amended to analyze areas for potential leasing."	"**Except where RMPs already authorize commercial leasing, for** commercial oil shale development to occur in the future, specific land use plans would need to be amended to analyze areas for potential leasing. **Even where plans already authorize leasing, additional NEPA analysis would precede any commercial-scale activity. Thus, Alternative A describes a scenario where no commercial-scale analysis would occur without further NEPA analysis.**"	52863-076
Figure 2.3.3-4, p. 2-29	Alternative C map.	This map does not currently indicate where environmentally sensitive areas are located.	BLM is requested to identify with specificity where each of the 12 sensitive environmental criteria, as listed in Table 2.3.3-3 on p. 2-33, occur. This might require several additional maps. The occurrence of these sensitive environmental criteria, typically managed with mitigation measures under the multiple use concept, are being used as a basis for exclusion of oil shale development. The location of these resources should be clearly defined and shown on maps in the PEIS.	52863-077
Section 2.6, pp. 2-53 to 54.	Sentence clarification.	"The alternatives presented in this PEIS were evaluated for potential environmental impacts associated with the amendment of land use plans to identify BLM lands in Colorado, Utah, and Wyoming that would be made available application for leasing for commercial oil shale or tar sands development. The PEIS also identifies the types of environmental impacts that could occur with commercial development of future oil shale and tar sands projects in the lease available lands."	"The alternatives presented in this PEIS were evaluated for potential environmental impacts associated with the amendment of land use plans to identify BLM lands in Colorado, Utah, and Wyoming that would be made available ~~**application**~~ for leasing **application** for commercial oil shale or tar sands development. The PEIS also identifies the types of environmental impacts that could occur with commercial development of future oil shale and tar sands projects in the **lands proposed for available leasing**."	52863-078
Section 3.1.1, pp. 3-1 to 41	Clarification.	Several locations state: "no [tar sands/oil shale] resources are located within the boundaries of this field office."	Change text to: "no **known** [tar sands/oil shale] resources are located within the boundaries of this field office."	52863-079
Section 3.1.1.5, p. 3-13 to 14	Clarification.	"Regarding the locatable minerals, uranium-vanadium, copper, and gold deposits and related mining claims occur within the Monticello Field Office, some in proximity to the White Canyon STSA."	"~~**Regarding the l**~~**L**ocatable minerals, uranium-vanadium, copper, and gold deposits and related mining claims occur within the Monticello Field Office, some in proximity to the White Canyon STSA."	52863-080

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
Section 3.2.1.5, p. 3-46, ¶ 2	Clarification.	Halite beds are up to 100 feet thick, not up to 30 feet thick as stated in the text.	Correct text to indicate halite beds are up to 100 feet thick.	52863-081
Section 3.2.2.2, p. 3-46	Clarification.	"Evacuation Creek" member of the Green River formation is commonly known as the "Uinta-Green River Transition."	Add this name reference for clarification.	52863-082
Section 3.2.2.5, p. 3-47	Correction.	"Gilsonite, a black, brittle natural petroleum residue, is found in the Uinta Basin; it occurs as miles-long vertical veins up to 18 ft wide (Cashion 1967)." Gilsonite veins range from steeply inclined to vertical.	"Gilsonite, a black, brittle natural petroleum residue, is found in the Uinta Basin **(Cashion 1967). Gilsonite veins range from steeply inclined to vertical and up to 18 ft wide**."	52863-083
Section 3.3, p. 3-53 and Section 4.4, pp. 4-27 to 29	Paleontological resource impacts and mitigation measures.	While the impact assessment suggests all negative impacts, a significant positive paleontological impact would be realized through the construction of a commercial oil shale facility. In any paleobotanical discovery, specimens must be recovered by quarrying. These specimens are curated and studied to further the knowledge of the paleontological setting of the area. Several hundred invertebrate and paleobotanical fossils have been found within Shell's RD&D leases. Absent construction projects, paleontologists have limited access to specimens. BLM is presently requiring extensive monitoring and curation of materials found in the lease areas. Mitigation measures proposed in this EIS include paleontological surveys, development of a paleontological resources management plan, curation of collected fossils, monitoring of earthmoving activities by a professional paleontologist and potential work stoppage at the paleontologist's discretion. Extensive recovery of additional collection of the same species will not further the knowledge base for these types of species. Only uniquely scientific specimens will be valuable for future research.	Development of a site-specific paleontological resource management plan is the preferred mitigation measure for any future commercial project, whether oil shale or tar sands. The BLM recognizes the variability of the paleontological resources, as shown by the revised classification system for fossil yields. As the regional knowledge of the resource is expanded, the mitigation measures can be fine tuned to ensure development of the scientific knowledge of the resource while minimizing the effect on the operation. We suggest revising text accordingly.	52863-084
Section 3.3.1, pp. 3-53 to 55	Clarification.	All of the rocks may contain varying quality and quantity of fossils. Not all zones contain fossils of paleontological value.	Please clarify text accordingly.	52863-085
Section 3.4.1.1, p. 3-60	Clarification.	"The assumption was demonstrated to be an overestimate and reduced to 12 million ac-ft in a hydrologic study by the BOR (CWCB 2004)."	"The assumption was demonstrated to be an overestimate and reduced **for water availability analysis purposes** to 12 million ac-ft in a hydrologic study by the BOR (CWCB 2004)."	52863-086
Section 3.4.1.2, p. 3-61, ¶ 4	Salinity control activities.	The section should consider salinity control activities that are administered under state and local programs. Programs under the Soil Conservation Service and administered under local jurisdictions especially in Grand Junction, Colorado should be	Consider adding discussion of state and local salinity and selenium control activities.	52863-087

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
		considered. This section might also consider the Selenium Task Force (Grand Junction) and its potential comments or positions on water quality controls.		52863-087 (cont.)
Section 3.4.1.3, p. 3-62 and Table 3.4.1-1	Update with current information.	The Colorado Water Quality Control Commission recently published proposed segments for listing, which should be incorporated into the Final PEIS.	Publish current listing information in final version with note that the listing may change as new information is developed.	52863-088
Section 3.4.1.2, p. 3-62	Text edit.	"The agency has developed a strategy to be implemented through its RMPs that primarily relies on best management of the basic resource base, including identifying targeted watersheds with high salt loading, improving vegetation cover to influence surface runoff and soil erosion on rangelands, and proper land uses."	"The agency has developed a strategy to be implemented through its RMPs that primarily relies on best management of the basic resource base, including identifying targeted watersheds with high salt loading, improving vegetation cover to **reduce** surface runoff and soil erosion on rangelands, and **encouraging** proper land uses."	52863-089
Section 3.4.1.4, p. 3-65	Clarification.	"The water use data listed in this section cover 2000 as the base year and projected water use in 2030 for Colorado and Wyoming, and in 2050 for Utah, taking into account population and industrial growth and changes in the agricultural landscape."	"The water use data listed in this section cover 2000 as the base year and projected water use in 2030 for Colorado and Wyoming, and in 2050 for Utah, taking into account population and industrial growth and changes in the agricultural landscape**, excluding potential water needs for oil shale or tar sands development**."	52863-090
Section 3.4.1.4, p. 3-65	Interstate water allocation.	The analysis fails to mention one aspect of interstate water allocation: if the other Upper Basin states do not use their full allocation, Colorado is entitled to use those states' unused shares in a given year. It is likely to be a considerable time before Wyoming, in particular, uses its full allocation, so more water may be available to Colorado than the PEIS indicates, at least for a time.	Add text to clarify that if the other Upper Basin states do not use their full allocation, Colorado is entitled to use those states' unused shares in a given year.	52863-091
Section 3.4.1.4, p. 3-65	Text edit.	"Consumptive use is defined as the portion of the diverted water that does not return to the stream system.In general, …"	"Consumptive use is defined as the portion of the diverted water that does not return to the stream system. **[Insert space] In** general, …"	52863-092
Section 3.4.1.4, p. 3-72, ¶ 6	Consumptive use.	Text discusses consumptive use of groundwater and states "for deeper aquifers (nontributary water), withdrawal of groundwater, if it is not returned to subsurface is considered to be consumptive use." This statement is incorrect.	Water pumped from nontributary aquifers and not returned to the subsurface should not be considered a consumptive use for purposes of evaluating water availability in the Colorado River Basin.	52863-093
Section 3.4.1.4, p. 3-73	Text edit.	"In 2005, the BOR's *Quality of Water Colorado River Basin Progress Report No. 22* (DOI 2005) also estimated the depletion of the water due to full basin development for the main stem of the Upper Colorado River Basin."	"In 2005, the BOR's *Quality of Water; Colorado River Basin Progress Report No. 22* (DOI 2005) also estimated the depletion of the water due to full basin development for the main stem of the Upper Colorado River Basin."	52863-094

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
Section 3.4.2.1, p. 3-75, ¶¶ 1, 3	Hydraulic conductivity parameters.	The ranges of aquifer system hydraulic conductivity parameters are taken from the *Colorado Ground Water Atlas* (Czyzewski, 2000; Topper, 2003). By design, the descriptions in the Atlas are very general; and, as a result, the ranges of parameter values are very wide ranging. Due to the wide range of parameter values, it is difficult to determine the reasonableness of any suggested impacts due to oil shale development. The ranges of well yields indicated for the Upper and Lower aquifers are very broad (1 to 1000 gpm) and inconsistent with the average value given for horizontal hydraulic conductivity, K_h (~1 ft/day). There is very little mention of the dissolution features in the Lower Aquifer which are the primary source of secondary permeability. These descriptions will presumably be more detailed in the NEPA analyses that are planned to be performed for individual projects when applications of leases are submitted.	Proposed language: "Generally, the transmissivity of both the upper and lower aquifer increases from the Basin margins to the central part of the Basin. This is primarily due to increasing thickness and greater incidence of dissolution features."	52863-095
Section 3.4.2.1, p. 3-75, ¶ 2	Hydraulic conductivity parameters.	The description of the aquifer system, taken from the *Colorado Ground Water Atlas* (Czyzewski, 2000; Topper, 2003), indicates a single confining unit separating the Upper and Lower Aquifers. A single value of vertical hydraulic conductivity is stated for this confining unit. There is no discussion of the numerous other units within the Uinta/Green River sequence that also act to restrict vertical ground water flow. The value suggested for the vertical hydraulic conductivity, K_v, of the Mahogany zone (intermediate confining zone) is 0.37 ft/day. The source of this value is not clear, but the value is very high and inconsistent with the K_h value suggested of <0.01 ft/day. This is important because the potential hydraulic connection between the Upper and Lower Aquifers is overstated. This description will presumably be more detailed in the NEPA analyses that are planned to be performed for individual projects.	Proposed language: "There are numerous geologic units within the Uinta/Green River sequence that act to restrict vertical ground water flow. One such unit has been identified as the Mahogany zone in early regional studies by the USGS. The vertical hydraulic conductivity of confining zones is generally very low (on the order of 10^{-4} ft/day), but can increase locally where fractures penetrate the confining layers."	52863-096
Section 3.4.2.1, p. 3-75, ¶ 6	Use classifications.	The "use" classifications, as discussed in this paragraph, are an oversimplification, based on TDS alone, of a more complex classification system.	Specific use limitations can be placed, for instance, on waters with a significant number of regulated constituents above table value standards.	52863-097
Section 3.4.2.1, p. 3-75, ¶ 7	Groundwater recharge.	The PEIS states that there is no ground water recharge during the summer months due to high evapotranspiration. There is no factual basis or data reference for this statement, and it neglects recharge through creek bottoms during ephemeral or intermittent stream flow. A total annual recharge of 34,400 ac-ft is stated, taken from *Colorado Ground Water Atlas*. The annual recharge	Proposed language: "A total annual recharge of 34,400 ac-ft is estimated for the area of the Piceance Basin north of the Colorado River ([xx] square miles). This is equivalent to an average recharge rate of [yy] in/yr."	52863-098

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		needs to be placed into context with the area involved. The recharge value is important because it leads to the statement about "mining" groundwater based on an (incorrect) stated total annual withdrawal rate of 46,000 ac-ft later in the document.		52863-098 (cont.)
Section 3.4.2.1, p. 3-76, ¶ 2	Groundwater withdrawal.	The PEIS states that the Rio Blanco County ground water withdrawal rate is 15,000 ac-ft/yr (88% of which is for coal, oil and gas). The annual ground water withdrawal rate is out of context. Most of this occurs either outside the oil shale development area or from deeper formations.	Place groundwater withdrawal amounts in context with specific ground water use in the Piceance Basin.	52863-099
Section 3.4.2.1, p. 3-76, ¶ 7	Groundwater withdrawal.	"In 1995, the total groundwater withdrawal for the overall Piceance Basin's five counties amounted to nearly 46,000 ac-ft. Groundwater is possibly being mined (i.e., overdrawn) in the basin, resulting in depletion of the aquifer system." The statement implies that the 46,000 ac-ft is being withdrawn from the Piceance Basin aquifers. In fact, most of the withdrawal is from the alluvium of the White and Colorado Rivers. When compared to the stated recharge rate of 34,400 ac-ft estimated for the Piceance Basin, it leads to the erroneous comment that ground water is possibly being mined or overdrawn because withdrawal exceeds recharge.	This statement needs to be removed or qualified. The ground water withdrawal rate from the Piceance Basin should be stated if it is to be compared with the recharge rate. Proposed language: "The high concentrations of TDS in many units of the Parachute Creek (oil shale) and overlying Uinta (sandstone) formations limit the immediate uses of local groundwater. TDS concentrations in excess of 3,000 mg/L, which are inherent in parts of some of the units, establish a general aesthetic limit for potability for some users, and a practical economic limit for treatability for some users. TDS concentrations in excess of 10,000 mg/L, which are characteristic of part of the "lower aquifer" and the saline zone immediately in contact with the nahcolite units, exceed regulatory limits for an underground source of drinking water (USDW). These high TDS concentrations highlight problems that will be encountered by entities attempting to produce such waters for commercial, agricultural, or domestic-use purposes. Moreover, the significant depths of much of the Parachute Creek formation limit accessibility for practical reasons, which further limits the use of these aquifers."	52863-100
Section 3.4.2.1, p. 3-76, last ¶	Water quality.	"Aquifers below the Green River Formation aquifers are generally not viable because of poor water quality…" There are waters of limited use within the Green River formation also. The "dissolution surface," as defined in USGS literature of	Include all Green River Formation aquifers with TDS > 10,000 mg/L as not viable.	52863-101

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		the 1970s and 1980s, is a very high TDS zone in contact with significant nacholite that is more or less in the center of the basin. This unit also is not of useable quality due to extremely high TDS, > 10,000 mg/L.		52863-101 (cont.)
Section3.4.2.1, p. 3-77	Refine statement to reflect status of groundwater resources to include oil and gas extraction.	"Essentially the only groundwater users in the northern province of the Piceance Basin (apart from the White River alluvium) are ranchers. An exception during the 1970s and early 1980s was oil shale exploration; the brevity of the development period, however, left the groundwater resources essentially untouched (Czyzewski 2000)."	Groundwater resources in the basin may be utilized by existing oil and gas development subject to Colorado water rights law. Clarify text accordingly.	52863-102
Section3.4.2.1, p. 3-77, ¶ 2	Mining impacts.	"Topper et al. (2003) list common sources of groundwater contaminants from Colorado mining operations and their associated drinking water standards. These include selenium (0.05 mg/L), iron (0.3 mg/L), manganese (0.05 mg/L), and arsenic (0.01 mg/L). Uranium is also listed as a potential contaminant resulting from mining." The PEIS statement about contaminants from mining is out of context. There is no metal mining; nor is there surface or underground mining for oil shale in the oil shale development areas of the Piceance Basin. None of the common ground water contaminants listed by Topper et al. (2003) as being associated with mining operations, generally, are necessarily associated with oil shale deposits or oil shale mining. It is inappropriate to attribute a general list of Colorado-wide contaminants to any specific deposit, oil shale or otherwise.	Revise text to reflect that there is no metal mining; nor is there surface or underground mining for oil shale in the oil shale development areas of the Piceance Basin. Based on water quality data developed for the Ca and Cb tracts, USGS wells in the Piceance basin, and water quality at mines throughout Colorado, the following can be said. Uranium concentrations in ground water in exceedance of Uranium standards at Colorado mines is associated with Uranium mines only, and is not associated with oil shale ground water. Arsenic is present rarely in some Colorado base and/or precious metal deposits, but not with oil shale. Manganese, while present to common at some base and precious metal mine drainages is not present in elevated concentrations in oil shale related waters.	52863-103
Section 3.4.2.2, p. 3-77	Clarification.	"The White River and Colorado River are administered by two different Water Districts in Colorado."	"The White River and Colorado River are administered by two different Water Districts in Colorado**, Colorado Water District 6 and 5, respectively**."	52863-104
Section 3.4.2.2, p. 3-77	Surface water runoff.	Addition of a couple sentences about drought year averages to the discussion of seasonal streamflow fluctuation would be helpful.	Consider including information about drought years and changes in seasonal flows.	52863-105
Section 3.4.2.2, p. 3-77, ¶ 4	Surface water runoff.	Inappropriate characterization of precipitation could lead to incorrect inferences about runoff from disturbed lands and revegetation success. Average annual precipitation in higher elevations of the White River leasing area ranges from 25" – 32" rather than as much as 48". The latter appears to be derived from	Recommend reviewing and incorporating data from Topper et al. 2003, and data from the Western Regional Climate Center (http://www.wrcc.dri.edu/summary/Climsmco.html).	52863-106

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		mapping of the Flat Tops area located to the east.		
Section 3.4.2.2 Figure 3.4.2-1, p. 3-78	Clarification.	The geographic representation could be better described. Text on page 3-77 refers to Yellow Creek. Figure 3.4.2-1 does not include Yellow Creek.	Please add Yellow Creek downstream of Corral Gulch to Figure 3.4.2-1. Corral Gulch is a tributary of Yellow Creek. Two of Shell's three PRLs are in the Yellow Creek drainage, while the remaining PRL and the EGL PRL are in the Ryan Gulch and Piceance Creek drainages.	52863-107
Section 3.4.2.2, p. 3-79, ¶ 3	Surface water runoff.	Shell's operations are located between Rifle and Meeker, and the watersheds in that area are tributary to the White River. The area does not drain to the Colorado River directly in that location.	Please edit the reference of Colorado River tributaries from located between "Rifle and Meeker," to between "Rifle and Grand Junction."	52863-108
Section 3.4.2.2, p. 3-79, ¶ 6	Colorado River Basin Salinity Control Forum.	Compliance with individual states' implementation of the Colorado River Basin Salinity Control Forum will be a requirement for all operations. Characterization of the salinity in the basin using data that is over 30 years old (USGS 1968) does not provide adequate background information to serve current development.	Consider referencing another source or Nancy J. Bauch and Norman E. Spahr. Salinity Trends in Surface Waters of the Upper Colorado River Basin, Colorado, J. Environ Qual 1998 27: 640-655.	52863-109
Section 3.4.4.2, p. 3-89	Text edit.	"Most of other creeks in the basin, such as Sand Creek, Shell Creek, and Barrow Spring Draw, are ephemeral."	"Most of the other creeks in the basin, such as Sand Creek, Shell Creek, and Barrow Spring Draw, are ephemeral."	52863-110
Section 3.5.1.1, p. 3-93, ¶¶ 2, 3 Figure 3.5.1-1, p. 3-94	Air.	The text in paragraph 2 states that winds are "predominantly westerly winds." Text in paragraph 3 describes the predominant prevailing wind direction in the region as from the west and southwest. However, these statements conflict with wind rose data shown in Figure 3.5.1-1 which, for the Piceance Basin, defines wind direction by Grand Junction and Meeker airport data. Data from both of these stations imply a predominant wind blowing toward the west. Neither of these stations represent a regional Piceance Basin wind, which is predominantly to the northeast. For the Piceance Basin, this figure is misleading. Wind direction data from Douglas Pass or Airplane Ridge meteorological stations would be more representative of the Piceance Basin region. Reliance on this data alone could lead to misconceptions and erroneous conclusions about regional air impacts from oil shale development.	The data sets shown on Figure 3.5.1-1, surrounding the Piceance Basin (Meeker and Grand Junction) show a wind pattern strongly influenced by local valley flows and not winds that predominate from the west or southwest as stated on page 3-93. There are publicly available meteorological data sets in and around the Piceance Basin region and above the valleys that indicate that regional winds predominate from the southwest throughout the basin. It might be more useful to the public to include data from at least one of the following stations: Douglas Pass, collected by the State of Colorado, or Airplane Ridge, collected by Shell. Both data sets are available from Colorado Department of Public Health and Environment-Air Pollution Control Division.	52863-111
Section 3.5.3, pp. 3-101, 3-106, Table 3.5.3-3	Terminology for Colorado Class I SO_2 increment areas.	Dinosaur and Colorado National Monuments are referred to as "Colorado Category I areas," creating possible confusion in terminology. "Category I" is used in the outdated listing of Colorado-specific PSD increments for SO_2. This terminology is	The preferred terminology for Class II areas in Colorado in which, Class I PSD increments for SO_2 apply would be "Colorado Class I SO_2 Increment areas."	52863-112

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		not used in the Colorado rule listing Dinosaur and Colorado National Monuments as being subject to PSD Class I increments for SO_2.		52863-112 (cont.)
Section 3.5.3, p. 3-102, Table 3.5.3-1, footnote f	Ozone designations.	The PEIS does not mention EPA's proposal to revoke the 1-hour O_3 NAAQS for 13 of the 14 EAC Areas.	For completeness, consider adding the statement that on Feb. 6, 2008, EPA published a proposal to revoke the 1-hour O_3 NAAQS for 13 of the 14 EAC Areas, as of one year after the effective date of the attainment designations under the 8-hour O_3 standard.	52863-113
Section 3.5.3, p. 3-103, footnote 10	Clarify the areas referred to.	The footnote refers to "the area," without further designation.	It should be revised to state that the "Colorado Class I SO_2 Increment areas" are not designated as PSD Class I areas, but under Colorado regulations the Class I PSD SO_2 increments apply.	52863-114
Section 3.5.3, p. 3-103	Class I areas potentially affected.	The text states that potential air quality for Class I areas northeast of the study area would be affected because the predominant wind direction is from the southwest in the region. However, potential impacts are not necessarily limited to Class I areas in the path of predominant winds.	The sentence should be revised to state that air quality in the listed study areas might be affected.	52863-115
Section 3.5.3, p. 3-105, Table 3.5.3.2, footnote a	Description of ozone NAAQS.	The description of the 8-hour ozone NAAQS states that compliance is determined by the 4th highest value. However, compliance is based on the 4th highest values averaged over 3 years.	Revise to include 3-year average in the description.	52863-116
Section 3.7.1.1.4, p. 3-119, ¶2	Clarification.	This section, which is a discussion of aquatic ecological resources in the Piceance basin, overstates the importance of some of the White River tributaries to aquatic resources. For instance, much of Yellow Creek approximately 6 miles upstream from the confluence is dry except during runoff, and even those segments that do run year-round do not support fish. Ryan Gulch is dry except in the uppermost reaches during runoff, and does not support fish. While trout do abide in Piceance Creek, and warm water species do occupy the lowermost reach of Yellow Creek, most of Yellow Creek and Ryan Gulch do not host fish at all.	Please revise text as appropriate.	52863-117
Section 3.10.2, p. 3-211	Current conditions.	The text should acknowledge the positive impacts of the steady, ongoing growth of RD&D projects since 1995. To date, oil shale research has provided many benefits to the local communities, and the text should be revised to reflect that.	Revise text to acknowledge benefits to local communities from oil shale research.	52863-118
Section 3.10.2.1, p. 3-213, Figure	Geographical scope of impacts.	It is unlikely that the effects of commercial development of oil shale in any of the areas will be confined to communities within	The text needs to be revised to recognize that locations outside the presently identified ROIs could	52863-119

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3.10.2-1		the specific state in which the project is located, particularly given the proximity of Grand Junction to the resource areas in Utah. Finally, the defined ROIs are not consistent with the assumptions regarding electrical power generation, e.g., the 150-mile radius criteria would encompass power plants in both Colorado and Utah for developments in Wyoming.	be impacted by oil shale development in neighboring states. The text needs to be revised to acknowledge and analyze the potential for impacts in other areas.	52863-119 (cont.)
Section 3.10.2.1.2, p. 3-214, ¶ 1	Employment.	The text and Table 3.10.2-4 focus on 2004 employment statistics; yet, employment has continued to grow in the natural gas-producing counties in the ROI in all states. The discussion of employment and labor market conditions needs to further address the potential implications of future oil and gas development with respect to oil shale.	The text should be revised to reflect the continued dramatic employment growth in many of these counties, and more current, available statistics should be used.	52863-120
Section 3.10.2.2, p. 3-217, ¶ 2, last sentence	Correction.	The economic and social disruption that occurred as a result of the oil shale bust in the mid 1980's was severe. However, the last sentence says: "In Rifle, this signaled the beginning of a "20-year recession," with the economy of Garfield County not recovering until the mid-1990s." This sentence needs to be corrected. Black Sunday occurred in 1982 and the mid 1990's is not 20 years from 1982.	The text should be revised to reflect that economic indicators show the recession lasted less than ten years in both Garfield and Mesa counties.	52863-121
Section 3.10.2.2, p. 3-219, ¶ 2, last two sentences	Clarification.	The discussion in the last two sentences of this paragraph needs to be revised to acknowledge the energy industry's considerable efforts to work with local and statewide institutions of higher learning to develop college and vocational programs to provide advanced learning opportunities for the youth and residents of northwestern Colorado.	Revise text accordingly.	52863-122
Section 3.10.2.2.1, p. 3-219	Clarification of entity name.	Reference to "Garfield County's Energy Impact Board" is incorrect.	The correct name of the entity is the Energy Advisory Board (EAB).	52863-123
Section 3.10.2.2.2, p. 3-221, ¶ 1 and Table 3.10.2-6	Population statistics.	This paragraph and Table 3.10.2-6 refer to population statistics from the 2000 census, which are now almost eight years old. Both the US census Bureau and the respective states have published population estimates for 2006, which should be discussed in the text. This is particularly important in the Colorado ROI because substantial population growth has occurred over the last several years.	The text needs to either update population statistics or acknowledge that considerable growth has occurred in recent years.	52863-124
Section 3.10.2.2.3, p. 3-223, ¶ 1	Correction.	"There has been little support from energy companies where existing roads need to be upgraded." This statement is not accurate.	Text should be revised to reflect the fact that Shell, alone, has contributed approximately one half million dollars for county roads over the last five years in the vicinity of their private research project, not including other in-kind work.	52863-125

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Sections 3.10.2.2.5 through 3.10.2.2.7, pp. 3-224 to 231	Social disruption.	These two sections and the subsequent sections in Chapter 4 dealing with social disruption ignore the social change that has been occurring in most communities in all three ROIs over the past quarter century or more. Much of the literature on social change associated with energy development during the 1970s and 1980s describes effects on small, stable, culturally cohesive and relatively isolated rural communities. In contrast, many of the communities in the three ROIs have undergone extensive growth and development during the recent past, associated with energy and mining development, tourism/recreation, retirement and second home development, and lifestyle migration. In the case of some of the communities in the Colorado ROI, a combination of development from all these factors has occurred. In fact, there are few small, stable rural communities left in the Colorado ROI; most communities have undergone population growth and/or social change.	The text needs to be revised to analyze and discuss these kinds of social changes and social trends to better articulate how these communities might be affected under the oil shale development alternatives.	52863-126
Section 3.10.2.2.4, p. 3-225, Table 3.10.2-9	Public service employment.	The totals for the statewide levels of service are not the sums of the other entries as they are for the ROIs. This inconsistency makes the ROIs seem underserved relative to other parts of the state. Given recent growth, the lack of parallel structure makes government services in the ROIs appear deficient, which could, in turn, inadvertently skew the assessment of impacts associated with growth.	The text should be revised to reflect that these differences represent definitional inconsistencies (and the inclusion of state employees in the latter) or the information should be further analyzed to ensure parallel structure and interpretation.	52863-127
Section 3.10.2.2.5, p. 3-229, ¶ 4, line 7.	Correction.	"In addition to population growth rates, the EIS suggests cultural similarities between existing and new residents and the perceived political helplessness of local residents also cause social disruption."	"In addition to population growth rates, the EIS suggests cultural **dissimilarities** between existing and new residents and the perceived political helplessness of local residents also cause social disruption."	52863-128
Section 3.10.2.2.6, p. 3-230, Table 3.10.2-12	Typo.	Total Crime Rate for Wyoming in 2001 appears to be a typo.	Verify information and correct if necessary.	52863-129
Sections: 3.10.3, pp. 3-231 to 3-233	Recreation economy.	There are no major tourism or recreation attractions within or immediately adjacent to the most likely area for oil shale development in the Colorado ROI. These areas are used primarily for hunting and other forms of dispersed outdoor recreation. There are few developed recreation sites near these areas.	The text should be revised to include a discussion of the recreation resources that are both in the ROI and near the oil shale development areas, and the role those specific resources play in the recreation economies and visitor statistics in each ROI. An area-specific description of recreation resources would yield clearer insights into the kinds of resources that could be impacted and the types of on-	52863-130

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			and off-site measures that could mitigate these impacts.	52863-130 (cont.)
Section 3.10.3, p. 3-231, footnote "b"	Typo.	"Divorce rates are the number of crimes per 1,000 population. Data are for 2004."	"Divorce rates are the number of **divorces** per 1,000 population. Data are for 2004."	52863-131
Section 3.10.3.2, p. 3-233 and Table 3.10.3-1, p. 3-232	Clarification.	This section and the associated table appear to overstate expenditures in many of the areas included in the recreation sector (e.g., amusement, eating and drinking places, hotels and lodging places and recreational vehicle parks) because they are being made by business visitors, transient natural gas workers and interstate travelers, who thereby overstate such recreation expenditures, employment and income.	The text should be revised to reflect that many businesses that profit from tourism and recreation would also benefit from oil shale development.	52863-132
Chapter 4	Mitigation measures.	NA	Instead of proposing new conservation measures, we suggest use of existing regulatory programs, best management practices, management plans and agency practices that are already incorporated into oil and gas and mining activities today.	52863-133
Section 4.1, p. 4-2 and Table 4.1.3-1, p. 4-11	Energy production assumption.	PEIS assumes a "200,000 bbl/day of oil" production, but it fails to mention that there will likely be associated gas production of approximately another 100,000 barrels equivalent (natural gas production converted to an equivalent liquid basis) based on our research. This additional energy recovery does not appear to be accounted for elsewhere in the document. In Table 4.1.3-1 on p. 4-11, the PEIS refers to 200,000 bbls/day without stating clearly whether it is barrels of oil or barrels equivalent (which includes gas production).	Clarify whether assumed production rates are barrels of oil or barrels equivalent (which includes gas production).	52863-134
Section 4.1, p. 4-4, Table 4.1.1-1	Employment assumptions.	This table includes the employment assumptions for construction. However, the assumptions presumably reflect the average employment during construction but don't indicate the assumed duration of construction, the peak construction employment, or duration of the peak. Awareness of the peak is an important element of the socioeconomic impacts, particularly since it sets up different issues with respect to housing, public service, and facility demands.	The text needs to be revised to include an analysis of the socioeconomic impacts attributable to the temporary/short-term peak impacts.	52863-135
Section 4.1, p. 4-4, Footnote f to Table 4.1.1-1	Correction.	The footnote makes reference to Section 4.11 and Appendix G for information regarding the methodology and the derivation of the indirect employment projections. Neither source documents the IMPLAN sectors, year on which the IMPLAN model is based, or the multipliers used in the assessment. This	Revise text accordingly. The multipliers for the three ROIs should also be displayed in Appendix G.	52863-136

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		information is important to assess the reasonableness of the employment estimates, and the text should be revised accordingly.		52863-136 (cont.)
Section 4.1.4, p. 4-12	Processing and infrastructure.	Text does not mention gas pipelines currently in place that could be utilized by oil shale projects. Oil shale projects could also utilize the existing rights-of-way to place oil pipelines along the same routes.	Assumption is reasonable at research and development stage, but because actual infrastructure needs may vary, they will be analyzed in greater detail in site-specific NEPA analysis later.	52863-137
Section 4.1.7, p. 4-12, ¶ 4	Processing and infrastructure.	"It also has been assumed that all processing required to upgrade the oil shale product to render it suitable for pipeline transport and acceptance at refineries would be conducted on-site."	Assumption is reasonable at research and development stage, but because actual infrastructure needs may vary, they will be analyzed in greater detail in site-specific NEPA analysis later.	52863-138
Section 4.1.7, p. 4-15	Processing and infrastructure.	Text assumes the production will be shipped to existing refineries (to the East and Gulf).	Assumption is reasonable at research and development stage, but because actual infrastructure needs may vary, they will be analyzed in greater detail in site-specific NEPA analysis later.	52863-139
Section 4.1.7, p. 4-15, ¶¶ 4, 5	Processing and infrastructure.	References that the most likely market for products will be the Midwest and the Gulf Coast and that development of additional refinery capacity is not considered to be necessary as a result of oil shale development.	Assumption is reasonable at research and development stage, but because actual infrastructure needs may vary, they will be analyzed in greater detail in site-specific NEPA analysis later.	52863-140
Section 4.2.2, p. 4-21	Consultation with stakeholders.	Consultation with stakeholders regarding concepts and strategies for future land use is a good idea. However, certain stakeholders may advocate land use actions that are not acceptable to oil shale proceeding forward.	Language should not require that oil shale companies adhere to all stakeholder input, but rather consider input.	52863-141
Section 4.2.2, p. 4-21 to 22	Consolidation of infrastructure. Employer-provided housing. Electricity power generation.	With regard to consolidation of infrastructure, employer-provided housing, and electricity power generation, there needs to be flexibility/recognition that other parameters need consideration as well as consolidation, and the development of a project plot plan necessarily requires a balance of many factors.	Incorporate flexibility and recognition that other parameters need consideration as well.	52863-142
Section 4.3.1.1, p. 4-25, ¶ 2	Surface disturbance acreage.	150 to 600 acres of surface disturbance at any one time is simply for illustration and not a limit since it is unknown at this time how much surface disturbance will be necessary for development.	Clarify text as appropriate.	52863-143
Section 4.4.2, p. 4-28 ¶ 4	Professional paleontologist.	Possible requirement that a qualified professional paleontologist be on site during excavation and earthmoving activities in areas deemed a high potential for fossils even though no fossils were identified during the paleontological survey should be reconsidered.	Proposed language: "In the event fossils are encountered during preliminary surveys or excavation activities, a qualified professional paleontologist may be required to witness further excavation."	52863-144

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Section 4.5.1, p. 4-29	Existing regulations.[3]	Text fails to recognize current regulations for Stormwater Construction and operating permits, Stormwater Management Plans, and Best Management Practices.	BLM should note these are already governed by existing regulations.	52863-145
Section 4.5.1, p. 4-29 and Section 4.5.3, p. 4-43 to 45	Existing regulations.[4]	Text fails to recognize current regulations for Stormwater Construction and operating permits, Stormwater Management Plans, and Best Management Practices.	Include recognition of current regulations for Stormwater Construction and operating permits, Stormwater Management Plans, and Best Management Practices.	52863-146
Section 4.5.1.3, p. 4-33	Existing regulations.[5]	The discussion of potential environmental consequences from contaminant sources, waste handling and discharge, acknowledges that injection is permitted through EPA, but does not identify that any of the other impacts are under regulatory control. This leaves the impression that oil shale development would not be performed in an environmentally responsible manner and in accordance with existing local, state and federal regulations.	BLM should note these are already governed by existing regulations. The discussion should also note that all oil shale development, discharges and waste handling would be controlled by permits with applicable local, state and federal land use agencies charged with the protection of land and water. Specifically, state mining agencies regulate extraction and the management of mining waste; federal land management agencies, state environmental regulatory agencies, and some local jurisdictions regulate non-point source discharges; and state environmental agencies regulate point source discharges and hazardous waste handling.	52863-147
Section 4.5.1.3, p. 4-34, ¶ 1	Existing regulations.[6]	The statement that discharge of surface runoff at a mining site is exempted from NPDES permits provides an inaccurate characterization of the industry's protection of the environment and existing regulatory requirements. Mine sites are subject to Stormwater Management permits and BMPs, and NPDES permits for point source discharges.	BLM should note these are already governed by existing regulations and revise paragraph to document that surface runoff at mining sites are subject to Stormwater permits and NPDES permits.[7]	52863-148
Section 4.5.1.3, p. 4-34, ¶ 5	Leachates.	This paragraph presumes, without evidence, that leachates from overburden have high salinity.	This paragraph should be re-oriented to indicate that retention ponds for process water, spent shale and fly ash leachates will have low permeability floors which will minimize the migration of contaminants,	52863-149

[3] This is an additional example relating to Section E in the comment letter.
[4] This is an additional example relating to Section E in the comment letter.
[5] This is an additional example relating to Section E in the comment letter.
[6] This is an additional example relating to Section E in the comment letter.
[7] See http://www.cdphe.state.co.us/wq/PermitsUnit/PolicyandGuidance/ProcessandSWMiningApplication.pdf, http://www.waterquality.utah.gov/UPDES/EPAForm2C.pdf, http://www.waterquality.utah.gov/UPDES/Group3Cover.pdf, http://deq.state.wy.us/wqd/WYPDES_Permitting/downloads/ShtFormF.htm , and http://deq.state.wy.us/wqd/WYPDES_Permitting/WYPDES_Storm_Water/stormwater.asp#Min-min%20permit.

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			and that disposal alternatives for waste rock will take into consideration containment requirements in light of the potential for leachate generation and migration in semi-arid environments.	52863-149 (cont.)
Section 4.5.1.3, p. 4-34, ¶ 6	Pesticide and herbicide use.[8]	This is an example of the PEIS raising an issue that sounds like a potential concern, when in reality it is regulated by existing programs. Pesticide and herbicide use is controlled by applicable local, state and federal land use agencies, and is likely to be performed by certified applicators.	This paragraph should indicate that pesticide and herbicide use is already controlled by applicable local, state and federal land use agencies, and is likely to be performed by certified applicators.	52863-150
Table 4.5.2-1, p. 4-40 footnote C	Conversion from barrels to gallons.	"bbl = barrel; 1 barrel water = 55 gal, 1 barrel oil = 42 gal."	To the best of our knowledge, when discussing energy development, 1 barrel of water has always been equal to 42 gallons, not 55 gallons.	52863-151
Section 4.5.3, p. 4-43 to 45	Existing regulations.[9]	Text fails to recognize current regulations for Stormwater Construction and operating permits, Stormwater Management Plans, and Best Management Practices.	BLM should note these are already governed by existing permitting and state regulations.	52863-152
Section 4.5.3, p. 4-44, ¶ 3	Water treatment.	"Water should be treated and recycled as much as possible." Certain waters, such as non-contact stormwater do not need to be treated as they are essentially clean.	"Water should be treated and recycled as much as **practical**."	52863-153
Section 4.5.3, p. 4-44, ¶ 4	Reclamation of disturbed areas.	"The size of cleared and disturbed lands should be minimized as much as possible and reclaim disturbed areas as quickly as possible." There may be times when waiting to reclaim disturbed areas is economically advantageous and more environmentally acceptable. For example, a 5-acre parcel may be reclaimed now, but in 6 months a 40-acre parcel will need reclaiming. By combining the two, money and resources are saved. In addition, soils can be better protected and erosion minimized by ensuring that the reclaimed areas are not redisturbed.	"The size of cleared and disturbed lands should be minimized as much as possible and reclaim disturbed areas as quickly as **practical**."	52863-154
Section 4.5.3, p. 4-44, last bullet	Clarification.	Implementation of the culvert sizing recommendation is based on incorrect application of culvert sizing and would prove unnecessary, costly and would increase disturbance areas.	Recommendations on culvert sizing may be appropriate for installations on perennial streams, but are tremendously oversized for ephemeral and intermittent streams found in the areas. We recommend that culvert sizing be in compliance with applicable state and federal requirements, and that it	52863-155

[8] This is an additional example relating to Section E in the comment letter.
[9] This is an additional example relating to Section E in the comment letter.

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			take the flow regime into consideration.	52863-155 (cont.)
Section 4.5.3, p. 4-45, ¶ 6	Contour berms and trenches.	"Contour berms and trenches could be installed around vehicle service and refueling areas, chemical storage and use areas, and waste dumps to fully contain spills. Liners could be used as needed to prevent seepage into groundwater."	Change text to: "Containment systems around vehicle service and refueling stations should follow existing practices found in spill prevention control and countermeasure (SPCC) guidance and Stormwater Pollution Prevention Plan (SWPPP)."	52863-156
Section 4.5.3, p. 4-45, last bullet	Stormwater Pollution Prevention Plan.	The requirement for an erosion and sedimentation plan in addition to a Stormwater Pollution Prevention Plan (SWPPP) is duplicative with existing state requirements and protections.	The requirement of an erosion and sedimentation plan would be excessive on top of required stormwater plan under existing regulations.	52863-157
Section 4.6.1, p. 4-46	Impacts on lake chemistry.	The text refers to "atmospheric deposition," without indicating what is deposited.	Revise to state that atmospheric deposition of sulfur and nitrogen compounds could cause changes in lake chemistry.	52863-158
Section 4.6.1, p. 4-46, 2nd bullet	Long-term impacts.[10]	This paragraph attempts to discuss the long-term possible impacts and is misleading. From work done to-date, we believe that there will be few, if any, near-field unacceptable impacts; these will all be resolved with current control technologies that all facilities will be required to install. Except for ozone, all impacts of concern will be far-field and regional impacts, and primarily related to Class 1 area Air Quality Related Values. Ozone and VOC / NOx emissions will have to be addressed in order to obtain air permits. To mention CO as a pollutant of issue outside of a large urban area is also overstated.	The 2nd bullet on page 4-46 is speculative, overstated and should be removed; particularly references to "potential impacts on human health and vegetation" and "health risks to workers and nearby residences." As stated later in Section 4.6.1, impacts on air quality, as well as human health and the ecosystem, will be limited to acceptable levels by applicable federal, state and local air quality regulations.	52863-159
Section 4.6.1, p. 4-46	Permit review.	The last paragraph on page 4-46 states that proposed new or modified air emissions sources undergo permitting review, but don't distinguish between minor and major sources.	After the sentence referring to permitting, add that permits for major sources must include requirements to install Best Available Control Technology to minimize emissions; and issuance of permits is conditioned on conducting air quality modeling to ensure the project does not cause or contribute to violations of PSD increments or adversely impact air quality-related values, including visibility, in Class I areas.	52863-160
Section 4.6.1, p. 4-47 to 48.	Existing regulations.[11]	As stated in Section 4.6.1, impacts on air quality, as well as human health and the ecosystem, will be limited to acceptable levels by applicable federal, state and local air quality regulations.	BLM should note these are already governed by existing permitting and state regulations.	52863-161
Section 4.6.1,	Inaccurate inclusion	In paragraph 2, it is inaccurate to include NOx in the listing of	The 2nd and 3rd paragraphs should be deleted since	52863-162

[10] This is an additional example relating to Section E in the comment letter.
[11] This is an additional example relating to Section E in the comment letter.

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p. 4-48, ¶¶ 2 to 3	of NOx as a greenhouse gas.	greenhouse gases.	they are redundant to discussions in Section 3.5.1.2-Global Climate Change, and any further or more detailed discussions are academic and speculative in the absence of regulatory authority, policy and framework.	52863-162 (cont.)
Section 4.6.1.1.2, p. 4-49	Discussion of production impacts.	Sources of production emissions include "support utilities" but do not specifically mention power plants.	Because electrical generation could be a major source of emissions, consider modifying this to refer to support utilities, including power plants.	52863-163
Section 4.6.2, p. 4-50	Mitigation measures.	"… it is unlikely that future oil shale development would cause significant adverse air quality impacts."	We agree with this statement and the section that supports it since existing regulatory and permitting programs will minimize and manage impacts.	52863-164
Section 4.7.1.5, p. 4-56, ¶ 2	Clarification.	"The Shell ICPs use large amounts of electricity…" Without quantification, this statement has little meaning and may not necessarily be true when compared to other technologies.	"The Shell ICPs use ~~large amounts of~~ electricity…"	52863-165
Section 4.7.2.2, p. 4-59, ¶ 5	Limited construction activities to daytime only operations.	Limiting construction activities to daytime-only operations results in delayed schedules and excessive cost.	Limitations to daytime operations are not warranted at a PEIS stage. Nighttime activities are generally acceptable both during construction and operation for most activities.	52863-166
Section 4.8.1.1, p. 4-62	Clarification.	Text states: "Spent shale remaining on the surface could become a chronic source of contaminated runoff unless adequate containment measures are implemented or unless it is transported offsite for disposal."	Change text to: "Oil shale development is subject to Stormwater Management permits and BMPs, and as such, BMPs would be applied to spent shale to control quality and quantity of runoff."	52863-167
Section 4.8.1.3, pp. 4-70 to 4-80	Include additional subsection labels.	This section includes subsections on general effects of habitat destruction, wildlife disturbance, noise, mortality or injury, and exposure to contaminants.	To make the discussion more readable, include subcategories based on types of activities or species within these subsections. For example, within the mortality or injury section, vehicle collisions, power line electrocutions, and habitat exposure and stressors, could be discussed separately.	52863-168
Section 4.8.1.3.5, p. 4-79	Water-based spills.	This section specifically discusses the effects of a land-based spill of contaminants, but there is no discussion of water-based spills.	Add discussion of water-based spills, but note limited water resources in this area, many dry drainages, semi-arid, etc.	52863-169
Section 4.8.1.3.5, p. 4-79	Herbicide effects.	This section discusses effects of herbicide use, without any context for how and when herbicides might be used in oil shale construction or operation.	Provide some background on how and why herbicides may be used, including control of noxious weeds to meet BLM and Colorado DRMS requirements for weed control.	52863-170
Section 4.8.1.4, p. 4-83 ¶ 4	Animal presence.	"Larger, more mobile animals…would leave the project area."	It should be noted that Shell personnel have seen and documented numerous large mammals at project sites from wild horses to elk, deer, coyotes, bears,	52863-171

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			etc.	52863-171 (cont.)
Section 4.8.1.4 , p. 4-85, ¶ 3, line 11	Threatened and endangered species.	"Three ACECs in the Piceance Basin of Colorado (Duck Creek, Ryan Gulch, and Dudley Bluffs) were established to protect known populations of the Dudley Bluffs twinpod and Dudley Bluffs bladderpod. These areas would not be available for leasing, and, therefore, would be protected from the direct effects of oil shale development. This action reduces the potential for impact on these species but does not necessarily eliminate it, as individuals could occur outside of the ACECs in suitable habitat." This statement is true for Alternative C as proposed in the PEIS. This statement is in the broader section 4.8 (Ecological Resources) 4.8.1 (Common Impacts) 4.8.4 (T&E and sensitive species) and is in direct conflict with the primary discussions of the ACECs in Alternative B as they are available for leasing subject to field office planning documents including the RMP and stipulations.	The statement on Page 4-85 needs to be clarified to address Alternative C only.	52863-172
Table 4.8.1-4, p. 4-99	Mitigation measures for wildlife and endangered species.	Four endangered fish can be found in the Colorado and/or White Rivers. These include the bonytail, Colorado pikeminnow, humpback chub, and razorback sucker. This table specifies that depletions from the Colorado River Basin are considered an adverse effect. There is no basis for this conclusion.	Any proposed activity with potential effect to these endangered species must be reviewed by the US Fish and Wildlife Service to determine the effect of the activity. Consultation must result in a biological opinion that the action will not jeopardize the continued existence of these species. It is premature for the BLM to determine that water depletions from the Colorado River Basin are universally considered an adverse effect to the species. Timing, season, and other mitigation measures included in a specific proposal will be considered in determination of the potential effect.	52863-173
Section 4.8.2.1, p. 4-102	Clarification.	"Avoid (if possible) or mitigate changes in the function of the 100-year floodplain or flood storage capacity." Strict adherence to this stipulation would greatly impact ability to develop projects. To "avoid (if possible) or mitigate" is overly general, and fails to consider management as a tool for resource protection. Resource management, as will be put forward through the resource	"Avoid (if possible) or **minimize and** mitigate changes in the function of the 100-year floodplain or flood storage capacity **in accordance with Army Corps of Engineers requirements. Mitigation measures will also include management under the authorities of the BLM Resource Management Plan including utilization and development of oil, gas, oil shale, and other resources.**"	52863-174

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		management plans, promotes multiple uses while managing resources and adverse environmental impacts. Avoidance per se leaves no room for mineral resource development, and mitigation unjustifiably presumes that adverse impacts will follow mineral development, which is not an accurate or justified assessment.		52863-174 (cont.)
Section 4.8.2.1, p. 4-102	Clarification.	"Avoid (if possible) or mitigate water quality degradation (e.g., chemical contamination, increased salinity, increased temperature, decreased dissolved oxygen, and increased sediment loads) that could result from construction and operation."	"Avoid (if possible) or **minimize and** mitigate**, in accordance with water quality regulations,** water quality degradation (e.g., chemical contamination, increased salinity, increased temperature, decreased dissolved oxygen, and increased sediment loads) that could result from construction and operation. **Mitigation measures will include management under the authorities of the BLM Resource Management Plan including utilization and development of oil, gas, oil shale, and other resources.**"	52863-175
Section 4.8.2.1, p. 4-102	Clarification.	"Avoid (if possible) or mitigate the impacts on aquatic habitats (including springs, seeps, and ephemeral streams), wetlands, and riparian areas that could result from changes to surface or groundwater flows."	"Avoid (if possible) or **minimize and** mitigate**, in accordance with existing Army Corps of Engineers and water quality regulations,** the impacts on aquatic habitats (including springs, seeps, and ephemeral streams), wetlands, and riparian areas that could result from changes to surface or groundwater flows. **Mitigation measures will include management under the authorities of the BLM Resource Management Plan including utilization and development of oil, gas, oil shale, and other resources.**"	52863-176
Section 4.8.2.2, p. 4-103, 2nd bullet, last sentence	Plant Communities and Habitats.	"Only locally native plant species would be used for the reclamation of disturbed areas to reestablish native plant communities." Carefully selected introduced species in combination with native plant species can often more effectively establish long lasting native plant communities while also providing for quick soil stabilization and erosion control.	Use of carefully selected introduced species should not be categorically excluded; but, rather, individual seed mixes appropriate for a specific site should be evaluated through review of the proposed Plan of Development.	52863-177
Section 4.8.2.3, p. 4-104	Mitigation measures for wildlife – speed limits.	NA	Consider including state and county-posted speed limits in list of potential mitigation measures to avoid mortality from vehicle collisions external to the project site.	52863-178

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
Section 4.8.2.3, p. 4-104	Habitat impacts – suggested rephrasing.	Text states: "Where habitat impacts cannot be avoided, these losses could be mitigated by habitat enhancement or compensatory habitat mitigation of in-kind, high value habitat areas developed in coordination with the USFWS and state fish and game departments."	Change text to: "Habitat enhancement and in-kind compensatory habitat are options available when developing a wildlife management plan for a project."	52863-179
Section 4.8.2.3, p. 4-104, ¶ 4	Habitat impacts – netting across water pits.	Text states: "Avoid (to the fullest extent practicable) the creation of open surface water bodies (including wastewater pits). Any surface water body created for projects would be netted and fenced to prevent use by all wildlife." Netting may be appropriate for reserve pits, which may contain hydrocarbons and be a hazard for wildlife, but not for actual water pits. Water bodies may be utilized to the benefit of wildlife, and netting should only be required when water chemistry demonstrates a need.	Change text to: "Water bodies may be utilized to the benefit of wildlife; however, netting and fencing may be required when water chemistry demonstrates a need to prevent use by wildlife."	52863-180
Section 4.8.2.3, p. 4-106	Mitigation measures for wildlife, seasonal restrictions – suggested rephrasing.	"Protect important big game winter habitat by prohibiting activities or surface use from November 15 to April 30 within certain areas encompassed by the authorization. The same criteria apply to defined big game birthing areas from May 1 to June 30. Application of this limitation to operation and maintenance of a developed project must be based on environmental analysis of the operational or production aspects. Exception, waiver, or modification of this limitation in any year may be approved in writing, including documented supporting analysis, by the authorized officer." These types of limitations are currently used for exploration, drilling, road building and other activities that are not necessarily year-round activities. Timing restrictions on year-round operations are not feasible.	Other mitigation measures are available, and should be developed into a site-specific project and mitigation plan. We suggest removing the requirement or allowing for other management and mitigation techniques or waivers, modifications, or exceptions as appropriate to facilitate a year-round operation. We agree that application of the timing limitation should be evaluated on a site-specific basis, but should not be the default limitation. Annual waivers and exceptions to timing limitations are not appropriate to a year-round, multi-year operation and should not be required to facilitate operation of a year-round facility. We would suggest a wildlife management plan as part of a plan of operation.	52863-181
Section 4.9.2, pp. 4-127 to 129	Cost and safety issues with the restrictions.	"Avoiding placement of facilities on ridgelines, summits, or other locations such that they will be silhouetted against the sky from important viewing locations." - In many cases these are optimum locations from a safety perspective. "Siting linear features (e.g., trails, roads, rivers) to cross other linear features at right angles whenever possible to minimize viewing area and duration." – May present safety issue.	Use BLM Goldbook and BLM VRM program to manage visual impacts. Prescriptive requirements are not appropriate for a PEIS.	52863-182

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Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]
		"Using nonreflective or low-reflectivity materials, coatings, or paints whenever possible." – May present safety issue. "Avoiding installation of gravel and pavement where possible to reduce color and texture contrasts with existing landscape." – May present safety issue.	
Section 4.10.1, p. 4-131, ¶ 2, last line Section 6.1.3.9, p. 6-61, line 2 and p. 6-68, ¶ 2, line 2	Common impacts.	"Leasing itself has the potential to impact cultural resources to the extent that the terms of the lease limit an agency's ability to avoid, minimize or mitigate adverse effects of proposed development to cultural properties." This sentence is repeated several places in the PEIS. Leases and project approvals are subject to compliance with state and federal requirements for cultural resource protection, and include requirements for identification and subsequent avoidance or mitigation for cultural sites deemed eligible for the National Historic Register. Issuance of a lease does not limit an agency's ability to manage cultural resources under applicable law.	The sentence should be removed, as it does not have basis.
Section 4.10.1, pp. 4-131 to 132	Existing regulations.[12]	The Cultural Resource Impacts section must assume that a project proponent will not comply with regulatory requirements. Complete cultural site destruction without mitigation and cultural site degradation and/or destruction is not a realistic outcome of any project development, assuming that a project is undertaken in compliance with regulations governing cultural resources. Potential adverse impacts are overstated and potential positive impacts are understated. Impact analysis should be done applying mitigation measures already required by regulation. In fact, on page 6-25, the EA indicates that adverse impacts will occur to one location at Shell Site 3 without the application of mitigation actions. Shell proposed to avoid the site as part of its Plan of Operations for that research project. It should be noted that application of regulatory and permitting requirements will minimize or eliminate many impacts considered. Nothing in this section discusses the scientific and cultural information and preservation of resources that will be found and developed as a result of these projects. As a result of numerous	All impact analyses must be conducted using the assumptions stated in Chapter 2 of the PEIS: that the projects are subject to existing federal, state and local laws and regulatory requirements as well as established BLM policies. BLM should note cultural resource impacts are already governed by existing permitting and state regulations as well as established BLM policies.

52863-182 (cont.)

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[12] This is an additional example relating to Section E in the comment letter.

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
		cultural resource inventories and documentation within the Piceance Basin, archaeologists and ethnologists are beginning to piece together a comprehensive picture of the nomadic Ute tribes. They are able to retrieve, curate, preserve and study artifacts that were previously undiscovered and unprotected.		52863-184 (cont.)
Section 4.11, p. 4-134, ¶ 1, line 7	Socioeconomic assessment.	The socioeconomic assessment assumes no proactive community development effort to avoid, manage or mitigate negative social, economic and fiscal consequences of oil shale development will occur prior to development of oil shale.	This text needs to be revised to state that federal, state and local governments and oil shale companies are all likely to encourage and perhaps require such efforts. While the details of these requirements are not yet known, the text needs to acknowledge that proactive community development planning would help avoid many potential socioeconomic impacts and reduce the magnitude of most impacts. Shell, in this regard, is committed to developing oil shale in a socially sustainable manner.	52863-185
Section 4.11, p. 4-135, ¶ 1	Socioeconomics - worker in-migration.	The statement: "...it was assumed that the entire construction and operations labor force ... would come from outside the ROI..." is unnecessarily broad and does not reflect industry's practice of hiring at least a percentage of its employees from the area.	The text needs to be revised to include further analysis and data, which show the positive impacts of hiring local workers on such communities.	52863-186
Section 4.11, p. 4-136 to 137, last bullet	Project timing.	This bullet assumes peak construction and first year of operations for an in situ project and for a power plant and coal mine. These dates are very speculative and could be either earlier or later. In any event, we believe that the peak construction year and the first year of operations for the oil shale project and the mine/power plant will be much closer together as opposed to being nine and ten, respectively, years apart as assumed.	Clarify text.	52863-187
Section 4.11.1.1, p. 4-137, ¶ 2, last sentence	Social disruption.	The statement: "qualitative assessment of the potential impact of a large number of in-migrants on social disruption in small rural communities" ignores the fact that many communities in the Colorado ROI are not small or rural, nor does it acknowledge the fact that social conditions in most communities in the Colorado ROI have undergone substantial social change associated with tourism, recreation, lifestyle migration and energy development. The "qualitative assessment" also does not acknowledge the potential for proactive community development, which will surely be required to avoid or soften social impacts.	The text needs to be revised to include an analysis that accurately describes changing social conditions in communities in the ROI and the potential for proactive community development efforts to avoid or mitigate such social impacts.	52863-188
Section 4.11.1, pp. 4-137 to 142	Housing.	The discussion indicates that a gravity model was used to assign oil shale workers and families to specific ROI communities.	The text should be revised to include information regarding the assignments generated by the	52863-189

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
		However, the results of this assignment are not presented in the text. Furthermore, the assumptions regarding the spatial distribution of employees using a gravity model and the assessment of impacts on housing implicitly assume a direct correlation between the availability of vacant housing and the residency assignments. Such a correlation may not be realistic. Finally, the conclusion that the housing demands associated with oil shale and tar sands development would absorb only 2.9 to 6.2 percent of vacant housing units, e.g., 334 to 802 units, seems tenuous given current trends in housing availability and the projected immigration of up to 4,093 additional residents into an ROI.	application of the gravity model and the assessments of impacts to recognize the spatial distribution.	52863-189 (cont.)
Section 4.11.1.3, p. 4-144, ¶ 2, starting at line 6	Social disturbance.	This section should acknowledge the social change that has already occurred in most communities in the Colorado ROI, which have already undergone considerable growth and change owing to tourism, recreation and lifestyle migration and energy development. These communities have already had to adapt to a different quality of life and have transitioned away from a more traditional lifestyle involving ranching. Most communities in the Colorado ROI are not small, isolated, close knit, homogenous communities; most have already transitioned toward a more urban lifestyle with increasing cultural and ethnic diversity. By not acknowledging these conditions in the text, it inaccurately assesses potential impacts and fails to consider the kinds of social affects that oil shale development may have on these communities.	The text should be revised to accurately describe current social conditions in the ROI and accurately assess how oil shale development may affect these conditions.	52863-190
Section 4.11.1.5, p. 4-145	Recreation impacts.	Because the discussion in Section 3.10.3 did not identify "popular recreation locations" in each ROI or discuss the proximity of such locations to the likely oil shale development areas, it is difficult to determine if economic impacts to recreation would be substantial or approach the 10 or 20 percent reductions in recreation employment described in these two scenarios.	The text should be revised to describe the potential recreation resources near the likely oil shale development areas, discuss the importance of those resources to the recreation economy within the ROI and describe how oil shale ancillary development might affect recreational uses associated with those resources. The discussion of the effects of a 10 to 20 percent reduction in recreation employment needs to be linked to the recreation resources likely to be affected and the relationship of those resources to the recreation economy within the ROI.	52863-191
Section 4.11.1.6, p. 4-146	Property valuation.	There is no corresponding Chapter 3 discussion of existing properties in areas that might be affected by oil shale	Text should be deleted or supported by documentation if this is to be used as a part of the	52863-192

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
		development and trends in valuation of those properties; consequently, there is a lack of perspective as to the magnitude or severity of this issue. For example, in the Colorado ROI, much of the likely oil shale development area, including the existing RD&D projects, are on BLM lands located at some distance from most private lands. Consequently, property values on most private lands are unlikely to be directly affected by oil shale development. Furthermore, indirect effects on property values could include increases in property values for some properties, not just decreases. Moreover, the assertion that breakdown in social structures of rural communities can adversely affect property values is counterintuitive to the experience of property value changes in boomtowns.	analysis.	52863-192 (cont.)
Section 4.11.2, p. 4-148	Mitigation measures.	First Bullet considers requiring operators to provide housing and services for all direct project hires. This is too prescriptive and unreasonable to require, especially at the PEIS stage. There are benefits from incorporating employees into the community where they can more easily support local businesses. This is best analyzed at the project-specific NEPA phase with proposed mitigations.	Delete requirement that operators provide housing and services for all direct project hires and postpone this analysis until the project-specific NEPA phase.	52863-193
Section 4.12.1.2, p. 4-151, ¶ 1	Social disruption.	This discussion assumes that communities in the Colorado ROI are isolated, stable, rural communities when, in fact, most communities in the ROI have recently undergone substantial tourism, recreation, lifestyle migration and energy development growth, with resulting social diversification.	The text should be revised to recognize the social change that has occurred in these communities and to describe potential social impacts based on accurate characterization of existing social conditions.	52863-194
Section 4.12.1.3, p. 4-152, ¶ 3	Environmental justice.	"Given the location of environmental justice populations in each state, construction and operation of oil shale facilities, power plants, and employee housing required for the oil shale development projects would produce impacts that would be experienced disproportionately by minority and low-income populations." This statement is not supported by the assessment. In the Colorado ROI, there is no evidence presented in the assessment to show that low income and minority populations would be either adversely impacted or disproportionately impacted by oil shale development.	The text should be revised to state that Environmental Justice communities *could* be adversely impacted by oil shale development rather than *will* be affected by such development.	52863-195
Section 4.13.1, p. 4-154	Typo.	"All such activities would be controlled by permits issued to state or local authorities."	"All such activities would be controlled by permits issued by state or local authorities."	52863-196

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
Section 4.13.1, p. 4-154, ¶ 2	Common impacts.	The statement of "virtually no hazardous materials would be associated with employer-provided housing" does not take into consideration necessary maintenance and upkeep. Many housing maintenance-related wastes are either hazardous materials (e.g. cleaning materials, pesticides, paints, aerosols, oils, lighting, batteries, medical wastes). Hazardous materials (wastes) from the housing areas ("household waste") would be solid wastes excluded from being RCRA hazardous wastes (hazardous materials) [40 CFR 261.4(b)(1)].	Proposed language: "It is expected that **minimal** amounts of hazardous materials would be associated with employer-provided housing."	52863-197
Section 4.13.1.2, p. 4-158, ¶ 4	Term "waste pile."	"Water intrusion controls and waste pile cover designs can limit the potential for leaching or erosion of the spent shale to create contaminated surface water effluents." The term "waste pile" has RCRA implications as they are defined as RCRA waste management units. Since the overburden piles are not hazardous waste [40 CFR 261.4(b)(3)], this term is misleading.	"Water intrusion controls and **spent shale** pile cover designs can limit the potential for leaching or erosion of the spent shale to create contaminated surface water effluents **and is managed under existing regulatory programs such as stormwater permits and reclamation permits**."	52863-198
Section 4.13.1.3, p. 4-159, ¶ 4	Stormwater Pollution Prevention Plans.	"Some degree of surface disturbance would occur with underground mining; the amount of contaminated surface water effluents, however, would be minimized by properly designed and implemented SWPPPs." The best management practices within a SWPPP are "designed and implemented" to minimize contaminated surface water effluents rather than the plan itself.	"Some degree of surface disturbance would occur with underground mining; the amount of contaminated surface water effluents, however, would be **managed** by properly designed and implement **Stormwater Pollution Prevention Plans (SWPPPs) best management practices**."	52863-199
Section 4.13.2, p. 4-161, ¶ 2	Hazardous materials.	"Regulatory requirements to address hazardous materials and waste management already largely address the mitigation of impacts." This is too specific for a PEIS and it should only refer to existing federal regulations. These additional requirements are not necessary. All of the bullets that come after this paragraph should be eliminated with the exception of bullet 12.	"Regulatory requirements to address hazardous materials and waste management already **regulate this activity and ~~largely~~** address the mitigation of impacts…." Bullet 1 - Not required Bullet 2 - Included in RCRA Requirements Bullet 3 - Included in RCRA & DOT Requirements Bullet 4 - Included in CWA & RCRA Requirements Bullet 5 - Included in RCRA Requirements Bullet 6 - Included in RCRA Requirements Bullet 7 - Included in RCRA Requirements Bullet 8 - Included in RCRA Requirements	52863-200

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Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
			Bullet 9 - Included in SARA Requirements – Section 312 Bullet 10 - Not required Bullet 11 - Remote operations cannot rely on "Just in Time" Bullet 12 - Could be left in Bullet 13 - Included in RCRA Requirements Bullet 14 - Included in RCRA, CWA, SPCC and OPA Requirements Bullet 15 - Included in CWA, SPCC, and OPA Requirements	52863-200 (cont.)
Section 4.11.2, p. 4-161, ¶ 4; p. 4-162, 10th bullet	"Just-in-Time" purchasing.	Most of what is written is already part of hazardous waste sections of CFR and RCRA and is redundant. The use of "Just-in-Time" purchasing strategies to limit the amount of hazardous materials present at the facility to just those quantities immediately needed to continue operations is unacceptable given the remote location and weather restrictions often encountered in the area.	Insert statement that hazardous waste storage will comply with all applicable federal, state, and local regulations. Remove 'Just-in-Time' language.	52863-201
Section 6.1.1.1, p. 6-2, ¶ 1, 3rd line	Correction.	"The region in which these lease areas are located is rural and relatively undeveloped." This statement is misleading. The Piceance Basin has had ongoing oil and gas development for decades and currently is experiencing significant natural gas drilling and infrastructure development, including local and interstate pipelines and several major gas processing plants. As the text notes in the following section, historic Nahcolite mining and recent sodium solution mining has also occurred in this area.	The text should be expanded to reflect that natural resource development has been ongoing in this area and has been fairly intensive over the last five years.	52863-202
Section 6.1.1.4, p. 6-5	Sentence clarification.	"During the construction phase for the RD&Ds, most of the surface water impacts …"	"During the construction phase for the **RD&D sites**, most of the surface water impacts …"	52863-203
Section 6.1.1.4, p. 6-8	Clarification.	"The magnitude of the impacts on groundwater and surface water will depend on the injection rate, locations of the injection wells, and the target geologic formation."	"The magnitude of the impacts on groundwater and surface water will depend on the injection rate, locations of the injection wells, **quality of injected water,** and the target geologic formation."	52863-204
Section 6.1.1.9, p. 6-25	Recognition of the positive impacts of the effects of oil shale development.	In certain instances, potential adverse impacts in the PEIS are overstated, while potential positive impacts are understated. For example, on page 6-25, the PEIS indicates that adverse impacts will occur to cultural resources at one location at Shell Site 3 without the application of mitigation actions. Shell proposed to	The PEIS should recognize that all of the negative impacts discussed may not occur and that some benefits may occur as a result of the numerous cultural resource inventories and documentation of cultural information within the Piceance Basin. As a	52863-205

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
		avoid the site as part of its Plan of Operations for that research project. Alternatively, Shell can request that the site be recorded as mitigation, thus making the information available. BLM should not assume that an operator will not comply with regulatory requirements and that adverse effects will occur as a result.	result of these inventories, archaeologists and ethnologists are beginning to piece together a comprehensive picture of the nomadic Ute tribes. They are able to retrieve, curate, preserve and study artifacts that were previously undiscovered and unprotected.	52863-205 (cont.)
Section 6.1.2.1, p. 6-38, last bullet	ACECs.	"ACECs that are not closed to mineral leasing include approximately 23,000 acres and are shown in Table 6.1.2-1. The land uses within these designated ACECs would be impacted by oil shale development through loss of the resource." For the Piceance Basin, this statement assumes 100% development of the ACEC, and ignores the protections provided for ACECs under the White River Field Office Resource Management Plan. The statement overestimates potential impacts and should be revised to be factual in the context of the BLM RMPs or removed. Project Impacts and mitigations are best defined through review of a project-specific Plan of Development with mitigations analyzed through a project-specific NEPA analysis.	Revise statement to acknowledge protections provided in BLM RMPs or delete.	52863-206
Section 6.1. *See specific pages identified in comment.*	Rounding presents inconsistent information.	Mileage of perennial streams under Alternative B is reported as both 248 and 249 mi. p. 6-44 = 249 mi. p. 6-45 = 248.3 mi. p. 6-93 = 249 mi. p. 6-95 = 248 mi. p. 6-96 = 248.3 mi. Similarly, mileage of perennial streams under Alternative C is reported as both 65 and 66 mi. p. 6-71 = 66 mi. p. 6-73 = 64.9 mi. and 65 mi. p. 6-93 = 66 mi. p. 6-96 = 64.9 mi.	Use consistent rounding techniques so that values are reported consistently.	52863-207
Section 6.1.2.7.3, p. 6-52 and Section 6.1.3.7.3, p. 6-78	Wildlife effects under Alternatives B and C.	The effects of Alternative B on wildlife are very generally described, i.e., "Impacts . . . could occur in a number of ways and would be related to (1) habitat loss, alteration, or fragmentation; (2) disturbance and displacement; (3) mortality; (4) exposure to hazardous materials; and (5) increase in human access." This is the exact same effects discussion as for Alternative C (Section	Include some discussion of the magnitude or severity of potential effects for Alternative B for purposes of comparison with Alternative C. It is possible that no leases will be nominated under either alternative or that the same leases will be nominated. In that case, the effects will be identical. However, more acres	52863-208

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
		6.1.3.7.3, p. 6-78).	are available under Alternative B, and there is at least a possibility of greater effects. Some discussion of the possible magnitude of effects and a comparison between alternatives is necessary.	52863-208 (cont.)
Section 6.1.2.7.4, pp. 6-52 to 6-54 and Section 6.1.3.7.4, pp. 6-78 to 6.81.	Threatened and endangered species effects under Alternatives B and C.	Impact analyses for threatened and endangered species are nearly identical under Alternatives B and C.	Provide some discussion of possible magnitude of effects for purposes of comparison.	52863-209
Section 6.1.3.4, p. 6-71	Clarification.	"Excluding these lands from application for leasing would provide complete protection from direct impacts for the resources found on these lands."	"Excluding these lands from application for leasing would provide complete protection from direct impacts **from oil shale development** for the resources found on these lands**; however, indirect impacts are still possible**."	52863-210
Section 6.1.4.7.1, p. 6-95	Consistency.	"Because of this decrease in available lease area, there are 15 fewer perennial streams and approximately 183 fewer miles of perennial stream habitat that could be affected by future commercial oil shale development under Alternative C than under Alternative B."	"Because of this decrease in **the** available lease area **under Alternative C**, there are **19** fewer perennial streams and approximately 183 fewer miles of perennial stream habitat that could be affected by future commercial oil shale development under Alternative C than under Alternative B." *Note: Alt. B = 37 streams, Alt. C = 18 streams, Difference = 37-18= 19*	52863-211
Section 6.1.5, pp. 6-106 to 6-108.	Cumulative impact areas of effect.	The cumulative impact discussion states, "These impacts are in the context of other major activities in the study areas that could also affect environmental resources and the socioeconomic setting."	Define the study areas and expressly describe geographic scope of the cumulative effects analysis.	52863-212
Section 6.1.5, p. 6-108	Comparing cumulative effects for Alternatives B and C.	BLM concludes in introducing the cumulative effects analysis that "[t]he magnitude of the differences between the cumulative effects of Alternatives B and C cannot be identified." Why? More acres are available for leasing under Alternative B, so there is at least a potential for more impacts under that alternative.	Explain why differences between the cumulative effects of Alternatives B and C cannot be identified.	52863-213
Section 6.1.5.3.7, p. 6-159	Cumulative impact study area for wildlife.	The cumulative impact study area for migratory wildlife species is not clear.	Specifically define the cumulative impact study area for wildlife, and consider including entire species range for species potentially affected by lease development, even if species range is outside oil shale leasing areas.	52863-214
Section A.1.2, p. A-7, ¶ 5	Clarification.	"In addition, natural gas production is prolific from formations located stratigraphically below the oil shale, with 4 of the top 35 natural gas fields in the United States located in the southern	"In addition, natural gas production is **modest** from formations located stratigraphically below the oil shale, with 4 of the top 35 natural gas fields in the	52863-215

Section and page number	Issue	Comment / Current PEIS Language[1]	Solution / Suggested Correction[2]	
		Piceance Basin." The gas production below the oil shale horizon would better be described as modest rather than prolific.	United States located in the southern Piceance Basin."	52863-215 (cont.)
Section A.1.2, p. A-8, ¶ 1	Correction.	Dawsonite is an aluminum mineral not a soda ash mineral.	Clarify text.	52863-216
Section A.1.2, p. A-8, ¶ 2	Oil shale resource size.	"About 80% of potential oil shale resources of the Green River Formation, or about 1.2 trillion bbl of oil equivalent, is found in west-central Colorado's Piceance Basin. Of the total potential resource, about 480 billion bbl are contained in deposits averaging at least 25 gal/ton."	We suggest, at a minimum, making the estimates in the Executive Summary (Table ES-1 and associated text), Chapter 2 and Appendix A more consistent with these estimates. We suggest that the final PEIS clearly summarize the in-place and "most likely" recoverable resource potential that is associated with each of the three alternatives, preferably as part of the Executive Summary.	52863-217
Section A.5.1, p. A-50	Correction.	"Shell Oil Mahogany Ridge Project."	The correct name of Shell's project is the "Mahogany Research Project."	52863-218
Section A.5.1, p. A-52	Clarification requested.	There is a reference to "*Mahogany Ridge portion of the Piceance Basin.*"	We have never heard this reference before and are unsure if it is an actual geographic area or not. Please add clarification of geographic location.	52863-219
Section A.5.3.3	Clarification.	This section necessarily draws on the EAs for each of the Shell RD&D projects. While the EAs indeed propose to disturb almost all of the surface within the RD&D acreage, smaller projects with smaller footprints could be implemented with BLM agreement. The EAs do define the upper limits of the environmental disturbances; however, those disturbances could be smaller.	Clarify text.	52863-220
Table D-5, p. D-9	Implementing agencies.	Need to add implementing agencies for groundwater in Colorado.	Should list DRMS and OGCC as implementing agencies for ground water at mining and oil and gas sites, respectively.	52863-221
Table D-10, p. D-15	Additional entity should be listed.	The Mined Land Reclamation Act (CRS 34-32-101 et seq.) as administered by the DRMS, has authority over weed management at mine sites and should be added to the list of authorities.	Add Mined Land Reclamation Act to list of authorities.	52863-222
Section D.2.1, p. D-20, ¶ 1	State Implementation Plans ("SIPs").	Text provides that although EPA has revised ozone and PM2.5 NAAQS, neither of these revised limits would be implemented by the states of Colorado, Utah or Wyoming until their State Implementation Plans ("SIPs") are formally approved by the EPA, and, until then, EPA is responsible for implementing these revised standards. This statement is inaccurate. Until and unless EPA adopts a Federal Implementation Plan due to a state's failure to submit a SIP or due to a failure to correct a deficiency in a SIP,	BLM should resolve any misunderstanding by deleting the last sentence of the first paragraph on page D-20 of Appendix D.	52863-223

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		or unless EPA finds there is a widespread failure by a state to enforce its SIP or permit program effectively and therefore assumes enforcement responsibility, EPA would not have responsibility to implement the revised standards. In the absence of such action by EPA, states have responsibility to implement the NAAQS for these pollutants through their existing programs, and they should amend their regulations as necessary to carry out that responsibility, pending adoption and approval of a SIP. SIPs will be adopted only for areas designated nonattainment for these pollutants, but states will be responsible for protecting the NAAQS in all areas.		52863-223 (cont.)
p. F-3	Minimization measures.	"To ensure that the desired results are being achieved, minimization measures will be evaluated and, if necessary, Section 7 consultation reinitiated." We are uncertain what is meant by "minimization measures" but it is standard that ongoing monitoring of endangered or threatened species would be done. USFWS monitors to ensure that conditions and assumptions upon which the Section 7 Biological Opinion was issued remain valid. Consultation can always be reopened. No additional action from BLM is needed.	We suggest deleting identified text.	52863-224
p. F-15	Yellow-billed cuckoo.	Although this species occurs only in Utah and is not of specific concern to Shell, a project-specific NEPA analysis will be conducted at a future time, and any potential impacts to the species will be addressed at that stage. At the appropriate time, a wildlife mitigation plan could address any concerns arising from the environmental analysis.	Eliminate the application of specific conservation measures at this preliminary stage in the PEIS and note that a wildlife mitigation plan could address any concerns following a project-specific NEPA analysis.	52863-225
Section G.2.4, p. G-7, ¶ 1, 4th line	Social disruption.	This section, again, assumes the absence of adequate planning measures. In reality, federal, state and local governments and the oil shale companies themselves will require extensive planning and community development efforts before oil shale development begins. Shell is committed to a pace of development that is socially sustainable. While some adverse or beneficial social change will certainly accompany the population growth associated with oil shale development, it is unrealistic to assume that oil shale development would occur without planning and community development and that increases in social distress and deterioration of quality of life are an inevitable consequence of oil shale development.	The text needs to be revised to accurately describe current social conditions in affected communities and to discuss the potential for proactive community development efforts to avoid or mitigate many social impacts.	52863-226

Notes:
¶ - paragraph
ACEC – Area of Critical Environmental Concern
BLM – Bureau of Land Management
BMP - best management practice
BOR - U.S. Bureau of Reclamation
CFR - Code of Federal Regulations
COGCC – Oil and Gas Conservation Commission
CWA – Clean Water Act
CWCB - Colorado Water Conservation Board
DOI - U.S. Department of the Interior
DOT - U.S. Department of Transportation
DRMS - Division of Reclamation Mining and Safety
EA – Environmental Assessment
EAB - Energy Advisory Board
EAC - Early Action Compact
ICP - in situ conversion process
MLA - Mineral Leasing Act
NA – not applicable
NAAQS - National Ambient Air Quality Standards
NEPA - National Environmental Policy Act of 1969
NPDES – National Pollutant Discharge Elimination System
OPA – Oil Pollution Act
p. – page
PEIS – Programmatic Environmental Impact Statement
pp. - pages
PRL – Preference right lease
PSD – Prevention of Significant Deterioration
RCRA - Resource Conservation and Recovery Act of 1976
RD&D – research, development, and demonstration
RMP - Resource Management Plan
ROI - region of influence
SIP - State Implementation Plans
SPCC - spill prevention, control, and countermeasure
SWPPP - Stormwater Pollution Prevention Plan
USACE - U.S. Army Corps of Engineers
USDW - underground source of drinking water
USFWS - U.S. Fish and Wildlife Service
USGS - U.S. Geological Survey
VRM - Visual Resource Management

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Appendix B

Oil Shale Projects - Partial List of Potential Permitting Requirements that might be required, depending on proposed project

AGENCY	TYPE OF PERMIT
PRODUCTION SITE	
Federal Agencies:	
Army Corps. of Engineers (COE)	Section 404 General Permit Section 404 Individual Permit
Bureau of Land Management (BLM)	Notice of Intent - Geophysical Exploration Permit to Drill NEPA - Environmental Assesment (EA) NEPA - Environmental Impact Statement (EIS) Leasing - RD&D, Preference Right, Commercial Right-of-Way Grant (ROW) Temporary Use Permit
Fish & Wildlife Service (FWS)	Section 7 Consultation
Federal Aviation Administration (FAA)	Notice of Proposed Construction or Alteration
Pipeline & Hazardous Materials Safety Administration (PHMSA)	Pipeline design & operation clearance Oil Spill Response Plan
EPA - Underground Injection Control (UIC)	UIC Permit
State Agencies:	
Historical Society & SHPO	Section 106 Consultation
Dept. of Labor & Employment, Division of Oil & Public Safety	Storage Tank Permit SPCC Plan
Division of Reclamation, Mining & Safety (DRMS)	Reclamation Permit..."112d-3 Permit" Prospecting Permit..."Notice of Intent"
Division of Water Resources & State Engineer's Office (SEO)	Water Well Permit Approval of Dam Construction Plans & Specs.
Division of Wildlife (DOW)	Involvement with USFWS (Sec. 7 Consultation)
State Land Board (SLB)	ROW lease
Air Pollution Control Division (APCD)	Air Pollution Emission Notice (APEN) Construction Permit New Source Review (NSR) Program Permit Title V Operating Permit
Hazardous Materials & Waste Management Division (HMWMD)	Notification of Regulated Waste Activity Underground Injection Well Permit by Rule Cert. of Designation (CD) for Garbage Dump
Water Qualtiy Control Division (WQCD)	CDPES Discharge Permit Stormwater Discharge Permit Section 401 Certification
Public Utilities Commission (PUC)	Haz. Mat. Transportation Annual Permit
Department of Transportation (CDOT)	State Highway Access Permit Utility/Special Use Permit
County Agencies:	
Planning Department Health Department Road & Bridge Department Building Department	Special or Conditional Use Permit Certificate of Designation (CD) for Garbage Dump Right-of-Way Access or Driveway Permit Utilities Installation Permit Building Permit
PIPELINES	
Federal Agencies:	
Army Corps. of Engineers (COE)	Section 404 General Permit Section 404 Individual Permit
Bureau of Land Management (BLM)	NEPA - Environmental Assesment (EA) NEPA - Environmental Impact Statement (EIS) Right-of-Way Grant (ROW) Temporary Use Permit
Fish & Wildlife Service (FWS)	Section 7 Consultation
Pipeline & Hazardous Materials Safety Administration (PHMSA)	Pipeline design & operation clearance Oil Spill Response Plan

AGENCY	TYPE OF PERMIT
PIPELINES continued	
State Agencies:	
Historical Society & SHPO	Section 106 Consultation
Division of Wildlife (DOW)	Involvement with USFWS (Sec. 7 Consultation)
State Land Board (SLB)	ROW lease
Air Pollution Control Division (APCD)	Air Pollution Emission Notice (APEN) Construction Permit
Water Quality Control Division (WQCD)	Stormwater Discharge Permit Section 401 Certification
Department of Transportation (CDOT)	State Highway Access Permit Utility/Special Use Permit
County Agencies:	
Planning Department	Special or Conditional Use Permit
Road & Bridge Department	Right-of-Way Access or Driveway Permit Utilities Installation Permit
Building Department	Building Permit
PRODUCT TRANSPORTATION	
Federal Agencies:	
Army Corps. of Engineers (COE)	Section 404 General Permit Section 404 Individual Permit
Bureau of Land Management (BLM)	NEPA - Environmental Assesment (EA) NEPA - Environmental Impact Statement (EIS) Right-of-Way Grant (ROW) Temporary Use Permit
Fish & Wildlife Service (FWS)	Section 7 Consultation
Pipeline & Hazardous Materials Safety Administration (PHMSA)	Pipeline design & operation clearance Oil Spill Response Plan
State Agencies:	
Historical Society & SHPO	Section 106 Consultation
Division of Wildlife (DOW)	Involvement with USFWS (Sec. 7 Consultation)
State Land Board (SLB)	ROW lease
Air Pollution Control Division (APCD)	Air Pollution Emission Notice (APEN) Construction Permit
Water Quality Control Division (WQCD)	Stormwater Discharge Permit Section 401 Certification
Department of Transportation (CDOT)	State Highway Access Permit Utility/Special Use Permit
County Agencies:	
Planning Department	Special or Conditional Use Permit
Road & Bridge Department	Right-of-Way Access or Driveway Permit Utilities Installation Permit
Building Department	Building Permit

Permit requirements.xls

Appendix C

Special Stipulation to Protect Rights of Owner(s) of Oil Shale Estate(s)

The rights and obligations of the Lessee hereunder are subject to the terms of an Agreement To Settle Pending Litigation Between The United Sates And The Owners Of Certain Oil Shale Mining Claims In Colorado, dated August 4, 1986. Under that Agreement, the owner(s) of the oil shale deposits present within lands covered in whole or in part by this lease hold dominant **mineral estate vis-ii-vis** the Lessor's subservient mineral estate **in the oil, gas** and coal that is present in the same lands. Among the rights of **the** pertinent holder(s) of such a dominant oil shale estate **arising** under the aforesaid Agreement are the following, which are hereby expressly incorporated into this Lease.

1. Upon receipt of the Lessee's Application for Permit to Drill (or similar request for authority to develop), the Lessor shall promptly provide written notice to the owner(s) of the pertinent dominant estate(s) concerning the authorization being sought by the Lessee.

2. The Lessor shall thereupon notify the Lessee of the identity and address of the owner(s) of pertinent dominant estate(s) and direct the Lessee to contact such person(s) and attempt in good faith to reach agreement on the need for, and terms of, any oil-shale protective measures in addition to, or more specific than, those included in the Standard Oil Shale Stipulation of this Lease. Any agreed protective provisions of this kind shall be adopted by the Lessor and incorporated into the Lessee's permit (or other authorization) to develop.

3. If the Lessee does not agree to a particular additional or more specific oil shale-protective provision desired by the owner(s) of a pertinent dominant estate, the rights of such dominant estate owner(s) will vary, depending on whether the protective measures in question relate to proposed developmental activities that are to take place above or below the essentially horizontal line of demarcation that is two hundred feet below the bottom of the Orange Marker (or a lateral stratigraphic projection of the Orange Marker or the equivalent thereof) as the term "Orange Marker" is used, and mapped, by Henry W. Roehler, United States Geological Survey, "Depositional Environments of Rocks in the Piceance Creek Basin, Colorado," Figures 1 and 2 and Guidebook to the Energy Resources of the Piceance Creek Basin, Colorado, Rocky Mt. Association of Geologists (1974).

   a. With respect to proposed developmental activities that would occur above the aforesaid line of demarcation, the Lessor shall adopt and incorporate into the Lessee's permit (or other authorization to develop) any additional or more specific provisions recommended by the owner(s) of a pertinent dominant oil shale estate which reasonable relate to protection of such dominant estate. The right of the owner(s) of a pertinent dominant estate to require adoption and incorporation of such additional or more specific oil shale-protective provisions shall be deemed to be in the nature of a right to impose any reasonable conditions (but not the payment of money) as consideration for a required consent to develop.

   b. With respect to proposed developmental activities that would occur below the aforesaid line of demarcation, the owner(s) of a pertinent dominant estate shall have a reasonable opportunity to recommend to the Lessor the adoption of any additional or more specific oil shale-protective provisions. The Lessor shall give careful consideration to such recommendations, shall adopt and incorporate such recommendations into the Lessee's permit (or other authorization to develop) where and to the extent that they are reasonable, and shall provide the pertinent owner(s) of a dominant estate with a written explanation of its decision not to so adopt and incorporate any or all of such recommendations. However, the provision of such explanation shall not be deemed to

relieve the Lessor or the Lessee of any liability either may have under then applicable law for damage or injury to the dominant estate.

4. The Lessee is hereby placed on notice that the Lessor is required to, and shall, vigorously enforce all oil shale-protective provisions included in the Standard Oil Shale Stipulation of this Lease or in this Special Stipulation, and any additional or more specific oil shale-protective provisions adopted in connection with, and incorporated into, Lessee's permit (or other authorization to develop) issued under this Lease.

5. The Lessee is hereby placed on notice that under the Lessor's August 4, 1986 Agreement referenced above, it is the stated intent of the parties that the owner(s) of such dominant oil shale estate(s) can enforce rights and obligations arising under that Agreement, including those incorporated expressly herein, directly against the lessee.

Appendix D

EXHIBIT OS-A

Lease Number:

OIL SHALE
STIPULATION

A. No wells will be drilled for oil or gas except upon approval of the Authorized Officer of the Bureau of Land Management. Drilling will be permitted only in the event that it is established to the satisfaction of the Authorized Officer that such drilling will not interfere with the mining and recovery of oil shale deposits or the extraction of shale oil by in situ methods or that the interest of the United States would best be served thereby.

B. No well will be drilled for oil or gas at a location which, in the opinion of the authorized officer, would result in undue waste of oil shale deposits or constitute a hazard to or unduly interfere with operations being conducted for the mining and recovery of oil shale deposits or the extraction of shale oil by in situ methods.

C. When it is determined by the Authorized Officer that unitization is necessary for orderly oil and gas development and proper protection of oil shale deposits, no well will be drilled for oil and gas except pursuant to an approved unit plan.

D. The drilling or the abandonment of any well on leases within an oil shale area will be done in accordance with applicable oil and gas operating regulations including such requirements as the Authorized Officer may prescribe as necessary to prevent the flow or infiltration of oil, gas, or water into formations containing oil shale deposits or into mines or workings being utilized in the extraction of such deposits.

Responses for Document 52863

52863-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

52863-002: Thank you for your comment.

52863-003: Thank you for your comment.

52863-004: Thank you for your comments. The BLM agrees there are positive impacts that could be associated with future commercial development of oil shale. As part of this PEIS, however, where BLM is considering land allocation decisions that would identify lands that would be available for application for commercial leasing and development, it has been determined that with the exception of the potential effect on property values, there is no effect associated with the proposed action.

52863-005: In general, valid existing rights are considered administrative actions by the BLM and do not require a specific planning decision to implement. This is a planning criterion, and as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decision are subject to valid existing rights. With respect to the federal government's commitment to issue commercial leases on the PRLAs to the RD&D lease holders, a lease will only be issued if the terms and conditions of the lease are met. This includes evaluation pursuant to NEPA that concludes that commercial-scale operations of the applicant's technology at that site do not pose environmental or social risks unacceptable to the BLM. The discussion of the PRLAs in the PEIS, however, has been revised to reflect the language in the lease and clarified that this is a component of all of the PEIS oil shale alternatives.

52863-006: Please see Response 52863-005. Also, the acreage actually available in Alternative A is 294,680 in the White River Field Office and 58,100 acres in the Vernal Field Office. The acreage in the White River RMP includes 70,820 acres in the Multimineral Zone that can also be made available for oil shale leasing if provision is made to not adversely affect recovery of other minerals.

52863-007: Thank you for your comment. The commentor is correct that Final PEIS decisions are subject to valid existing rights.

52863-008: The White River RMP needs to be amended to ensure a consistent leasing program across all three states. In addition, please see the response to Comment 52863-005.

52863-009: Alternative A would allow consideration for leasing on a total of 352,780 acres included in the Book Cliffs and White River RMP areas subject to further NEPA analysis and management prescriptions in the plans.

52863-010: The BLM acknowledges the commentor's preference for Alternative B.

52863-011: The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands. It is only after conducting further site-specific NEPA analysis where existing resource values are compared that a leasing decision would be made. The BLM is committed to managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands and its resources, and to provide for domestic sources of minerals. The procedure identified in Alternative B is consistent with BLM's legal mandates and would follow the agency's regulations and guidelines.

52863-012: Please see response to Comment 52863-005 regarding the treatment of the RD&D leases in the Final PEIS.

52863-013: Thank you for your analysis of the effects of Alternative C on potential commercial leasing.

52863-014: Thank you for your comment. We cannot say for certain at this time that large-scale operations will be required to support initial development of project infrastructure, or that the oil shale resource configuration of Alternative C would result in fragmented parcels that are unlikely to be explored or developed.

52863-015: Alternative C was developed to allow for consideration of oil shale development over a more restricted landscape consistent with existing land use plan decisions. Alternative B was developed to explore the impacts of making more lands available and allowing wider consideration of lands with higher resource values. Together with Alternative A, they provide the necessary range of alternatives as required by NEPA and the CEQ implementing regulations. The BLM believes that both Alternatives B and C meet the requirements of FLPMA.

52863-016: Alternative C takes advantage of existing planning decisions that are based on BLM's experience and professional knowledge of the impacts of other mineral activities. It is a different approach to consideration of future oil shale development, and for that reason, provides a range of options for the decision maker.

52863-017: The BLM agrees that specific mitigation strategies must be developed on a project-specific basis and must take into account cumulative effects on resources in the ROI. Some potential mitigation measures are presented in Sections 4.8.2, 5.8.2, and Appendix F of the PEIS.

52863-018: These ACECs are excluded from consideration for leasing only under Alternative C. These areas would be available for consideration under both Alternatives A and B. Alternatives were developed in the PEIS to provide a range of possible areas available for leasing for comparison of impacts.

52863-019: The PEIS does not recommend excluding development from VRM Class II areas; rather, it observes that it would be difficult to meet Class II standards. VRM classifications are set through land use planning decisions and would be evaluated as part of the NEPA analysis considering future leasing and development.

52863-020: Legal and regulatory frameworks represent the minimum requirements for resource protection. Depending upon the values found on a particular site and the findings in the NEPA analysis for the lease or project, the BLM could require a higher level of protection than the legal minimum.

52863-021: Thank you for your comment.

52863-022: The BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedure to implement a commercial leasing program, and therefore your comments are outside the scope of this PEIS.

52863-023: The BLM agrees that as long as enough information can be provided to complete a thorough NEPA review of proposed actions and potential effects, a combined leasing/plan of development may be possible.

52863-024: Please see response to Comment 52863-020 regarding mitigation that might provide more protection than the required minimum regulatory compliance.

The potential mitigation measures listed in Chapters 4 and 5 are examples of the kinds of mitigation that might be applied at the site-specific level if the resource conditions identified are present. They are not being automatically applied to future lease and development actions. Site-specific analysis will determine what mitigation measures may be required.

52863-025: The BLM has indicated in Sections 4.1 and 5.1 that compliance with applicable federal, state, and local laws, and regulations is assumed. There may be a misunderstanding to the effect that even with regulatory compliance, there can be effects on resources through accident, intentional illegal acts (e.g., cultural resources), or even through approved actions. It is true that the identified potential mitigation actions in Chapters 4 and 5 are not applied to the analysis nor are they being required to be applied to future actions—future mitigation will be determined through additional NEPA analysis of leasing or plans of development.

52863-026: Stipulations for oil and gas are generally developed at the RMP level, largely because the technologies are better known. In the case of oil shale, it may be more appropriate at the early technology development stage to create performance-based standards for specific outcomes or desired future conditions. This will have to be considered in the individual RMPs or in the pre-leasing NEPA analysis, which may also be addressing land use plan amendments to allow commercial development.

52863-027: Potential mitigation measures are presented and described for each resource area in Chapters 4 and 5. In addition, conservation measures are presented in Appendix F that were developed in consultation between the USFWS and the BLM specifically for the oil shale and tar sands program to protect threatened, endangered, and special status species. As stated in the text, these measures are presented as examples of mitigation measures that could be employed and may not apply to all sites and projects. Mitigation measures would be developed on a project-specific basis and in consultation with the BLM and other federal and state agencies.

52863-028: It is BLM's policy to optimize the recovery of both resources in an endeavor to secure the maximum return to the public in revenue and energy production; prevent avoidable waste of the public's resources utilizing authority under existing statutes, regulations and lease terms; honor the rights of each lessee, subject to the terms of the lease and sound principles of resource conservation; and protect public health and safety and mitigate environmental impacts.

Conflicts associated with potential oil shale leasing and existing oil and gas leases will be analyzed, and stipulations could be developed to mitigate the conflict consistent with BLM policy to protect the prior existing right whether it is oil shale or oil and gas.

52863-029: The referenced oil shale stipulation attached to the comment letter was included in leases issued between 1968 and 1989 and is a valid condition on those leases. Oil and gas leases issued since 1989 do not have this stipulation. It is not known at this time what percentage of oil and gas leases have the referenced stipulation. This does not negate the underlying comment that it might be possible to develop one resource while protecting another, but at this time that is not yet clear. The BLM will continue to review potential conflicts between recovery of oil and gas and other minerals as part of future NEPA analysis.

52863-030: The Yates IBLA decision referenced in the comment is only applicable to the designated "Potash Area" defined by the Secretary of the Interior, which established specific parameters for concurrent operations of potash mining and oil and gas development. The decision focused on whether the BLM's denial of the APD was consistent with the provision of the Order and has no bearing on oil shale and multiple mineral development. As stated in the PEIS, it is BLM's policy to optimize the recovery of both resources in an endeavor to secure the maximum recovery of both resources in an endeavor to secure the maximum return to the public. The statement that existing oil and gas leases, or other mineral leases, have priority over later-issued oil shale leases because they are "first in time" is a concept that is still valid.

52863-031: In preparing the PEIS, the BLM used a current understanding of potential conflicts between existing oil shale and tar sands extraction technologies and other mineral developments. Although it is quite possible that future technological

development could lead to compatible extraction of oil shale and other mineral resources (such as oil and gas), there is currently sufficient information available to support the statement that "using any technology under consideration in this PEIS, is largely incompatible with other mineral development activities." However, if technologies evolve that allow such coordinated development, the BLM would consider lease applications and plans of development for such use.

52863-032: An RFDS is a projection of a likely anticipated oil shale and tar sands activity supported by a clear set of supportable assumptions. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. Analysis of the cumulative effects in this PEIS is qualitative to reflect the limited and highly speculative character of the information available and the limited nature of the decision to be made on the basis of this PEIS.

At the leasing stage, by contrast, applications for leases would have to include information regarding the technology to be employed in development of oil shale or tar sands resources, as well as impacts to be expected. Therefore, when such information would be less speculative, it would be possible to develop a meaningful RFDS. That RFDS would be an important component for performing a cumulative effects analysis of oil shale and tar sands activities that could occur as a result of leasing the resources in the particular region. An RFDS for an area of proposed oil shale and tar sands leasing would provide information for evaluating the type and extent of potential effects from oil shale and tar sands development. Effects analysis (direct, indirect, and cumulative) for leasing would be broad and generalized because it is necessarily based on a hypothetical scenario of exploration and development; however, it would not be based purely on speculation.

At the project level, the plan of development would provide more detailed technical information necessary for cumulative effects analysis of the proposed development action. An operator would have to comply with a plan of development approved by the BLM. A development proposal would have to provide detailed information for activities that would involve ground disturbance, thereby potentially supporting a more concrete RFDS than the scenario used to analyze effects related to a leasing decision. Consequently, the nature and extent of effects from the proposed development action can be determined with a higher degree of accuracy and confidence than that associated with a leasing level RFDS.

52863-033: Thank you for your comment.

52863-034: The numbers in question were created for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The numbers were developed with the understanding that they underestimate the actual in-place

resource. The numbers were developed using the values that described the minimum quality and thickness that was deemed to be economic. Those values are a minimum 25 ft thickness and a minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming, the values used were 15 ft thick and 15 gallons per ton. These values, coupled with the acreage in each of the alternatives, created the numbers in question. It is true that the use of more exact isopachs and quality data, had they been available, would have provided much higher values for each of the alternatives, but the alternatives remain comparable.

52863-035: Data used to delineate the most geologically prospective area is referenced in footnote 2 on Page 1-4 of the Draft PEIS. The deposits were sufficiently characterized so that the agency could delineate where the most geologically prospective resources are located. In the Piceance Basin, the deposits were characterized by the USGS data. The Green River, Washakie, and Uinta Basins were characterized by a BLM geologist using Fischer Assay data from existing exploration drill holes.

Should industry come forward with an economically and environmentally sound proposal that is outside of the most geologically prospective area, the BLM and the Secretary of the Interior have the authority to undertake another EIS that would consider additional modification of land use plans to allow leasing for such a proposal.

52863-036: The BLM recognizes the authority and responsibility of local, state, and Tribal air quality regulatory agencies to implement the federal Clean Air Act, with EPA oversight. The BLM also recognizes these agencies' ability to establish air quality requirements that are more stringent than the federal standards. All BLM actions (either direct or by use authorization) must comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, and implementation plans. However, the FLPMA directs "the public lands be managed in a manner that will protect the quality of … air and atmospheric … values;" and "In managing the public lands the Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." Therefore, the BLM has the legal authority to limit potential air quality impacts from activities it conducts or approves, subject to its management discretion.

The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans. However, speculation regarding where and how potential development might occur is beyond the scope of this programmatic analysis.

52863-037: Figure 3.5.1-1 in Section 3.5.1.1 provides both prevailing wind information at several monitoring locations throughout the study area and a citation for where

the information was obtained. Speculation regarding specific air quality impacts' mitigation measures is beyond the scope of this programmatic analysis.

52863-038: Section 3.5.3, lists the Prevention of Significant Deterioration (PSD) Class I areas (Table 3.5.3-3) and describes the significance for their designation, as well as identifying the four Class I areas closest to the oil shale and tar sands resources. The Draft PEIS also indicates that most of the study area is designated PSD Class II, which "allow for moderate emission growth." A map of all mandatory federal PSD Class I areas is available online at: http://www.nature.nps.gov/air/Maps/ images/ClassIAreas.jpg

Section 3.5.3, also describes applicable regulations and monitoring programs to address potential visibility and atmospheric deposition impacts and identifies the four Class I areas closest to the oil shale and tar sands resources.

52863-039: Section 3.5.1.2, of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

52863-040: See response to Comment 52863-039.

52863-041: See response to Comment 52863-039.

52863-042: See response to Comment 52863-039.

52863-043: Comment noted. The data referred to in the comment were provided by OSEC and appear in the final Environmental Assessment for their RD&D project. You are correct; greenhouse gas emissions are very dependent on the extraction and processing technologies employed.

52863-044: See response to Comment 52863-039.

52863-045: Water needs for commercial oil shale development would be evaluated at the project levels and reported in project-specific NEPA documents.

52863-046: The assumptions used in the PEIS are considered reasonable for the current purpose; they will be refined in future project-specific analysis considering specific proposed locations and specific proposed technologies, depending on the scope of the project to be assessed.

52863-047: The noise analysis in the PEIS used the most conservative guideline for noise levels as an appropriate measure at the programmatic level. Other guidelines or state-regulated levels may be appropriate when specific sites are proposed for development. The text (introduction to Section 4.7) has been modified to explain

that higher levels may apply given the nature of the zone (area) affected by the activity being considered. As noted in the modified text, there will be two additional levels of NEPA analysis: during the leasing process and approval of the plan of development. At these times, sound levels reflecting the zone appropriate for the proposed site will be used.

The Rio Blanco County regulation has been noted in the text.

52863-048: See response to Comment 52863-048.

52863-049: The references have been added to the text in Section 3.4.2.1 and the chapter reference list.

52863-050: The PEIS states the following in Section 4.9.2, immediately prior to listing the visual impact mitigation measures for oil shale development and operations:

"Development activities will implement visual impact mitigation measures to the extent applicable and practicable. Potential mitigation measures that may be applied to siting, development, and operation of oil shale leases, as warranted by the result of the lease-stage or plan of development-stage NEPA analyses include the following."

Thus the visual impact mitigation measures listed in the PEIS are not "required mitigation." They are explicitly identified as potential mitigation measures. Mitigation requirements would be assessed in future NEPA analyses conducted at the lease and/or plan of development stages.

52863-051: As the PEIS indicates, a full NEPA analysis will need to be undertaken at a lease application-specific level before any lease for oil shale development is issued. That NEPA analysis will consider supporting infrastructures as part of its cumulative analysis.

52863-052: The text in Appendix A has been amended to capture this point.

52863-053: The BLM is evaluating the amendment of land use plans in parts of Colorado, Utah, and Wyoming to identify public lands that would be available for future application for leasing for oil shale or tar sands development. The proposed action does not commit BLM to any particular reclamation state or end-use. Project-specific requirements to ensure the successful reclamation of disturbed land as well as any post-reclamation use would be established by the BLM prior to leasing.

52863-054: The information presented in the PEIS addressing impacts to sage grouse is of sufficient detail for the purposes of the PEIS. The PEIS provides an overview of a multitude of impacts that could occur to sage grouse from commercial oil shale and tar sands development.

The PEIS is a programmatic-level document that analyzes allocation decisions. There is sufficient information pertaining to habitat fragmentation on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing.

It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. These documents will evaluate specific occurrences of species of concern and analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. Site-specific NEPA analysis would include mitigation such as BMPs, specific protections, or avoidance to mitigate or eliminate impacts to sage grouse from commercial oil shale or tar sands development. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders. Mitigation of impacts on sage grouse would include recommendations included in the BLM's national sage grouse habitat conservation strategy, as well as those contained in statewide and regional sage grouse conservation strategies that have been prepared by state agencies.

52863-055: The list of conservation measures presented in Appendix F was developed in consultation between the USFWS and BLM specifically for the oil shale and tar sands program. As stated in the text, these measures are not meant to be the final list of measures to be employed and would be subject to modification on the basis of consultation with the USFWS at the project-specific lease and development stages.

52863-056: See response to Comment 52863-055.

52863-057: The conservation measures listed in Appendix F include avoidance of riparian and wetland resources whenever possible and restoration when avoidance is not possible. As stated in the comment, any impacts on jurisdictional wetlands or waters of the United States would require a Section 404 permit from the United States Army Corps of Engineers.

52863-058: See response to Comment 52863-055. These measures are not meant to restrict flexibility in developing innovative approaches to protecting listed species.

52863-059: The list of conservation measures presented in Appendix F was developed in consultation between the USFWS and BLM specifically for the oil shale and tar sands program. As stated in the text, these measures are consistent with existing requirements. These measures are not meant to be the final list of measures to be

employed and would be subject to modification on the basis of consultation with the USFWS at the project-specific lease and development stages.

52863-060: The distribution and status of Colorado River cutthroat trout in the study area are discussed in Sections 3.7.1 and 3.7.4. Impacts to this species are discussed in Sections 4.8.1.1 and 4.8.1.4. A wildlife management plan that includes this species is not necessary as the BLM is signatory to the Colorado River cutthroat trout Conservation Agreement (CRCT Conservation Team 2006), which identifies conservation objectives and actions for this species.

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. The PEIS compares potential impacts of the allocation decisions on ecological resources but is based on a comparison of lands available for leasing among alternatives with key aquatic and terrestrial habitats that overlap the lease areas. Subsequent project- or site-specific NEPA documents will be prepared to determine whether or not a lease will be offered in a specific area. These will include quantitative analyses of water quality impacts to fish and wildlife species that occur within the project area, including considerations of direct, indirect, and cumulative effects (including other infrastructure required to support oil shale and tar sands development); reasonable alternatives; and mitigation measures to protect fish and wildlife habitats. Mitigation measures would be determined in conjunction with input from federal, state, and local agencies and interested stakeholders.

52863-061: See response to Comment 52863-055.

52863-062: The list of conservation measures presented in Appendix F for the southwestern willow flycatcher was developed in consultation between the USFWS and BLM specifically for the oil shale and tar sands program. As stated in the text, these measures are not meant to be the final list of measures to be employed and would be subject to modification on the basis of consultation with the USFWS.

52863-063: The list of conservation measures presented in Appendix F for the Canada lynx was developed in consultation between the USFWS and BLM specifically for the oil shale and tar sands program. As stated in the text, these measures are not meant to be the final list of measures to be employed and would be subject to modification on the basis of consultation with the USFWS.

52863-064: Conservation measures presented in Appendix F of the PEIS were developed jointly by the BLM and USFWS to avoid and minimize impacts of commercial oil shale development on federally listed threatened and endangered species and could be applied, if deemed appropriate and in consultation with the USFWS, at the lease or development stage of potential future projects. As stated in the PEIS, ESA Section 7 consultations between the BLM and the USFWS would be required for all projects that have the potential to affect listed species before

leased areas could be developed. Those consultations would identify conservation measures, allowable levels of incidental take, and other requirements to protect listed species.

52863-065: Please see responses to Comments 52863-117 through 52863-131, 52863-134, and 52863-135.

52863-066: The text in Sections 6.1.5 and 6.2.5 define study areas considered to usually include the lands managed by a BLM Field Office that contain oil shale resources and the ROI counties associated with them, as defined in Table 3.10.2-1. Larger areas are considered for certain resources (e.g., land, air, and water).

The PEIS cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

For example, NEPA analyses at the leasing and development stages will consider effects from Reasonably Foreseeable Future Actions (RFFAs) (40 CFR 1508.7). If the proposed action would impact a particular resource that one or more RFFAs would also impact, the impacts of those RFFAs would be included in the cumulative effects analysis for the proposed action. At the leasing or development stage, the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects. For example, the geographic extent of a cumulative effects analysis for leasing or for a proposed development project will reflect not only the geographical limits of the proposed lease/projects but also the geographical limits of the resource being affected (e.g., elk winter range).

52863-067: An RFDS uses variables or factors to make an informed estimate of the types and number of oil shale or tar sands operations needed to produce the resource. These variables would include the price, availability of exploration and development equipment, availability of infrastructure including the pipeline transportation network, the type of technology, economics, and the willingness of investors to invest in the project. It was therefore difficult to project a likely anticipated oil shale and tar sand activity supported by a clear set of supportable assumptions. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available information would be too speculative to support a meaningful scenario. Analysis of the cumulative effects in this PEIS will be qualitative to reflect the limited and highly speculative character of the information available and the limited nature of the decision to be made on the basis of this PEIS.

As explained in Sections 6.1.5 and 6.2.5, in order that the decision maker might have sufficient information to make a reasoned choice among the alternatives, the BLM has developed a general analysis of the potential incremental impacts from all past, present, and reasonably foreseeable actions, in conjunction with a single hypothetical oil shale or tar sands facility, with the understanding that there might be more than one or even many oil shale/tar sands projects.

52863-068: Please see the response to Comment 52863-005. The PEIS has been revised to clarify the discussion of this issue.

52863-069: Table ES-1 has been modified to clarify the conditions present in Alternative A.

52863-070: Thank you for the comment. References in the document have been changed.

52863-071: This has been corrected.

52863-072: Thank you for your comment. This has been added to the document.

52863-073: Section 2.2.1 has been modified to address the 2006 Supreme Court decision in Rapanos vs. United States and clarify the scope of CWA jurisdiction.

52863-074: Section 2.2.1 has been modified to indicate that the reviews are to be conducted every three years.

52863-075: The description of Alternative A in Section 2.3.2 has been clarified.

52863-076: The description in Section 2.3.2 of the Final PEIS has been modified to more clearly describe Alternative A.

52863-077: The “density” of these data makes it very difficult to reproduce in this document. The information summary in the PEIS is based on decisions regarding protection of sensitive resources related to oil and gas operations in existing RMPs and is available in BLM State Offices and Field Offices.

52863-078: Thank you for your comment. The change has been made.

52863-079: Thank you for your comment. A text change has been made.

52863-080: The text in Section 3.1.1.5 has been revised as suggested.

52863-081: Although newer data may indicate halite beds are up to 100 ft thick, the BLM is relying on the available, citable reference (DOI 1973) data that states that the halite beds are up to 30 ft thick; the text in Section 3.2.1.5 has remained unchanged.

52863-082: Evacuation Creek is an accurate name for this member of the Green River Formation; however, the text has been changed to note that this formation is also commonly known as the "Uinta-Green River Transition."

52863-083: The text in Section 3.2.2.5 has been modified.

52863-084: It is acknowledged in Section 4.4 that the discovery of previously unidentified fossils would be a possible benefit of development. Also, as stated on page 4-1 of the Draft PEIS, the PEIS provides examples of mitigation measures that the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final or comprehensive list of required stipulations or management prescriptions.

52863-085: The discussion of the Potential Fossil Yield Classification identifies the units that have a high potential for containing fossils. Table 3.3-1 lists this information. The discussion of the classification system acknowledges that the potential for paleontological resources would vary. Specific analysis would be done at the site-specific level that would further identify when and if monitoring by paleontologists would be necessary. No text change has been made.

52863-086: It should be 15 million ac-ft instead of 12 million acre-ft. The share of the Upper Colorado River Basin states is assumed to be 6 million acre-ft, with 7.5 million acre-ft delivered to the Lower Colorado River basin states plus 0.75 to Mexico (a total of 14.25 million acre-ft that is less than the 15 million acre-ft). In 2007, a study by the BOR (2007), confirmed that the long-term natural flow at Lees Ferry would be about 15 million acre-ft. The text has been corrected.

Final EIS-Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operation for Lake Powell and Lake Mead.

52863-087: Salinity control is an important issue when evaluating potential impact to water quality across the basins in all three states. However, the PEIS is a programmatic-level document, and state and local programs for salinity control would instead be covered in site-specific NEPA analyses for any proposed commercial developments.

52863-088: The list of 303(d) impaired streams changes annually and is submitted to EPA for approval. The PEIS uses the most current approved lists. When an oil shale and/or tar sands project is developed, the most updated impaired streams near the project site would be listed. Impacts on these streams as well as other streams would be evaluated.

52863-089: Thank you for your comment. The specified text in Section 3.4 has been revised.

52863-090: The text in Section 3.4.1.4 has been revised accordingly.

52863-091: Thank you for your comment. The text has been revised accordingly, as shown at the end of the first paragraph in Section 3.4.1.1.

52863-092: The space has been inserted.

52863-093: According to the cited reference (BOR 2004), all groundwater pumpage is considered consumptive use in the Colorado River Basin. The most recent provisional draft from June 2007 contains the same language. The reference text in the PEIS has been retained.

52863-094: The colon (:) has been inserted.

52863-095: As the commentor concluded, site-specific NEPA analysis would be performed for any proposed developments. These analyses would include analysis of the local hydrogeologic framework and measurements of relevant parameters.

52863-096: The first paragraph of Section 3.4.2.1 includes a description of the variability to be expected within units that are generally aquitards or aquifers. Some of the text in the referenced paragraph has been modified in a way consistent with the commentor's proposed language.

52863-097: The text in Section 3.4.2.1 has been updated to account for other parameters of the classification system.

52863-098: The recharge rate is a relevant value for the Piceance Basin from a respectable source. Recharge is difficult to estimate, and its rate in the Piceance Basin would be expected to vary locally due to varying surficial material properties. Glover et al. (1998) assert the reasonable claim that little or no recharge occurs in the summer. Their estimate of recharge from losing streams is minimal compared to the recharge from infiltration of precipitation. The recharge is estimated as 0 to 2.3 in./yr, depending on elevation, according to Glover et al.(1998). This information has been included in Section 3.4.2.1.

Please see also the response to Comment 52863-100.

52863-099: The text in Section 3.4.2.1 has been modified in response to the comment.

52863-100: The text in Section 3.4.2.1 has been modified to make more clear that the withdrawal rate represents a wider area with multiple aquifers.

52863-101: The Green River water quality is described in Section 3.4.2.1 prior to the reference paragraph. This material has been expanded to address the concern of the commentor.

52863-102: The text in Section 3.4.2.1 has been modified accordingly.

52863-103: The referenced paragraph has been deleted.

52863-104: The "Water Districts" should read "Water Divisions." The text in Section 3.4 has been corrected.

52863-105: The text in Section 3.4.2.2 has been expanded to include drought year flow information.

52863-106: Thank you for your comment. The text has been corrected.

52863-107: "Yellow Creek" has been added to Figure 3.4.2-1.

52863-108: The text in Section 3.4.2.2 has been corrected.

52863-109: The text in Section 3.4.2.2 has been revised to include more recent information.

52863-110: The specified text in Section 3.4.4.2 has been corrected.

52863-111: Wind data presented for specific monitoring stations should not be assumed to be representative of regional flow due to influences by local topography. Speculation regarding what meteorological data might be needed to analyze air quality impacts from potential site-specific development is beyond the scope of this programmatic analysis.

52863-112: The Final PEIS text has been modified to use the term "Colorado Class I SO_2 Increment area(s)."

52863-113: The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process.

52863-114: The Final PEIS text has been modified to use the term "Colorado Class I SO_2 Increment area(s)."

52863-115: Section 3.5.3 lists the PSD Class I areas (Table 3.5.3-3) and describes the significance for their designation, as well as identifying the four Class I areas closest to the oil shale and tar sands resources. The Draft PEIS also indicates that most of the study area is designated PSD Class II, which "allow for moderate emission growth." A map of all mandatory federal PSD Class I areas is available online at: http://www.nature.nps.gov/air/Maps/ images/ClassIAreas.jpg

Wind data presented for specific monitoring stations should not be assumed to be representative of regional flow due to influences of local topography. Speculation regarding what meteorological data might be needed to analyze air quality

impacts from potential site-specific development is premature at this stage in the process.

52863-116: Table 3.5.3-2 in Section 3.5.3 appropriately describes the 8-hour ozone concentration as the 4th-highest monitored values. The text did not state 8-hour ozone NAAQS "compliance is determined by the 4th highest value."

52863-117: Text has been added to Section 3.7.1.1.4 to identify that portions of some of the smaller tributaries mentioned go dry during some parts of the year and do not support extensive fish communities.

52863-118: Text has been added to Section 3.10.2.1.2 of the PEIS to include a description of the direct employment benefits of the six existing RD&D projects. Indirect employment and income generated from these projects are presented in Section 6.1.1.10.2.

52863-119: If commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken to analyze in detail the extent of regional economic impacts. If it is determined that additional impacts may occur in other counties outside each ROI, particularly with regard to workforce commuting patterns and oil shale and tar sands project-related electricity generation facilities, these counties would be included in any future site-specific assessment.

52863-120: The text in the PEIS has been changed to address the issue raised in the comment.

52863-121: The text in the PEIS has been changed to address the issue raised in the comment.

52863-122: Text has been added to Section 3.10 of the PEIS indicating the various industry contributions toward mitigating the adverse impacts of oil and gas development in local communities.

52863-123: The text in the PEIS has been changed to address the issue raised in the comment.

52863-124: Population baseline data for each ROI for 2000 were the most recent actual data available when the Draft PEIS was released. ROI population projections, including data for 2004 presented in Section 6.1.1.10, were taken from county population forecasts prepared by each state and reflect growth rates projected in those forecasts.

52863-125: Text has been added to Section 3.10 of the PEIS indicating the various industry contributions toward mitigating the adverse impacts of oil and gas development in local communities.

52863-126: The text in the PEIS has been changed to acknowledge that it is likely that some degree of social change may have already occurred with the advent of the recent oil and gas boom in each ROI.

52863-127: The text in the PEIS has been changed to address information provided in the comment.

52863-128: The text in the PEIS has been changed to address information provided in the comment.

52863-129: The text in the PEIS has been changed to address the issue raised in the comment.

52863-130: As indicated in Section 3.10.3 of the PEIS, Table 3.1.2-1 identifies resources in each ROI that are used for recreational purposes.

52863-131: The text in the PEIS has been changed to address the issue raised in the comment.

52863-132: Text has been added to the PEIS to reflect that, as the commentor suggests, some expenditures in the sectors identified as providing equipment and services to outdoor recreation may also include expenditures made by business visitors, oil and gas workers, and interstate travelers.

52863-133: Please see the response to Comment 52863-020.

52863-134: The production numbers cited refer to barrels of oil. Appendix A, Section 3, acknowledges that flammable hydrogen gases will be produced in both aboveground and in situ retorting. Although those discussions acknowledge the potential commercial value of those gases, the BLM believes that they will most likely be consumed on site to augment commercial fuels used for various external combustion sources needed to support the overall oil shale development operation. BLM also recognizes, however, that as the oil shale industry matures and begins to capture economies of scale and other synergies, flammable gases produced during retorting may be an additional commercial product originating from the oil shale operation.

52863-135: Employment levels presented in Table 4.1.1-1 are for the peak year of construction for each technology. Although the employment numbers in this table are rounded, they match the peak year direct construction employment numbers presented in Tables 4.11.1-1 and 5.11.1-1. Assumptions with regard to the timing of the peak year of construction and the timing of operations can be found in Section 4.11 of the PEIS.

52863-136: Text has been added to Appendix G of the PEIS providing more information on the IMPLAN multipliers used in the analysis.

52863-137: Section 4.1.4 indicates that oil shale facilities will need to connect to existing electric transmission grids and crude oil interstate pipelines. Appendix A describes the manner in which each of the six ongoing RD&D operations connect to the existing electric power grid and the natural gas pipeline network. Both Section 4.1.4 and Appendix A also indicate that some amount of mine-site upgrading of raw shale oil will be required to make it acceptable to refineries as crude feedstock and that crude oil interstate pipeline carriers are also expected to establish acceptance criteria for shale oil for both physical characteristics (e.g., pour point) and maximum amount of contaminants (especially nitrogen-bearing contaminants) before they accept shale oil for pipeline transport. Both of these topics can be expected to receive detailed consideration in the project-specific NEPA analysis that will be completed before any oil shale development lease is issued.

52863-138: Thank you for your comment. You are correct. The extent to which mine-site upgrading will occur will be based on project-specific and site-specific conditions. Upgrading can be expected to be analyzed in detail in the project-specific NEPA analysis that would precede any oil shale development lease issuance.

52863-139: As indicated elsewhere, this PEIS only establishes the basis for land allocations. You are correct that upgrading of raw oil shale will be considered in detail in project-specific NEPA analyses. Leases for oil shale development will be executed only after completion of those project-specific NEPA analyses.

52863-140: As indicated elsewhere, this PEIS only establishes the basis for land allocations. Prior to a leasing decision, additional NEPA analysis would be required.

52863-141: As discussed on pages 4-1 and 5-1 of the Draft PEIS, the PEIS provides examples of mitigation measures, including consultation with stakeholders which the BLM may consider adopting, if site-specific analysis warrants. The measures presented refer to public participation in the land use planning process. These are potential measures that could be adopted and are not proposed as a final or a comprehensive list of required stipulations or management prescriptions.

52863-142: Thank you for your comment.

52863-143: The specified text is based on assumptions noted in Table 4.1.3-1. The text has been modified to note that the range in acreage is approximate.

52863-144: The BLM maintains a process for considering paleontological resources. The process is identified in the BLM Manual 8270. The procedure identified in the comment is part of the existing BLM process. Paleontologists are on staff with the BLM supporting BLM policies in the management of these resources. The BLM will protect public resources in ways consistent with current policies and practices.

52863-145: The section describes common impacts. Stormwater permit regulation would not completely negate the common impacts described in the section.

52863-146: Section 4.5.3 presents a variety of mitigation measures that could be implemented during project construction and operation. Theses are examples of potential mitigation measures which the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final or a comprehensive list of required stipulations or management prescriptions.

See also response to Comment 52863-145.

52863-147: Existing regulations certainly could reduce some impacts of oil shale and/or tar sands development. However, new technologies and types of potential contaminants may occur in the development of oil shale and/or tar sands. The existing regulations are not likely to completely eliminate the impacts described in Section 4.5.1.3.

52863-148: The statement is referring to the National Pollutant Discharge Elimination System (NPDES, not the State Pollutant Discharge Elimination System or SPDES) and the surface runoff not intercepted by drainage systems (e.g., near some access roads).

In the 1987 amendments to the CWA, Congress explicitly excluded stormwater runoff from the definition of a point source. Runoff from mining operations or oil and gas exploration, production, or treatment operations is exempt from the NPDES permit program if that runoff is composed entirely of flows from conveyances or conveyance systems used for collecting and transporting precipitation runoff. To qualify for the exemption, however, the runoff must not be contaminated by contact with any overburden, raw material, intermediate product, finished product, by-product, or waste product located on the site of operations.

In the text, we clarify that Colorado, Utah, and Wyoming have been granted NPDES authorization. The states' NPDES programs must be at least as stringent as the federal program.

In this region, wind is an important agent in eroding and transporting soil particles. Though surface runoff is controlled, as specified by current regulations, the wind processes could have impacts on water resources from mining operations.

52863-149: Although soil and overburden salt content varies, disturbed soil and overburden may generally be presumed to provide a source of increased salinity above background level for nearby surface water or shallow groundwater. The construction design for facilities built for handling various waste streams would

be based on site-specific permitting, and are therefore beyond the scope of this programmatic study.

52863-150: Existing regulations may be able to reduce the impacts of pesticide and herbicide uses. However, the regulations are not likely to completely eliminate the natural dispersion of the pesticides and herbicides or possible misuse during application, resulting in impacts on the water resources.

52863-151: The barrel unit equal to 42 gallons has been revised in the text. The water volumes in the table have also been modified accordingly.

52863-152: Please see response to Comment 52863-148.

52863-153: Thank you for your comment. The text of Section 4.5.3 has been changed accordingly.

52863-154: Wind is an active erosion agent in an arid or semi-arid environment. Timely reclamation of disturbed areas could reduce impacts tremendously.

Decisions regarding the application of any mitigation measures would be based on site-specific and project-specific parameters at later stages of OSTS development.

52863-155: Thank you for your comment. The text in Section 4.5.3 has been revised accordingly.

52863-156: Contour berms and trenches are recommended not only for vehicle service and refueling stations. They are common measures that can be applicable to different areas, as described in the text.

52863-157: The soils in arid and semi-arid environments are very sensitive to erosion, and the size of disturbed areas in oil shale development is expected to be large. Salt loadings in streams in the Colorado Upper Basin are a major concern. Therefore, an erosion and sedimentation plan is recommended.

52863-158: A definition of “atmospheric deposition” has been added to the Final PEIS (Chapter 9 – Glossary).

52863-159: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues

associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation regarding where and how potential development might occur is beyond the scope of this programmatic analysis. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52863-160: See response to Comment 52863-159.

52863-161: The BLM will not conduct or authorize activities which would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. See also response to Comment 52863-159.

52863-162: The Final PEIS text has been modified to use the term “nitrous oxide” rather than “NO_X.” The text in the “2nd and 3rd paragraphs” is appropriate for inclusion in the PEIS.

52863-163: “Support utilities” include, but are not limited to, “power plants.”

52863-164: Thank you for your comment.

52863-165: The text in Section 4.7.1.5 has been revised regarding electricity use.

52863-166: The text in Sections 4.7.2.2 and 5.7.2.2 have been revised to indicate that in some areas continuous, 24-hour construction may be allowed.

52863-167: The suggested text was added to Section 4.8.1.1.

52863-168: Subcategories based on types of activities or species is often a desirable organizational approach. However, adding a further sub-level of categorization to the wildlife impacts discussion in the PEIS would be somewhat cumbersome, particularly as a 6th-level categorization would only contain one or two paragraphs per subcategory.

52863-169: The paragraph prior to the discussion of land-based spills in Section 4.8.1.3.5 provides a discussion of water-based spills. Additional discussion of water-based spills is provided in Section 4.8.1.1, Aquatic Resources. A more detailed site- and species-specific analysis of potential land- and water-based spill impacts on wildlife resources would be conducted for any proposed project.

52863-170: It would not be known until the project-specific lease stage as to whether herbicides would be used during the development, operational or restoration of an oil shale or tar sands lease area. The potential use of herbicides and any mitigation measures to minimize herbicide spills or application to undesignated areas would be included in project-specific NEPA documents.

Information on the general use of herbicides on BLM lands has been analyzed in a separate federal decision in the NEPA document entitled, "Final Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement" and can be found on the World Wide Web at: http://www.blm.gov/wo/st/en/prog/more/veg_eis.html.

52863-171: Wildlife can react to disturbance in various ways, including attraction, habituation, and avoidance. However, noise and human presence generally result in most wildlife avoiding the area. Wildlife species that are common in developed areas could potentially be attracted to a lease development, particularly species such as bears, foxes, and squirrels that readily habituate and can be attracted to human activities primarily when a food source is accidentally or deliberately made available. However, such behavior is considered to be adverse and could lead to dangerous interactions between wildlife and humans. Some attraction to project areas can be due to shade provided by structures and altered food resources provided by plant growth within the project area. Overall, most wildlife would continue to be disturbed by vehicles, facility machinery, and human presence.

The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent project- or site-specific NEPA documents will be prepared to evaluate specific occurrences of wildlife and analyze the environmental consequences of leasing (including consideration of direct, indirect, and cumulative effects of disturbance to wildlife), reasonable alternatives, and possible mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. Site-specific

NEPA analysis would include mitigation such as best management practices (BMPs), specific protections, or avoidance to mitigate impacts to wildlife from disturbance.

52863-172: The commentor is correct in stating that some ACECs are available for mineral development under Alternative B. The text in the PEIS has been corrected.

52863-173: All water depletions from the Colorado River Basin are considered to have an adverse effect on the Colorado River endangered fishes. The depletion results in adverse effect regardless of timing and season. Consultation with the USFWS regarding any such depletions must be conducted prior to project implementation as stated in Appendix F.

52863-174: Minor changes were made to the subject text.

52863-175: See the response to Comment 52863-176.

52863-176: The referenced mitigating measures are provided as examples of actions that may be taken at the site-specific level depending upon the conditions on each site. These are not presented as required mitigation measures but as examples of those that may be applied after site-specific analysis.

The comment also suggests specific wording that would limit mitigating measures to only those required by existing regulations of other agencies. Since mitigating measures would be applied to minimize impacts, it is not appropriate at this PEIS level to restrict potential mitigation only to existing regulatory requirements.

As the comment suggests, measures required under existing RMPs will also be applied.

52863-177: The species mix used for the reclamation of disturbed areas would be expected to be developed in coordination with the local BLM office and included in the habitat restoration plan for the project. The use of only native species is recommended, because of the strong influence of seeded species on the composition of the restored plant community and competition from seeded non-native species. However, appropriate methods of soil stabilization and erosion control would be determined by the BLM.

52863-178: The mitigation measure related to vehicle collisions with wildlife has been modified to include the need to obey posted speed limits.

52863-179: The text in Section 4.8.2.3 of the PEIS has been revised as suggested.

52863-180: The text in Section 4.8.3.2 of the PEIS has been revised to reflect the concerns expressed in the comment.

52863-181: The referenced mitigating measures are provided as examples of actions that may be taken at the site-specific level depending upon the conditions on each site. These are not presented as required mitigation measures but as examples of those that may be applied after site-specific analysis.

52863-182: See response to Comment 52863-50. Potential safety issues would be considered when deciding if this mitigation measure would be appropriate for a particular project in the course of additional NEPA analysis that would be required using the site-specific information prior to the issuance of any lease.

52863-183: The statement has been retained. It is true that leases and project approvals are subject to compliance with state and federal requirements for cultural resource protection, as is stated in the PEIS. However, the issuance of a lease grants property rights to a lessee and is an irretrievable and irreversible commitment of the resource. If lease stipulations, for whatever reason, fail to mitigate a situation that arises concerning a cultural site, the managing agency's ability to rectify the situation and manage those resources properly could be limited.

52863-184: The BLM does note in Sections 4.10 and 5.10 that projects are subject to existing federal, state, and local laws and regulatory requirements, as well as established BLM policies. It is also acknowledged in these sections that the discovery of previously unidentified cultural resources would be a possible benefit of development. Sections 4.10.2 and 5.10.2 present the potential impacts that could occur as a result of leasing and development, but it also clearly states that mitigation measures can be applied to limit the magnitude of these impacts and potentially avoid them altogether. The level of protection and mitigation provided by statute and regulations is more evident at a project-specific level. The cultural resources analysis provides full disclosure to the public and the decision maker of the potential adverse consequences of leasing and development activities, the mitigation afforded by federal and state laws and regulations, the scientific and cultural benefits, and the examination and preservation of newly discovered sites.

52863-185: Text has been added to the PEIS indicating that it is possible that some community development programs, with participation from energy resource developers and local, state, and federal governments, will be implemented proactively in each ROI to avoid, manage, or mitigate negative social, economic, and fiscal consequences of oil shale development, prior to development of oil shale.

52863-186: As the technologies, scale of development, and project locations associated with oil shale, and tar sands, and ancillary development are not known, the analysis described in the PEIS was based on a series of assumptions regarding project production levels and timelines for each resource and technology, direct project employment, direct and indirect population (workers and their families) in-migration rates, the provision and location of direct and indirect worker housing, and local public services and infrastructure during both construction and

operations phases. These assumptions, described in Section 4.11 of the PEIS, were based on publicly available NEPA reviews, BLM experience with oil shale and tar sands and other energy-related projects, and industry data on power generation and coal mining. These assumptions are reasonable for a programmatic review of potential socioeconomic impacts.

52863-187: See response to Comment 52863-186.

52863-188: The text in the PEIS has been changed to acknowledge that it is likely that some degree of social change may have already occurred with the advent of the recent oil and gas boom, tourism and recreation, retirement, and second home development in each ROI.

Further analysis of social change occurring with various forms of economic development could be analyzed in more detail as part of future NEPA reviews of commercial oil shale and tar sands facilities. The PEIS attempts to illustrate the character and extent of social change that may occur in rural communities associated with energy development in Section 3.10.2.2.5.

Text has been added to the PEIS indicating that it is possible that some community development programs, with participation from energy resource developers and local, state, and federal governments, could be implemented proactively in each ROI to avoid, manage, or mitigate negative social, economic, and fiscal consequences of oil shale development, prior to development of oil shale.

52863-189: The results of the analysis using a gravity model assigning in-migrating population to specific communities was not included in the PEIS because of the programmatic scope of the analysis. Although socioeconomic data are available at the individual community level, the analysis presents data at the ROI-level in order to capture the overall scale of the impacts of each technology and ancillary facilities. When commercial-scale development occurs, additional NEPA analyses would determine the impacts of facilities on population, employment housing (including the capacity of local housing markets to absorb new oil shale and tar sands workers and their families), and local government finances and employment for the communities most likely impacted.

52863-190: The text in the PEIS has been changed to acknowledge that it is likely that some degree of social change may have already occurred with the advent of the recent oil and gas boom in each ROI and the growth in tourism and recreation in the Colorado ROI.

52863-191: As indicated in Section 3.10.3 of the PEIS, Table 3.1.2-1 identifies resources in each ROI that are used for recreational purposes.

As it is not known which recreational resources are likely to be affected by oil shale or tar sands development and by how much, the economic analysis uses the two scenarios to estimate impacts on the sectors providing recreational equipment and services to visitors using public lands on which development may occur. As a result, as the commentor notes, there is no direct connection between specific recreational resources and the resulting economic impacts of oil shale or tar sands projects.

When commercial-scale resource development occurs, additional NEPA analyses could be undertaken to analyze in detail the extent of the impacts of these developments on recreation visitation and expenditures at specific recreational resources in each ROI and the resulting regional economic impacts.

52863-192: Information on the impacts of the Colony Project on property values can be found in Section 3.10.1 of the PEIS, and on the impact of recent oil and gas development in Section 3.10.2.2.2. Discussion of the potential impacts of oil shale and tar sands projects on property values, including changes in property values both in the vicinity and at some distance from the developments, can be found in Section 4.11.1.6.

52863-193: A series of mitigation measures related to the provision of direct and indirect employee housing and related services were suggested in the PEIS in order to reduce the initial impact of construction and operations activities in each ROI, particularly with regard to the impact on housing markets.

As discussed on pages 4-1 and 5-1 of the Draft PEIS, the PEIS provides examples of potential mitigation measures which the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final or a comprehensive list of required stipulations or management prescriptions.

52863-194: The text in the PEIS has been changed to acknowledge that it is likely that some degree of social change may have already occurred with the advent of the recent oil and gas boom in each ROI.

52863-195: Text in Sections 4.12 and 5.12 of the PEIS has been changed to reflect that oil shale or tar sands developments would only produce adverse impacts that are experienced disproportionately by low-income and minority populations in a number of locations in each ROI.

52863-196: Thank you. The text has been changed.

52863-197: The points made in the comment are correct. Relatively small amounts of hazardous materials will be utilized in the maintenance of housing and administrative areas. Appropriate changes have been made to the text.

52863-198: The RCRA exclusion cited in the comment, 40 CFR 261.4(b)(3), applies only to overburden (i.e., that which overlies the desired material) that is returned to the mine site. The discussion here speaks to spent shale, which is a waste product of aboveground oil shale processing and would not be covered by the cited exemption. Nevertheless, the alternative language suggested in the comment removes any possible misunderstanding, so the term "waste pile" is being changed to "spent shale pile."

52863-199: Thank you for the clarification. A text change has been made.

52863-200: Although many of the bullets reproduce controls normally applied through the implementation of a RCRA regulatory program, they are itemized here for emphasis and as a way of indicating to those readers that are uninformed about the RCRA program the types of controls and protections that are considered most essential. As for the applicability of Just-in-Time ordering, it can be argued that remote locations are exactly the locations that can most benefit from adoption of this strategy as a way to minimize the amounts and types of hazardous materials present on-site and to ensure that emergencies involving hazardous materials present on-site can be successfully resolved using on-site resources and personnel. No text changes have been made.

52863-201: It can be argued that the remoteness of the location especially requires a just-in-time ordering strategy for hazardous materials to ensure that any emergency can be effectively managed by on-site personnel and resources, at least until remotely located additional support can arrive on the site. The applicant is still free to consider the exigencies of weather and the remoteness of the area when determining the minimal amounts of hazardous materials that need to be retained on-site to avoid operational disruptions. Appropriate logistical controls can be established to both minimize the amounts of hazardous materials present and avoid operational disruptions.

52863-202: Thank you for the comment but the BLM believes the current description of the area provided throughout the PEIS conveys an accurate picture of the nature of the study area.

52863-203: The text in Section 6.1.1.4 has been revised accordingly.

52863-204: The text in Section 6.1.1.4 has been revised accordingly.

52863-205: The disclosure of the presence of an archaeological site within the Shell Site 3 project location and the identification that adverse effects could occur if the site is determined eligible for listing on the National Register of Historic Places is appropriate. Mitigation measures would not be necessary if no possible adverse effects were identified. This does not imply that the operator would intentionally disturb the site, but with more people and equipment in an area, negative impacts sometimes do occur. Sections 4.10 and 5.10 discuss a range of possible impacts to

cultural resources that could occur as a result of future leasing and development. These sections do identify the positive benefits of data recovery as new information can be made available to the scientific community. However, data recovery still results in the irretrievable loss of contextual data, even though artifacts may be salvaged, thereby making many components of the site unavailable for future study.

52863-206: A wording change has been made to indicate that ACECs could be impacted under this alternative. In ACECs not closed to mineral entry BLM, would likely mitigate impacts to important resources depending on the situation; however, ACECs can be changed, modified, or removed in the BLM planning process so impacts to protected resources are possible.

52863-207: Thank you for your comment. The Final PEIS has been edited to catch these kinds of inconsistencies.

52863-208: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Therefore, the impact analyses provided in the PEIS qualitatively indicate the types of impacts that could occur to wildlife based on BLM experience with other types of mineral development. The commentor is correct that the effects of leasing among alternatives would be the same if the same number of leases were granted for the same locations, and that impacts could potentially be greater for Alternative B due to the increased acreage available for development and the fewer stipulations when compared to Alternative C. Section 6.1.4.7 compares the potential impacts to ecological resources from oil shale development among the three alternatives.

52863-209: A comparison of the impacts of alternatives in presented in Section 6.1.4.7.4. That section notes the differences in the amounts of land available for leasing under the two alternatives, differences in the number of species found in areas available for leasing under the three alternatives, and the potential impacts of development on threatened and endangered species. Because there are no technology differences among the alternatives, many of the potential impacts of development are expected to be similar.

52863-210: Thank you for your comment. The text of Section 6.1.3.4 has been revised accordingly.

52863-211: The text in Section 6.1.4.7.1 has been modified to improve clarity. Also, please note the estimate of affected stream miles has been changed by the addition of a buffer area to the analysis.

52863-212: See response to Comment 52863-066.

52863-213: See response to Comment 52863-067.

52863-214: As described in the introduction to Sections 6.1.5 and 6.2.5, the cumulative impact study areas considered include the lands managed by BLM Field Offices that contain oil shale and tar sands resources and the ROI counties associated with them. The impact analyses provided in the PEIS qualitatively indicates the types of cumulative impacts that could occur to wildlife. Project-specific NEPA analyses would identify and quantitatively assess any cumulative impacts that are beyond the scope of the cumulative impacts addressed in the PEIS.

52863-215: The document has been changed to note that gas production below the oil shale horizon is occurring.

52863-216: The document has been revised to reflect that Nahcolite is being mined for sodium bicarbonate and that Dawsonite is an aluminum bearing sodium mineral.

52863-217: See response to Comment 52863-034.

52863-218: The text has been corrected.

52863-219: This was a reference to the Mahogany Zone of the Parachute Creek Member of the Piceance Basin. The text has been corrected.

52863-220: Thank you for your comment. A footnote has been added for clarification.

52863-221: As noted in the introductory material of Appendix D, the citations in the tables are only those of general statutory authority. The tables are not intended to list the agencies that implement those statutes.

52863-222: The reference to the Colorado Mined Land Reclamation Act has been added to Table D- 10.

52863-223: Indeed, the EPA does have responsibility to implement new or revised National Ambient Air Quality Standards until such time as the EPA approves implementation by local, state, or Tribal air quality regulatory agencies. If an air quality regulatory agency fails to address any procedure required under the Clean Air Act, the EPA formally takes responsibility for that procedure by establishing a "Federal Implementation Plan."

The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. See also the response to Comment 52863-159.

52863-224: The word "minimization" has been changed to "mitigation." The list of conservation measures presented in Appendix F was developed in consultation between the USFWS and BLM specifically for the oil shale and tar sands

program. As stated in the text, these measures are not meant to be the final list of measures to be employed and would be subject to modification on the basis of consultation with the USFWS at the project-specific lease and development stages.

52863-225: See response to Comment 52863-055.

52863-226: Given the programmatic nature of the PEIS, the purpose of the analysis of socioeconomic impacts was limited to estimating impacts for a ROI in each state based on the likely residential location of project workers and, consequently, the region in which the majority of socioeconomic impacts of the prospective facilities would most likely occur.

Important aspects of the current social environment in each ROI are described in Section 3.10.2.2 of the PEIS, including quality of life, population, housing, fiscal conditions, public service employment, social disruption, and social change.

Text has been added to Sections 4.11.12 and 5.11.12 of the PEIS indicating that it is possible that some community development programs, with participation from energy resource developers and local, state, and federal governments, could be implemented proactively in each ROI to avoid, manage, or mitigate negative social, economic, and fiscal consequences of oil shale development, prior to development of oil shale.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52864.

Comment Date: March 20, 2008 16:38:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52864

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Privacy Preference: Withhold name and address from public record
Attachment: Oil Shale PEIS Public Comment letter.pdf

Comment Submitted:

See Attachment.

March 18, 2008
, CO

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

Re: Public comment on BLM Oil Shale and Tar Sands Draft Programmatic EIS proposed alternatives.

Dear BLM,

The purpose of this letter is to urge the policy adoption of **Alternative A, no action,** from the current BLM Oil Shale and Tar Sands Draft Programmatic EIS. While specific reasons will follow, the general premise is that the BLM is being forced to react to a short-sighted, knee-jerk dictate to resolve America's foreign source energy dependence with expedience and at any cost. While the historical conditions surrounding the creation of the Energy Policy Act of 2005 are well understood by the author, I submit that to enact policy based on he dictated PEIS in a hasty manner, with regards to leasing the federal lands that encompass the Oil Shale deposits of the upper Colorado River watershed, would be to capitulate to an industry written, poorly conceived congressional mandate that wholly fails to take into account the massive known and unknown environmental impacts that large scale resource production from the shale would impose upon the affected areas. 52864-001

Foremost amongst my concerns are the recommendations of the RAND Corporation study, Gauging the Prospects of a U.S. Oil Shale Industry, Rand Corp., 2005 (http://www.rand.org/pubs/research_briefs/RB9143/index1.html). While it is understood that the Energy Policy Act of 2005 required a rapid release of a PEIS, it should be noted that this timeframe was mutually exclusive with many of the recommendations of the Rand study, most of which are common sense measures required prior to any responsible decision on large scale mineral rights leasing of Federal Lands . A summary of the Rand key Recommendations are included here:

"When private firms are willing to devote, *without appreciable government subsidy*, their resources to oil shale development, government decisionmakers should address the critical policy issues above. In particular, early action is warranted to:

- Develop and implement a research plan to establish options for mitigating ecological damage;
- **Conduct research aimed at mathematically modeling the subsurface environment, along with a multiyear hydrological, geochemical, and geophysical monitoring program (if investments are for in-situ retorting);**
- Conduct research aimed at establishing and analyzing options for long-term spent shale disposal (if investments are for mining/ surface retorting);
- Model regional air quality to determine preferred locations for federal leasing and inform decisions on air quality permits for initial plants; and
- Develop a federal shale oil leasing strategy for the Green River Formation.

Many uncertainties about technology performance and environmental impacts are unresolved, and most of the critical issues will not be fully resolved until the initial round of large-scale commercial facilities are constructed and operated. **Given this, oil shale development should proceed at a measured pace**. 52864-002

Because oil shale development could profoundly affect local residents and other stakeholders, the federal government should consider fostering the creation of a regionally based organization dedicated to planning, oversight and advice, and public participation". 52864-003

My concern is that while the proposed in-situ extraction process has been demonstrated, it is not known is what lingering effects mobilizing millions of barrels of oil will have upon the environment, especially the watershed, in the long term. While much of the oil will be extracted, what percentage remains behind when the site is no longer profitable, and now in a mobile form? Where does the water that will certainly boil out get re-injected, and what will its effect be on local water tables and surface water quality? How long after site closure does it take for the shale to cool off, and does the remained natural gas and oil reabsorb, or is this left as an environmental time bomb to leach into the surrounding rock and strata over time? A proper study of these issues is required before any large scale permitting can be under taken. 52864-004

Another concern not mentioned in the Rand report is the massive amount of energy that this process will consume. In reading the PEIS, it is apparent that it has not adequately analyzed the preferred alternative for connected action. Specifically, the preferred alternative will turn a large swath of currently undeveloped Colorado, Utah and Wyoming into an industrial zone, complete with roads, pipelines, electrical transmission lines, gathering points, and other infrastructure. The energy input alone will require several massive dedicated power plants with their associated costs and pollution, most notably massive greenhouse gas emissions. The build up of this industrial base, along with increased population in the affected areas will impact local air quality, water usage, and energy demands. The current PEIS fails to properly consider these effects, or to thoroughly analyze their long term impact on the region. 52864-005

The third issue I would call attention to is the massive energy usage that the in-situ process requires. While proponents have claimed that the ratio is 1.5 units in for every 3.5 extracted, that measurement assumes that the incredible amount of natural gas that is collected (3 to 4 times the amount of oil that is extracted) will be processed and consumed to provide the heat required to release the hydrocarbons from the shale. The processing alone of this gas will create a huge amount of CO2 and other emissions, not to mention the probable release of a great deal of methane in to the atmosphere. Burning it will cause further pollution, and represents a phenomenal addition to the energy balance equation. The industry claims the 1.5:3.5 ratio based on the fact that much of the heat can be generated by the produced gas and therefore removes the collected gas from the input to the equation as if it were a useless byproduct of the extraction process. Without this chicanery, the ratio is closer to 1:1 or even 1.5:1, a net loss. At very least, the connected action of burning natural gas to extract oil needs to be examined in the light of the clean air act and area land use policy requirements.

52864-006

The final issue is water usage. By the proponent's admission, this process will require 3 to 5 barrels of water for each barrel of oil produced. A cursory examination of the geographic areas that the basins lie in can only yield the conclusion that these water resources do not exist. Certainly there is water here, but taking it comes at the expense of the entire southwest population base and agricultural industry, including Southern California. Above the concern of poisoning the entire upper Colorado River Watershed, one must question the voracious consumption of this scarce resource and the connected affect it would have on the whole of the southwest, and its millions of residents. I propose that this PEIS has not completed a thorough study of the consequences to the Western States of massive increased water usage in the upper Colorado River drainage if the preferred alternative is granted.

52864-007

In closing, I submit that due to the absence of examination of the connected actions to the preferred alternative, that the only course of action is to adopt Alternative A, no action, until such a time that these issues have been properely addressed.

52864-001 (cont.)

Sincerely,

, CO

Responses for Document 52864

52864-001: The BLM acknowledges the commentor's preference for Alternative A.

52864-002: Thank you for your comment. The BLM believes the program being proposed will proceed in a very deliberate manner consistent with all applicable regulations.

52864-003: The establishment of community development programs or regionally based organizations is outside the scope of this PEIS. The analysis undertaken for the PEIS provides information on impacts in each region of influence in the absence of these measures. A series of mitigation measures related to the provision of direct and indirect employee housing and related services and to the development of socioeconomic monitoring, vocational training, and outreach programs are provided as examples of measures that could be applied in order to reduce the initial impact of construction and operations activities in each ROI, particularly with regard to the impact on housing markets, local public services and infrastructure, social disruption, and wholesale and retail price inflation. Actual development of mitigation measures would occur at the time leasing or plan of development applications are considered.

Text has been added to the PEIS stating that various additional impact mitigation strategies could be designed and implemented at the local and state level, once the location, timing, and magnitude of impacts of specific projects are known, and that the role of tax revenues in attempts to diversify local economies and reduce dependency on natural resource extraction industries could also be considered.

52864-004: Regarding the potential impacts from leaching of organic materials from in situ retorting, please see the responses to Comments 52650-024, 52786-032, and 51371-003. The potential impact from the injection of various waste waters would be regulated and would depend on site-specific conditions. This impact is discussed in Sections 4.5.1.3 and 6.1.1.4 of the PEIS. It is anticipated that monitoring data from the RD&D sites would provide valuable information for decision-making related to any future commercial leases.

52864-005: The BLM prepared a cumulative analysis to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Colorado, Utah, or Wyoming. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical

generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

52864-006: Thank you for your comment. While it is safe to assume that flammable gases that are generated during oil shale processing would be captured and could be effectively used to augment commercial available fuels in support of the oil shale processing activities, there is too much uncertainty in the technological paths that will be used in that processing. Consequently, detailed calculations of the amount of flammable gas generated or the concomitant environmental impacts of the subsequent processing or use of those gases must be deferred to project-specific NEPA analyses that will be conducted before any oil shale development lease is issued.

52864-007: The specific amount of water needed for oil shale development depends on many factors, including scale of development, technologies used in the development, and the locations and hydrologic conditions of project sites. That is the reason the PEIS describes a range of estimates of water needs for oil shale and/or tar sands development.

The PEIS use long-term hydrologic data, states' water plans, and historical water consumption data to evaluate regional water availability in the oil shale basins. Therefore, the water availability results represent long-term average conditions. For projected water uses, results from state water plans were used. The state plans have taken regional population growth into consideration. As stated in the PEIS (Section 4.3.1), whether enough water is available for development depends on the results of intensive negotiations between various parties, including water rights owners, state and federal agencies, and municipal water providers as well as the developers. The source of water to be needed for any oil shale and/or tar sands development projects would be specified in project-specific NEPA documents and not in this PEIS.

The allocation of water of the Colorado River is dictated by various compacts. Therefore, the development of oil shale in the Upper Colorado River Basin is unlikely to affect the water allocation in Lower Basin states, such as California.

Public use water is unlikely to be diverted for oil shale development. Agricultural water might be a candidate for sources of water rights. Impacts on water resources caused by transfers of water from agricultural uses to oil shale development have been added to the text in Section 4.5 of the PEIS.

Thank you for your comment, Donald Cogswell.

The comment tracking number that has been assigned to your comment is OSTSD52865.

Comment Date: March 20, 2008 16:38:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD52865

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Attachment:

Comment Submitted:

Dear Sir.

I am writing to support the adoption of Alternative B. This Preferred Alternative, will help make available for commercial development oil shale resources critical to the economic and energy security of our Nation. Without immediate oil shale development it may not be possible to avert an energy supply crisis substantially worse than the supply shortfalls experienced in the 1970s. As one versed in thermodynamics and the relationship of energy to society it is clear we have no other choice but to include oil shale in the mix. Without it, we have no hope of filling the shortfalls with any alternative.

I urge the BLM to reject Alternative C, because it gives the illusion that oil shale is available, but will not result in serious private sector interest because resources that survive the cut are not as investment worthy as those included in Alternative B. I urge the BLM to reject Alternative A because this simply promotes the status quo, which has existed for nearly a century and which we can ill-afford to continue.

52865-001

Sincerely

Don Cogswell

Response for Document 52865

52865-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Roberta Harper-McIntosh.

The comment tracking number that has been assigned to your comment is OSTSD52867.

Comment Date: March 20, 2008 16:41:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD52867

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State: [Withheld by requestor]
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Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

PLEASE AVOID MINING FOR SHALE OIL FOR MILLIONS OF ACRES ACROSS WY, CO, AND UT. The environmental impact is just too high. In addition to pinching the flow of the already uverburdened CO River, the process requires too much electricity and too much outright annihilation of the land in question. The heavy metals and other leachates are deadly for groundwater supplies. 52867-001

Rather than intensifying our fossil fuel use to the absolute bitter and destructive end, please enact a policy of CREATIVE energy development, not just fossil fuels and poor-yeild ethanol production.

Thank you.

Roberta Harper-McIntosh , NE

Response for Document 52867

52867-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Joanne Avery.

The comment tracking number that has been assigned to your comment is OSTSD52868.

Comment Date: March 20, 2008 17:03:46PM
Oil Shale and Tar Sands
Comment ID: OSTSD52868

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Comment Submitted:

I work in the summers an hours drive from the San Rafael Swell- it is one of my favorite places to hike and explore the wilderness. Please do not create a commercial exploration nightmare- there are few enough places that offer the solitude and beauty of the SRS. Leave it alone! | 52868-001

Response for Document 52868

52868-001: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. The limited action of amending the RMPs will not result in adverse impacts to resources, with the possible exception of impacts to property values. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development in specific locations, including consideration of direct and indirect effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated.

Thank you for your comment, Dave Little.

The comment tracking number that has been assigned to your comment is OSTSD52869.

Comment Date: March 20, 2008 17:12:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52869

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Attachment: BLM Comment Letter.pdf

Comment Submitted:

See Attachment.

DENVER WATER
1600 West 12th Avenue • Denver, Colorado 80204-3412
Phone 303-628-6000 • Fax No. 303-628-6199 · www.denverwater.org

March 20, 2008

BLM Oil Shale &
Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

To Whom It May Concern:

Re: Comments on Draft Oil Shale & Tar Sands Programmatic Environmental Impact Statement

The Front Range Water Users Council (Council), consisting of Denver Water, Northern Colorado Water Conservancy District, Colorado Springs Utilities, Aurora Water, Board of Water Works of Pueblo, Southeastern Colorado Water Conservancy District, and Twin Lakes Reservoir and Canal Company, submit these comments on the December 2007 Draft Oil Shale and Tar Sands Programmatic Environmental Impact Statement (Draft PEIS). The Council members are the largest water suppliers of municipal, commercial, industrial, and agricultural water needs in the state of Colorado. About half of the State's population receives its water supply from Council members. The Council became aware of the Bureau of Land Management's (BLM) Draft PEIS and the schedule for comments in late February 2008. Therefore, a letter was submitted to the BLM on behalf of the Council requesting a 60-day extension to the comment period allowing for a more thorough review of the document. To date no response to the request has been received.

Negative Impact of Large Uses on Endangered Fish Species

Oil shale development impacts to the Colorado River could negatively impact Threatened and Endangered Species. According to a preliminary review, the water requirements for commercial leasing could be substantial, especially when considered in the context of other current and anticipated projects/activities in the Upper Colorado River Basin. The Council is concerned that the substantial water use could hold negative consequences for the Colorado River Endangered Fish Species Recovery Program. In addition, the project as proposed raises several policy questions surrounding the amount of available water from the Upper Colorado River for existing and future development. 52869-001

The State of Colorado is currently engaged in an effort to recover four federally listed fish species (Colorado pikeminnow, Humpback chub, Razorback sucker, and Bonytail) along a 15-Mile reach of the Colorado River approximately 50 river miles below the area of development of oil shale. The Programmatic Biological Opinion (PBO) for the Upper Colorado River

Endangered Fish Recovery Program is a multi-agency effort, which requires upstream water users to release 10,825 acre-feet of water to the mainstem of the Colorado River on a demand schedule. Future depletions associated from oil shale development need to be analyzed concurrent with the releases required to determine if there are impacts to the cooperative efforts on the Upper Colorado River between Front Range Water Users and West Slope water users to benefit the Endangered Species. Currently there is a 120,000 acre-feet pool of developable Colorado River water under the PBO. What will be the impact of oil shale development on the PBO? Will its uses be beyond the 120,000 acre-feet and will that jeopardize the endangered fish? Will its uses place at risk both existing and future East and West Slope diversions? What are the impacts on the 120,000 acre-feet of developable Colorado River water? Is the use of the limited water resource for oil shale development in the best economic, social, and environmental interest of the region and Colorado? 52869-001 (cont.)

Negative Impact on Future Water Development in Colorado

Oil shale development impacts to the Colorado River could have negative impacts on reasonably foreseeable and future water development needs and projects. According to Table 4.5.2-1 (Water Budget Data for Oil Shale Development Projects) of the Draft PEIS, the remaining available surface water in the year 2000 was 340,000 acre-feet/year and the projected amount for 2030 ranges between 268,000 – 412,000 acre-feet/year. Is this data presented accurate? Does this data take into consideration reasonably foreseeable water development projects? The State of Colorado is only now attempting a comprehensive analysis of the amount of Colorado River water remaining under the Colorado River Compact. As a minimum, the Draft PEIS must list the "ranges" of water available for use in Colorado under the Compact. What are the social, economic, and environmental impacts to communities on the Front Range of Colorado if they are unable to develop Colorado River water or they are required to remain dependent on non-tributary groundwater? What are the Threatened and Endangered Species issues associated with this shift in water supply use? How does the shift from use of Colorado River water to South Platte River water affect the Platte River Recovery Program and the four species being protected by that program? Considering that there is only a limited amount of water that can be developed in the Platte River without impacting the Threatened and Endangered Species in Nebraska, how will development of Colorado River water by oil shale impact the social, economic, and environmental resources on the Front Range of Colorado? 52869-002

Additional Analysis of Population and Technology Impacts Needed

Oil shale development impacts to the Colorado River will have impacts on population growth and energy use. The Draft PEIS should provide a more detailed analysis and additional discussion of the population influx associated with oil shale development, the proposed retorting technologies, and the subsequent energy demands. These variables could potentially have a greater impact on water resources in the region and is inadequately addressed. The Draft PEIS mentions proposed in-situ retorting technology and underground mining techniques with surface retorting that are to be implemented as part of the oil shale development and does not specify duration or the technology most feasible for the oil shale areas located in Colorado. However, variability in amount of water needed and the potential environmental impacts associated with these technologies make it difficult to determine the effects on resources on such a large scale, especially since the incorrect assumption is made that resources will be available for oil shale development under all conditions. Impacts associated with dewatering activities involved with 52869-003

the in-situ retorting process could be significant. These impacts could include degrading/depleting groundwater resources, critical habitat areas, aquatic resources, and surface water quality. 52869-003 (cont.)

Water Quality Impacts

Oil shale development impacts to the Colorado River could have negative impacts to water quality, water treatment facilities, and raw water users. There is also an increased risk of significantly reduced quality water resulting from the oil shale sites. Another potential environmental concern is the increase in salinity and other toxic compounds stemming from oil shale development that could adversely affect the Colorado River Basin ecosystem, endangered fish species, and municipal, industrial, agricultural, and recreational users. The Draft PEIS provides no discussion about baseline or comprehensive water quality monitoring of the water resources in this region. A water quality monitoring program would provide important background data on water quality in the developable oil shale areas, especially since it is indicated that water generated from oil shale development would be of lower quality than the receiving waters. Therefore, the Draft PEIS should provide more technology specific data to further define the impacts of oil shale development on water resources. Oil shale development has not historically been successful in Colorado so the Draft PEIS should also consider the corresponding "bust" cycle if oil shale development is not economically feasible and how the water resources could be reallocated to beneficial uses that will support population growth in other areas of the state. 52869-004

Increased Energy Demands

Oil shale development impacts to the Colorado River could have negative impacts by increasing energy demands in the region. Along with increased oil shale development and production over the BLM's suggested 20 year period of time, there would be an increase in energy needs. These increased energy needs could elevate levels of greenhouse gases, which could have potential impacts on climate and regional water supplies. The Draft PEIS identifies the need for a 2,400-MW coal fired power plant to service the needs of the oil shale industry and the population growth (double the size of the Craig power plant, the largest power plant in Colorado). The Draft PEIS shows inconsistencies between Table 4.1.6-1 (Assumptions Associated with a 1,500-MW and a 2,400-MW Conventional Coal-fired Electric Power Plant) and the text on Page 4-32. The table indicates water use of 13,000 acre-feet/year, yet in the text water use of approximately 13,800 acre-feet/per year is suggested. This 800 acre-feet/year difference corresponds to approximately 6%, which represents a significant amount of water in this tri-state area. The Draft PEIS should also consider the impacts associated with the amount of water consumed, water quality impacts, and increased emissions, such as greenhouse gases from additional coal-fired power plants to meet energy needs for development. If it takes a 2,400-MW coal-fired power plant to serve oil shale development, is there a reasonable expectation that there will be sufficient oil developed to justify the cost including other resources consumed, i.e. coal and water. 52869-005 52869-006

The Draft PEIS has raised substantial concerns that development of oil shale in Colorado could significantly affect the Council's ability to serve its existing customers and the future growth projected for the Front Range of Colorado. The Draft PEIS provides insufficient data and analysis and does not properly identify or address the direct or cumulative impacts caused by oil 52869-007

shale development. Furthermore, the BLM's present deadline for comments does not provide the Council with adequate time to prepare specific comments on this potentially enormous new water use of an already strained water supply. In short, it is critical that the Council have adequate time to develop a comprehensive set of comments on the Draft PEIS. The fact that oil shale development in Colorado has been discussed for decades, and with the potential impacts that oil shale development could have on the state's existing and future citizens, the Council believes it should have a meaningful role in the comment process. 52869-008

Sincerely,

Dave Little on behalf of the Front Range Water Users Council

cc:
Governor of Colorado Bill Ritter
Director of Colorado DNR Harris Sherman
Senator Wayne Allard
Senator Ken Salazar

Responses for Document 52869

52869-001: This PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. The PEIS provides an effective analytical foundation for subsequent project-specific NEPA documents.

The amount of water needed would depend on many factors including the technologies to be used, the scale of the development, water conservation measures, and the location of a project site, which dictates groundwater and surface water conditions. These factors would remain unclear until a development plan is submitted and after the BLM accepts leasing applications for oil shale and/or tar sands development. Therefore, the impacts on the instream flows under the Colorado River Endangered Fish Species Recovery Program would be better evaluated at the project level. The results of the evaluation would be reported in subsequent NEPA documents.

Instream flows water rights are held and administrated by CWCB in Colorado. The water rights are protected in the same ways as other water rights. Any water rights transferred to oil shale developers in Water Court would be subject to the test of the "No Harm Rule" that provides protection to downstream water rights holders from injury. CWCB could exercise water calls when existing instream flow water rights are threatened.

52869-002: The estimates in the table are based on CWCB's Statewide Water Supply Initiative study in 2004. They are possible because the acreage of agricultural land is expected to reduce with time. The details of the estimates can be found in Tables 4.5.2-1 and 3.4.1-2.

Based upon the Upper Colorado River Basin Compact, the share of Colorado state is 51.75% of the amount allocated to the Upper Basin states (see Section 3.4.1.1).

This PEIS is a programmatic-level document, analyzing allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and possible mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. The PEIS provides an effective analytical foundation for

subsequent project-specific NEPA documents. The amount of water to be needed would be better understood at the future project-specific level.

52869-003: Estimated population influx associated with oil shale development is discussed in Section 4.11.1.2, and estimated water needs, including those for worker families, are presented in Section 4.5.2. Potential impacts of dewatering are also discussed in Section 4.5.2. At this time information is not available to specify the start date or the duration of oil shale development activities.

This PEIS analyzes the environmental consequences of land use allocation decisions and not the consequences of oil shale or tar sands development. However, the PEIS provides an effective analytical foundation for subsequent project-specific NEPA analyses that will be required.

52869-004: This PEIS is a programmatic-level document, analyzing allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. The PEIS provides an effective analytical foundation for subsequent project-specific NEPA documents.

For future oil shale and/or tar sands development projects, each project will need to establish environmental baseline conditions including monitoring networks near project sites. Water uses, wastewater handling, water sources, technologies used for the development, and all activities in the vicinity of the project site would be specified. The above information would be used to evaluate impacts. The results would be reported in project-specific NEPA documents.

52869-005: Thank you for your comment. In order to provide a reference point against which various environmental impact analyses could be performed, the BLM made a set of assumptions regarding necessary support for reasonably foreseeable future commercial oil shale operations (including the manner in which necessary additional power would be provided). However, the BLM also recognizes that a vastly different development scenario may actually materialize than the one the BLM envisioned, and resource needs may similarly be vastly different. While the assumptions provided in the PEIS are sufficient to support land allocation decisions, they do not support leasing decisions. Comprehensive NEPA analyses, including analyses of necessary supporting infrastructures, must be completed on a project-specific basis before leases are issued.

The BLM uses a phased approach to oil shale development. The first phase is an RD&D leasing program that the BLM believes will significantly enhance the collective knowledge regarding commercial technologies and associated impacts.

This information would allow the BLM to make justified decisions regarding oil shale development. If coal-fired power plants are used to generate energy for in situ oil shale development, the emission from the plants could increase greenhouse gases in the atmosphere. The amount of the emission depends on the technology used in the power plants. The emission impacts would be evaluated in project-specific NEPA documents, if leasing is granted for oil development.

The water use of 13,800 ac-ft/year in the text has been changed to 13,000 ac-ft/yr. Thank you for your comment.

52869-006: The PEIS provides a general discussion of the impacts associated with water and power requirements associated with potential future oil shale and tar sands development. At present, water and power requirements are very speculative due to the variation in technology currently available, and because the source of the water and power (and, therefore, the impacts) is unknown. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power and water requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52869-007: The PEIS presents estimates of water demand for individual oil shale and tar sands projects that are based on estimates for existing technologies. As noted in the text, there is some uncertainty associated with those estimates as applied to future technologies. More realistic assessments of water use await results from the RD&D program. Additionally, there is too much uncertainty at this time to identify likely development scenarios as would be required for a more accurate cumulative impact analysis.

52869-008: Thank you for your comment. The BLM made the PEIS available for review for slightly over 120 days. The standard comment period for a draft EIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Per CEQ regulations, the BLM planning and NEPA processes are integrated. Therefore, the BLM provided a 90-day comment period, doubling the amount of time for the public to review and comment on the PEIS. In addition, the BLM extended the review period an additional 30 days.

The decisions in the PEIS will not foreclose future opportunities for meaningful consultation regarding the incredibly complex water issues that all Western states are facing. The PEIS has identified water issues as critical to the future consideration of the development of oil shale, and the BLM intends that they will receive close scrutiny in each subsequent NEPA action considering commercial leasing and development.

The BLM is conducting a phased decision-making process for commercial oil shale development—proceeding from land use planning, to leasing, to operational permitting. The land use planning or allocation decision does nothing more than to remove an administrative barrier preventing the BLM from accepting lease applications. Subsequent NEPA analysis will be required prior to the leasing and development phases. Water availability to support oil shale development depends on many factors including state law and regulation, available water supplies, project locations, technologies to be used, and various other activities involved in the development. Impacts of water depletion and other surface and groundwater impacts would be addressed in subsequent project-specific NEPA documents when these factors can be better defined. Depending on the type and level of development, regional water impacts may limit oil shale and tar sands development (Section 6.1.5.3.4).

The BLM has also initiated the research, development, and demonstration leasing process to provide important information, including water usage and treatment needs, that can be used as the BLM works with communities, states, and other federal agencies to develop strategies for managing any environmental effects associated with oil shale development, including effects on water resources. The BLM will look forward to the Council’s participation in subsequent NEPA analysis.

Thank you for your comment, Maurice Dechant.

The comment tracking number that has been assigned to your comment is OSTSD52870.

Comment Date: March 20, 2008 17:14:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD52870

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Middle Initial: L
Last Name: Dechant
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Address 3:
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State: CO
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Country: USA
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Privacy Preference: Don't withhold name or address from public record
Attachment: Mesa County Comments - Draft PEIS.pdf

Comment Submitted:

Please see the attached comments. See Attachment.

Mesa County Attorney's Office

P.O. Box 20,000 Grand Junction, Colorado 81502-5004 (970) 244-1612 • FAX (970) 255-7196

March 20, 2008

DELIVERY BY WEB, E-MAIL. AND US MAIL

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Re: Comments of Mesa County, Colorado Regarding the BLM Oil Shale and Tar Sands PEIS.

To The Bureau of Land Management:

Mesa County appreciates the opportunity to submit comments on the Draft PEIS. The Mesa County Board of County Commissioners has requested that I prepare and submit our comments. We have followed the preparation of the PEIS as a Cooperating Agency. Although the areas being considered for commercial leasing of oil shale resources are not necessarily located within the boundaries of Mesa County, experience with the previous development of the Colony Project in the late 1970's and early 1980's confirms that the impacts of oil shale development will fall heavily on Mesa County and its municipalities. We remember the impacts and difficulties of the "boom" era and we remember even more clearly the impacts and difficulties of the "bust" era following Black Sunday. Our comments are as follows:

We are concerned with the change in scope of the PEIS. The original intent of the PEIS was to provide analysis not only for amendment of land use plans (RMP's) but also for the issuance of leases for the commercial development of oil shale and tar sands resources. That scope has now been changed to utilize the PEIS only for amendment of the RMP's. We realize that during the development of the Draft PEIS, concerns were raised that there was a lack of information about specific technologies and that much of the information about specific technologies and the resulting impacts was historic and based on technologies that are now over thirty years old. However, typically, a PEIS is completed to modify the RMP's and leases are then issued on nominations. Site specific NEPA analyses are completed after the leases are issued and are based on company-specific development technology and plans, which will reflect current technologies and impacts. Conditions are placed on a lease as an outcome of the site specific NEPA analysis. In this regard, we strongly support the RD&D approach and program currently being undertaken. To the extent it can be expanded with the issuance of additional leases and the evaluation of additional technologies, we would support such expansion. 52870-001

Information and techniques presently being developed on the RD&D leases will be valuable in the site-specific process.

52870-001 (cont.)

We strongly support the use of site-specific NEPA analysis, where the PEIS is used to amend the RMP's and issue the leases and the NEPA analysis is conducted after the lease is issued. Under the current Draft PEIS, only the RMP's would be amended. Leasing would follow another NEPA analysis and development would follow a third NEPA analysis. We are concerned that no applicant will be willing to conduct a very expensive NEPA analysis prior to leasing, with no guarantee that the applicant will be the successful bidder on the lease, and then conduct a subsequent expensive NEPA analysis if they win the lease based on the first NEPA analysis. We believe this process will be economically onerous on the applicants, the Cooperating Agencies, and the impacted local governments. As previously stated, we support thorough and specific NEPA analyses at the appropriate time. However, we urge BLM to consider the capacity of the Industry, the Cooperating Agencies, and the impacted local governments to effectively and economically participate in the process as presently contemplated.

52870-002

We note at various sections of the Draft PEIS the consideration of Regulatory and operational constraints. With regard to Alternatives B and C, Table ES-1 states "All commercial development would be conducted in compliance with federal, state, and local regulatory requirements and established BLM policies." Paragraph 4.1 states "A key assumption is that all applicable federal, state, and local regulatory requirements will be met (see Section 2.2 and Appendix D)." It is respectfully suggested that this should not only be an assumption, but a commitment by the BLM. This commitment should extend not only to the regulations of counties which are the physical site of the lease and the project, but to the regulations of counties such as Mesa County which will be impacted by the lease and project. Specifically, without limitation, roads, pipeline ROW's, air and water quality, wildlife, tourism, housing, sanitation, social and economic impacts and, in fact, the entire lists of impacts and concerns set out in Chapters 4, 5, and 6, are of concern to Mesa County in the issuance of leases and the development of projects, even if the physical site of the lease and project is in a neighboring county.

52870-003

On occasion, we run into and consider the concept of Federal Preemption of local regulations. As a specific note regarding honoring local regulatory requirements, Mesa County has a long history of cooperation with the Forest Service and BLM through a variety of methods, including agreements for joint planning, etc. We very much appreciate the efforts and cooperation of the Forest Service and BLM in this regard.

Specifically regarding the three oil shale alternatives, we believe that Alternative A, No Action Alternative, is not in the best interest of the United States, the State of Colorado, and/or Mesa County. The thoughtful and carefully regulated exploration and development of oil shale reserves is a vital component of energy development for our country and our local area. Regarding Alternatives B and C, we note that many of the impacts are of the same nature in Alternative C as in Alternative B, they are simply more

52870-004

limited in extent in Alternative C because of its significantly smaller size. We note that the lands available for leasing in Alternative C appear to be smaller and more scattered and we question whether Alternative C would result in a situation in which development of the oil shale reserves becomes economically impossible. With this in mind, and with the basic assumption that the NEPA process will result in leases and projects which minimize and mitigate their negative impacts, we concur that Alternative B should be the Preferred Alternative.

52870-004 (cont.)

Mesa County's experience with the impacts of the Colony Project and with other energy related development is that the negative impacts of the development occur significantly in advance of the tax revenues and other revenues that assist to mitigate the negative impacts. Our economy in Mesa County and in this general region is significantly different than it was in the late 1970's and early 1980's. However, although the energy industry has attempted to assist in many ways, impacts from the current exploration and development of natural gas have stretched local resources. We strongly believe that government and industry need to make significant, early, up-front investments in and contributions to the infrastructures of local entities which will be impacted by oil shale development. These investments and contributions can be later credited against severance and/or other taxes and impact fees as they come due. We believe that these investments and contributions should be considered in and required by the NEPA process. In this regard, we join in, and respectfully refer the BLM to, the March 20, 2008 comments submitted by Club 20.

52870-005

We appreciate the opportunity to participate in the PEIS process and we look forward to cooperating with the BLM and participating in the site specific NEPA project analyses as oil shale development proceeds.

Sincerely,

Maurice Lyle Dechant
Mesa County Attorney

Responses for Document 52870

52870-001: The experimental state of the oil shale and tar sands industries prevents the BLM from completing a NEPA analysis of the amendments to the RMPs that would be sufficiently detailed to allow oil shale or tar sands leasing to proceed without additional NEPA analysis. The BLM acknowledges the commentor's support for the RD&D program and the recommendation for additional RD&D leases. Although future rounds of RD&D leasing are possible, no decision has been made whether there will be additional opportunities to compete for RD&D leases on federal lands.

52870-002: Thank you for your comment. Site-specific impacts of potential development will be identified in future NEPA analysis prior to leasing, which will be used to make decisions regarding lease stipulations. Unlike oil and gas, and both surface and underground mining, the nature of oil shale and tar sands development is still not understood well enough to support lease issuance.

52870-003: The BLM's intent is that future development would be conducted in compliance with federal, state, and local regulatory requirements, and established BLM policies, as is stated in the PEIS. The particular reference cited in Chapters 4 and 5 has been changed to clarify this intention.

52870-004: The BLM acknowledges the commentor's preference for Alternative B.

52870-005: Given the programmatic nature of the PEIS, the purpose of the analysis of socioeconomic impacts is to provide an overview of the type and magnitude of impacts that would likely occur with the construction and operation of oil shale and tar sands facilities. As the scale of development and project locations associated with oil shale and tar sands resource development are not known, the analysis described in the PEIS is limited to estimating impacts for an ROI in each state, based on the likely residential location of project workers. As described in Section 4.11.1.1 of the PEIS, the in-migrating population assumed with each facility was assigned to local communities in each ROI based on facility direct workforce, community population, and intervening distances. Expenditure levels to support the in-migrating population at existing levels of service are then estimated for each community and aggregated for each ROI.

If commercial-scale resource development occurs, additional NEPA analyses would be undertaken, where project locations, employment levels, and the number of in-migrating workers in each phase of development would be known, enabling a detailed analysis of oil shale, tar sands, and ancillary facility impacts on local tax revenues, facility and infrastructure capacity, and expansion costs, and on the local government expenditures required to maintain different levels of service.

Text has been added to the PEIS indicating that the BLM cannot direct that government funds be paid to state and local governments to mitigate impacts from oil shale development. The BLM can only show those impacts in NEPA documents and address how those impacts were mitigated in the past by direction from Congress to use the bonus bids from the federal leases.

Thank you for your comment, Richard Warnick.

The comment tracking number that has been assigned to your comment is OSTSD52871.

Comment Date: March 20, 2008 17:28:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD52871

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Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I remember the Tar Sands Triangle EIS back in the 1980s. Then, as now, extraction of tar sand and oil shale in Utah was economically impractical without massive government subsidies. Then, as now, the environmental consequences would virtually eliminate all other land uses. 52871-001

Under the requirement of the Federal Land Management and Policy Act, the unnecessary and undue degradation of public lands is prohibited. If the Oil Shale & Tar Sands Programmatic EIS had examined the degradation caused by tar sands mining in Alberta, Canada, it would be clear that leasing our public lands for this purpose is prohibited by law.

The very prospect of leasing has jump-started an ugly anti-wilderness campaign by the petroleum industry, hiding behind the front group "Americans for American Energy." Phony websites have been set up, Utah state legislators have been bribed, and wilderness advocates have been smeared as terrorist collaborators. This is happening because of this EIS process. 52871-002

No leasing is the only legal alternative. 52871-003

Responses for Document 52871

52871-001: The BLM is managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

52871-002: The Energy Policy Act of 2005 directed the Secretary of the Interior to complete a PEIS for a commercial leasing program for oil shale and tar sands resources on public lands. Studies such as this PEIS are consistent with the policy declarations delineated in the FLPMA and can be useful in determining uses of public land in the national interest. The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences in order to determine if leasing would result in any adverse impacts.

52871-003: The BLM acknowledges the commentor’s preference to not support leasing of oil shale and tar sands on public lands.

Thank you for your comment, Reeves Brown.

The comment tracking number that has been assigned to your comment is OSTSD52872.

Comment Date: March 20, 2008 17:30:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD52872

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Privacy Preference: Don't withhold name or address from public record
Attachment: Oil Shale PEIS comments, 08-03-20.pdf

Comment Submitted:

(Please see attached .pdf file) See Attachment.

"Voice of the Western Slope Since 1953"
A coalition of individuals, businesses and local governments

(970) 242-3264 ★ FAX (970) 245-8300
P.O. Box 550 ★ Grand Junction, CO 81502-0550
www.club20.org

March 20, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

(These comments also submitted electronically via the OSTSEIS website.)

RE: CLUB 20 comments regarding Oil Shale & Tar Sands Programmatic EIS

To whom it may concern:

Thank you for this opportunity to submit comments regarding the BLM's Oil Shale & Tar Sands Draft Programmatic EIS. CLUB 20 is a 55-year old membership organization representing the individuals and businesses throughout Western Colorado's 22-county region.

We have attached a copy of CLUB 20's Oil Shale Policy Statement supporting a "prudently-paced commercial scale leasing program". CLUB 20 believes that the keys to every sustainable community are a vibrant economy, a sustainable environment, and a stable culture. To that end, we appreciate the efforts which your staff has made to address each of these considerations as part of the PEIS process.

CLUB 20 recognizes that the U.S. Department of Energy has estimated that 800 billion to 1 trillion barrels of recoverable oil may exist within the oil shale deposits of the Green River Formation in Northwest Colorado, Southwest Wyoming, and Northeast Utah (the bulk of which is located in northwestern CO) and this is the largest known deposit of oil shale – and one of the largest untapped hydrocarbon resources – in the world. Given our growing national dependence on foreign oil supplies and the increasing instability in most of these supplier regions, we believe it is prudent and necessary that we work to develop our domestic energy reserves to their full potential, while respecting the other environmental and cultural values that define our region's quality of life. 52872-001

We believe that it is important for our country to be proactive and purposeful about preparing a well-conceived plan for the thoughtful development of this important resource in order to avoid getting pushed into a crisis-oriented, commercial-scale oil shale program later on. This PEIS is an important part of that deliberate effort.

CLUB 20 strongly supports the RD&D approach to oil shale development and urges additional opportunities for such leases.

In initiating the research, development, and demonstration (RD&D) program, the BLM provided an opportunity to ensure that oil shale technologies can operate at economic and environmentally acceptable levels before the agency authorizes full-scale commercial leasing on public lands. We applaud this approach and encourage the BLM to invite additional RD&D leases and require that all extraction technologies on BLM lands be first proven in such a manner. An extended RD&D oil shale leasing program might even preclude the need for a separate commercial leasing program if the RD&D program remains open for other companies to participate.

52872-001 (cont.)

CLUB 20 supports deferral of issuing commercial leases until site-specific NEPA analysis is completed, but encourages that efforts to develop the rules regarding such leases proceed.

As the PEIS's initial analyses indicates, *"potential impacts on many resources, especially air, water, and socio-economic conditions, could be significant depending upon the location and number of commercial projects and the pace of development."* In recognition of this, we support the BLM's decision to defer approval of commercial leases until adequate information is available about the scope and scale of the proposed development, and then conduct appropriate site-specific NEPA analysis at that time.

52872-002

When that site-specific NEPA analysis is conducted, and because of the economic importance of our traditional agriculture and tourism industries in northwest Colorado, we urge you to pay special attention to:

- the anticipated water demands of proposed commercial leases and resulting impact on irrigated agriculture, and
- the potential adverse impact on tourism (given the PEIS's conclusion that *"commercial oil shale development activities are largely incompatible with recreational land use").*

52872-003

Although we support deferral of issuing these commercial leases, we urge the BLM to proceed now with efforts to develop the proposed rules associated with those future leases. Once the federal government has appropriate regulations and NEPA compliance in place, the Secretary of Interior has found that sufficient support exists within the State, and the lease applicant has demonstrated the capability of proceeding with a technically feasible, commercially viable and environmentally sound technology, then the federal government should proceed with the issuance of commercial oil shale leases.

52872-002 (cont.)

CLUB 20 prefers Alternative B among the three identified management scenarios.
We agree with the BLM's recommendation to pursue Alternative B *"because it would make the largest amount of potential oil resources available for application for leasing while still providing for an environmentally sound program and would provide the greatest flexibility in locating future development."*

We recognize and appreciate that the PEIS excludes any commercial leasing for all three alternatives on the most environmentally sensitive lands including *"designated Wilderness Areas, Wilderness Study Areas, and other areas that are part of the National Landscape Conservation System administered by the BLM (e.g., National Monuments, National Conservation Areas, Wild & Scenic Rivers, and National Historic and Scenic Trails), existing Areas of Critical Environmental Concern that are currently closed to mineral development, and lands within incorporated town and city limits."*

In addition, we appreciate that *"under both alternatives* (B & C), *additional NEPA analyses would be conducted prior to the issuance of commercial leases"* and "*site-specific NEPA analyses would be conducted during evaluation and approval of plans of development during the project development phase"* in order to *"identify potential project-specific impacts and define appropriate lease stipulations and required mitigation measures."*

We recognize that BLM lands are public lands and are required to be managed for multiple-use. As such, and as concerns those lands with the most prospective oil shale development opportunity, we believe it is appropriate to designate these lands as suitable for development consideration (subject to the aforementioned existing restrictions within land use plans and subject to additional site-specific NEPA analysis) as Alternative B proposes.

52872-001 (cont.)

We request clarification that Alternative A (No Action Alternative) will honor the original RD&D lease stipulations.
While acknowledging that the six existing RD&D leaseholders each *"has an identified preference right lease area for future potential commercial development"* on an adjacent 5000-acre site, the PEIS is unclear as to whether these leaseholders will actually be able to exercise this right. The PEIS defines the geographic scope of Alternative A as *"960 acres leased for 6 RD&D projects (160 acres each)"* and states that *"the six RD&D projects would move forward on the 160-acre leases. Alternative A includes only the RD&D activities at these sites; it does not evaluate future commercial leasing at these or any other locations."*
Later, the PEIS acknowledges that *"Under the terms of the RD&D program, the federal government has a commitment to grant the RD&D companies leases for commercial development within the preference right lease areas, provided that all conditions of the program are met".*

52872-004

Does Alternative A continue to honor the RD&D lease terms which allow the leaseholders to expand their technologies from the 160-acre RD&D sites to the adjacent 5000-acre tracts, or does this Alternative effectively preclude the RD&D leaseholders from exercising their preference right lease? We believe that the existing RD&D leaseholders need to be able to exercise their preference right on the adjacent 5000-acre tracts so long as they comply with the original terms of the lease, including proving the efficacy of the technologies which they are employing.

52872-004 (cont.)

We believe that Alternative C is too limiting to be considered a legitimate alternative for developing the oil shale resource.

While we appreciate the BLM's efforts to offer multiple development scenarios, and we recognize that the intent of Alternative C is to provide for more limited development, we are concerned about the economic feasibility of developing any of the oil shale resource on the lands identified within Alternative C. The PEIS rightly notes that within Alternative C, *"a large portion of the lands proposed to be available for application for leasing is composed of relatively small, isolated tracts of land"*. Because of this fact, we believe that Alternative C, like Alternative A, is effectively a "No Action" alternative because it doesn't provide for large enough contiguous parcels to warrant the substantial investment necessary to recover the oil shale reserves. Alternative C is essentially economically unfeasible as proposed.

52872-005

In place of Alternative C, we recommend that additional consideration be given to a hybrid version of Alternatives B & C which provides for large enough tracts of contiguous acreage to make development economically feasible, while still providing additional land protections beyond that afforded in Alternative B.

We believe the federal government must encourage industry to make appropriate UP-FRONT investments in the infrastructure of locally-impacted communities.

Like economic booms in the past, we are concerned about the socio-economic impacts to the local communities. As the PEIS anticipates, *"rapid increases in population in-migration in parts of each region of influence could impact quality of life, in particular requiring a transition from traditional rural, to more urban lifestyles, and potentially cause large social disruption impacts."*

52872-006

Specifically, with the increasing natural gas development activity in northwestern Colorado, we are already experiencing:

- housing shortages,
- dramatic increases in retail and housing prices,
- overwhelming demands on the community's social and physical infrastructure (schools, police and fire services, social services, water and sewer), and

- a lack of available workforce to sustain each community's traditional Main Street economy.

We believe that government and industry need to make appropriate and substantial UP-FRONT investments in the infrastructure of each local affected community in order to enable these communities to grow their services to meet the demands associated with oil shale development. While we fully recognize that we DO have a collective responsibility to develop our domestic energy reserves in the interest of national security, we believe that we have an equal responsibility – as a nation – to ensure that the burden of this energy development isn't borne disproportionately on the back of local host communities. Specifically,

- We believe that the states' traditional 50% share of the Federal Mineral Lease (FML) revenue (which was recently reduced to 48% by Congressional passage of the 2008 Interior Appropriations Bill) MUST be restored (IMMEDIATELY, and RETROACTIVELY) with specific dedication of the vast majority of those funds to be used to mitigate the impacts of energy development on local communities.
- We believe that the BLM should encourage industry to make UP-FRONT investments in local community infrastructure by granting a pre-payment credit against their FML liability for any such investments. Without such up-front investments, local communities are continually chasing their tail trying to catch up with impact needs as they wait for months to receive the lease revenues associated with those impacts. Such up-front investments by industry will allow communities to invest ahead of the impacts, thus both facilitating the development of the resource while minimizing the disruptive impact on the community.

52872-006 (cont.)

This region – particularly Garfield, Rio Blanco and Mesa Counties – is already experiencing significant challenges as a result of the growth in natural gas exploration since 2001. The PEIS accurately notes that *"developments in the oil and gas industry have produced rapid growth in employment in many communities"* which has created *"significant labor shortages in numerous service industries". "Local government agencies are also experiencing staffing difficulties, where teaching, health worker, public safety, road and bridge, and fire personnel positions are currently difficult to fill."* It is tragically paradoxical that, at the same time that the demands for these services are MOST increasing, the impacted communities are LEAST able to meet these demands with experienced and qualified personnel. Unlike the PEIS study areas in Utah and Wyoming, the average annual growth in employment in the Colorado study area (3.1%) is significantly outpacing the statewide average (2.4%).

Increase in Employment within the Oil & Gas Sector

	1998	2004	Increase
Garfield County, CO	120	287	239%
Mesa County, CO	190	350	184%
Uintah County, UT	450	700	156%

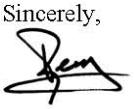
The PEIS failed to acknowledge the physical infrastructure needs of impacted communities.

Funding infrastructure needs during oil and gas development can put local jurisdictions under enormous financial pressure since tax revenues intended to mitigate impacts of energy development are not available largely until AFTER the impacts have occurred. Although the PEIS made a passing reference to impacts on community infrastructure, there was no effort to quantify how large this impact may actually be. The City of Rifle, Colorado is in need of a $60 million investment in their water treatment facility, and Highway 13 (between Rifle and Craig, Colorado) will require an investment of $80 million just to maintain it's ability to support the volume of heavy equipment traffic associated with energy development. This funding problem is exacerbated with the rising cost of construction materials which has resulted in increasing the cost of a 2-lane road in Garfield County from $1 million to $2.5 million per mile. We believe the PEIS should attempt to identify the types of physical infrastructure investments (if not an estimate of the costs associated with those investments) that local governments will be required to make in order to meet the demands associated with commercial oil shale development.

52872-007

Thank you again for this opportunity to comment on the Draft Oil Shale & Tar Sands Programmatic PEIS.

Sincerely,



Reeves Brown
Executive Director
CLUB 20

"Voice of the Western Slope Since 1953"
A coalition of individuals, businesses and local governments

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05-4 EN 02

Oil Shale, Development and Implementation of a National Strategy

WHEREAS the U.S. Department of Energy estimates that 800 billion to 1 trillion barrels of recoverable oil may exist within the oil shale deposits of the Green River Formation in Northwest Colorado, Southwest Wyoming, and Northeast Utah (the bulk of which is located in northwestern CO) and this is the largest known deposit of oil shale in the world and one of the largest untapped hydrocarbon resources available for development, and

WHEREAS CLUB 20 recognizes the potential value of this oil shale resource, and we also recognize the need to realize this value while sustaining the other existing social, economic and environmental values that comprise the overall quality of life in western Colorado; and

WHEREAS oil shale development is important for our country's national security to supplement our nation's growing energy demand, and

WHEREAS, without well-conceived research and development, this region may someday be faced with another crisis-oriented, commercial-scale oil shale program;

52872-001 (cont.)

WHEREAS, the U.S. Department of the Interior is currently in the process of evaluating the environmental impacts, socioeconomic consequences, technical feasibility, and economic viability of activities proposed on Research Development, and Demonstration (RD&D) leases for oil shale resources of Western Colorado, and

WHEREAS, Section 369(e) of the Federal Energy Policy Act requires that after consultation with affected States, local governments and other stakeholders, if the Secretary of Interior finds sufficient support & interest exists in a State, the Secretary may conduct a lease sale in that State under commercial leasing regulations;

THEREFORE BE IT RESOLVED that CLUB 20 supports research and development efforts leading to an environmentally sound, socially responsible and economically viable oil shale program that will result in the efficient recovery of the resource, and

BE IT FURTHER RESOLVED that CLUB 20 supports efforts by the U.S. Departments of Energy, Interior and Defense, in cooperation with State and Local governments, to continue to develop and implement a national oil shale strategy and urges that this strategy include the following:

1) Incorporate a prudently-paced commercial scale leasing program to allow time for adequate demonstration and testing of experimental development technologies;
2) Provide an opportunity for ongoing participation of directly impacted state agencies, specifically including the Department of Natural Resources and the Department of Health, and local governments by designating them as "Cooperative Agencies" and, in so doing, provide them additional opportunity to observe and comment on the development of oil shale in their area in addition to continuing the opportunity for public participation.

52872-008

3) Update BLM's existing "carrying capacity" concept which is included in current Resource Management Plans for a) air quality, b) water quality and quantity, c) wildlife impacts, and d) socio-economic values to assure prudent development of the oil shale resource in balance with these other values;
4) Utilize the Colorado Joint-Review Process to facilitate and coordinate the federal, state and local permit process;
5) Support the existing BLM Research, Development & Demonstration (RD&D) oil shale leasing program, and specifically the conversion of successful technologies (technologies which are environmentally sound, socially responsible, economically viable, and which result in the efficient recovery of the resource) to commercial scale leases; and
6) Encourage tax & royalty structures that result in timely mitigation of impacts from development, including incentives for "up front" industry contributions to state agencies and local governments through establishment of a federal royalty credit for these contributions.
7) Issue commercial leases when the Secretary of Interior has found sufficient support exists within the State, and that the applicant has demonstrated the capability of proceeding with a technically feasible, commercially viable and environmentally sound technology, and the federal government has proper mechanisms in place (regulations, permitting program, NEPA review) to ensure prudent development.
8) Concurrent with the commercial leasing program, BLM should continue to make RD & D leases available to provide interested companies the opportunity to develop and demonstrate viable technology.

52872-008 (cont.)

Adopted 4/1/05
Amended 3/31/06
Amended 9/8/06

Responses for Document 52872

52872-001: The BLM acknowledges the commentor's preference for Alternative B. The BLM also acknowledges the commentor's support for additional RD&D leasing. Although expanding the RD&D program to support additional leasing is possible, no decision has been made whether there will be additional opportunities to compete for RD&D leases on federal lands.

52872-002: Thank you for your comment. The BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedure to implement a commercial leasing program. The BLM published a proposed rule for the management of a commercial oil shale leasing program in the *Federal Register* on July 23, 2008. The BLM rulemaking process is separate and apart from the drafting of the PEIS.

52872-003: Thank you for your comment. The common impacts of transferring water from agricultural use to oil shale development on water resources have been added to Sections 4.5 and 5.5 of the PEIS.

In site- or project-specific NEPA analysis, impacts on irrigated agriculture and tourism would likely be presented in the sections describing water resources, land use, and socioeconomics.

52872-004: In general, valid existing rights are considered Administrative Actions by the BLM and do not require a specific planning decision to implement. This is a Planning Criteria, and as outlined in the BLM's Land Use Planning Manual (Section 1601.06G), all decisions made in land use plans and subsequent implementation decisions are subject to valid existing rights. With respect to the federal government's commitment to issue commercial leases on the preference right lease areas (PRLAs) to the RD&D lease holders, a lease will only be issued if the terms and conditions of the lease are met. This includes evaluation pursuant to NEPA that concludes that commercial-scale operations of the applicant's technology at that site do not pose environmental or social risks unacceptable to the BLM. The discussion of the PRLAs, however, has been revised to reflect the language in the lease and clarified that this is a component of all of the PEIS oil shale alternatives.

Alternative A includes the six existing RD&D leases. They will be eligible for conversion to commercial leases and expansion to their PRLAs pursuant to the terms of the leases and after separate NEPA analysis for each conversion is conducted.

52872-005: The BLM appreciates the commentor's suggestion of a hybrid of Alternatives B and C. Alternative C excludes lands where mineral development is subject to surface use restrictions. The commentor has not suggested which areas or which

types or purposes of surface use restrictions should be included or excluded from consideration for future commercial leasing.

52872-006: The issues articulated in the comment are also included in the analysis in the PEIS as issues that will be faced by local communities and counties if future oil shale development occurs; however the suggestion that BLM encourage or require industry to make upfront contributions to improve infrastructure and to help local governments address the issues raised is beyond the BLM's authority. There is no basis on which BLM can require these to be done.

The comment regarding the receipts from mineral lease revenues is an issue that only Congress can address; it is beyond the scope of the PEIS.

52872-007: If commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken, where project locations, employment levels, and the number of in-migrating workers in each phase of development would be known, enabling a detailed analysis of oil shale, tar sands, and ancillary facility impacts on local tax revenues, facility and infrastructure capacity and expansion costs, and on the local government expenditures required to maintain different levels of service.

Text has been added to the PEIS indicating that the BLM cannot direct that government funds be paid to state and local governments to mitigate impacts from oil shale development. The BLM can only show those impacts in NEPA documents and can address how those impacts were mitigated in the past by direction from Congress to use the bonus bids from the federal leases.

52872-008: We thank you for your comments. The BLM is committed to managing the public lands in full compliance with the FLPMA principles of multiple use and sustained yield, to preserve and protect the public lands and its resources, and to provide for domestic sources of minerals. The BLM plans to cooperatively manage the public lands through its land use planning process to achieve a balance among a variety of uses and resource protection, and promote responsible development of the oil shale and tar sands resources. The BLM is also committed to providing opportunities for the ongoing participation of state, local governments, and other stakeholders by strengthening partnerships and promoting the principle of shared stewardship of the public lands.

See also response to 52872-001.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52873.

Comment Date: March 20, 2008 17:37:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD52873

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale is needed

March 20, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

The math is simple: in order to reduce our dependence on foreign energy America must increase its own domestic energy production. Yet at this point our country has not taken any substantive steps towards establishing energy independence, even though increasing our domestic production is the easy remedy to our current energy problems.

Thus as America's energy demands rise, so does its disturbing reliance upon foreign sources of energy. The solution is simple - develop more American energy by increasing domestic production. Oil shale possesses great potential in remedying this dilemma, as it is both recoverable and abundant. Yet as America grows even more desperate to import more and more of a vanishing resource, for some reason oil shale has been overlooked. 52873-001

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country.

I support the development of oil shale and other resources that give America a fighting chance in establishing energy independence. 52873-001 (cont.)

Sincerely,

Response for Document 52873

52873-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Pam Miller.

The comment tracking number that has been assigned to your comment is OSTSD52874.

Comment Date: March 20, 2008 17:52:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD52874

First Name: Pam
Middle Initial:
Last Name: Miller
Organization: Nine Mile Canyon Coalition
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Address 3:
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State: UT
Zip: 84501
Country: USA
Email: millers@emerytelcom.net
Privacy Preference: Don't withhold name or address from public record
Attachment: Oil Shale and Tar Sands.doc

Comment Submitted:

See Attachment.

The Nine Mile Canyon Coalition appreciates the opportunity to comment on the Oil Shale and Tar Sands Programmatic Environmental Impact Statement (OSTS PEIS).

The mission of the Nine Mile Canyon Coalition is to preserve and protect Nine Mile Canyon, in partnership with landowners, user groups, federal, state, and local agencies, and Native American organizations.

Development of tar sands or oil shale in the Argyle Canyon STSA would be disastrous to Nine Mile Canyon, which has been determined eligible for, and nominated to the National Register of Historic Places. Nine Mile Canyon is so significant to the historic and prehistoric record, that in 2004, the National Trust for Historic Preservation listed the canyon on their annual list of *America's 11 Most Endangered Historic Places,* in order to draw public attention and action to the threats energy development in the region poses on the cultural values of the canyon. Relatively undisturbed for thousands of years, Nine Mile Canyon provides a prehistoric museum in its original place, the context of which would otherwise be lost if tar sands and oil shale development to be allowed in the Argyle Canyon STSA. 52874-001

The Nine Mile Canyon National Scenic Back Country Byway would be ruined by tar sands development in the Argyle Canyon STSA, and is a direct conflict with the OSTS PEIS which supposedly eliminates areas around National Scenic Highways (OSTS PEIS 4-130). It appears that the development of the PEIS intentionally excluded the Nine Mile Canyon Back Country Byway from the maps in order to hide this fact and confuse the public (table 3.1.2-1). 52874-002

Our Coalition membership spends a lot of time in the canyon and is acutely aware of the fragility and tenuous health of the perennial Nine Mile (also known as Minnie Maud) and Argyle Creeks. The Argyle Canyon STSA in located in an extremely arid region, and drought conditions are frequent and can be very severe. Water sources are needed for irrigating crops and replenishing culinary/potable ground water. Oil Shale and tar sands extraction methods are known to be disastrous to water quality. Development of these energy resources would impact water quality from Argyle and Nine Mile Canyons, all the way through the Colorado River basin, impacting water users in Utah, Arizona, Nevada, California and Mexico. Such development would render agricultural property useless. More industrial development in the area would threaten rock art and cultural values. 52874-003

We agree with the positions of the Colorado Plateau Archaeological Alliance (CPAA), the Utah Rock Art Research Association (URARA), and therefore urge you to withdraw the Argyle Canyon STSA from consideration in the OSTS PEIS. 52874-004

Responses for Document 52874

52874-001: Nine Mile Canyon is acknowledged by the BLM as an important area containing a rich collection of cultural resources. Section 3.9 provides a general overview of cultural resources data available electronically from the State Historic Preservation Offices in Colorado, Utah, and Wyoming in 2006. It represents a snapshot in time of data available electronically so that a general synopsis of cultural resources in the large study regions could be provided. It is recognized in the PEIS that the data may be incomplete as they do not include an analysis of nonelectronic files at the SHPO, including backlog and new information, or site files from the BLM. A footnote has been added to further clarify this point to each subsection that presents these data. The section does not go into any detail about any specific locations within the study area, such as Nine Mile Canyon or specific TCPs. The PEIS is a programmatic-level document that analyzes allocation decisions. The PEIS provides an adequate description of environmental resources in areas that would be made available for lease application to enable a decision among alternatives. Detailed site-specific surveys for sensitive and protected resources in project areas would be required prior to any leasing or development decisions.

It is also acknowledged that additional data will become available on a regular basis and that future NEPA analysis and compliance with and appropriate consultation as required by the National Historic Preservation Act and other authorities specific to Native American concerns will need to take place. Potential impacts to cultural resources that could result from leasing and development of oil shale and tar sands resources and possible mitigation measures that the BLM could require in lease stipulations are discussed in Sections 4.10 and 5.10. However, cultural resource issues are site-specific and would need to be evaluated at later stages of analysis if and when leases are applied for.

52874-002: The PEIS does not eliminate “areas around National Scenic Highways” from consideration from leasing. Instead, as noted in Section 5.9.2, the Draft PEIS states that tar sands-related development and operation activities near National Scenic Byways, All American Roads, and state-designated scenic highways should conform to VRM Class II or Class III objectives depending on distance of the development/activity from the designated roadway. As indicated by the Official Designations page of the National Scenic Byways Program Web Site (http://www.byways.org/explore/byways/15780/designation.html), the Nine-Mile Canyon Backcountry Byway is officially designated as a BLM Backcountry Byway. It is not a National Scenic Byway, All-American Road, or state-designated scenic highway. It, therefore, would not be subject to this mitigation measure; however, it would still be subject to mitigation measures for visual resources, and the requirements of the VRM Class designation for that area as specified in the RMP.

52874-003: The BLM recognizes that water is a major constraint in developing oil shale and/or tar sands. Therefore, the BLM is not committing to development in this PEIS. The PEIS is a programmatic-level document that analyzes allocation decisions. These allocations do not authorize the immediate leasing of lands for commercial development, nor do they authorize commercial development.

The water needed for oil shale and/or tar sands development depends on many factors, including scale of development, technologies used in the development, national agricultural economy, and the locations and hydrologic conditions of project sites. Many of these factors are still undefined. To reduce these uncertainties, the BLM has initiated a phased approach to oil shale development. The first phase is an RD&D leasing program that the BLM believes will significantly enhance the collective knowledge regarding commercial technologies and associated impacts. The environmental impacts would be evaluated by individual projects in NEPA documents at subsequent leasing and plan of development stages. The results would be presented in project-specific NEPA documents. Discharges of wastewater from any lease areas would be subject to all applicable state water-quality requirements. Lessees would have to obtain rights to use water in compliance with state law.

52874-004: Please see responses to Documents 00053 and 52748 for responses to the letters from CPAA and URARA, respectively. As stated in those responses, areas with cultural and historic values that are excluded from both Alternatives B and C for tar sands are designated ACECs and National Historic and Scenic Trails. For oil shale, only ACECs withdrawn from mineral entry are excluded from Alternative B, while all ACECs are excluded from Alternative C. National Historic and Scenic Trails are excluded from consideration for leasing in both Alternatives B and C for oil shale. The differences in the alternatives are included to allow analysis of the differing impacts of the alternatives on various resources. Under all alternatives, the BLM would comply with all applicable requirements for cultural and historical preservation, whether areas are included in areas available for application for leasing.

Thank you for your comment, Erica Hennig.

The comment tracking number that has been assigned to your comment is OSTSD52875.

Comment Date: March 20, 2008 18:07:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD52875

First Name: Erica
Middle Initial: L
Last Name: Hennig
Organization:
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Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear BLM,

The purpose of this letter is to urge the policy adoption of Alternative A, no action, from the current BLM Oil Shale and Tar Sands Draft Programmatic EIS. While specific reasons will follow, the general premise is that the BLM is being forced to react to a short-sighted, knee-jerk dictate to resolve America's foreign source energy dependence with expedience and at any cost. While the historical conditions surrounding the creation of the Energy Policy Act of 2005 are well understood by the author, I submit that to enact policy based on he dictated PEIS in a hasty manner, with regards to leasing the federal lands that encompass the Oil Shale deposits of the upper Colorado River watershed, would be to capitulate to an industry written, poorly conceived congressional mandate that wholly fails to take into account the massive known and unknown environmental impacts that large scale resource production from the shale would impose upon the affected areas. 52875-001

Foremost amongst my concerns are the recommendations of the RAND Corporation study, Gauging the Prospects of a U.S. Oil Shale Industry, Rand Corp., 2005 (http://www.rand.org/pubs/research_briefs/RB9143/index1.html). While it is understood that the Energy Policy Act of 2005 required a rapid release of a PEIS, it should be noted that this timeframe was mutually exclusive with many of the recommendations of the Rand study, most of which are common sense measures required prior to any responsible decision on large scale mineral rights leasing of Federal Lands . A summary of the Rand key Recommendations are included here: 52875-002

"When private firms are willing to devote, without appreciable government subsidy, their resources to oil shale development, government decisionmakers should address the critical policy issues above. In particular, early action is warranted to: • Develop and implement a research plan to establish options for mitigating ecological damage; • Conduct research aimed at mathematically

modeling the subsurface environment, along with a multiyear hydrological, geochemical, and geophysical monitoring program (if investments are for in-situ retorting); • Conduct research aimed at establishing and analyzing options for long-term spent shale disposal (if investments are for mining/ surface retorting); • Model regional air quality to determine preferred locations for federal leasing and inform decisions on air quality permits for initial plants; and • Develop a federal shale oil leasing strategy for the Green River Formation. Many uncertainties about technology performance and environmental impacts are unresolved, and most of the critical issues will not be fully resolved until the initial round of large-scale commercial facilities are constructed and operated. Given this, oil shale development should proceed at a measured pace. Because oil shale development could profoundly affect local residents and other stakeholders, the federal government should consider fostering the creation of a regionally based organization dedicated to planning, oversight and advice, and public participation". 52875-002 (cont.)

My concern is that while the proposed in-situ extraction process has been demonstrated, it is not known is what lingering effects mobilizing millions of barrels of oil will have upon the environment, especially the watershed, in the long term. While much of the oil will be extracted, what percentage remains behind when the site is no longer profitable, and now in a mobile form? Where does the water that will certainly boil out get re-injected, and what will its effect be on local water tables and surface water quality? How long after site closure does it take for the shale to cool off, and does the remained natural gas and oil reabsorb, or is this left as an environmental time bomb to leach into the surrounding rock and strata over time? A proper study of these issues is required before any large scale permitting can be under taken. 52875-003

Another concern not mentioned in the Rand report is the massive amount of energy that this process will consume. In reading the PEIS, it is apparent that it has not adequately analyzed the preferred alternative for connected action. Specifically, the preferred alternative will turn a large swath of currently undeveloped Colorado, Utah and Wyoming into an industrial zone, complete with roads, pipelines, electrical transmission lines, gathering points, and other infrastructure. The energy input alone will require several massive dedicated power plants with their associated costs and pollution, most notably massive greenhouse gas emissions. The build up of this industrial base, along with increased population in the affected areas will impact local air quality, water usage, and energy demands. The current PEIS fails to properly consider these effects, or to thoroughly analyze their long term impact on the region. 52875-004

The third issue I would call attention to is the massive energy usage that the in-situ process requires. While proponents have claimed that the ratio is 1.5 units in for every 3.5 extracted, that measurement assumes that the incredible amount of natural gas that is collected (3 to 4 times the amount of oil that is extracted) will be processed and consumed to provide the heat required to release the hydrocarbons from the shale. The processing alone of this gas will create a huge amount of CO2 and other emissions, not to mention the probable release of a great deal of methane in to the atmosphere. Burning it will cause further pollution, and represents a phenomenal addition to the energy balance equation. The industry claims the 1.5:3.5 ratio based on the fact that much of the heat can be generated by the produced gas and therefore removes the collected gas from the input to the equation as if it were a useless byproduct of the extraction process. Without this chicanery, the ratio is closer to 1:1 or even 1.5:1, a net loss. At very least, the connected action of burning natural gas to extract oil needs to be examined in the light of the clean air act and area land use policy requirements. 52875-005

The final issue is water usage. By the proponent's admission, this process will require 3 to 5 barrels of water for each barrel of oil produced. A cursory examination of the geographic areas that the basins lie in can only yield the conclusion that these water resources do not exist. Certainly there is water here, but taking it comes at the expense of the entire southwest population base and agricultural industry, including Southern California. Above the concern of poisoning the entire upper Colorado River Watershed, one must question the voracious consumption of this scarce resource and the connected affect it would have on the whole of the southwest, and its millions of residents. I propose that this PEIS has not completed a 52875-006

thorough study of the consequences to the Western States of massive increased water usage in the upper Colorado River drainage if the preferred alternative is granted. In closing, I submit that due to the absence of examination of the connected actions to the preferred alternative, that the only course of action is to adopt Alternative A, no action, until such a time that these issues have been properely addressed. 52875-006 (cont.) 52875-001 (cont.)

Sincerely, Erica Hennig , Colorado

Responses for Document 52875

52875-001: The BLM acknowledges the commentor's preference for Alternative A.

52875-002: Information and recommendations from RAND Corporation and others were available to Congress when it passed the Energy Policy Act of 2005, which, among many other things, directed the Secretary of the Interior to prepare this PEIS and oil shale leasing regulations. Ongoing research at BLM RD&D sites and other places is expected to address many issues related to making oil shale a viable commercial enterprise.

52875-003: Since the alternatives in the PEIS do not authorize the immediate leasing of the lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The PEIS's analysis provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision.

Subsequent NEPA analysis will be required prior to any leasing or plan of development decision and will address the direct, indirect, and cumulative effects of that action. That analysis will also help to form the basis for the development of mitigation measures, such as best management practices to avoid or mitigate short-term and long- term adverse impacts.

52875-004: The BLM is proposing a three-phased or staged approach to oil shale and tar sands development that includes NEPA analysis at the allocation, leasing, and plan of development stages. This approach would provide the flexibility to consider the effects of advances in extraction technologies and to understand their impacts on economic, social, and environmental conditions. The step being taken in this PEIS is identification of lands that would be available for future application for oil shale or tar sands leasing. The BLM has determined that with the exception of a potential effect on property values, there is no effect associated with the proposed action. This action commits no resources and grants no rights in public lands. Subsequent NEPA evaluations of leasing and plans of development would consider direct, indirect, and cumulative effects of proposed actions, including consideration of any associated impacts of power plants and transmission facilities and impacts on air quality.

52875-005: The PEIS is considering the impact of land allocation decisions. Speculation regarding energy balance and potential impacts from as-yet-unproven technologies is beyond the scope of the PEIS.

52875-006: The specific amount of water needed for oil shale development depends on many factors, including scale of development, technologies used in the development,

and the locations and hydrologic conditions of project sites. That is the reason the PEIS describes a range of estimates of water needs for oil shale and/or tar sands development.

The PEIS use long-term hydrologic data, states' water plans, and historical water consumption data to evaluate regional water availability in the oil shale basins. Therefore, the water availability results represent long-term average conditions. For projected water uses, results from state water plans were used. The state plans have taken regional population growth into consideration. As stated in the PEIS (Section 4.3.1), whether enough water is available for development depends on the results of intensive negotiations between various parties, including water rights owners, state and federal agencies, and municipal water providers as well as the developers. The source of water needed for any oil shale and/or tar sands development projects would be specified in project-specific NEPA documents.

The allocation of water of the Colorado River is dictated by various compacts. Therefore, the development of oil shale in the Upper Colorado River Basin is unlikely to affect the water allocation in Lower Basin states, such as California.

Public use water is unlikely to be diverted for oil shale development. Agricultural water might be a candidate for sources of water rights. Impacts on water resources caused by transfers of water from agricultural uses to oil shale development have been added to the text in Section 4.5 of the PEIS.

Thank you for your comment, Christopher Lolley.

The comment tracking number that has been assigned to your comment is OSTSD52876.

Comment Date: March 20, 2008 18:22:26PM
Oil Shale and Tar Sands
Comment ID: OSTSD52876

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Attachment: CVX Comments on PEIS_20March2008.doc

Comment Submitted:

See Attachment.

Christopher S. Lolley
Oil Shale Manager

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March 20, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory EVS/900
9700 S. Cass Ave.
Argonne IL 60439

Re: Comments on Draft Oil Shale and Tar Sands Resource Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS) December 21, 2007

To Whom It May Concern:

Chevron would like to thank you for the opportunity to provide comments on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS). We appreciate the effort which has gone into this work and recognize that this effort included collaboration with other federal, state and local agencies.

Chevron is committed to helping provide the energy the world needs in a way which is socially and environmentally responsible. We desire to positively impact the communities in which we operate, and our vision with regard to oil shale development, as with all projects we undertake, is to be the company most admired for its people, partnership and performance.

The Energy Policy Act of 2005 declared that oil shale and tar sands development are strategically important domestic energy resources that should be developed to reduce the nation's growing dependence on oil from politically and economically unstable foreign sources. Chevron fully supports this declaration and believes that the vast oil shale resources in the United States are an important part of this strategy.

Chevron's View on Commercial Leasing Program

Chevron believes that a full scale commercial leasing program should not proceed at this time without clear demonstration of commercial technologies. The BLM's original intent in issuing RD&D leases was to help accomplish this task. The RD&D program helps to insure that oil shale technologies can operate at economically sustainable and environmentally responsible levels prior to full-scale commercial

52876-001

leasing. To that end, Chevron encourages the BLM to consider expanding the RD&D leasing program. Chevron also feels that the infrastructure and socioeconomic needs of local communities need to be addressed as the industry goes from research to commercial development. Our efforts are to work in cooperation and partnership with pragmatic environmental groups, local communities and government to move oil shale development forward in a way that is environmentally responsible, economically sustainable, and proven initially on a small scale.

52876-001 (cont.)

Chevron, however, does support discussions on developing a path forward for eventual commercial leasing. It is important that discussions take place now to help develop the proposed rules and regulations around the eventual issuance of these leases. In particular, Chevron would like to see improved regulatory consistency between the BLM, state and local governments. A possible solution would be to establish some sort of joint review process or board with decision making powers.

52876-002

Chevron Agrees with the BLM's Recommended Alternative B

Given the three scenarios put forth in the PEIS by the BLM, Chevron agrees with the BLM's recommendation of Alternative B. This scenario is the only one of the three which were considered that allow for full and adequate development of the vast oil shale resource. Both of the other alternatives are too restrictive.

Programmatic Alternative A does not allow for the eventual issuance of commercial leases. Chevron recommends clarification on the description of Alternative A. This alternative essentially limits development to the existing RD&D leases which have been granted. However, according the BLM leases, the lessee " ...shall have the exclusive right to acquire any or all portions of the preference lease area for inclusion in the commercial lease, up to a total of 5,120 contiguous acres..." The BLM needs to clarify whether or not their intent was to include the contiguous acres which are already part of the approved lease programs.

52876-003

Chevron views Alternative C as too restrictive for the eventual commercial development of the vast oil shale resources available. Chevron believes that the spirit of the Energy Policy Act of 2005 was not to unnecessarily restrict oil shale development to small isolated parcels of land, but rather to maximize the potential development of this resource for the energy security of the country.

One alternative which was not considered was a hybrid alternative which would represent a middle ground between Alternative B and Alternative C. This might provide additional contiguous land for adequate commercial development activity while protecting additional land if that is deemed necessary.

52876-004

Chevron Believes Adequate Characterization of the Oil Shale Resource is Essential to Understand its Impact on Domestic Energy Resources

The PEIS represents a significant document which will be reviewed by many in the public domain. As such, it is important to accurately quantify the potential oil shale

52876-005

resource in the United States. Chevron recognizes that there is uncertainty in all resource estimates. We also recognize the resource estimates are dependent on the assumptions used for the calculation. There is significant literature in the public domain which has attempted to quantify the potential volumes of oil shale resources in the United States. Chevron suggests that the BLM consider publishing a range of potential resource volumes rather than a single deterministic number as shown in Table ES-1. This would adequately communicate to other government, industry and public officials not only the magnitude of this important and vast resource, but also the uncertainty in trying to quantify the volume depending on the set of assumptions used.

52876-005 (cont.)

Chevron would like to again thank you for the opportunity to comment on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS). We appreciate the effort which has been put into the study and look forward to working with peers in our industry, the BLM, other federal, state, and local agencies as well as the public in helping to unlock this vast resource.

Please contact me if you have any questions or need clarification on our comments.

Sincerely,

Christopher S. Lolley

Responses for Document 52876

52876-001: Thank you for your comment. The BLM is proposing a phased or staged approach to oil shale development that will be able to adapt to changes in technology and perceived cumulative effects from all resource development occurring in an area or region. The first phase of the approach is the RD&D leasing program, which the BLM believes will significantly enhance the collective knowledge of commercial technologies and associated impacts. The second and third phases would occur prior to approval of a lease or approval of a development action and would require additional NEPA analysis of specific proposals, where more detailed consideration of the range of resource values present would occur and where more information on the technology expected to be deployed would be available to inform the analysis. It is at these last two stages that lease stipulations and mitigation measures would be developed. This phased or staged approach would ensure that a commercial oil shale program meets the intent of Congress to make areas available for oil shale and tar sands development while taking advantage of the best available practices to minimize impacts and offering opportunities for states, local communities, and the public to participate in the process.

Although expanding the RD&D program to support additional leasing is possible, no decision has been made whether there will be additional opportunities to compete for RD&D leases on federal lands.

52876-002: The BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedures to implement a commercial leasing program. The BLM published a proposed rule for the management of a commercial oil shale leasing program in the *Federal Register* on July 23, 2008. The BLM rulemaking process is separate and apart from the drafting of the PEIS. The PEIS analyzes the environmental consequences of an allocation decision; therefore, any comment concerning the regulatory process are outside the scope of the PEIS.

52876-003: The BLM acknowledges the commentor's preference for Alternative B.

52876-004: The decision maker is not bound to select a particular alternative. It would be possible for a "hybrid" alternative to be selected as long as the selection is within the range of analysis completed in the PEIS. The Record of Decision for such a selection would contain a discussion of the rationale for the selection.

52876-005: Thank you for your comment. The numbers in question were calculated for comparative purposes to illustrate the potential differences between Alternatives A, B, and C. The numbers were developed with the understanding that the number underestimates the actual in-place resource. The numbers were developed using the values that described the minimum quality and thickness that was deemed to be economic. Those values are a minimum 25 ft thickness and a

minimum quality value of 25 gallons per ton for Utah and Colorado. In Wyoming the values used were 15 ft thick and 15 gallons per ton. These values coupled with the acreage in each of the alternatives generated the numbers in question. It is true that the use of more exact isopachs and quality data, if available, would have provided much higher values for each of the alternatives, but the alternatives would remain comparable.

Thank you for your comment, Jana Axelrad.

The comment tracking number that has been assigned to your comment is OSTSD52877.

Comment Date: March 20, 2008 18:31:16PM
Oil Shale and Tar Sands
Comment ID: OSTSD52877

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Attachment:

Comment Submitted:

Please protect the BLM land from being destroyed. There is so little precious land left in our country. There is no doubt that the proposed development would cause massive, irreversible environmental damage - scarring the landscape with mines, roads, pipelines, and power lines; releasing toxic pollution; consuming enormous amounts of scarce water; requiring ten new coal-fired power plants to provide needed power; endangering the health of local communities; and spewing out greenhouse gases that add to climate change impacts.

52877-001

52877-002

Responses for Document 52877

52877-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

52877-002: The PEIS analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) from an allocation standpoint because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

Thank you for your comment, Robert Dutton.

The comment tracking number that has been assigned to your comment is OSTSD52878.

Comment Date: March 20, 2008 18:33:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52878

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Comment Submitted:

Developing US shale oil reserves is imperative to saving America from a financial, environmental, technological, and political disaster. As a comparison, I want to see what the environmental costs of 1st and 3rd world oil exploration, extraction, shipments, are in comparison to projected US shale oil extraction. That would include the environmental cost of tar sands oil extraction in Alberta; oil spills from importing oil; flaring off natural gas; transport costs of bringing oil to the US. Another cost of not developing shale oil is that without the oil savings, the US loses the capital needed to develop new technologies necessary for solving many of the other health, environmental, and technological problems of the world. A strong US is a benefit to the world. A financially bankrupt US will be unable to stop global chaos from reigning. I believe the US can responsibly extract shale oil while minimizing pollution. I also believe opening up leases to all competent, financially capable companies, that follow certain guidelines, would expand the entreprenuerial spirit, which would help rejuvenate the industry. Make it competitive similar to an X-Prize. 52878-001

Response for Document 52878

52878-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Chris Russell.

The comment tracking number that has been assigned to your comment is OSTSD52879.

Comment Date: March 20, 2008 18:57:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD52879

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Address 3:
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State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment: PEIS comments chris.doc

Comment Submitted:

See Attachment.

Chris Russell, Ph.D.

March 20, 2008

Bureau of Land Management
Oil Shale and Tar Sands Resources Draft Programmatic EIS Comments,
9700 South Cass Avenue,
Argonne IL 60439

Thank you for the opportunity to comment on the draft PEIS. This document is important to the commercialization of our vast oil shale resources, which will very soon be needed to fill shortfalls in liquid fuels supplies. While production of electricity from solar energy in its various forms, as well as reduction of demand through improved efficiency will help, even combining these alternatives is insufficient to avoid an economic crisis brought on by fuel supply shortfalls.

Leaving this resource in the ground is not an option, and the sooner we begin development, the better we can *plan* for and mitigate adverse impacts. If we wait for the crisis to occur, we will be *reacting*, and the results will surely be less favorable. The US has already put itself on a tenuous energy path with its lack of appreciation of the importance of domestic energy supply to our economic health. The billions of barrels recoverable from oil shale is an asset that no other country enjoys, and failing to begin the development now puts us at greater risk for the future.

52879-001

I urge adoption of Alternative B, and a rejection of Alternatives A and C, these latter being totally ineffectual for the need at hand. I also urge the BLM to proceed expeditiously to implement commercial leasing rules so as to make the resource available for private sector development. Until resources are available, significant development of technology by the private sector will not occur; there is no percentage to investing in technology if there is no promise of deployment.

52879-002

The current BLM R D and D leasing program is dangerously narrow in its prospects to provide needed technology. There is no guarantee that any of these will succeed, and current efforts by some in Congress to delay commercial leasing can only have the effect of dampening the enthusiasm for R and D expenditures.

It is urgent that this Nation breaks out of its malaise and takes decisive action for its future well-being. Adopting Alternative B and promulgating commercial leasing rules for federal oil shale land is essential for the long-term health of this Country.

52879-001 (cont.)

Sincerely yours,

Chris Russell, Ph.D.

Responses for Document 52879

52879-001: The BLM acknowledges the commentor's preference for Alternative B.

52879-002: The BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedures to implement a commercial leasing program. The BLM published a proposed rule for the management of a commercial oil shale leasing program in the *Federal Register* on July 23, 2008. The BLM rulemaking process is separate and apart from the drafting of the PEIS. The PEIS analyzes the environmental consequences of an allocation decision, and therefore comment concerning the regulatory process is outside the scope of the PEIS.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands resources. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands.

Thank you for your comment, Greg Scott.

The comment tracking number that has been assigned to your comment is OSTSD52880.

Comment Date: March 20, 2008 20:42:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD52880

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Privacy Preference: Withhold address from public record
Attachment: Oil Shale PEIS Comments.doc

Comment Submitted:

See Attachment.

Gregory L. Scott
"Come to the Mountains and receive their Good Tidings!" - John Muir

March 20, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

VIA WEBSITE FORM ATTACHMENT

RE: Comments on PEIS

To Whom It May Concern:

Please accept my comments, below, on the draft PEIS. As an environmental consultant for 28 years and having contributed to numerous NEPA documents over that timeframe, I must say that this document looks more like a feeble attempt to circumvent NEPA than it does a legitimate attempt to comply. Please read on.

Yours Truly,

Greg Scott

Comment 1: Air quality impacts dismissed without evaluation

Executive Summary states that the PEIS analyses "are being developed to analyze the direct, indirect, and cumulative environmental, cultural, and socioeconomic impacts of the proposed action and its alternatives." However, the analyses of air quality in Sections 4 and 6 is extremely generic and does not specifically address any of the proposed alternatives. The entire treatment of air quality effects in Chapter 4 is less than five pages, including only three paragraphs on global climate change, yet the next phase of evaluation will not occur until after public lands have been leased to industry. Chapter 6 keeps mumbling the same two paragraphs about short-term construction impacts and long-term development impacts that cannot be addressed because technology is unknown, but will be in a site-specific NEPA process, i.e., after leasing. There is no evaluation of the potential impacts of various technologies on any scale of development, although development will be imminent when that evaluation occurs. 52880-001

As an example of possible CO2 emissions from the Shell in-situ technology, I have calculated the net increase of such emissions from its application equivalent to satisfying our current oil imports (about 12 million barrels per day) with oil shale. No similar analysis was attempted in the PEIS. Based on data from the Rand report (2005), the Energy Information Administration on coal–fired electric generation capacity and coal usage and EPA's AP-42 emission factors document, I have calculated that 149,000 MW of new electric generation would be required at 124 new 1200 MW plants within the three-state project area (equivalent to 44% of the total coal-fired utility generating capacity in the US today) just to produce the oil crude, excluding further refining, transport to markets and other primary and secondary effects, including the mining and transportation of the coal. Since coal is both an abundant and economic local resource in the region, it would be the preferred energy source to generate electricity. The CO2 emissions from just the coal-fired generators to support such an endeavor would be **1.8 billion tons per year**, which also excludes the final combustion of the produced liquid fuel. Since there is no available carbon capture and sequestration technology within the foreseeable future and coal to liquids technology is also not commercially viable at present, one must assume that those CO2 emissions would be released unmitigated. And, given that coal is also a finite energy resource, is this the best use of that resource? 52880-002

Further, the extended use of liquid petrofuels derived from oil shale is not evaluated at any level. Since there is no current technology to limit or capture CO2 emissions from the combustion of liquid petrofuels, one must assume that all such emissions would also occur unmitigated decades into the future. What is the net effect of an energy policy based on dedicating 2.3 million acres of public lands to oil shale and tar sands development, thus perpetuating petroleum as a primary fuel over the next century? What would be the net effect on CO2 emissions? Will there even be an environment left that will sustain human habitation under such a scenario? This PEIS offers no clue. 52880-003

Given that no legislative NEPA process was conducted in preparation of the Energy Policy Act of 2005, the current PEIS must serve that purpose and put some realistic numbers on the impacts of the policies therein, before land is actually dedicated to that end. That has not occurred and this PEIS is grossly inadequate for that purpose.

Comment 2: Cumulative impacts inadequately addressed with inconsistent level of detail

Section 6 describes cumulative impacts of the proposed alternatives and cumulative impacts in association with other industrial activities in the project area for each environmental media. Impacts to water resources describes the current state of available water resources and projected future uses and availability for the proposed action, each section running many pages. The cumulative air 52880-004

quality impacts, Section 6.1.5.3.5, is a mere two paragraphs, repeated over and over, and defers all meaningful evaluation until after leasing has occurred. How can informed decisions about the allocation of massive amounts of public lands to leasing be made without any information about the potential impacts, both of the subject action and cumulatively? The implication is that this BLM action is only a paper transaction and has no impact upon the environment. If that were true, one would expect that the level of detail in all sections would be the same and the document would be only a few pages in length. Given that some environmental professionals took the PEIS task seriously points the very fact that the Air Quality sections are meaninglessly inadequate. A wholesale revision of all air quality sections in required

52880-004 (cont.)

Comment 3: Coal-fired assumptions

Table 6.2.5-3 lists assumptions related to impacts from coal-fired electric generation as an off-lease activity for cumulative impacts. In addition, although totally ignored throughout the PEIS is the significant need for dedicated electric generation for certain of the oil shale technology alternatives, such as the Shell in-situ process. In this table, a 1500MW coal-fired generator has no boiler ash or fly ash solid waste, although the two smaller plants do generate these solid wastes. I am unaware of any coal-fired technology that produces no solid wastes.

Also, in the table for emissions, regulatory limits under the New Source Performance Standards are listed for SO2, NOx and PM, but the assumption for all other air pollutants is "NA" suggesting that there are no such emissions from the commercial development under the revised land use plans and subsequent leasing activity (development is routinely required as a condition leases). I am unaware of any coal-fired technology that produces only SO2, NOx and PM, but no other criteria, hazardous air pollutants or greenhouse gas emissions. I suggest that this table be revised after a review of EPA's AP-42 Emission Factors document, the standard a wide variety of industrial sources, and then a thorough treatment of current permitted emissions and actual emissions, current ambient air quality data and projected emissions for at least one commercial development scenario be assessed to quantify realistic air quality impacts, including upon visibility, as an air quality related value.

52880-005

Comment 4: Circumvention of NEPA and public process

In the Environmental Policy Act of 2005, Congress directed the BLM to "Complete a programmatic environmental impact statement for a commercial leasing program for oil shale and tar sands resources on public lands…" Since Congress did not conduct a legislative NEPA process to determine the potential environmental and socioeconomic impacts of oil shale and tar sands development prior to passing EPAct 2005, this PEIS is the first and only NEPA process that will occur prior to the actual leasing of public lands to the energy industry. Indeed, in several places in the PEIS, it states that detailed impact assessment will be addressed in the site-specific NEPA process (this is prevalent throughout sections that address air quality impacts). Throughout, the PEIS states that the proposed changes to multiple land use plans over three states is a paper transaction, commits BLM to no specific course of action and therefore, will not have a significant environmental impact. It goes on to argue that because there are no commercially available technologies for development of energy resources, it is not even possible at this stage to evaluate potential impacts. However, the result of proposed Alternative B will be to conduct leasing of public lands to the maximum extent before any further NEPA process occurs.

52880-006

Once leasing has occurred and land is committed to industry under contract and industry has invested in actual lease contracts, it will have rights to develop those leases without the benefit of determining the cumulative effects of all proposed leases under the wholesale changes to many

land use plans. Thus, while the PEIS in a few places pays lip service to future NEPA process where lease stipulations and other conditions will be developed (e.g., Section ES-4), it does not commit BLM to conduct a separate NEPA process prior to the actual leasing of lands. In fact, at the public meeting on this PEIS in Denver on February 12, 2008, more than one BLM representative stated that the next stage of the NEPA process would occur as a site-specific EIS after lease sales have occurred. These circular arguments are a clear and blatant attempt by BLM to circumvent the intent of NEPA and are tantamount to the level of planning prior to the US invasion of Iraq, and would likely have similar consequences. Under NEPA, that would be illegal.

52880-006 (cont.)

Comment 5: Rush to commit public lands to development in the absence of commercially available development technology.

The 2005 Rand report (p. 21) states "Questionable commercial readiness and high production costs pose serious problems that currently prevent oil shale development." In the major media, Shell has stated that it will not be in a position to determine the commercial viability of its proprietary in-situ process for oil shale until at least 2010 and will use data from its two R&D leases under EPAct 2005 to make that determination. Proprietors of other oil shale technologies are even farther from such determination. Other technical problems, many related to environmental impacts, have yet to be resolved or even quantified beyond basic commercial viability.

Yet, the PEIS process has been expedited to conclude in favor of leasing public lands to the maximum extent well in advance of any industry decision on whether this will ultimately be commercially viable. The Denver Post reports on 3/19/2008 that the petitions of many State, County and local governmental organizations, and others, to extend the comment period have been denied by BLM. And, without the commitment to an additional pre-lease NEPA process, there is the strong appearance that this PEIS process is not only substantially premature, but may be a charade to mask the giveaway of public lands to industry without a clue as to the real effects of such action, because even the industry has no clue.

52880-007

This is the ultimate example of putting the cart before the horse. The process needs to be slowed down so that all affected parties have adequate time to review the processes, technologies, impacts, viabilities and other important issues, locally, regionally, nationally and globally. After all, the kerogen in the shale is not going anywhere and there is no need to rush to a solution that may prove commercially unviable and/or environmentally unsatisfactory or unmitigatable. An extension to the comment period would be a responsible first step in this direction.

Comment 6: Environmental and economic soundness of alternatives

PEIS Section 2.1 states, "The BLM has identified Alternative B as the Preferred Alternative for both oil shale and tar sands because it would make the largest amount of potential oil resources available for application for leasing while still providing for an environmentally sound program and would provide the greatest flexibility in locating future development. The BLM's current approach is designed to ensure that oil shale technologies can operate at economic and environmentally acceptable levels before the agency authorizes fullscale commercial leasing on public lands."

52880-008

How can BLM assure that Alternative B is 'environmentally sound" when it failed to quantitatively evaluate any of the alternatives for air quality impacts? There is no air quality impact assessment, either for a model project (where under Land Use, 14,000 acres is designated including 4800 acres for a new coal-fired electric generation plant, but Air Quality does not evaluate this impact on the atmosphere), or cumulatively for several such projects. There is no air quality impact evaluation of

any specific technology alternative even from the simple standpoint of evaluating facility emissions or cumulative emissions from the maximum development under Alternative B.

And, how can BLM "ensure that oil shale technologies can operate at economic and environmentally acceptable levels" when the industry itself will not so determine for at least two more years? This PEIS certainly does not address that topic, and therefore, fails to satisfy its own criteria. 52880-008 (cont.)

This PEIS is a wholesale failure with respect to addressing the environmental and economic effects of global climate change, particularly with respect to probable near-future greenhouse gas emissions control programs (e.g., carbon cap and trade or carbon tax being discussed in Congress). It is widely agreed that such carbon reduction programs are both vital to the survival of a livable planet and imminent, yet this PEIS goes forth merrily with no such evaluation whatsoever, and therefore, fails miserably to meet NEPA requirements. 52880-009

Further, since the PEIS reports that the current total electric generating capacity in the region is a mere 8400 MW, such a development scenario, a reasonable plan based on energy independence and security cited in EPAct 2005, would require a nearly 18-fold increase in electric generation, and an attendant similar increase in all emissions of air pollutants, including mercury, which bioaccumulates. The PEIS offers no substantive evaluation of any of this was even and that failure needs to be seriously reinvestigated, as the ultimate scale of available lands for potential leasing and development may need to be significantly scaled back for environmental reasons. 52880-010

Comment 7: Schedule of potential leasing not addressed

Alternative B maximizes the amount of land (at least 100% of BLM-administered lands in the area) to be made available for leasing, exploration and development, but nowhere did I find in the PEIS the potential effects of the schedule of such leasing. It also fails to address or establish any priority criteria for leasing the most potentially productive lands first, thereby minimizing the amount of land eventually leased when other more environmentally benign energy technologies become commercially available. This plan seems to not only maximize the amount of land, but also the rapidity with which leasing might occur. Expedited leasing on BLM lands for oil and gas development has been criticized for making too much land available too fast, thereby reducing potential lease revenues to the public as energy values skyrocket, which would increase the value of leases if delayed.

BLM should consider an alternative schedule of amending land use plans based on phases prioritized by the density and viability of the energy resources assessed, as it does no good to rush to change all land use plans at once when it is virtually impossible for development to occur on that scale in short order even if commercially viable technologies were available, which they are not. Further, a phased approach to amending land use plans, and also to eventual leasing, would allow for a learning process to improve conditions and effects on future leases that would not be derived from an all at once approach. A phased approach would also allow local governments and economies, as well as the public, whose land and resource it is, to better digest the program and would minimize the effects of probable costly lawsuits. There is no real reason to hurry this process, except to insure that the industry gets access to the resource at the earliest possible date and at the least possible cost, which is a specific detriment to the public, who BLM is supposed to represent. 52880-011

Figure 3-4 in the Rand report projects a schedule for oil shale technology evolution from the R&D stage to commercial scale development. Based on Shell's projection of a determination of commercial viability around 2010, the scale-up to sub-commercial scale development, which can occur within the physical limits of the six R&D leases currently in place, another six to eight years

would be required before actual development outside current R&D program limits is needed, or 2016 at the earliest. Again, there is no reason to rush. By then, oil prices could be $300/barrel and the value of leases could also triple or more. So expediting wide-scale leases on public lands just defeats the value of the public return on investment in leasing lands for development. And, if the energy prices drop in that timeframe, it would be likely that demand has diminished or alternatives have been found and thus, the oil from shale is not needed or cost-effective. Expediting leasing is simply not in the public's best interest. 52880-011 (cont.)

Comment 8: Whose land is it, anyway?

The PEIS recommends making all BLM lands that may have some oil shale potential available for leasing and let the industry tell the BLM (and the public) where they want to develop. The priority should be, given that the land is public and is to be managed primarily for public benefit, that the BLM determine the environmentally acceptable lands where energy resources are present and then on a systematic and phased basis, offer those lands to the industry for maximum public benefit. You've got it backwards. This land and its resources belong to the public, not the energy industry. 52880-012

Responses for Document 52880

52880-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52880-002: See response to Comment 52880-001.

Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

Speculation regarding the quantity and source of electrical power which might be needed for potential development is beyond the scope of this programmatic analysis.

52880-003: See response to Comment 52880-001.

As stated in the Draft PEIS, direct emissions of climate change air pollutants "are likely to be a small fraction of global emissions." Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process.

52880-004: See response to Comment 52880-001.

52880-005: The PEIS is a programmatic document assessing the impact of allocation decisions and includes general information to support this intended purpose. Table 6.2.5-3 contains two entries for "solid waste"; the first addresses coal combustion wastes that would be generated (fly ash and bottom ash), while the second addresses solid wastes that would be generated from the operation of other pollution control devices (e.g., scrubbers to remove sulfur oxides from the exhaust stream). Assumptions regarding the amount of additional power that will be needed include the power demands of the Shell technology.

52880-006: The commentor is incorrect in the portrayal of the effect of the alternatives in this PEIS and subsequent NEPA actions. The PEIS states in Chapter 1 and in numerous places thereafter that additional NEPA analysis will be required prior to issuance of any commercial leases. The BLM has developed two programmatic alternatives for both oil shale and tar sands to implement Congressional direction in the Energy Policy Act of 2005. These alternatives are described in detail in Sections 2.3.3 and 2.4.3 of the Draft PEIS.

52880-007: On the basis of input from the cooperating agencies, it was determined that the analysis to support leasing decisions would require making many speculative assumptions regarding potential, unproven technologies. Consequently, the scope of the PEIS was changed from a leasing decision to an allocation decision. The PEIS analyzes the environmental consequence of land use allocation decisions that do not commit any resources or grant any lease rights. Prior to any commercial leasing and development, additional NEPA analysis will be required. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources.

The PEIS does address the potential impacts of oil shale and tar sands leasing and development in Chapters 4 and 5 to disclose the possible types of impacts that would have to be evaluated in future site-specific NEPA analyses, if leases are applied for and plans of development are submitted. It is premature at this stage to deny access to particular lands without sufficiently knowing the technologies to be applied or the specific physical area of potential effect.

The comment period for the Draft PEIS was extended for an additional 30-day period from March 20 until April 21, 2008.

52880-008: See response to Comment 52880-002.

52880-009: See response to Comment 52880-001.

Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

Sections 4.6, 5.6, 6.1.1.5, 6.1.2.5, 6.1.3.5, 6.1.4.5, 6.1.5.3.5, 6.1.6.1.4, 6.2.2.5, 6.2.3.5, 6.2.4.5, 6.2.5.3.5, and 6.2.6.1.4 of the PEIS all address potential impacts to air quality. However, no air pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

52880-010: The PEIS states that this additional energy may be required for oil shale development using in situ methods. However, it would be an inappropriate exercise in speculation to attempt to present an analysis of impacts from power generation (including emissions) for oil shale/tar sands development, because the amount of power required would vary with the technology to be implemented, and also because the source of the power and therefore the impacts are unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources.

The connected impacts from required power production would be assessed in future project-specific analyses when information on the source and amount of required energy was available.

52880-011: As stated in the Energy Policy Act, the development of oil shale, tar sands, and other strategic unconventional fuels, for research and commercial development, should be conducted in an environmentally sound manner by using practices that minimize impacts. The BLM believes that analyzing an allocation decision provides the opportunity to build on scientific, governmental, or industry research in order to analyze, in a general way, the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however. Prior to offering for lease any parcels of land for commercial oil shale or tar sands exploration and development, further analysis will be carried out and documented in accordance with NEPA, to support any decisions in this regard. That NEPA analysis will evaluate the environmental impacts of the oil shale and tar sands exploration and development and develop specific mitigation measures to mitigate or eliminate the identified impacts. BLM believes that such a phased approach will ensure that commercial

oil shale development programs meet the intent of Congress and take advantage of the best available practices to minimize impacts and to offer opportunities for states, local communities, and the public to participate in the process. While uncertainty is an inherent part of planning, and delays are possible in bringing any new resource into commercial development, the BLM is committed to managing the public lands in full compliance with the FLPMA principles of multiple use and sustained yield, to preserve and protect the public lands and its resources, and to provide for domestic sources of minerals.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale or tar sands technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. In addition, the BLM will involve the state, local communities, and the public throughout the NEPA processes.

52880-012: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . .” (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52881.

Comment Date: March 20, 2008 22:48:01PM
Oil Shale and Tar Sands
Comment ID: OSTSD52881

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM oil shale report

March 20, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

Tax and royalty revenues that would result from oil shale and tar sands development would provide great benefit to the socioeconomic infrastructure of the nation and the region. A growing oil shale and tar sands industry would provide great employment opportunities in the region.

A particularly evocative example of America's stubborn refusal to exploit American energy is with oil shale. Oil shale in America is both vast and recoverable, with over a trillion barrels of oil located on American land. Yet opportunities for development have been consistently denied, even as America's dependence upon foreign nations raises along with our ever increasing energy needs. Actions must be taken.

52881-001

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources.

As America's energy needs soar and its energy dependence upon foreign nations worsens, now is certainly not the time for the federal government to deny America the opportunity to exploit its rich oil shale resources. 52881-001 (cont.)

Sincerely,

Response for Document 52881

52881-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Lester Flake.

The comment tracking number that has been assigned to your comment is OSTSD52883.

Comment Date: March 21, 2008 07:54:21AM
Oil Shale and Tar Sands
Comment ID: OSTSD52883

First Name: Lester
Middle Initial: D
Last Name: Flake
Organization:
Address: 1652 East 550 South
Address 2:
Address 3:
City: Springville
State: UT
Zip: 84663
Country: USA
Email: LDFlake@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

With the declines in sage grouse and pigmy rabbits already evident this would be another major blow. Research clearly is showing strong negative effects from oil and gas developments on public land. Sage grouse are landscape level species and many populations should already be listed. Smaller populations are disappearing or have gone extinct already. Leks are being abandoned mostly within 4 years of the start of gas and oil well developments such as coal gas surface mining. These energy companies should mitigate losses by permantely buying out grazing leases from private operators and placing extensive portions of public land in reserve for sage grouse and other obligate species. The amount of area of mitigation should include an area equivalent to all land within 5 miles of any type of energy related operations inlcuding new roads. I oppose widespread development of oil shale for these reasons. Les Flake

52883-001

52883-002

Responses for Document 52883

52883-001: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. Thus, land allocation decisions would not result in impacts to the greater sage-grouse. Policies and BMPs that would be implemented at the project-specific level are expected to avoid crucial greater sage-grouse habitat to the extent practicable and, where not possible, minimize and mitigate impacts to the species. Mitigation measures for greater sage-grouse would be incorporated as project stipulations, as needed. The need for these mitigation measures would be determined on a project-by-project basis in conjunction with input from federal, state, and local agencies, and interested stakeholders. Mitigation of impacts to sage grouse would include recommendations included in BLM's national sage grouse habitat conservation strategy, as well as those contained in state-wide and regional greater sage-grouse conservation assessment and management plans.

52883-002: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Martha Cornett.

The comment tracking number that has been assigned to your comment is OSTSD52884.

Comment Date: March 21, 2008 08:54:29AM
Oil Shale and Tar Sands
Comment ID: OSTSD52884

First Name: Martha
Middle Initial:
Last Name: Cornett
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Can we not learn from the mishaps of others? Do we not see the inpact of our actions on our lives? ALL parts of our ecological system are necessary for our own survival, whether we see the direct impact daily or not. Our country has let large companies direct our laws and destroy our environment without considering the impact...all for the money.And last year, their profits were in the BILLIONS!!! How much more do they need?	52884-001

Response for Document 52884

52884-001: Thank you for your comment.

Thank you for your comment, CINDY JEANES.

The comment tracking number that has been assigned to your comment is OSTSD52885.

Comment Date: March 21, 2008 10:55:43AM
Oil Shale and Tar Sands
Comment ID: OSTSD52885

First Name: CINDY
Middle Initial:
Last Name: JEANES
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

1. ETHANOL
2. PLASTIC CAN BE MADE FROM CORN
3. PUT OUR FARMERS TO WORK
4. SOLAR ON ROOFS Microsolar Inc.

52885-001

MOVE AWAY FROM OIL NOW!!!

GET AWAY FROM THE TRADITIONAL POWER PLANT BY INSTALLING SOLAR ON EVERY ROOF. WHY NOT USE THE ROOF FOR A DULE PURPOSE.

Response for Document 52885

52885-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, Barry Brault.

The comment tracking number that has been assigned to your comment is OSTSD52886.

Comment Date: March 21, 2008 11:25:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD52886

First Name: Barry
Middle Initial: F
Last Name: Brault
Organization: Bledrock, LLC
Address: 322 Culver Blvd. #176
Address 2:
Address 3:
City: Playa Del Rey
State: CA
Zip: 90293
Country: USA
Email: bbrault@ielement.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I congratulate and applaud the BLM for pursuing this. I wholeheartedly and enthusiastically endorse the mining and removal of Oil shale and Tar Sands as long as it is done in a responsible manner. These strategic unconventional reserves must be exploited so as we, as a country are not so dependent on foreign suppliers. | 52886-001

Response for Document 52886

52886-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, David Bensey.

The comment tracking number that has been assigned to your comment is OSTSD52887.

Comment Date: March 21, 2008 11:54:16AM
Oil Shale and Tar Sands
Comment ID: OSTSD52887

First Name: David
Middle Initial:
Last Name: Bensey
Organization:
Address: 2200 N Loop W, Ste 310
Address 2:
Address 3:
City: Houston
State: TX
Zip: 77018
Country: USA
Email: bensey@swbell.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Given that the leasing/permitting process is likely to take a year or two or more, and given that the in situ process recently tested will take three or four years to ramp up, and given that the likely producers will start with small investments until the commercial feasibility of their process is proven, it is likely that large scale production of shale oil is ten years away, even if we started today. In the meantime, our country continues to rely on foreign sources of energy, some of which are subject to very real political risks. We need to take all reasonable steps to expedite this process. Because of the very long lead times, problems and errors can be identified and corrected long before full scale production begins. The political, economic and environmental risks we face from delay outweigh any risks from moving forward.	52887-001

Response for Document 52887

52887-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Joseph Scharnow.

The comment tracking number that has been assigned to your comment is OSTSD52888.

Comment Date: March 21, 2008 12:03:28PM
Oil Shale and Tar Sands
Comment ID: OSTSD52888

First Name: Joseph
Middle Initial: J
Last Name: Scharnow
Organization:
Address: P.O. Box 2132
Address 2:
Address 3:
City: Swansboro
State: NC
Zip: 28584
Country: USA
Email: jscharnow@ec.rr.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am 100% in favor of the US governments continued search and recovery of oil of any type in the USA. Its time to resume our ability to provide our own energy. Also the liquefying of coal for fuel.We some of worlds greatest coal reserves. Greater use of diesel auto engines as in europe for greater mpg. The infastructure is already in place. Corn is not the way to go.Wind and solar will follow. Removing energy dependance from foreign lands will remove many threats from our enemies.Canada & Mexico excluded. | 52888-001

Response for Document 52888

52888-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Gerald Park.

The comment tracking number that has been assigned to your comment is OSTSD52889.

Comment Date: March 21, 2008 12:22:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD52889

First Name: Gerald
Middle Initial: M
Last Name: Park
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I have read some of the draft EIS. It is time to open the way for leasing BLM lands to be leased OS/TS. The resources within this domaine are important to the welfare of our country. Cost foreign imports places our Nation in bondage and aids many who would see our way of life end to further their agenda. LET'S DO IT. G.M.P. | 52889-001

Response for Document 52889

52889-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Richard Hatfield.

The comment tracking number that has been assigned to your comment is OSTSD52890.

Comment Date: March 21, 2008 14:01:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52890

First Name: Richard
Middle Initial:
Last Name: Hatfield
Organization:
Address:
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am writing to oppose oil shale and tar sands developmnet in the Roan and San Rafael BLM districts. The recreational value of these lands is too high to risk damage from this type of mining. 52890-001

R. A. Hatfield

Response for Document 52890

52890-001: The BLM acknowledges the commentor's preference against oil shale and tar sands development on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52891.

Comment Date: March 21, 2008 15:49:13PM
Oil Shale and Tar Sands
Comment ID: OSTSD52891

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale study should be taken seriously

March 21, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

There is a strong need to develop unconventional hydrocarbon resources like oil shale and tar sands in the US to offset the decline of traditional oil production.

Despite all the benefits that might be accrued, the federal government seems to deny America the chance to run on American energy. Oil shale, a resource of particular value and abundance, has been all but overlooked - in fact it isn't even tabulated in America's counted oil reserves. Nevertheless, oil shale's potential is vast: some estimates calculating that nearly 1.2 to 1.8 trillion barrels worth lie under American ground. 52891-001

Oil shale is a realistic option in America's quest for energy independence. Developing this resource will ensure safe and reliable energy for generations of Americans.

Sincerely,

Response for Document 52891

52891-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, John Austin.

The comment tracking number that has been assigned to your comment is OSTSD52892.

Comment Date: March 21, 2008 16:38:57PM
Oil Shale and Tar Sands
Comment ID: OSTSD52892

First Name: John
Middle Initial: F
Last Name: Austin
Organization:
Address: 30800 L25 Rd.
Address 2:
Address 3:
City: Hotchkiss
State: CO
Zip: 81419
Country: USA
Email: johnausitn@tds.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The figure for domestic oil production on oage A-109 (Vol. III) is incorrect - the correct amount is approximately 5 million bbl./day. It varies week-to-week and is generally slightly over 5 million, such as 5.05 million. 52892-001

There is no information evidently on the companies receiving demonstration leases, or perhaps there is a brief reference in the draft e.i.s. somewhere. I would like to find out what were the circumstances that resulted in not awarding leases to certain applicants. I think there were six or eight such applicants. 52892-002

Sincerely - John F. Austin

Responses for Document 52892

52892-001: Thank you for your comment. The figure used was taken from then-current publications by DOE's Energy Information Administration, the nation's official source for energy statistics. We agree that the number changes with time.

52892-002: Comments regarding the administration of the RD&D leases and the RD&D selection process are outside the scope of this PEIS.

Thank you for your comment, Nelson Reese.

The comment tracking number that has been assigned to your comment is OSTSD52893.

Comment Date: March 21, 2008 18:22:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD52893

First Name: Nelson
Middle Initial: G
Last Name: Reese
Organization:
Address: 942 Norfolk Ave.
Address 2:
Address 3:
City: Park City
State: UT
Zip: 84060
Country: USA
Email: gnrskis@msn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Our country needs to preserve our greatest assets. Our natural habitat and amazingly beautiful recreational areas. The pressure for energy is great. Our country must shift to a sustainable energy path. Wind, solar and geothermal can not come on line as quickly and fully as possible if our government chooses to primarily support the oil and gas industry. Exploiting new ares for oil and gas development is using our tax dollars to keep destroying the habitat, damaging our essential ecosystem and keeping America addicted to oil. We need a new direction in government subsidisation toward green energy and to save our land for our enjoyment and to sustain life on our planet.	52893-001

Response for Document 52893

52893-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52894.

Comment Date: March 21, 2008 20:13:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD52894

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am against opening any protected lands for exploration and development of oil shale or tar sands deposits. This land should be protected for future generations. | 52894-001

Response for Document 52894

52894-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gordon Young PE.

The comment tracking number that has been assigned to your comment is OSTSD52898.

Comment Date: March 24, 2008 13:15:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD52898

First Name: Gordon
Middle Initial: W
Last Name: Young PE
Organization: Young Ideas
Address: 4933 South 1065 East
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84117
Country: USA
Email: gordon_young@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Could you tell me what portion of the tar sands deposits are buried less than 10-20 meters below the surface and extending in a more or less horizontal direction? We develop new technologies and have developed a method of "subsurface strip mining" which would allow a tar sand bed or seam to be removed at that depth or perhaps even more with minimal surface disruption. In addition, the tar sand could be easily replaced back in the original location after oil removal, eliminating waste storage problems as well as visual and vegetation strip mining problems. 52898-001

We would like contact with someone on your staff (with a technical mining engineering background) who would be appropriate to discuss this idea with.

Gordon W.Young - Professional Engineer (PE)

Response for Document 52898

52898-001: Thank you for sending information on your method. You should submit your requests for information directly to the BLM rather than through the PEIS comment process. Contact information is available on the OSTS web site: http://www.ostseis.anl.gov.

Thank you for your comment, vanessa valencia.

The comment tracking number that has been assigned to your comment is OSTSD52899.

Comment Date: March 25, 2008 18:02:59PM
Oil Shale and Tar Sands
Comment ID: OSTSD52899

First Name: vanessa
Middle Initial:
Last Name: valencia
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

hey! what is wrong with some people?? can people stop being ignorant and UNDERSTNAD that pollution, is destroying our world...and not only that...its destroying animal sand US!! we have to keep the earth clean for future generations...and that is not gonna happen if we keep digging for oil why dont we just make up a asubsitute for oil...like corn syrup??	52899-001

Response for Document 52899

52899-001: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, stephen parker.

The comment tracking number that has been assigned to your comment is OSTSD52900.

Comment Date: March 25, 2008 20:21:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52900

First Name: stephen
Middle Initial: r
Last Name: parker
Organization:
Address: 301 powder river ave
Address 2:
Address 3:
City: bozeman
State: MT
Zip: 59718
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

PLEASE,do not pass this opportunity to allow for the impact on the enviornment that other programs have proven to be the best long term approach

52900-001

Response for Document 52900

52900-001: Thank you for your comment.

Thank you for your comment, Tim Paterniti.

The comment tracking number that has been assigned to your comment is OSTSD52902.

Comment Date: March 27, 2008 11:08:14AM
Oil Shale and Tar Sands
Comment ID: OSTSD52902

First Name: Tim
Middle Initial: J
Last Name: Paterniti
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The BLM needs to approve the PEIS to test the commercial viability of oil shale in Colorado. The amount of acreage is small, but the test will prove or disprove viability of the resource. Colorado and the US need to explore all available domestic sources of energy in order for us to grow our economy.	52902-001

Response for Document 52902

52902-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Lois Mills.

The comment tracking number that has been assigned to your comment is OSTSD52903.

Comment Date: March 27, 2008 19:30:15PM
Oil Shale and Tar Sands
Comment ID: OSTSD52903

First Name: Lois
Middle Initial: V
Last Name: Mills
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I think that since we have become so dependent upon oil from other countries, we should get what we can from our own country and allow them to get the oil from the shale. Even if it should cause a little environmental damage, it would be of less importance than high energy prices. | 52903-001

Response for Document 52903

52903-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Charlene Russell.

The comment tracking number that has been assigned to your comment is OSTSD52904.

Comment Date: March 28, 2008 18:43:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD52904

First Name: Charlene
Middle Initial:
Last Name: Russell
Organization:
Address: 1046 S. Charlotte Ave.
Address 2:
Address 3:
City: San Gabriel
State: CA
Zip: 91776
Country: USA
Email: cmountainspirit@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I'm about to move from the Los Angeles area to Moab, UT. I'm totally against the oil shale & tar development in Roan Plateau, CO, and the San Rafael Swell in Utah. All open and wild areas that are left on this planet need to be left alone. If it could be done with no impact and not visible and not fenced off then it could be considered. However where ever the oil companies go, there follows an ugly sore on the land. I've seen So. Calif. go from a beautiful area with orchards, farms, wild space to cement, crowds, congestion, to many homes and not enough open spaces. It's awful

52904-001

Response for Document 52904

52904-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52905.

Comment Date: March 29, 2008 09:43:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD52905

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: BLM's PEIS is a good first step for oil shale development

March 29, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

We strongly support the development of oil shale resources in western Colorado for the significant growth of economic development it would have on the region.

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves. 52905-001

American energy is the only answer to its energy problems. Develop oil shale for the future of American citizens.

Sincerely,

Response for Document 52905

52905-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Mary Sari.

The comment tracking number that has been assigned to your comment is OSTSD52907.

Comment Date: March 31, 2008 19:16:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD52907

First Name: Mary
Middle Initial: E
Last Name: Sari
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear Sherry Thompson, BLM Project Manager:

I am writing to support the "No Action" alternative in the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands.

I oppose all development of oil shale and tar sands on public lands. In this age of global warming, this is not the kind of energy we need to be developing. Our planet is at a tipping point, and the land needs to be cared for, not ravaged. If we invested money into renewable energy rather than fossil fuels, we would have a much safer place to live in. Thank you, Mary Sari

52907-001

Response for Document 52907

52907-001: The BLM acknowledges the commentor's preference for Alternative A.

Thank you for your comment, Kerry Higgins.

The comment tracking number that has been assigned to your comment is OSTSD52908.

Comment Date: April 1, 2008 09:12:01AM
Oil Shale and Tar Sands
Comment ID: OSTSD52908

First Name: Kerry
Middle Initial:
Last Name: Higgins
Organization:
Address: 7209 79th dr ne
Address 2:
Address 3:
City: Marysville
State: WA
Zip: 98270
Country: USA
Email: kerryehiggins@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

This is a great way to vamp the economy and create thousands of jobs. We need to do this for the vitality of our nation. | 52908-001

Response for Document 52908

52908-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52910.

Comment Date: April 3, 2008 16:25:20PM
Oil Shale and Tar Sands
Comment ID: OSTSD52910

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: America should run on American energy

April 3, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

American energy must be utilized to a greater extent in order for America to overcome its current energy problems. Instead of consistently ignoring the vast energy potential of the United States, America should instead start to use the rich energy supply it has in order to satisfy its energy needs.

As both America and the world's supply of crude oil declines, it is imperative that America focus on other resources to satisfy its growing energy demands. One such resource is oil shale, which has enormous energy potential. Even the most conservative assessments approximate that America's recoverable oil shale is equivalent to more than 800 billion barrels of oil. This supply far exceeds the reserves of even the most oil-rich nations. 52910-001

Oil shale is a viable answer to reducing America's staggering dependence upon foreign energy, which currently stands at over 60% and is only expected to increase. In this precarious time, America must start to commercially develop its rich oil shale supply, and help America fight the war for energy independence. By utilizing oil shale and other forms of American energy, the benefits to America's energy security and economy will be significant.

Now is certainly not the time to deny America the opportunity to increase domestic energy production. Support oil shale development in the near future. 52910-001 (cont.)

Sincerely,

Response for Document 52910

52910-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52911.

Comment Date: April 6, 2008 21:30:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD52911

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

During the 1980's, Fred Hartley, CEO of Unocal, who was developing shale oil, said that oil would have to sell for $40.00 a barrel to make the shale oil profitable. According to the inflation rate that would equal about $80.00 per barrel today. We are well above that now and no relief in sight. Go for the shale oil "all out". Open ANWAR, the Chukchi Sea and the shale oil and we will not support the radical Muslems and we would control our price of oil. Use this energy until we develop something better, which will take longer than developing our own oil resources. Time is wasting. 52911-001

Response for Document 52911

52911-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Kurt Reisser.

The comment tracking number that has been assigned to your comment is OSTSD52913.

Comment Date: April 11, 2008 11:23:36AM
Oil Shale and Tar Sands
Comment ID: OSTSD52913

First Name: Kurt
Middle Initial: D
Last Name: Reisser
Organization:
Address: 1630 Ivy St
Address 2:
Address 3:
City: Denver
State: CO
Zip: 80220
Country: USA
Email: kurt.reisser@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I would like to express my support for Programmatic Alternative C as proposed by the BLM.

Potential hydrocarbon resources in oil shale and tar sands are potentially significant, and responsible development of these resources are in the public interest. Extreme care will need to be taken to insure that any extraction of these resources is done in a manner deemed environmentally acceptable, and minimizes usage of water resources and maintains a modest "footprint". Merely saying "no" to leasing and development of optimal technologies would in my opinion be as irresponsible as blanket opening of federal lands to leasing for oil shale and tar sand hydrocarbon extraction. 52913-001

Response for Document 52913

52913-001: The BLM acknowledges the commentor's preference for Alternative C.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52914.

Comment Date: April 11, 2008 11:36:49AM
Oil Shale and Tar Sands
Comment ID: OSTSD52914

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

We would be better off in the long run converting the area into a National Park. Practical policy would be emphasizing a departure from opening every scrap of land with underdeveloped resource potential. Conservation of natural resources, including hydrocarbons (in-place and developed)should be the primary driver inthe plan for this acreage.	52914-001

Response for Document 52914

52914-001: The BLM acknowledges the commentor's preference for not disturbing public lands.

Thank you for your comment, Walter Baker.

The comment tracking number that has been assigned to your comment is OSTSD52915.

Comment Date: April 11, 2008 11:38:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD52915

First Name: Walter
Middle Initial: L
Last Name: Baker
Organization:
Address: 1510 N. Tyler
Address 2:
Address 3:
City: Enid
State: OK
Zip: 73703
Country: USA
Email: wlbaker@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Our troops are being killed in the Middle East.

Perhaps the continued restrictions of exploration and development in the Western United States - to protect some unheard of plant or animal coupled with the continued restrictions of development due to the whining of a small group of self-serving NIMBYs is not such a grand position.	52915-001

Response for Document 52915

52915-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, George Klein.

The comment tracking number that has been assigned to your comment is OSTSD52916.

Comment Date: April 11, 2008 12:38:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD52916

First Name: George
Middle Initial: D
Last Name: Klein
Organization:
Address: 17424 W. Grand Pkwy; Suite 127
Address 2:
Address 3:
City: Sugar Land
State: TX
Zip: 77479
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

If the USA wants to acheive more energy independence, these lands should be opened up for development of oil shale and tar sands NOW.

I recommend they be opened without limits.

52916-001

Response for Document 52916

52916-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52917.

Comment Date: April 11, 2008 13:23:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD52917

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil Shale PEIS

April 11, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

It is time for America to address its growing energy problems with the obvious solution: develop more American energy. The Bureau of Land Management's draft PEIS for oil shale and tar sands sets us on the right path to accomplishing this.

One significant way in which America can increase its domestic energy production is through the development of its oil shale resources. As the world's largest unexploited resource, oil shale's energy potential is almost immeasurable. In fact, some estimates indicate that Colorado's oil shale supply alone is four times greater than Saudi Arabia's known oil reserves. As a result, America needs American energy, and there is no better place to look than America's rich oil shale resources. 52917-001

An important step for America to develop its own energy would be realizing the enormous energy potential of oil shale. Yet even as many American companies have been anxiously anticipating the substantial economic benefits oil shale presents, this resource's importance has been consistently ignored. Overlooking oil shale's abundance is a mistake: Colorado's oil shale resources alone have been estimated to be nearly four times that of Saudi Arabia's known oil reserves.

Increasing domestic energy production is the only real solution to America's energy problems, thus it is time to look to emerging energy sources like oil shale. 52917-001 (cont.)

Sincerely,

Response for Document 52917

52917-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, coerte voorhies.

The comment tracking number that has been assigned to your comment is OSTSD52918.

Comment Date: April 11, 2008 13:30:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52918

First Name: coerte
Middle Initial: a
Last Name: voorhies
Organization:
Address: 338 n. sterling
Address 2:
Address 3:
City: lafayette
State: LA
Zip: 70501
Country: USA
Email: cvoorhies@petsec.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

for years, i have wondered why our misinformed leaders and populace have shied away from our indigenous immense reserves of petroleum in our western states. if i recall these deposits are in areas of sparse population, vegetation and poor scenery. whatever it takes to open the oil shales up for development, i say go for it!!!!	52918-001

Response for Document 52918

52918-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52919.

Comment Date: April 11, 2008 16:17:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD52919

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I believe it is critical for country's energy needs to open up as much federal acreage for oil and gas exploration and development as possible. Especially in areas as non-scenic as the Green River basin, it is rediculous to restrict oil and gas development. This is a dessert wasteland, and easily reclaimed after drilling and production is finished.	52919-001

Response for Document 52919

52919-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Robert Cook.

The comment tracking number that has been assigned to your comment is OSTSD52921.

Comment Date: April 11, 2008 17:08:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52921

First Name: Robert
Middle Initial: A
Last Name: Cook
Organization:
Address: 929 Meadow View Rd.
Address 2:
Address 3:
City: Gardnerville
State: NV
Zip: 89460
Country: USA
Email: cookra@charter.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I would like to see more land made available for oil & gas exploration. However, unlike many of my fellows in oil & gas industry and AAPG, I insist that wildlife habitats be defined & protected, ie. like sage grouse mating & nesting grounds, antelope & elk grazing areas, and that ground water resources be fully protected from drilling and production pratices. 52921-001

What has happened to ranchers and the land in general in the Green River and Wasachie Basins of Wyoming becasue of gas exploration and production is unacceptable.

Dr. Robert A. Cook, former Chief Geologis, ARCO International Oil & Gas CO.

Response for Document 52921

52921-001: The BLM acknowledges the commentor's preference for access to oil and gas resources as long as it is accomplished in an environmentally sound manner. However, issues associated with oil and gas are outside the scope of this PEIS. The BLM is committed to managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, James Cobb.

The comment tracking number that has been assigned to your comment is OSTSD52922.

Comment Date: April 11, 2008 17:20:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD52922

First Name: James
Middle Initial: D
Last Name: Cobb
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I support releasing all land that has any potential for oil or gas development. | 52922-001

Response for Document 52922

52922-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Pat Fritzler.

The comment tracking number that has been assigned to your comment is OSTSD52923.

Comment Date: April 11, 2008 22:06:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD52923

First Name: Pat
Middle Initial:
Last Name: Fritzler
Organization:
Address:
Address 2:
Address 3:
City: Lakewood
State: CO
Zip: 80232
Country: USA
Email: patf9858@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Regarding tar sands and oil shale extraction in Colorado, as a tax payer, you have my full permission to move forward if all of the following conditions are met. 1. All other avenues of environmentally sound ideas have been pursued and no viable answers have been found. 2. The details for tar sands and/or shale oil extraction are brought forward for a vote by the citizens of Colorado and other states affected. 3. Consideration for the health and welfare of future generations outweighs the benefit of profit for any corporations involved. 4. Global warming is found to be false.

52923-001

Response for Document 52923

52923-001: Thank you for your comment. The BLM is committed to managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect public land and its resources, and to provide for domestic sources of minerals.

Thank you for your comment, Neil Hurley.

The comment tracking number that has been assigned to your comment is OSTSD52924.

Comment Date: April 12, 2008 04:36:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD52924

First Name: Neil
Middle Initial: F
Last Name: Hurley
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am a practicing geologist and an Emeritus Professor of geology from the Colorado School of Mines.

Oil shale is a strategic resource that will be needed by future generations of Americans. Access should be maximized. I support Programmatic Alternative B, which opens the largest acreage for development. 52924-001

Response for Document 52924

52924-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Richard Sams.

The comment tracking number that has been assigned to your comment is OSTSD52925.

Comment Date: April 12, 2008 07:01:35AM
Oil Shale and Tar Sands
Comment ID: OSTSD52925

First Name: Richard
Middle Initial: H
Last Name: Sams
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment: Mobil Oil in US.doc

Comment Submitted:

see attached See Attachment.

Bypassed Oil from Infill Drilling

By Richard H. Sams

Introduction and Historical Perspective

In the wake of last year's high oil prices, Congress is about to vote another confiscatory "Windfall profits tax" on our industry. This time they propose to turn the money they collect from us over to the agribusiness industry. Their stated intention is to *subsidize* "farmers" for ethanol programs from the monies received through taxes on oil production. Wise Americans should demand a better solution to reduce oil imports, a solution that may lie partially within the petroleum industry itself. The hyped up Congressional rhetoric now claims that ethanol and biodiesel fuels, like the old defunct synfuels programs, are THE solution for Energy Independence. Such nuances are quite likely to fail just as miserably as did the synfuels programs. Simplified solutions such as this hastily inscribed act need to be carefully scrutinized, especially as to who wins and who ultimately loses. At least the oil industry finally managed to get its message through to Congress, namely, that increasing dependency on foreign imports is not only an economic drain but political suicide as well. It is fair and now very important to ask our congressmen: *what does history tell us about real solutions to our nation's energy problem?* Together let us briefly review that history. 52925-001

The Arabian oil embargo of 1973 resulted in a sudden uncontrollable oil price increase plus an economic shock to the entire U. S. populace. It spawned the original "Windfall profits tax" where with the stroke of a pen, President Jimmie Carter granted the U.S. government an Overriding Royalty under *every* oil well in the nation producing more than ten barrels per day! (And please tell me, where did *those* billions of tax dollars go?) In spite of that punitive tax, the industry got the exploration ball rolling and managed to curb for at least ten years the domestic U.S. production decline curve (Figure 1). Just what happened in those years between 1975 and 1985 to temporarily postpone it?

(paste Figure 1)*

The Impact of Infill Drilling on Rising Oil prices

When rising oil prices reached "the price-is-right," a rash of infill drilling in aging or abandoned domestic oil fields followed. It proved that much previously discovered oil had actually been left in the ground, i.e., bypassed. The extra "new" oil stemmed the U.S. production decline curve, and it was due to production from infill drilling in existing oil fields. This fact emerged unexpectedly from the ensuing drilling boom statistics that stretched from 1974 to1980. The numbers reveal that a new target of almost *eighty (80) billion barrels of mobile oil* still lies, for the most part, bypassed within known reservoirs of the lower forty-eight United States (Fisher, 1987). This is oil that could be recovered by a systematic examination and delineation of complex reservoirs by re-drilling known accumulations with strategically spaced wells (infill drilling). Such wells would take advantage of the *geologic heterogeneity* that exists *between* older wells within these fields (Fisher and Galloway, 1983, Fisher and Findley, 1986).

After the statistical studies were published, several new oil companies were organized to capitalize on this idea. These have demonstrated their success in adding value to their company's assets through infill drilling. Recoverable, bypassed mobile oil is present, proven, and economic in many old fields, even without enhanced oil recovery methods. Why is this so? Because bypassed mobile oil remaining in the ground is due mainly to government well-spacing regulations.

The state of Texas, in establishing fair rules for well spacing, incorrectly assumed that all oil fields were just like its notorious East Texas field. That is, oil reservoirs that were to be drained by the wells consisted of rocks (or unconsolidated sediments) with *homogeneous* properties. It was assumed by petroleum engineers that the rock pore spaces were totally interconnected (as in the East Texas Woodbine reservoir) such that oil reservoirs in general would be drained by each well to a radial distance of about 750 feet. The surface area inscribed thereby covered a little over forty acres; so 40-acre spacing became the standard well-spacing rule. (Actually, the drainage distance also depended largely on the reservoir pressure and the drive mechanism where the pressure was generally a function of the depth to the producing zone. So allowances were later made for shallower and deeper wells by establishing individual field rules). Thereafter, practically all states within the U.S. followed the Texas ruling, and the 40-acre legal space between wells in most states was thus derived from engineering assumptions rather than geological data. Well spacing today varies only as to depth unless a specific reason can be demonstrated to governing authorities. But because *most* oil reservoirs are in fact *geologically heterogeneous* (not homogeneous) over the intervening distance between wells, much mobile oil has been unintentionally left in the ground, or bypassed

52925-001 (cont.)

The Impact of Falling Oil Prices

What else resulted from the notorious Arab oil embargo, and how did it affect the economics of the synfuels programs? With higher oil prices exploration was revived, this time, however, major companies and a few large independents explored overseas, and throughout the entire non-OPEC world. In time, a lot more oil was finally discovered in areas like the North Sea and Nigeria, areas that were *not* controlled by OPEC. By 1986 that new production came into the world oil market to compete and break OPEC's exclusive control over oil prices. A competitive oil glut then followed, and prices naturally tumbled on the world market as supply soon exceeded immediate demand.

It was the *world market*, not government subsidies, that reigned over prices, and those subsidized synfuels projects economically collapsed with lowered oil prices. By 1991 with prices down, exploration efforts also collapsed. They reached unprecedented low levels of activity according to the number of active drilling rigs (*UP Int'l*, April, 28, 1992), seismic crew months, exploratory budgets (*AAPG Explorer*, July 1991), and expenditures for offshore leases (*Houston Chronicle*, April 16, 1992). At the 1991 Gulf of Mexico Offshore sale, only $56.2 million in bonuses was offered for leases. Some tracts even went for as low as $25 per acre! Compared with the previous year's sale where $260 million in high bids were offered to the U.S. government, this is a paltry sum. Close to 200,000 jobs were also lost to the industry, and on a common dollar basis, the long-term price level for crude oil then averaged about $10 per barrel (Megill, *AAPG Explorer*, April, 1992). Our so-called "Windfall" profits had vanished (if they ever existed). But did Congress ever consider voting to subsidize "Windfall losses" in the domestic oil industry? Of course not, only in the expensive deep Gulf of Mexico plays were they asked to rescue the domestic industry in order to retain some of those 200,000 jobs. Nevertheless, onshore we bore it and stacked our rigs to rust in the yards.

So what does history teach us about the future?

Geologist, M. King Hubbert accurately predicted that the year1970 would mark the U.S. domestic oil production peak (Figure 1). Congress ignored that and voted to *cut* the Depletion allowance, our industry's equivalent to depreciation in other businesses. Knowledge of those facts allowed the OPEC cartel to take over control of the world market price of oil when Texas abandoned its oil production allowable program. After the ten year infill drilling and exploration reprieve, U.S. oil production continued its decline such that by 2003, it had dropped approximately 35% while U.S. oil consumption grew about 50% thus leaving a sizeable gap (Figure 1). In spite of warnings from independent oilmen, the results from the halt in domestic exploration left that gap to be filled mainly by major oil company overseas imports now at a substantially higher price, and petrodollars are once again flowing out of the nation's economy. The government's subsidized synfuels were not there to cover the gap and now the crisis is still with us. So it is fair to conclude that Congress's new "environmentally-friendly alternative fuels fix-its" are not going to give us energy independence without help from domestic infill drilling.

52925-001 (cont.)

Regardless of subsidies, ethanol additives to mix with gasoline, or biodeisel alternative fuels, it is a geological certainty that at some time in the near the future, world oil production (like U.S. oil production) will also peak and decline, and the price *must* then rise even more because developing countries like China now bid for it too. Unadjusted for inflation, the current price is already over five times that common dollar based long-term price, but more importantly, the world market price of oil applies *equally* to both newly discovered oil and to that 80 billion barrels of domestic bypassed oil to be recovered from re-drilling old fields. Therefore a reassessment of the many depleted or partially depleted oil reservoirs is demanded by the times because considerably less risk is involved in the re-drilling of known oil-productive reservoirs than lies in the uncertainty of exploring. The oil is there. The big questions are: how much? And where are the best opportunities to make a good return on one's investment with infill drilling?

Selection Criteria for Lease Acquisition and Infill Drilling

In Texas, Galloway and others (1983) grouped several known reservoirs containing bypassed volumes of undeveloped oil into major trends or plays on the basis of structural controls, temporal distribution, gross lithology, and reservoir characteristics. These catalogued reservoirs represent an excellent low-risk target for increasing proven oil reserves (and hence property asset value) of abandoned or marginally producing oil properties. But which ones offer the best return on the investment? Not *all* old or abandoned fields offer the same opportunities.

The key to an economically successful venture in infill drilling involves using a combination of several correct assessments. In addition to the geological heterogeneity, a term introduced above, these assessments include remaining oil volumes and historical recovery efficiency in a field, as well as the re-drilling, completion, and production (operating) costs, and most of all, the net revenue interest to the working interest (after taxes) available to the venture. A balancing of these criteria, i.e., weighing one against the other, should achieve the best results. Therefore a brief discussion of each of these criteria mentioned follows:

1. Geologically Heterogeneous Reservoirs

The potential for infill drilling and recovery of substantial amounts of movable oil is enhanced in large part by *geologic heterogeneity* (Tyler, 1988). Tyler defined this term as: *the compartmentalization of oil and gas reservoir rocks within a particular oil or gas field due to variances in rock properties.* These variances result primarily from their deposition and diagenesis, both of which greatly affect the ultimate porosity and permeability of the rock reservoir. These are commonly measured quantities available from core data, and the records from old wells in most fields usually contain them.

52925-001 (cont.)

Well-log interpreted depositional environments of the producing unit also hint at the degree of compartmentalization. For example, it is predictable that lateral continuity of a basin floor fan deposit or a barrier island beach deposit should offer little heterogeneity. Such reservoirs would not likely contain predictable compartments of bypassed oil or gas. On the other hand, proximal slope fan deposits contain many separate isolated channels and therefore should offer a high degree of reservoir heterogeneity in a field with this productive reservoir. A channel-cut through a barrier bar deposit predictably will have depositional complexity but rarely will it be compartmentalized because the sand-filled channel there will be in contact with the barrier beach sands leaving sand-against-sand interconnected permeability. Hence, this occurrence would *not* meet favorable selection criteria.

On the other hand, low sinuosity channel sands in many depositional environments are a very attractive target. They are more attractive than high sinuosity channel sands because the trend of the channel bank is usually more predictable, and point bar sands within them are commonly isolated by thin shale interbeds that were deposited during times of low current energy as the channel filled.

Diagenetic controls, such as calcite cementation or quartz grain overgrowth, are generally less well understood. But through careful study some rules of occurrence can be found and applied. Diagenesis is considerably more important in carbonate reservoirs.

Due to diagenesis carbonate reservoirs can be expected to be particularly heterogeneous, except pure oolites, grainstones, and some pervasively dolomitized limestone.

2. Recovery Efficiency and Remaining Oil Volumes

Tyler (1988) defined *recovery efficiency* as the amount of oil recovered over the life of the reservoir before re-drilling (cumulative production) divided by the volumetric calculation of the original oil in place (OOIP), expressed as a percent. Original oil in place is calculated by multiplying the average porosity times the water saturation, times the thickness of pay, times the areal extent of the reservoir. Unfortunately, this calculation usually assumes a homogeneous reservoir and is therefore always overstated. A low recovery efficiency implies that there remains a lot of OOIP, but it does not guarantee that all of it is bypassed mobile oil.

Reservoir efficiency should be evaluated not only on the basis of the reservoir characteristics but also on the basis of the efficiency of the historical operators of the property, giving proper weight to each. This is obviously a subjective call. Efficient operators and/or waterfloods generally leave little oil behind. But low recovery efficiency due to an "unsophisticated" operator in the field is often as likely to have recoverable bypassed oil left behind than oil resulting from reservoir compartmentalism due to natural causes. For example, the low recovery efficiency of the San Andreas-Grayburg trend of West Texas is, on the whole, more likely due to natural causes than to multiple operator inefficiency in most fields. This is because of a large amount of unpredictable diagenetic alteration is present in the reservoir, but the operator's knowledge of this fact could have affected his efficiency.

Periodic fluctuations in oil prices during the life of the field may explain low recovery efficiency because of economics. Oil production with a high water cut being produced during high prices will be abandoned during low prices because of the added cost of saltwater disposal if an injection well was not on the lease.

52925-001 (cont.)

3. Re-drilling, Development, and Operating Costs

Personal computers and our current knowledge of how to use them are markedly different today than during the 1970s Energy Crisis when infill drilling began to affect declining production. Drilling, completion, and operating costs that will vary from well to well because of engineering and testing can now be input and monitored. Such data can be blended with a company's Economic Business Model that considers such time-dependent items as discounted cash flow rate of return on the investment, future net worth of reserves in the ground and their sensibility to production rates, and oil price variance. Cost data from each newly drilled and completed well, along with varying costs (some even varying on a daily basis) can be input into the model. Today's personal computers allow frequent updates and easy communications with field operational personnel particularly in cases where time is money.

Computers can also analyze, integrate, and project the results gathered from new geologic data as each additional well is drilled so that the interpreted geological character of the complex reservoir becomes more precise as infill drilling progresses.

4. Net Revenue Interest After Taxes, about the "Bottom Line"

A company-customized Economic Business Model is imperative in calculating the "bottom line" after tax return on investment from a particular venture, especially as it progresses through redevelopment of an old field. The model can compare expectations with reality, and thereby assist in decision making tremendously. When surprises (good or bad ones) occur, flexible adjustments can be easily evaluated with a computer model.

But most critical to the bottom line in a field with multiple leases in the leasehold (the usual case) is each individual well's net-revenue-after-tax dollars delivered to the venture. This is the revenue stream that leads to a profit. The cost of individual leasehold obligations, in addition to the cost of infill drilling and completion, such items as royalty, overriding royalties, workovers, water disposal, and required continuous development, gates and livestock protection, environmental regulations (especially new rulings), and future plugging and abandonment costs should not be neglected as real future costs in the bottom line calculations of the economic model. Such costs in an old field of stripper wells are usually inherited and can (and do) vary widely from lease to lease. As a contingency, allow for added costs from unpredictable governmental intervention. This is sure to happen. It always has.

Summary and Conclusions

Between 1975 and 1985, infill drilling in old or abandoned oil fields proved that much previously discovered oil had actually been bypassed in existing fields due to well-spacing rules. In spite of the continuing decline in U.S. production since 1970, this added production from bypassed oil was largely responsible for postponing that decline for another ten years while government and businesses outside the petroleum industry were able to adjust consumption and, under high oil prices, become more energy efficient. 52925-001 (cont.)

Congress chose to tax oil and subsidize a synfuels program that failed miserably when oil prices eventually dropped due to successful exploration efforts overseas that competed with OPEC's cartel. The lesson from this is that subsidies *cannot* keep things economic for long in a world market. Despite environmental concerns about pollution, low oil prices brought on continued increases in fossil fuel consumption leaving a large gap to be filled by oil imports now at substantially higher prices, and petrodollars are once again flowing out of our nation, this time to some unfriendly folks. Synfuels were clearly not the answer to energy independence, but infill drilling definitely put "a finger in the leaking dike" of the Energy Crisis. It bought ten years' time and some security while the oil industry explored for giant fields overseas and found them in the Gulf of Mexico as well. Conservative numbers reveal that even today nearly eighty (80) billion barrels (*3.36 trillion gallons*) of mobile oil lie bypassed within known oil fields in the lower forty-eight states. This oil will once again come into play, but only in periods of high prices and only if not unfairly taxed.

Not *all* old or abandoned fields offer the same opportunities. Some should even be left alone. The key to an economically successful venture in infill drilling involves using a combination of several assessments. These assessments include reservoir heterogeneity, remaining oil volumes and recovery efficiency in a field, as well as the re-drilling, completion, and production costs, and net revenue interest available after taxes.

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_____ and R.J. Findlay, 1986, Recent production trends and outlook for future oil and gas supplies in Texas: Geol. Circ. 86-4, Bureau of Econ. Geology, Univ. of Texas, Austin.

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Megill, Robert E., Amer. Assoc. Petroleum Geol. *Explorer* article in reference to: Long term price of crude oil, April, 1992.

Tyler, Noel, 1988, New Oil from Old Fields: *Geotimes,* v. 33, No. 7, p.9.

The Houston Chronicle, April 16, 1992: Reporting on recent offshore lease bid sale.

United Press International, April 28,1992: Reporting on oil drilling activity.

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*Source of U.S. Oil Production/consumption Graph (Figure 1): "World Oil Production: Future Implications" author unknown, Georgia Institute of Technology website: (www.gatech.edu/docs/oil_production.pdf). This author modified the graph only by highlighting the years 1975-1985 to show when infill drilling influenced the U.S. production decline.

Response for Document 52925

52925-001: Thank you for your comment.

Thank you for your comment, Clifford Clark.

The comment tracking number that has been assigned to your comment is OSTSD52926.

Comment Date: April 12, 2008 10:36:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD52926

First Name: Clifford
Middle Initial: C
Last Name: Clark
Organization:
Address: 7709 South Glencoe Way
Address 2:
Address 3:
City: Centennial
State: CO
Zip: 80122
Country: USA
Email: geoman49@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am supportive of making as much acreage as possible open for Oil and Gas Exploration and Development.

I have personal knowledge of how little this activity disrupts wildlife activity. Raptors have built their nests on our oil tanks and stairs. Wild Horses hover around drilling rigs to watch the activity. Reclaimed drilling locations have more vegetation and food for animals on them than the undisturbed grounds surrounding them. Common senses should prevail, not emotional and unfounded opposition. The USA energy industry is only finding 1 BBL of oil for every 4 BBL of oil it consumes. The US Dollar has lost it's value and is worth only 75% of what it was against the Euro within the last 2-3 years. We need to stimulate drilling and exploration in the US and not restrict it.

52926-001

Response for Document 52926

52926-001: The BLM acknowledges the commentor's general support for oil shale and tar sands development.

Thank you for your comment, Patricia Youngson.

The comment tracking number that has been assigned to your comment is OSTSD52927.

Comment Date: April 12, 2008 19:37:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52927

First Name: Patricia
Middle Initial:
Last Name: Youngson
Organization:
Address: 2227 Canyon Blvd. #352
Address 2:
Address 3:
City: Boulder
State: CO
Zip: 80302
Country: USA
Email: patyoungson@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

No mining for oil shale. 52927-001

Response for Document 52927

52927-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, michael arden.

The comment tracking number that has been assigned to your comment is OSTSD52928.

Comment Date: April 14, 2008 08:51:44AM
Oil Shale and Tar Sands
Comment ID: OSTSD52928

First Name: michael
Middle Initial: p
Last Name: arden
Organization:
Address: [Withheld by requestor]
Address 2: [Withheld by requestor]
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Quite simply,plan B should be applied to enable the domestic oil industry to survive and to allow our country to become less dependent upon reserves outside of the US. | 52928-001

Response for Document 52928

52928-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, GEORGE BOLE.

The comment tracking number that has been assigned to your comment is OSTSD52929.

Comment Date: April 14, 2008 09:20:25AM
Oil Shale and Tar Sands
Comment ID: OSTSD52929

First Name: GEORGE
Middle Initial: R
Last Name: BOLE
Organization:
Address: PO BOX 940850
Address 2:
Address 3:
City: HOUSTON
State: TX
Zip: 770947850
Country: USA
Email: grbole@sbcglobal.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I PREFER PROGRAMMATIC ALTERNATIVE B. THANK YOU, GEORGE R BOLE | 52929-001

Response for Document 52929

52929-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Richard Wells.

The comment tracking number that has been assigned to your comment is OSTSD52930.

Comment Date: April 14, 2008 11:12:33AM
Oil Shale and Tar Sands
Comment ID: OSTSD52930

First Name: Richard
Middle Initial: B
Last Name: Wells
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I favor more development of shale gas and tar sands, as I use a lot of natural gas and gasoline. Better we use our own resources than rely on foreign countries. Programmatic B seems to allow the moset acreage for development, so I favor that. Sincerely, R>B> Wells	52930-001

Response for Document 52930

52930-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Robert Dutton.

The comment tracking number that has been assigned to your comment is OSTSD52931.

Comment Date: April 15, 2008 18:18:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52931

First Name: Robert
Middle Initial: R
Last Name: Dutton
Organization:
Address: 827 Geissler Road
Address 2:
Address 3:
City: Montesano
State: WA
Zip: 98563
Country: USA
Email: dutton.randy@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment: Envirn Effects of Increased Atmospheric CO2.pdf

Comment Submitted:

Developing the shale oil is critical in fending off US economic, and environmental collapse. It further is necessary to stem the famine and turmoil sweeping across the globe resulting from the misguided US ethanol mandate and subsidy, which is converting food to fuel. CO2 is not the problem, so states the Oregon Institute of Science and Technology report on Environmen tal Effects of Increased Atmospheric Carbon Dioxide http://www.oism.org/pproject/review.pdf. But CO2 is part of the solution because it increases the rate of growth of crops and trees. As a candidate for the Washington State Legislature, I'll try to eliminate all the ethanol subsidies and mandates. See Attachment.	52931-001

Environmental Effects of Increased Atmospheric Carbon Dioxide

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January 1998

ABSTRACT **A review of the research literature concerning the environmental consequences of increased levels of atmospheric carbon dioxide leads to the conclusion that increases during the 20th Century have produced no deleterious effects upon global weather, climate, or temperature. Increased carbon dioxide has, however, markedly increased plant growth rates. Predictions of harmful climatic effects due to future increases in minor greenhouse gases like CO_2 are in error and do not conform to current experimental knowledge.**

SUMMARY

World leaders gathered in Kyoto, Japan, in December 1997 to consider a world treaty restricting emissions of "greenhouse gases," chiefly carbon dioxide (CO_2), that are thought to cause "global warming" – severe increases in Earth's atmospheric and surface temperatures, with disastrous environmental consequences.

Predictions of global warming are based on computer climate modeling, a branch of science still in its infancy. The empirical evidence – actual measurements of Earth's temperature – shows no man-made warming trend. Indeed, over the past two decades, when CO_2 levels have been at their highest, global average temperatures have actually cooled slightly.

To be sure, CO_2 levels have increased substantially since the Industrial Revolution, and are expected to continue doing so. It is reasonable to believe that humans have been responsible for much of this increase. But the effect on the environment is likely to be benign. Greenhouse gases cause plant life, and the animal life that depends upon it, to thrive. What mankind is doing is liberating carbon from beneath the Earth's surface and putting it into the atmosphere, where it is available for conversion into living organisms.

RISE IN ATMOSPHERIC CARBON DIOXIDE

The concentration of CO_2 in Earth's atmosphere has increased during the past century, as shown in figure 1 (1). The annual cycles in figure 1 are the result of seasonal variations in plant use of carbon dioxide. Solid horizontal lines show the levels that prevailed in 1900 and 1940 (2). The magnitude of this atmospheric increase during the 1980s was about 3 gigatons of carbon (Gt C) per year (3). Total human CO_2 emissions – primarily from use of coal, oil, and natural gas and the production of cement – are currently about 5.5 GT C per year.

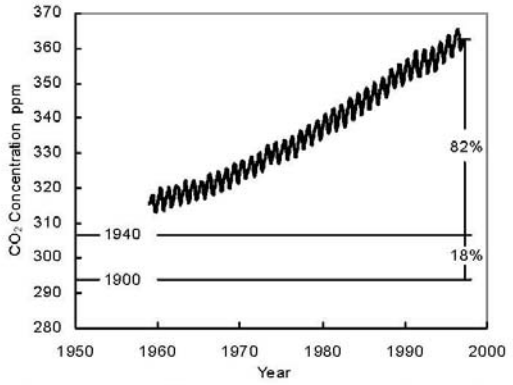

Fig. 1. Atmospheric CO_2 concentrations in parts per million by volume, ppm, at Mauna Loa, Hawaii. These measurements agree well with those at other locations (1). Periodic cycle is caused by seasonal variations in CO_2 absorption by plants. Approximate global level of atmospheric CO_2 in 1900 and 1940 is also displayed (2).

To put these figures in perspective, it is estimated that the atmosphere contains 750 Gt C; the surface ocean contains 1,000 Gt C; vegetation, soils, and detritus contain 2,200 Gt C; and the intermediate and deep oceans contain 38,000 Gt C (3). Each year, the surface ocean and atmosphere exchange an estimated 90 Gt C; vegetation and the atmosphere, 60 Gt C; marine biota and the surface ocean, 50 Gt C; and the surface ocean and the intermediate and deep oceans, 100 Gt C (3).

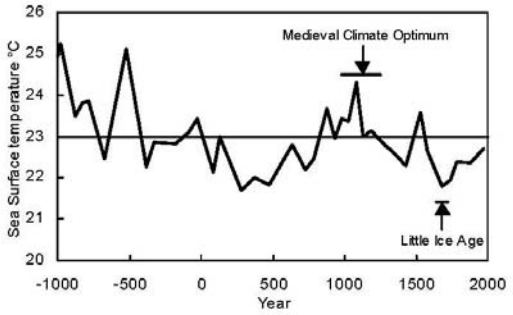

Fig. 2. Surface temperatures in the Sargasso Sea (with time resolution of about 50 years) ending in 1975 as determined by isotope ratios of marine organism remains in sediment at the bottom of the sea (7). The horizontal line is the average temperature for this 3,000 year period. The Little Ice Age and Medieval Climate Optimum were naturally occurring, extended intervals of climate departures from the mean.

So great are the magnitudes of these reservoirs, the rates of exchange between them, and the uncertainties with which these numbers are estimated that the source of the recent rise in atmospheric carbon dioxide has not been determined with certainty (4). Atmospheric concentrations of CO_2 are reported to have varied widely over geological time, with peaks, according to some estimates, some 20-fold higher than at present and lows at approximately 18th-Century levels (5).

The current increase in carbon dioxide follows a 300-year warming trend: Surface and atmospheric temperatures have been recovering from an unusually cold period known as the Little Ice Age. The observed increases are of a magnitude that can, for example, be explained by oceans giving off gases naturally as temperatures rise. Indeed, recent carbon dioxide rises have shown a tendency to follow rather than lead global temperature increases (6).

There is, however, a widely believed hypothesis that the 3 Gt C per year rise in atmospheric carbon dioxide is the result of the 5.5 Gt C per year release of carbon dioxide from human activities. This hypothesis is reasonable, since the magnitudes of human release and atmospheric rise are comparable, and the atmospheric rise has occurred contemporaneously with the increase in production of CO_2 from human activities since the Industrial Revolution.

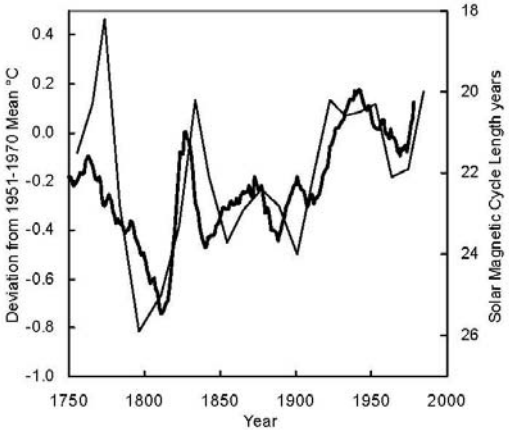

Fig. 3. Moving 11-year average of terrestrial Northern Hemisphere temperatures as deviations in °C from the 1951-1970 mean – left axis and darker line (8,9). Solar magnetic cycle lengths – right axis and lighter line (10). The shorter the magnetic cycle length, the more active, and hence brighter, the sun.

ATMOSPHERIC AND SURFACE TEMPERATURES

In any case, what effect is the rise in CO_2 having upon the global environment? The temperature of the Earth varies naturally over a wide range. Figure 2 summarizes, for example, surface temperatures in the Sargaso Sea (a region of the Atlantic Ocean) during the past 3,000 years (7). Sea surface temperatures at this location have varied over a range of about 3.6 degrees Celsius (°C) during the past 3,000 years. Trends in these data correspond to similar features that are known from the historical record.

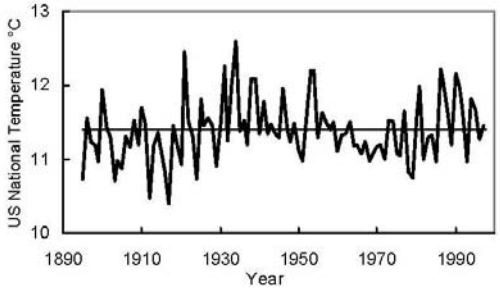

Fig. 4. Annual mean surface temperatures in the contiguous United States between 1895 and 1997, as compiled by the National Climate Data Center (12). Horizontal line is the 103-year mean. The trend line for this 103-year period has a slope of 0.022 °C per decade or 0.22 °C per century. The trend line for 1940 to 1997 has a slope of 0.008 °C per decade or 0.08 °C per century.

For example, about 300 years ago, the Earth was experiencing the "Little Ice Age." It had descended into this relatively cool period from a warm interval about 1,000 years ago known as the "Medieval Climate Optimum." During the Medieval Climate Optimum, temperatures were warm enough to allow the colonization of Greenland. These colonies were abandoned after the onset of colder temperatures. For the past 300 years, global temperatures have been gradually recovering (11). As shown in figure 2, they are still a little below the average for the past 3,000 years. The human historical record does not report "global warming" catastrophes, even though temperatures have been far higher during much of the last three millennia.

What causes such variations in Earth's temperature? The answer may be fluctuations in solar activity. Figure 3 shows the period of warming from the Little Ice Age in greater detail by means of an 11-year moving average of surface temperatures in the Northern Hemisphere (10). Also shown are solar magnetic cycle lengths for the same period. It is clear that even relatively short, half-century-long fluctuations in temperature correlate well with variations in solar activity. When the cycles are short, the sun is more active, hence brighter, and the Earth is warmer. These variations in the activity of the sun are typical of stars close in mass and age to the sun (13).

Figure 4 shows the annual average temperatures of the United States as compiled by the National Climate Data Center (12). The most recent upward temperature fluctuation from the Little Ice Age (between 1900 and 1940), as shown in the Northern Hemisphere record of figure 3, is also evident in this record of U.S. temperatures. These temperatures are now near average for the past 103 years, with 1996 and 1997 having been the 42nd and 60th coolest years.

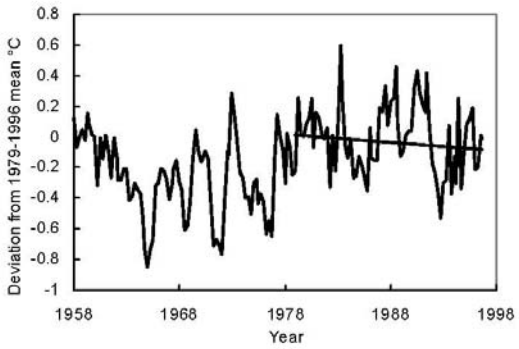

Fig. 5. Radiosonde balloon station measurements of global lower tropospheric temperatures at 63 stations between latitudes 90 N and 90 S from 1958 to 1996 (15). Temperatures are three-month averages and are graphed as deviations from the mean temperature for 1979 to 1996. Linear trend line for 1979 to 1996 is shown. The slope is minus 0.060 °C per decade.

Especially important in considering the effect of changes in atmospheric composition upon Earth temperatures are temperatures in the lower troposphere – at an altitude of roughly 4 km. In the troposphere, greenhouse-gas-induced temperature changes are expected to be at least as large as at the surface (14). Figure 5 shows global tropospheric temperatures measured by weather balloons between 1958 and 1996. They are currently near their 40-year mean (15), and have been trending slightly downward since 1979.

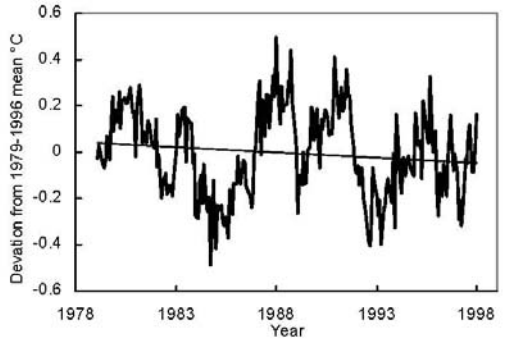

Fig. 6. Satellite Microwave Sounding Unit, MSU, measurements of global lower tropospheric temperatures between latitudes 83 N and 83 S from 1979 to 1997 (17,18). Temperatures are monthly averages and are graphed as deviations from the mean temperature for 1979 to 1996. Linear trend line for 1979 to 1997 is shown. The slope of this line is minus 0.047 °C per decade. This record of measurements began in 1979.

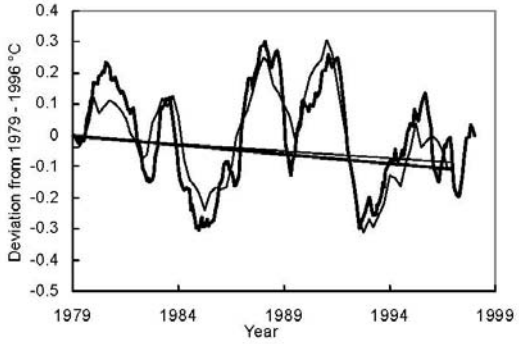

Fig. 7. Global radiosonde balloon temperature (light line) (15) and global satellite MSU temperature (dark line) (17,18) from figures 5 and 6 plotted with 6-month smoothing. Both sets of data are graphed as deviations from their respective means for 1979 to 1996. The 1979 to 1996 slopes of the trend lines are minus 0.060 °C per decade for balloon and minus 0.045 for satellite.

Since 1979, lower-tropospheric temperature measurements have also been made by means of microwave sounding units (MSUs) on orbiting satellites (16). Figure 6 shows the average global tropospheric satellite measurements (17,18) – the most reliable measurements, and the most relevant to the question of climate change.

Figure 7 shows the satellite data from figure 6 superimposed upon the weather balloon data from figure 5. The agreement of the two sets of data, collected with completely independent methods of measurement, verifies their precision. This agreement has been shown rigorously by extensive analysis (19, 20).

While tropospheric temperatures have trended downward during the past 19 years by about 0.05 °C per decade, it has been reported that global *surface* temperatures trended upward by about 0.1 °C per decade (21, 22). In contrast to tropospheric temperatures, however, surface temperatures are subject to large uncertainties for several reasons, including the urban heat island effect (illustrated below).

During the past 10 years, U.S. surface temperatures have trended downward by minus 0.08 °C per decade (12) while global surface temperatures are reported increased by plus 0.03 °C per decade (23). The corresponding weather-balloon and satellite tropospheric 10-year trends are minus 0.4 °C and minus 0.3 °C per decade, respectively.

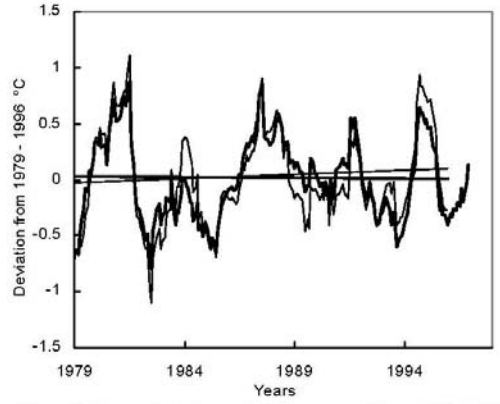

Figure 8. Tropospheric temperature measurements by satellite MSU for North America between 30° to 70° N and 75° to 125° W (dark line) (17, 18) compared with the surface record for this same region (light line) (24), both plotted with 12-month smoothing and graphed as deviations from their means for 1979 to 1996. The slope of the satellite MSU trend line is minus 0.01 °C per decade, while that for the surface trend line is plus 0.07 °C per decade. The correlation coefficient for the unsmoothed monthly data in the two sets is 0.92.

Disregarding uncertainties in surface measurements and giving equal weight to reported atmospheric and surface data and to 10 and 19 year averages, the mean global trend is minus 0.07 °C per decade.

In North America, the atmospheric and surface records partly agree (20 and figure 8). Even there, however, the atmospheric trend is minus 0.01 per decade, while the surface trend is plus 0.07 °C per decade. The satellite record, with uniform and better sampling, is much more reliable.

The computer models on which forecasts of global warming are based predict that tropospheric temperatures will rise at least as much as surface temperatures (14). Because of this, and because these temperatures can be accurately measured without confusion by complicated effects in the surface record, these are the temperatures of greatest interest. The global trend shown in figures 5, 6 and 7 provides a definitive means of testing the validity of the global warming hypothesis.

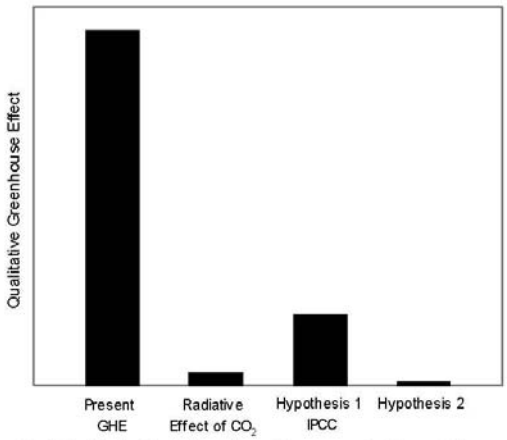

Fig. 9. Qualitative illustration of greenhouse warming. Present: the current greenhouse effect from all atmospheric phenomena. Radiative effect of CO_2: added greenhouse radiative effect from doubling CO_2 without consideration of other atmospheric components. Hypothesis 1 IPCC: hypothetical amplification effect assumed by IPCC. Hypothesis 2: hypothetical moderation effect.

THE GLOBAL WARMING HYPOTHESIS

There *is* such a thing as the greenhouse effect. Greenhouse gases such as H_2O and CO_2 in the Earth's atmosphere decrease the escape of terrestrial thermal infrared radiation. Increasing CO_2, therefore, effectively increases radiative energy input to the Earth. But what happens to this radiative input is complex: It is redistributed, both vertically and horizontally, by various physical processes, including advection, convection, and diffusion in the atmosphere and ocean.

When an increase in CO_2 increases the radiative input to the atmosphere, how and in which direction does the atmosphere respond? Hypotheses about this response differ and are schematically shown in figure 9. Without the greenhouse effect, the Earth would be about 14 °C cooler (25). The radiative contribution of doubling atmospheric CO_2 is minor, but this radiative greenhouse effect is treated quite differently by different climate hypotheses. The hypotheses that the IPCC has chosen to adopt predict that the effect of CO_2 is amplified by the atmosphere (especially water vapor) to produce a large temperature increase (14). Other hypotheses, shown as hypothesis 2, predict the opposite – that the atmospheric response will counteract the CO_2 increase and result in insignificant changes in global temperature (25-27). The empirical evidence of figures 5-7 favors hypothesis 2. While CO_2 has increased substantially, the large temperature increase predicted by the IPCC models has not occurred (see figure 11).

The hypothesis of a large atmospheric temperature increase from greenhouse gases (GHGs), and further hypotheses that temperature increases will lead to flooding, increases in storm activity, and catastrophic world-wide climatological changes have come to be known

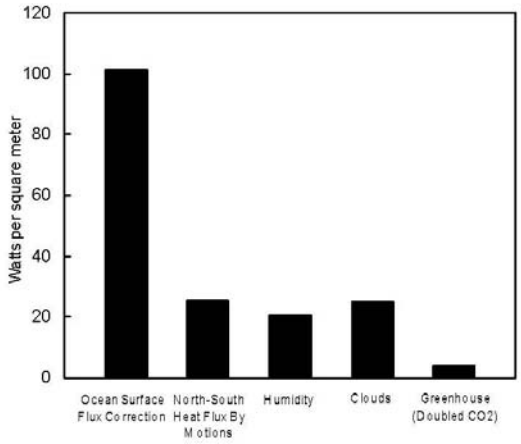

Fig. 10. The radiative greenhouse effect of doubling the concentration of atmospheric CO_2 (right bar) as compared with four of the uncertainties in the computer climate models (14, 28).

as ''global warming'' – a phenomenon claimed to be so dangerous that it makes necessary a dramatic reduction in world energy use and a severe program of international rationing of technology (29).

The computer climate models upon which ''global warming'' is based have substantial uncertainties. This is not surprising, since the climate is a coupled, non-linear dynamical system – in layman's terms, a very complex one. Figure 10 summarizes some of the difficulties by comparing the radiative CO_2 greenhouse effect with correction factors and uncertainties in some of the parameters in the computer climate calculations. Other factors, too, such as the effects of volcanoes, cannot now be reliably computer modeled.

Figure 11 compares the trend in atmospheric temperatures predicted by computer models adopted by the IPCC with that actually observed during the past 19 years – those years in which the highest atmospheric concentrations of CO_2 and other GHGs have occurred.

In effect, an experiment has been performed on the Earth during the past half-century – an experiment that includes all of the complex factors and feedback effects that determine the Earth's temperature and climate. Since 1940, atmospheric GHGs have risen substantially. Yet atmospheric temperatures have not risen. In fact, during the 19 years with the highest atmospheric levels of CO_2 and other GHGs, temperatures have fallen.

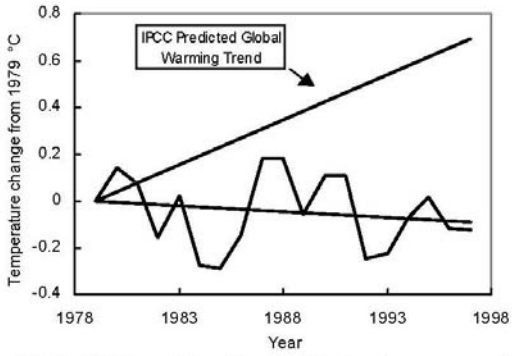

Fig. 11. Global annual lower tropospheric temperatures as measured by satellite MSU between latitudes 83 N and 83 S (17, 18) plotted as deviations from the 1979 value. The trend line of these experimental measurements is compared with the corresponding trend line predicted by International Panel on Climate Change (IPCC) computer climate models (14).

Not only has the global warming hypothesis failed the experimental test; it is theoretically flawed as well. It can reasonably be argued that cooling from negative physical and biological feedbacks to GHGs will nullify the initial temperature rise (26, 30).

The reasons for this failure of the computer climate models are subjects of scientific debate. For example, water vapor is the largest contributor to the overall greenhouse effect (31). It has been suggested that the computer climate models treat feedbacks related to water vapor incorrectly (27, 32).

The global warming hypothesis is not based upon the radiative properties of the GHGs themselves. It is based entirely upon a small initial increase in temperature caused by GHGs and a large theoretical amplification of that temperature change. Any comparable temperature increase from another cause would produce the same outcome from the calculations.

At present, science does not have comprehensive quantitative knowledge about the Earth's atmosphere. Very few of the relevant parameters are known with enough rigor to permit reliable theoretical calculations. Each hypothesis must be judged by empirical results. The global warming hypothesis has been thoroughly evaluated. It does not agree with the data and is, therefore, not validated.

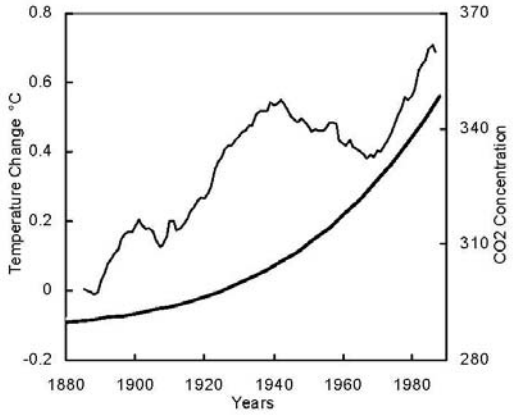

Figure 12. Eleven-year moving average of global surface temperature, as estimated by NASA GISS (23, 33, and 34), plotted as deviation from 1890 (left axis and light line), as compared with atmospheric CO_2 (right axis and dark line) (2). Approximately 82% of the increase in CO_2 occurred after the temperature maximum in 1940, as is shown in figure 1.

The new high in temperature estimated by NASA GISS after 1940 is not present in the radiosonde balloon measurements or the satellite MSU measurements. It is also not present in surface measurements for regions with comprehensive, high-quality temperature records (35). The United States surface temperature record (see figure 4) gives 1996 and 1997 as the 38th and 56th coolest years in the 20th century. Biases and uncertainties, such as that shown in figure 13, account for this difference.

GLOBAL WARMING EVIDENCE

Aside from computer calculations, two sorts of evidence have been advanced in support of the ''global warming'' hypothesis: temperature compilations and statements about global flooding and weather disruptions. Figure 12 shows the global temperature graph that has been compiled by National Aeronautic and Space Administration's Goddard Institute of Space Studies (NASA GISS) (23, 33, and 34). This compilation, which is shown widely in the press, does not agree with the atmospheric record because surface records have substantial uncertainties (36). Figure 13 illustrates part of the reason.

The urban heat island effect is only one of several surface effects that can confound compiled records of surface temperature. Figure 13 shows the size of this effect in, for example, the surface stations of California and the problems associated with objective sampling. The

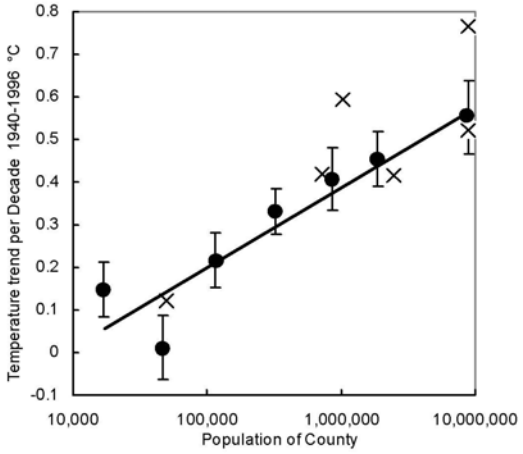

Fig. 13. Surface temperature trends for the period of 1940 to 1996 from 107 measuring stations in 49 California counties (39, 40). After averaging the means of the trends in each county, counties of similar population were combined and plotted as closed circles along with the standard errors of their means. The six measuring stations in Los Angeles County were used to calculate the standard error of that county, which is plotted alone at the county population of 8.9 million. The ''urban heat island effect'' on surface measurements is evident. The straight line is a least-squares fit to the closed circles. The points marked ''X'' are the six unadjusted station records selected by NASA GISS (23, 33, and 34) for use in their estimate of global temperatures as shown in figure 12.

East Park station, considered the best situated rural station in the state (37), has a trend since 1940 of minus 0.055 °C per decade.

The overall rise of about plus 0.5 °C during the 20th century is often cited in support of ''global warming'' (38). Since, however, 82% of the CO_2 rise during the 20th century occurred after the rise in temperature (see figures 1 and 12), the CO_2 increase cannot have caused the temperature increase. The 19th century rise was only 13 ppm (2).

In addition, incomplete regional temperature records have been used to support ''global warming.'' Figure 14 shows an example of this, in which a partial record was used in an attempt to confirm computer climate model predictions of temperature increases from greenhouse gases (41). A more complete record refuted this attempt (42).

Not one of the temperature graphs shown in figures 4 to 7, which include the most accurate and reliable surface and atmospheric temperature measurements available, both global and regional, shows any warming whatever that can be attributed to increases in greenhouse gases. Moreover, these data show that present day temperatures are not at all unusual compared with natural variability, nor are they changing in any unusual way.

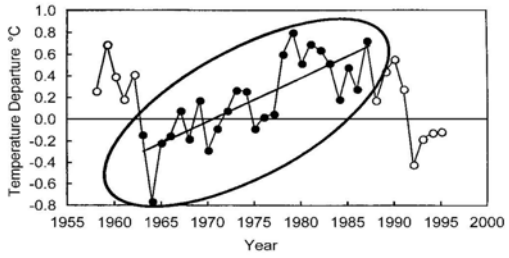

Fig. 14 The solid circles in the oval are tropospheric temperatures for the Southern Hemisphere between latitudes 30 S and 60 S, published in 1996 (41) in support of computer-model-projected warming. Later in 1996, the study was refuted by a longer set of data, as shown by the open circles (42).

SEA LEVELS AND STORMS

The computer climate models do not make any reliable predictions whatever concerning global flooding, storm variability, and other catastrophes that have come to be a part of the popular definition of ''global warming.'' (See Chapter 6, section 6-5 of reference 14.) Yet several scenarios of impending global catastrophe have arisen separately. One of these hypothesizes that rising sea levels will flood large areas of coastal land. Figure 15 shows satellite measurements of global sea level between 1993 and 1997 (43). The reported current global rate of rise amounts to only about plus 2 mm per year, or plus 8 inches per century, and even this estimate is probably high (43). The trends in rise and fall of sea level in various regions have a

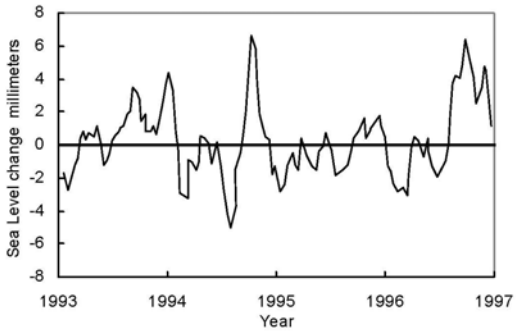

Fig. 15. Global sea level measurements from the Topex/Poseidon satellite altimeter for 1993 to 1997 (43). The instrument record gives a rate of change of minus 0.2 mm per year (43). However, it has been reported that 50-year tide gauge measurements give plus 1.8 mm per year. A correction of plus 2.3 mm per year was added to the satellite data based on comparison to selected tide gauges to get a value of plus 2.1 mm per year or 8 inches per century (43).

wide range of about 100 mm per year with most of the globe showing downward trends (43). Historical records show no acceleration in sea level rise in the 20th century (44). Moreover, claims that global warming will cause the Antarctic ice cap to melt and sharply increase this rate are not consistent with experiment or with theory (45).

Similarly, claims that hurricane frequencies and intensities have been increasing are also inconsistent with the data. Figure 16 shows the number of severe Atlantic hurricanes per year and also the maximum wind intensities of those hurricanes. Both of these values have been decreasing with time.

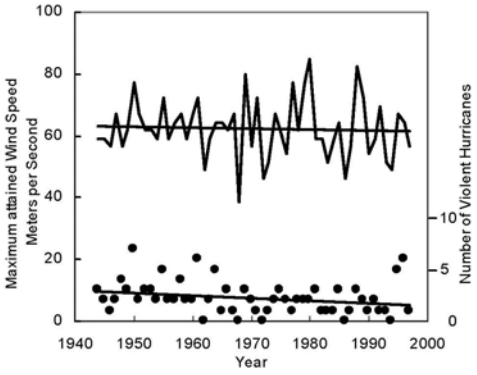

Fig. 16. Annual numbers of violent hurricanes and maximum attained wind speeds during those hurricanes in the Atlantic Ocean (46). Slopes of the trend lines are minus 0.25 hurricanes per decade and minus 0.33 meters per second maximum attained wind speed per decade.

As temperatures recover from the Little Ice Age, the more extreme weather patterns that characterized that period may be trending slowly toward the milder conditions that prevailed during the Middle Ages, which enjoyed average temperatures about 1 ºC higher than those of today. Concomitant changes are also taking place, such as the receding of glaciers in Montana's Glacier National Park.

FERTILIZATION OF PLANTS

How high will the carbon dioxide concentration of the atmosphere ultimately rise if mankind continues to use coal, oil, and natural gas? Since total current estimates of hydrocarbon reserves are approximately 2,000 times annual use (47), doubled human release could, over a thousand years, ultimately be 10,000 GT C or 25% of the amount now sequestered in the oceans. If 90% of this 10,000 GT C were absorbed by oceans and other reservoirs, atmospheric levels would approximately double, rising to about 600 parts per million. (This assumes that new technologies will not supplant the use of hydrocarbons during the next 1,000 years, a pessimistic estimate of technological advance.)

One reservoir that would moderate the increase is especially important. Plant life provides a large sink for CO_2. Using current knowledge about the increased growth rates of plants and assuming a doubling of CO_2 release as compared to current emissions, it has been estimated that atmospheric CO_2 levels will rise by only about 300 ppm before leveling off (2). At that level, CO_2 absorption by increased Earth biomass is able to absorb about 10 GT C per year.

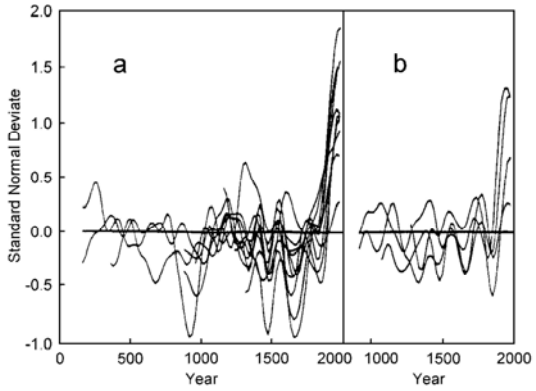

Fig. 17. Standard normal deviates of tree ring widths for (a) bristlecone pine, limber pine, and fox tail pine in the Great Basin of California, Nevada, and Arizona and (b) bristlecone pine in Colorado (48). The tree ring widths have been normalized so that their means are zero and deviations from the means are displayed in units of standard deviation.

As atmospheric CO_2 increases, plant growth rates increase. Also, leaves lose less water as CO_2 increases, so that plants are able to grow under drier conditions. Animal life, which depends upon plant life for food, increases proportionally.

Figures 17 to 22 show examples of experimentally measured increases in the growth of plants. These examples are representative of a very large research literature on this subject (49-55). Since plant response to CO_2 fertilization is nearly linear with respect to CO_2 concentration over a range of a few hundred ppm, as seen for example in figures 18 and 22, it is easy to normalize experimental measurements at different levels of CO_2 enrichment. This has been done in figure 23 in order to illustrate some CO_2 growth enhancements calculated for the atmospheric increase of about 80 ppm that has already taken place, and that expected from a projected total increase of 320 ppm.

As figure 17 shows, long-lived (1,000- to 2000-year-old) pine trees have shown a sharp increase in growth rate during the past half-century. Figure 18 summarizes the increased growth rates of young pine seedlings at four CO_2 levels. Again, the response is remarkable,

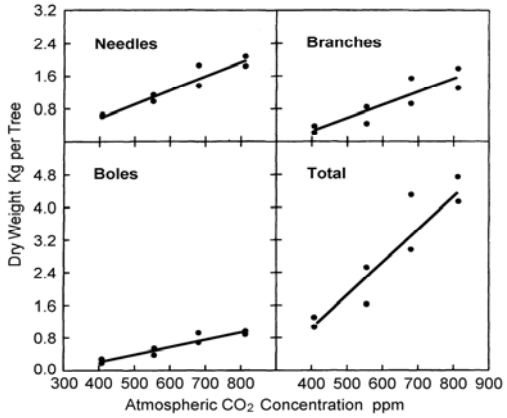

Fig. 18. Young Eldarica pine trees were grown for 23 months under four CO_2 concentrations and then cut down and weighed. Each point represents an individual tree (56). Weights of tree parts are as indicated.

with an increase of 300 ppm more than tripling the rate of growth.

Figure 19 shows the 30% increase in the forests of the United States that has taken place since 1950. Much of this increase is likely due to the increase in atmospheric CO_2 that has already occurred. In addition, it has been reported that Amazonian rain forests are increasing their vegetation by about 34,000 moles (900 pounds) of carbon per acre per year (57), or about two tons of biomass per acre per year.

Figure 20 shows the effect of CO_2 fertilization on sour orange trees. During the early years of growth, the bark, limbs, and fine roots of sour orange trees growing in an atmosphere with 700 ppm of CO_2 exhibited rates of growth more than 170% greater than those at 400 ppm. As the trees matured, this slowed to about 100%. Meanwhile, orange production was 127% higher for the 700 ppm trees.

Trees respond to CO_2 fertilization more strongly than do most other plants, but all plants respond to some extent. Figure 21 shows the response of wheat grown under wet conditions and when the wheat was stressed by lack of water. These were open-field experiments. Wheat was grown in the usual way, but the atmospheric CO_2 concentrations of circular sections of the fields were increased by means of arrays of computer-controlled equipment that released CO_2 into the air to hold the levels as specified.

While the results illustrated in figures 17-21 are remarkable, they are typical of those reported in a very large number of studies of the effect of CO_2 concentration upon the growth rates of plants (49-55).

Figure 22 summarizes 279 similar experiments in which plants of

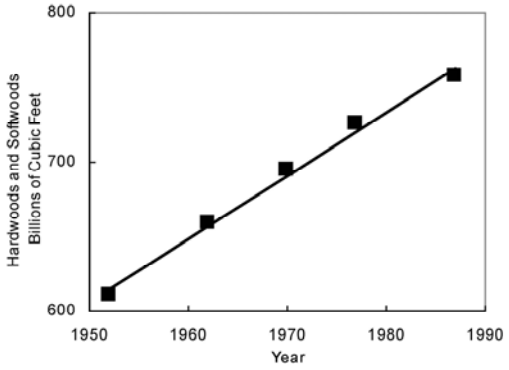

Fig. 19. Inventories of standing hardwood and softwood timber in the United States compiled from *Forest Statistics of the United States* (58).

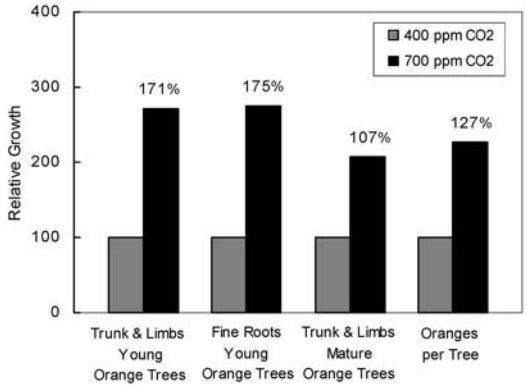

Fig. 20. Relative trunk and limb volumes and fine root biomass of young sour orange trees; and trunk and limb volumes and numbers of oranges produced per mature sour orange tree per year at 400 ppm CO_2 (light bars) and 700 ppm CO_2 (dark bars) (59, 60). The 400 ppm values were normalized to 100. The trees were planted in 1987 as one-year-old seedlings. Young trunk and limb volumes and fine root biomass were measured in 1990. Mature trunk and limb volumes are averages for 1991 to 1996. Orange numbers are averages for 1993 to 1997.

various types were raised under CO_2-enhanced conditions. Plants under stress from less-than-ideal conditions – a common occurrence in nature – respond more to CO_2 fertilization. The selections of species shown in figure 22 were biased toward plants that respond less to CO_2 fertilization than does the mixture actually covering the Earth, so figure 22 underestimates the effects of global CO_2 enhancement.

Figure 23 summarizes the wheat, orange tree, and young pine tree enhancements shown in figures 21, 20, and 18 with two atmospheric CO_2 increases – that which has occurred since 1800 and is believed to be the result of the Industrial Revolution and that which is projected for the next two centuries. The relative growth enhancement of trees by CO_2 diminishes with age. Figure 23 shows young trees.

Clearly, the green revolution in agriculture has already benefited from CO_2 fertilization; and benefits in the future will likely be spectacular. Animal life will increase proportionally as shown by studies of 51 terrestrial (63) and 22 aquatic ecosystems (64). Moreover, as shown by a study of 94 terrestrial ecosystems on all continents except Antarctica (65), species richness (biodiversity) is more positively correlated with productivity – the total quantity of plant life per acre – than with anything else.

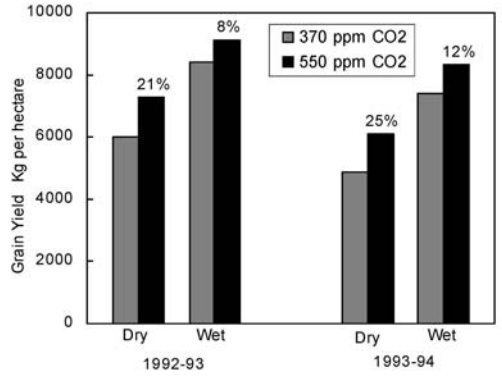

Fig. 21. Grain yields from wheat grown under well watered and poorly watered conditions in open field experiments (61, 62). Average CO_2-induced increases for the two years were 10% for wet and 23% for dry conditions.

DISCUSSION

There are no experimental data to support the hypothesis that increases in carbon dioxide and other greenhouse gases are causing or can be expected to cause catastrophic changes in global temperatures or weather. To the contrary, during the 20 years with the highest carbon dioxide levels, atmospheric temperatures have decreased.

We also need not worry about environmental calamities, even if the current long-term natural warming trend continues. The Earth has been much warmer during the past 3,000 years without catastrophic effects. Warmer weather extends growing seasons and generally improves the habitability of colder regions. ''Global warming,'' an invalidated hypothesis, provides no reason to limit human production of CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 as has been proposed (29).

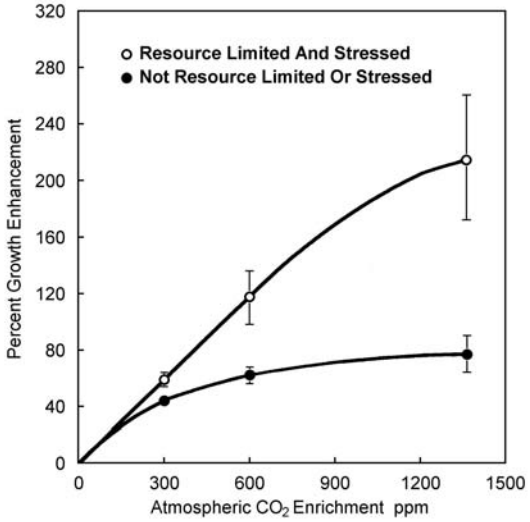

Fig. 22. Summary data from 279 published experiments in which plants of all types were grown under paired stressed (open circles) and unstressed (closed circles) conditions (66). There were 208, 50, and 21 sets at 300, 600, and an average of about 1350 ppm CO_2, respectively. The plant mixture in the 279 studies was slightly biased toward plant types that respond less to CO_2 fertilization than does the actual global mixture and therefore underestimates the expected global response. CO_2 enrichment also allows plants to grow in drier regions, further increasing the expected global response.

Human use of coal, oil, and natural gas has not measurably warmed the atmosphere, and the extrapolation of current trends shows that it will not significantly do so in the foreseeable future. It does, however, release CO_2, which accelerates the growth rates of plants and also permits plants to grow in drier regions. Animal life, which depends upon plants, also flourishes.

As coal, oil, and natural gas are used to feed and lift from poverty vast numbers of people across the globe, more CO_2 will be released into the atmosphere. This will help to maintain and improve the health, longevity, prosperity, and productivity of all people.

Human activities are believed to be responsible for the rise in CO_2 level of the atmosphere. Mankind is moving the carbon in coal, oil, and natural gas from below ground to the atmosphere and surface, where it is available for conversion into living things. We are living in an increasingly lush environment of plants and animals as a result of the CO_2 increase. Our children will enjoy an Earth with far more plant and animal life as that with which we now are blessed. This is a wonderful and unexpected gift from the Industrial Revolution.

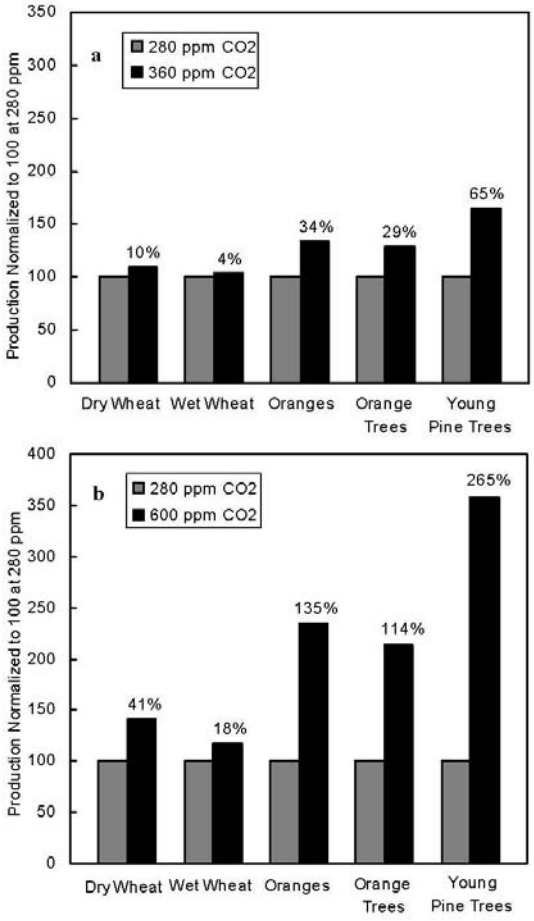

Fig. 23. Calculated growth rate enhancement of wheat, young orange trees, and very young pine trees already taking place as a result of atmospheric enrichment by CO_2 during the past two centuries (a) and expected to take place as a result of atmospheric enrichment by CO_2 to a level of 600 ppm (b).

In this case, these values apply to pine trees during their first two years of growth and orange trees during their 4th through 10th years of growth. As is shown in figure 20, the effect of increased CO_2 gradually diminishes with tree age, so these values should not be interpreted as applicable over the entire tree lifespans. There are no longer-running controlled CO_2 tree experiments. Yet, even 2,000 year old trees still respond significantly as is shown in figure 17.

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Response for Document 52931

52931-001: Thank you for your comment.

Thank you for your comment, Stewart jackson.

The comment tracking number that has been assigned to your comment is OSTSD52932.

Comment Date: April 15, 2008 18:23:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52932

First Name: Stewart
Middle Initial: a
Last Name: jackson
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please open the shale evaluation program to the maximum possible area of potential interest for shale-oil development. If the USA is to become somewhat energy independent then the program that was shelved at Parachute many years ago needs to be reimplemented and may take 40 years of research and development similar to the 45 year lead time needed for the tar sands of Alberta and Saskatchewan which are now coming into their own. There was amajor effort there starting in the 1960's but it was ready to roll when prices moved from the then $3 per barrel to the economic $40 range and the now $100 with the cost of production now down to $20. It is patently absurd to not develop this domestic resource while fighting wars to retain a toehold in antagonistic and precarious jurisdictions throughout the world. Let us utilize our talents to develop our own naturally occurring organic substances, i.e. shale with oil versus beating up the food supply with bio fuel stimulation that has placed half the world on the verge of starvation. We can do it effectively and environmentally acceptable. Please establish the alternative allowing the maximum possible acreage available for potential development. Stewart A Jackson, Ph D, P. Geol. 52932-001

Response for Document 52932

52932-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, CHESTER URBATI.

The comment tracking number that has been assigned to your comment is OSTSD52933.

Comment Date: April 15, 2008 18:26:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD52933

First Name: CHESTER
Middle Initial:
Last Name: URBATI
Organization:
Address: 18825 OAK RIDGE DRIVE
Address 2:
Address 3:
City: SAUCIER
State: MS
Zip: 39574
Country: USA
Email: CURBATI@AOL.COM
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Sir, this issue is a National Crisis issue. If we do n ot get out from under Speculative Oil insanity the Country is going under. Shale Oil and Tar Oil can be the short term solution as long as we want to burn fossil fuel's. We need to start mining and processing this resource today! I can see were BIG OIL loves what they are repeaping in profits, but this country needs a Governemnet were a solution is at hand and we can make it happen like we did with WWII. If that crazy Man Hitler ran a whole war campaign on Coal Oil why can;t we use this technology today and do it efficient and clean???	52933-001

Response for Document 52933

52933-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52934.

Comment Date: April 15, 2008 18:28:35PM
Oil Shale and Tar Sands
Comment ID: OSTSD52934

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

Paying $550 billion per year to import 5.5 billion barrels of oil is nonsensical, when we have 2 trillion barrels of oil (8 times the reserves of Saudi Arabia) tied up in oil shale in the US.

Let us stop paying money to the Middle East to fund their Madrasses, and let us start, now, to develop this very large strategic domestic resource.

52934-001

Response for Document 52934

52934-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, JaLayne Cowley.

The comment tracking number that has been assigned to your comment is OSTSD52935.

Comment Date: April 15, 2008 18:35:38PM
Oil Shale and Tar Sands
Comment ID: OSTSD52935

First Name: JaLayne
Middle Initial:
Last Name: Cowley
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

BLM Decision Makers:

With regards to the PEIS for Oil Shale and Tar Sands, please approve alternative B so that these important resources can be developed. This would give us the opportunity to reduce our dependence on foreign oil. I have great confidence that American innovators have the ability to develop technologies which would allow for the safe and environmentally-sound extraction of these fuel sources. I am concerned that the fuel price crisis is impacting too much in many aspects of our economy-- food prices, trucking services, transportation, etc. Please do the right thing for our country by approving Alternative B. 52935-001

Thank you, JaLayne Cowley

Response for Document 52935

52935-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Todd Foret.

The comment tracking number that has been assigned to your comment is OSTSD52936.

Comment Date: April 15, 2008 18:58:37PM
Oil Shale and Tar Sands
Comment ID: OSTSD52936

First Name: Todd
Middle Initial: L
Last Name: Foret
Organization: Foret Plasma Labs
Address: 3 Waterway Court 1A
Address 2:
Address 3:
City: The Woodlands
State: TX
Zip: 77380
Country: USA
Email: toddforet@usa.net
Privacy Preference: Don't withhold name or address from public record
Attachment: Foret Plasma Oil Shale Presentation Final oct 16 2007.pdf

Comment Submitted:

Please see attached presentation given at the 27th annual Oil Shale Presentation. See Attachment. | 52936-001

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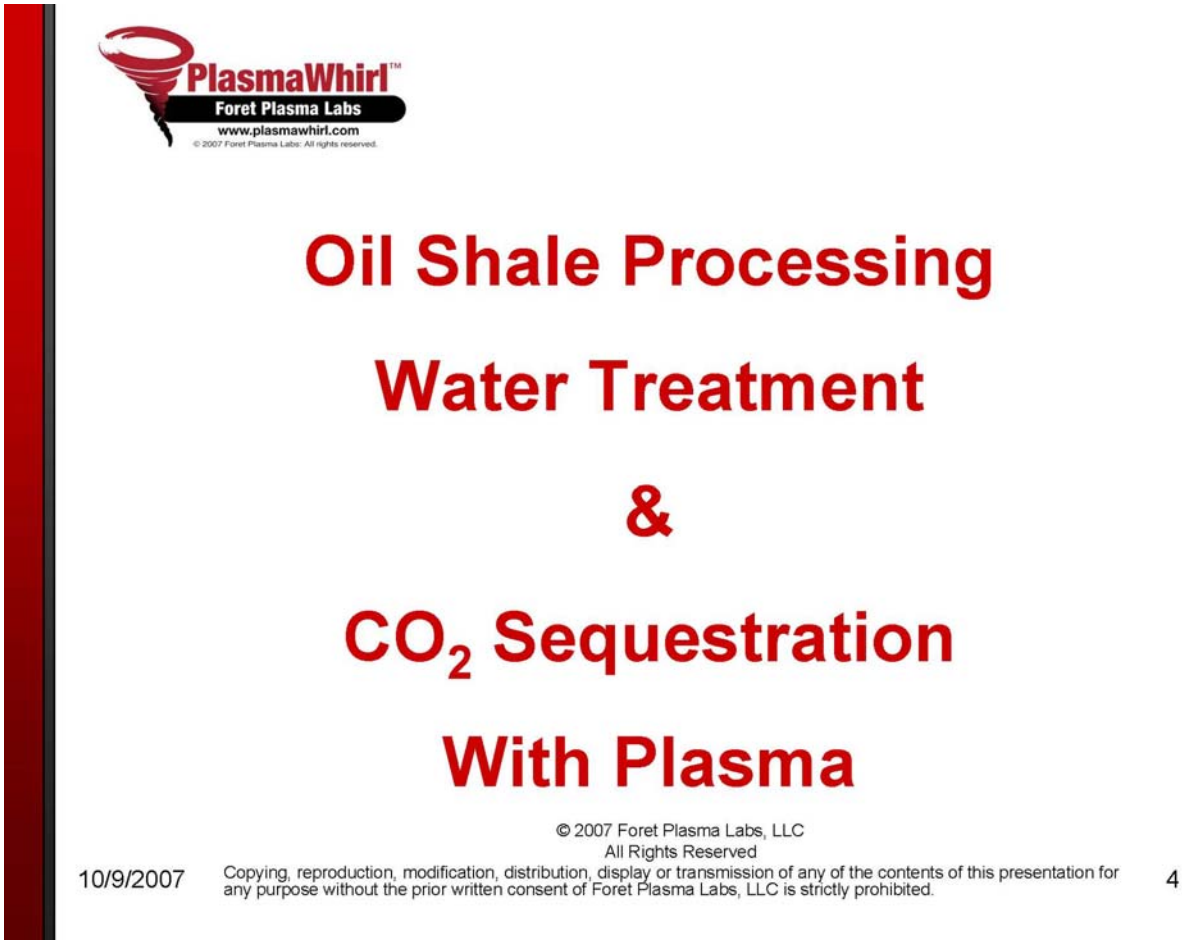
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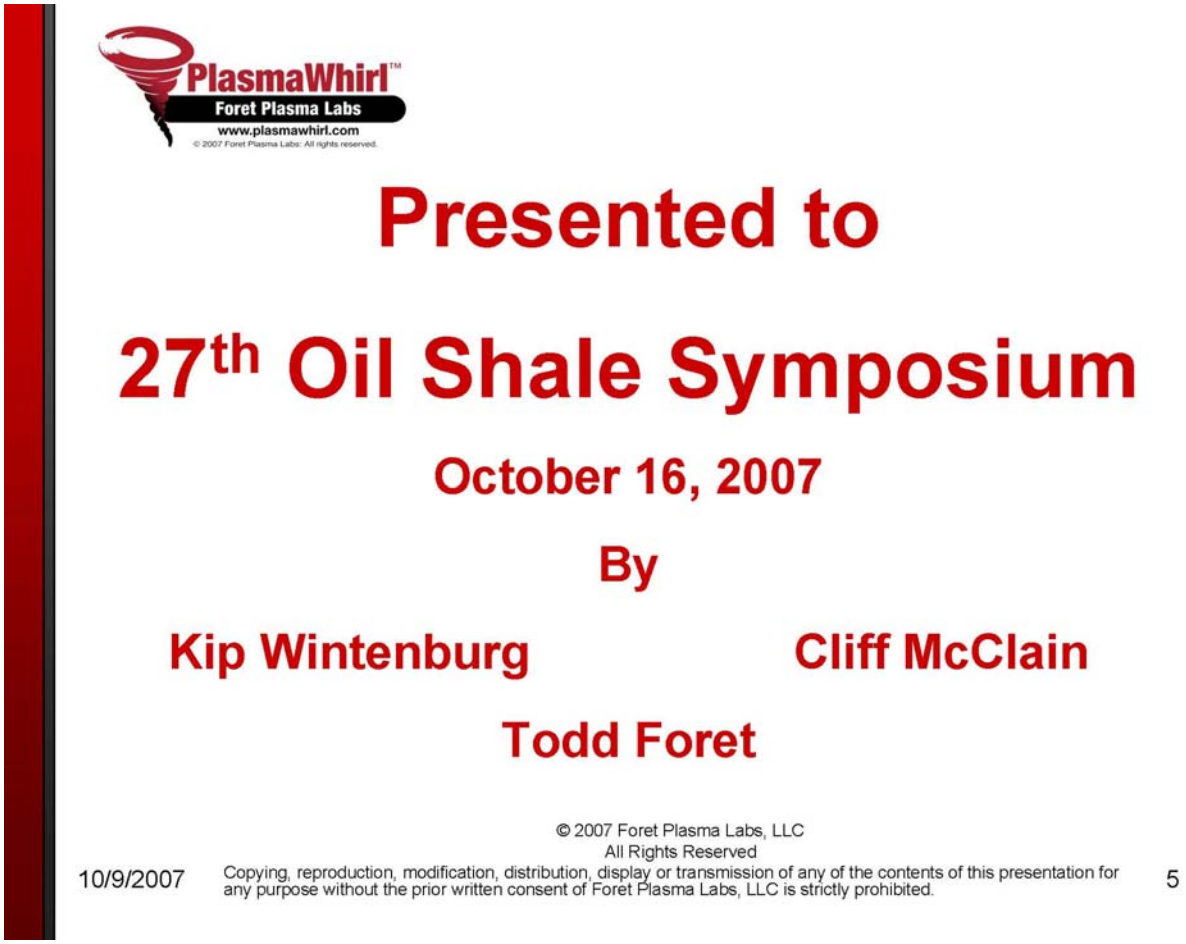
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Presented to
27th Oil Shale Symposium
October 16, 2007
By
Kip Wintenburg
Cliff McClain
Todd Foret
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Introduction

By: Kip Wintenburg

Water and green house gas emissions are two critical and emerging issues in the development of shale oil from the Green River Formation of Colorado, Utah and Wyoming. According to estimates by Los Alamos National Lab and Earth and Environmental Sciences, 3.5% to 8% of the 5.3 million acre-ft/yr of water allocated to these Upper Colorado River States may be utilized for oil shale production.[1] A recent issue for the development of oil shale is concern about the quantity of **CO_2** co-produced as oil shale kerogen is pyrolzed. A recent model confirms that power plant emissions are likely the dominant source of CO_2 and that uncertainty about the **heat** required to produce a barrel of shale oil remains a critical uncertainty.[2]

[1]**WILSON, Cathy J.** and FOSTER, Jean M., Earth and Environmental Sciences, Los Alamos National Lab, EES-10, MS J495, Los Alamos, NM 87544, cjw@lanl.gov

[2]**Jeremy Boak**, Colorado School of Mines, "Estimate of CO2 Production for In-Situ Production of Shale Oil from the Green River Formation in Western Colorado."

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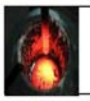
Potential Plasma Applications within Green River Basin

Plasma Gasification Solids	PlasmaWhirl™ Solids	Oil Shale Coal
Plasma Reforming CO_2 Sequestration	PlasmaWhirl™ Liquids	Stranded Gas Coal Bed Methane
Plasma Upgrading	ArcWhirl™	Shale Oil "Kerogen" Bitumen
Plasma Water Treatment	ArcWhirl™ Disinfection	Produced Water Wastewater
Plasma Melting	 ArcWhirl™ Melter	Drill Cuttings Spent Oil Shale
High Temperature Electrolysis	Hi-TEMPER™	Insitu Resources Spent Caustic/Acid

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FPL Proprietary Plasma Systems & Torches

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PlasmaWhirl™ Liquids	•Air Core in Hydrocyclone replaced with plasma core •Multiple Units installed on inlet and outlet headers	•Gasification & Combustion in one step	•Single Torch •Up to 100kw/torch •Very Lean Combustor
ArcWhirl™	•Carbon Arc •Multiple Units installed on inlet and outlet headers	•Heavy Oil Upgrading •Syngas Production •Biomass Gasification	•Single Torch •Up to 15 MW/torch •Torch used for PlasmaWhirl Solids
ArcWhirl™ Disinfection	•Same as ArcWhirl •Single large unit with reflector for increasing irradiation time	•Ultra High Volume Disinfection •IR Drying	•Single Torch •Up to 15 MW/torch
ArcWhirl™ Melter	•Carbon Arc •Water Cooled Reactor with no refractory lining	•Vitrification + Fast Quench in one step •Biomass Diesel	•Single Torch •Up to 15 MW/torch
Hi-TEMPER™	•Plasma Electrolysis •Liquids with high conductivity	•Hydrogen Generation •Caustic Regeneration	•Electrolysis Cell •Up to 15 MW/Cell

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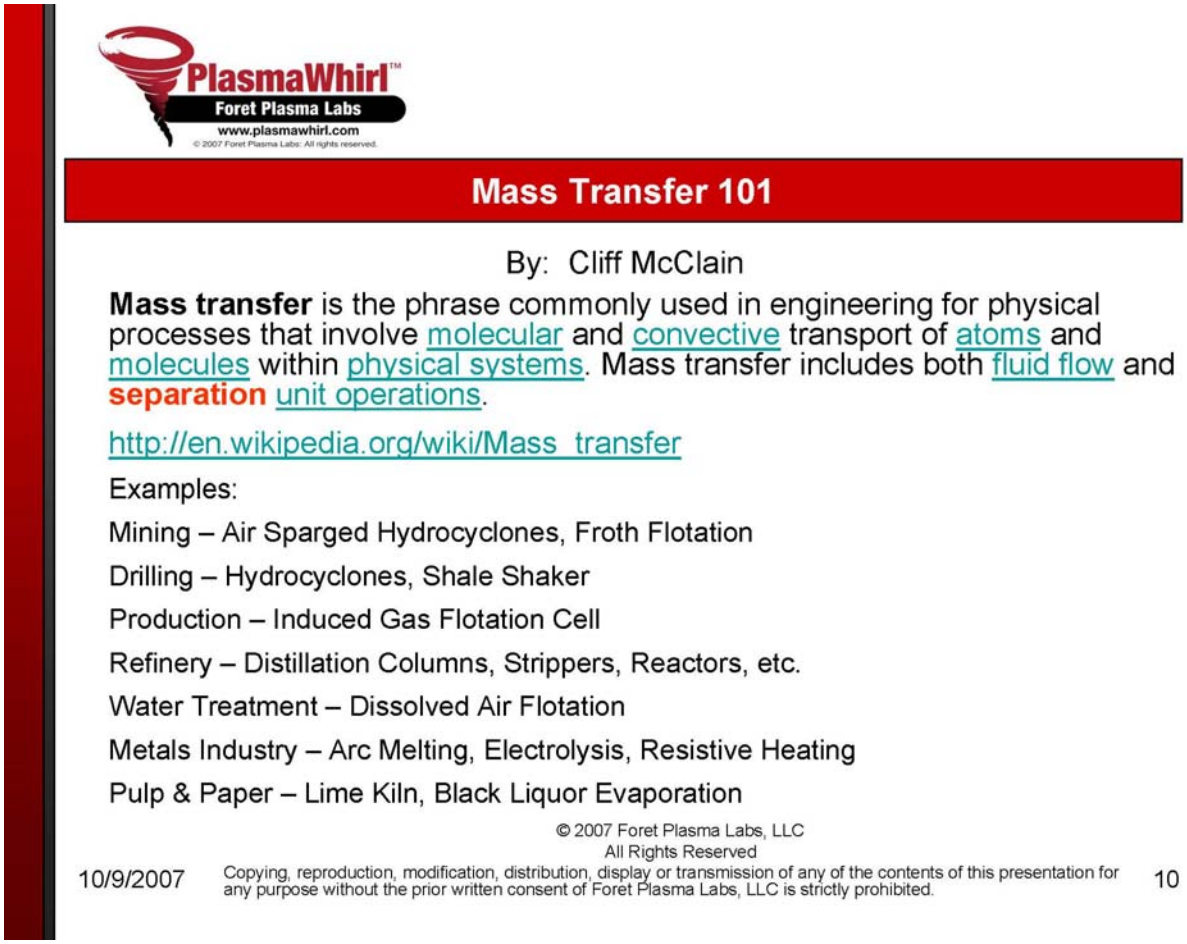
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Mass Transfer 101
By: Cliff McClain
Mass transfer is the phrase commonly used in engineering for physical processes that involve molecular and convective transport of atoms and molecules within physical systems. Mass transfer includes both fluid flow and separation unit operations.
http://en.wikipedia.org/wiki/Mass_transfer
Examples:
Mining – Air Sparged Hydrocyclones, Froth Flotation
Drilling – Hydrocyclones, Shale Shaker
Production – Induced Gas Flotation Cell
Refinery – Distillation Columns, Strippers, Reactors, etc.
Water Treatment – Dissolved Air Flotation
Metals Industry – Arc Melting, Electrolysis, Resistive Heating
Pulp & Paper – Lime Kiln, Black Liquor Evaporation
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Hydrocyclones – Vortex or "WHIRL" Flow

Hydrocyclones are commonly used in mining, drilling, pulp & paper

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Hydrocyclones – Vortex or "WHIRL" Flow

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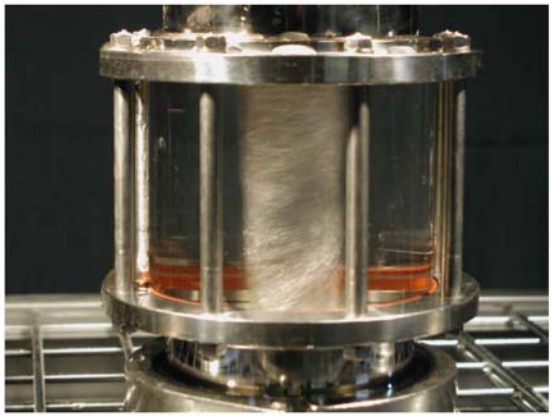
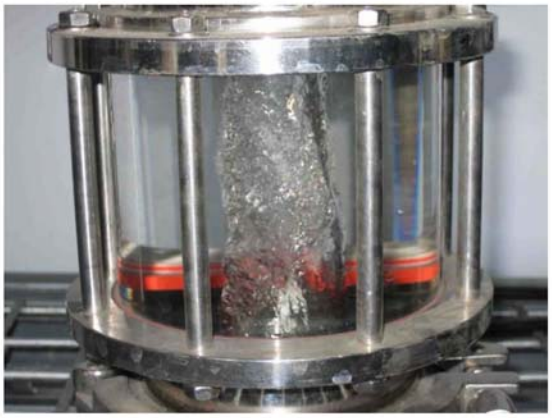
Hydrocyclones – Air or Gas Core





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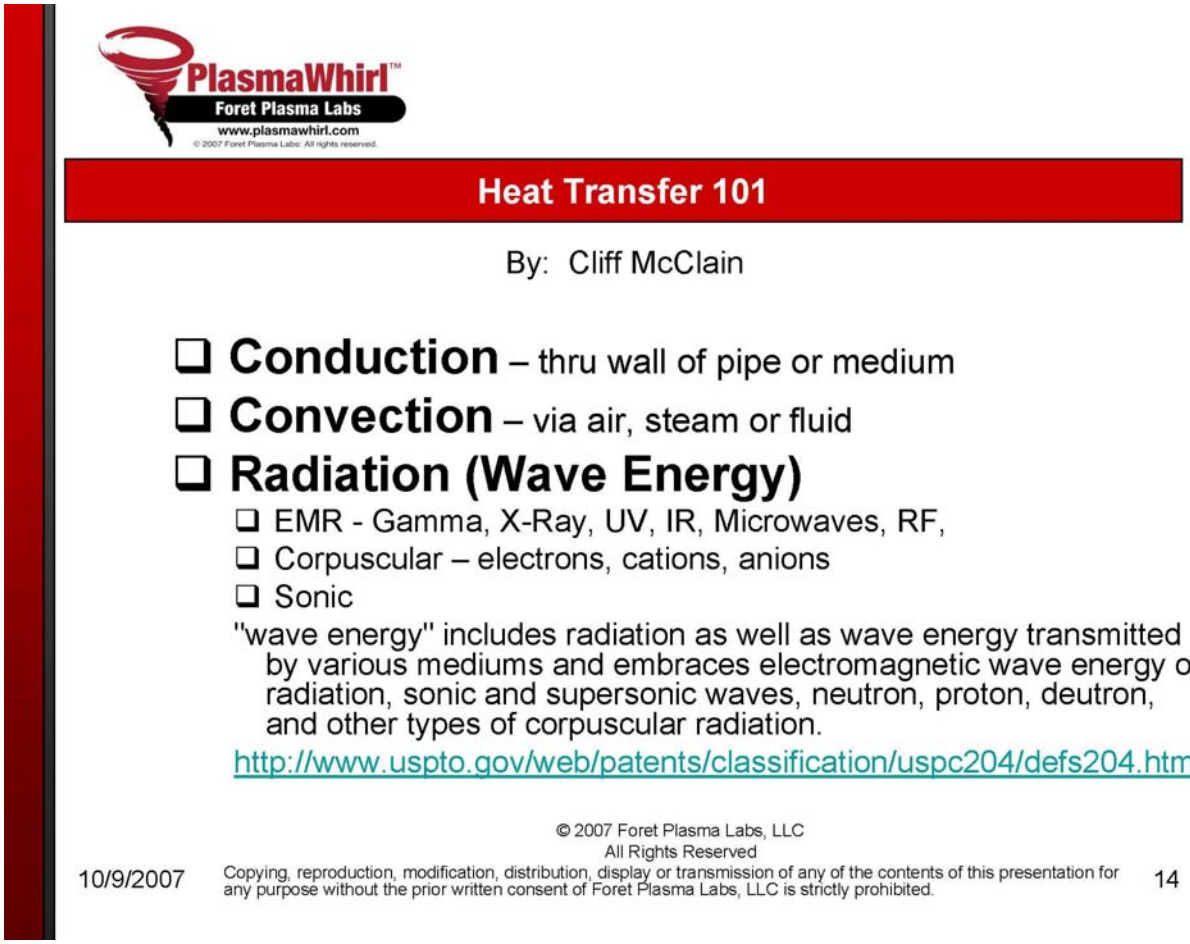
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Heat Transfer 101
By: Cliff McClain
Conduction – thru wall of pipe or medium
Convection – via air, steam or fluid
Radiation (Wave Energy)
EMR - Gamma, X-Ray, UV, IR, Microwaves, RF,
Corpuscular – electrons, cations, anions
Sonic
"wave energy" includes radiation as well as wave energy transmitted by various mediums and embraces electromagnetic wave energy or radiation, sonic and supersonic waves, neutron, proton, deutron, and other types of corpuscular radiation.
http://www.uspto.gov/web/patents/classification/uspc204/defs204.htm
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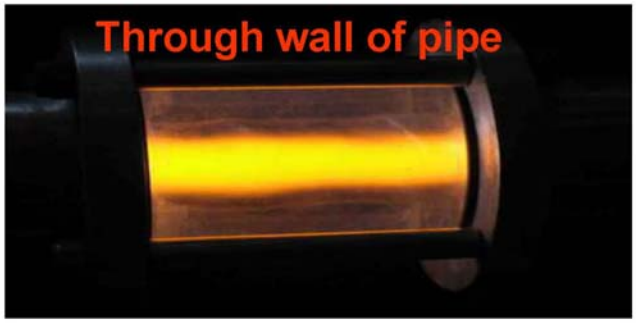
Heat Transfer 101 - Conduction



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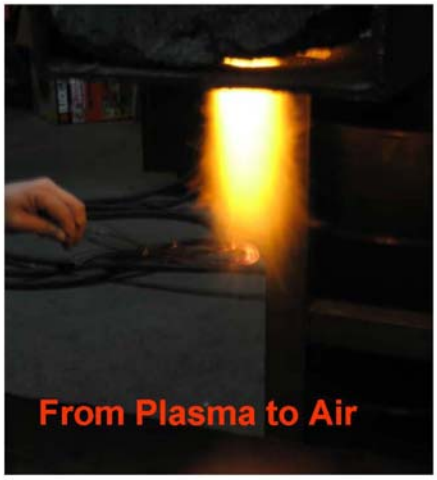
Heat Transfer 101 - Convection



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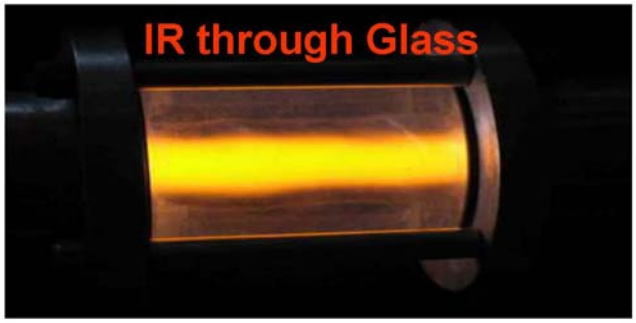
Heat Transfer 101 - Radiation



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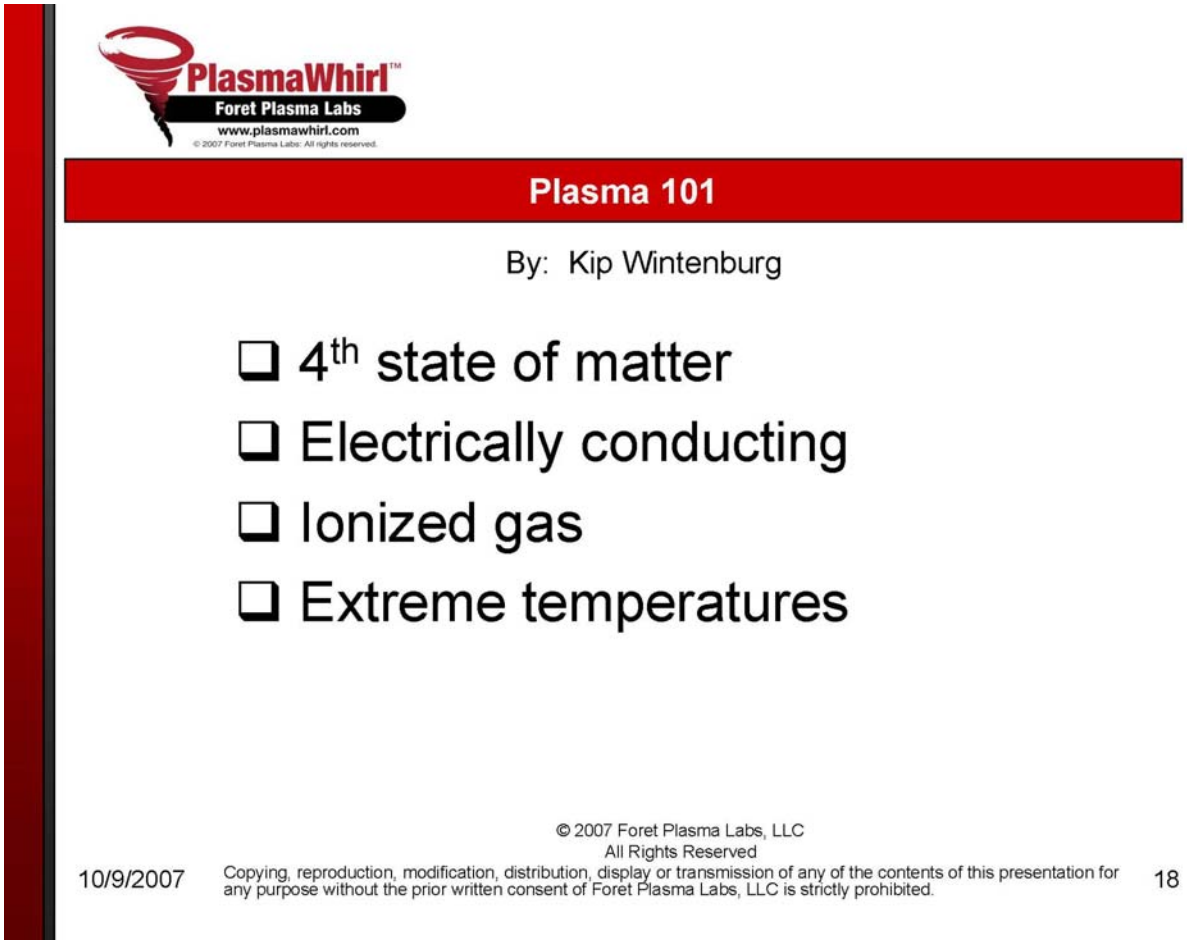
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Plasma 101
By: Kip Wintenburg
❑ 4th state of matter
❑ Electrically conducting
❑ Ionized gas
❑ Extreme temperatures
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Plasma 101 – 99% of universe exists in the plasma state

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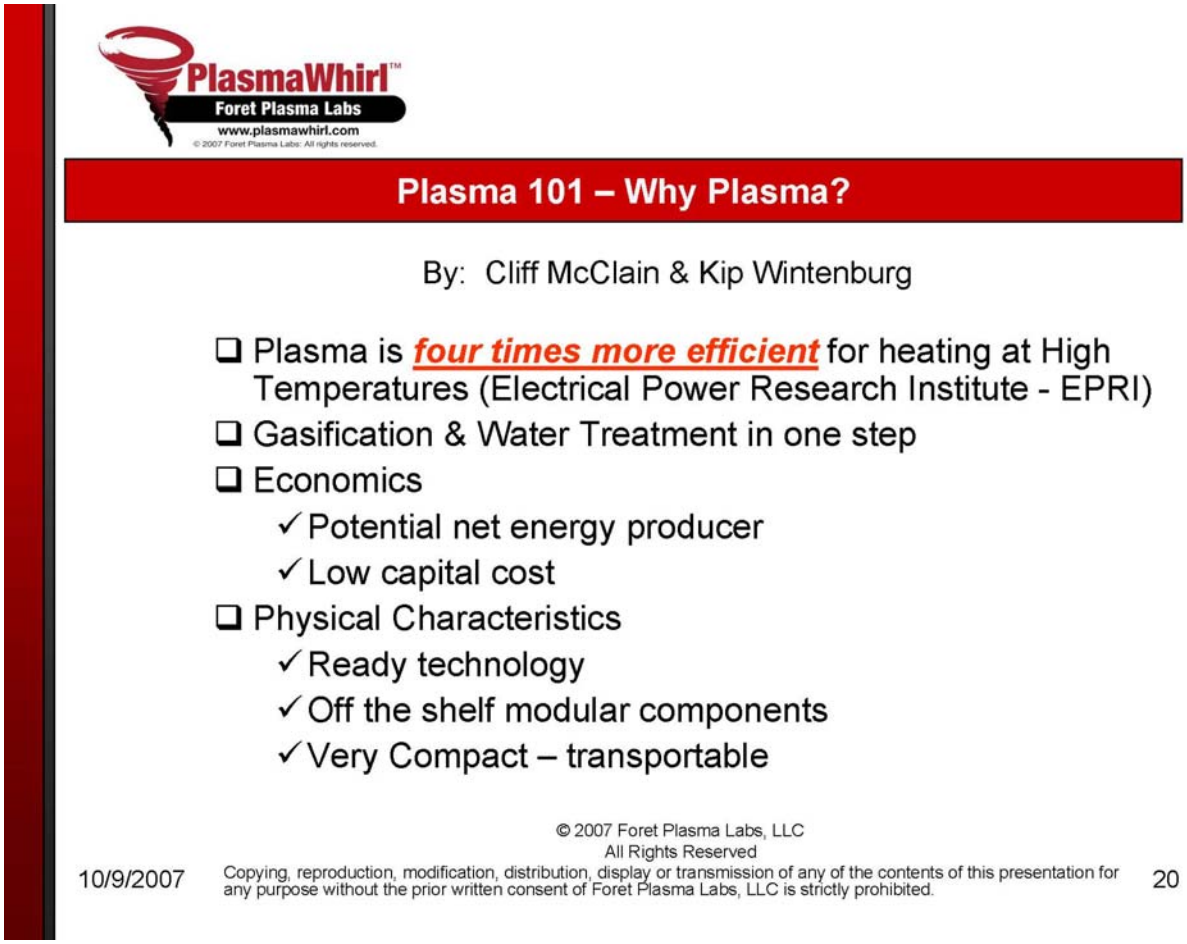
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Plasma 101 – Why Plasma?
By: Cliff McClain & Kip Wintenburg
Plasma is four times more efficient for heating at High Temperatures (Electrical Power Research Institute - EPRI)
Gasification & Water Treatment in one step
Economics
✓Potential net energy producer
✓Low capital cost
Physical Characteristics
✓Ready technology
✓Off the shelf modular components
✓Very Compact – transportable
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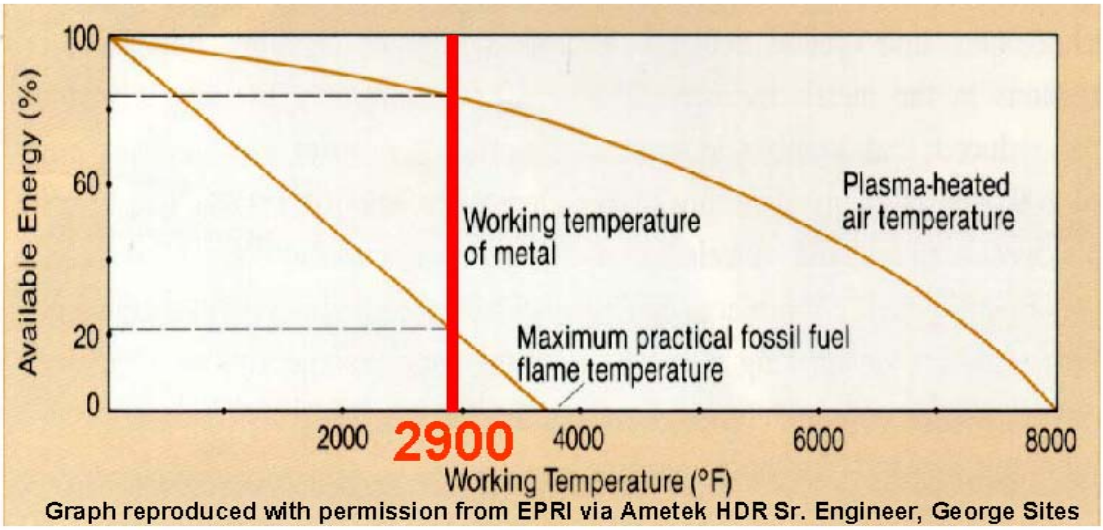
Plasma 101 – EPRI Graph Plasma vs Fossil Fuels



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http://www.hdrpower.com/app/1001.asp

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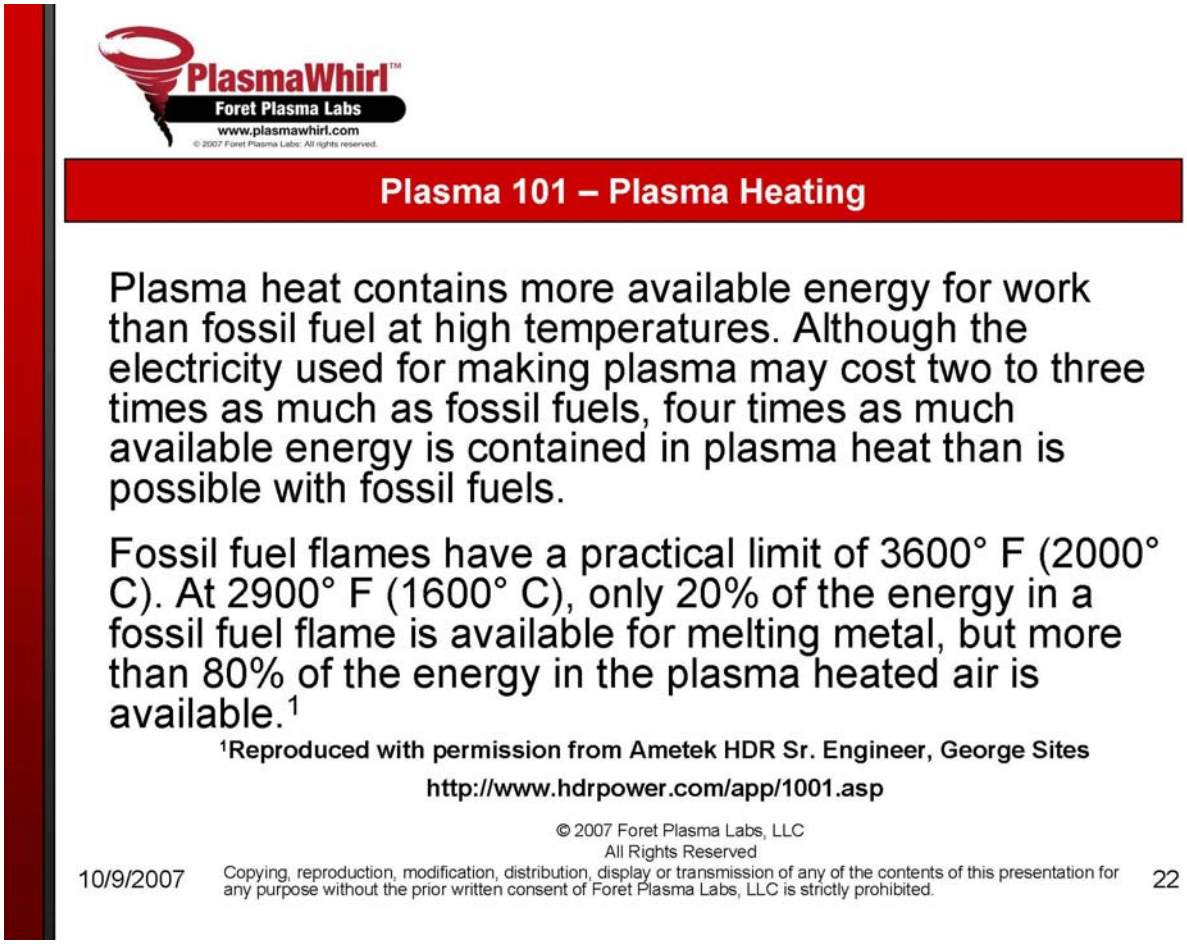
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Plasma 101 – Plasma Heating
Plasma heat contains more available energy for work than fossil fuel at high temperatures. Although the electricity used for making plasma may cost two to three times as much as fossil fuels, four times as much available energy is contained in plasma heat than is possible with fossil fuels.
Fossil fuel flames have a practical limit of 3600° F (2000° C). At 2900° F (1600° C), only 20% of the energy in a fossil fuel flame is available for melting metal, but more than 80% of the energy in the plasma heated air is available.[1]
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Plasma 101 – Plasma Heating continued

Although the Plasma Torch has been around for many years, the applications are just becoming known. Now with the advancements in power electronics and control methods the applications are more wide spread than ever due to the increased controllability of the arc.

The small size, minimal installation costs and the ability to use different gasses are all benefits of the Plasma Torch. However, the greatest advantage is the ability to provide and maintain **accurate temperature control**.[1]

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Plasma Confinement – Inertial Confinement

Inertial and Magnetic

Inertial Confinement

Angular Momentum or high velocity gases or used to Pinch or Squeeze the plasma and contain it within the center

Typical everyday applications:

Plasma Cutting, Gouging & Spraying

ESAB PT 19 Torch

Transferred Arc Torch

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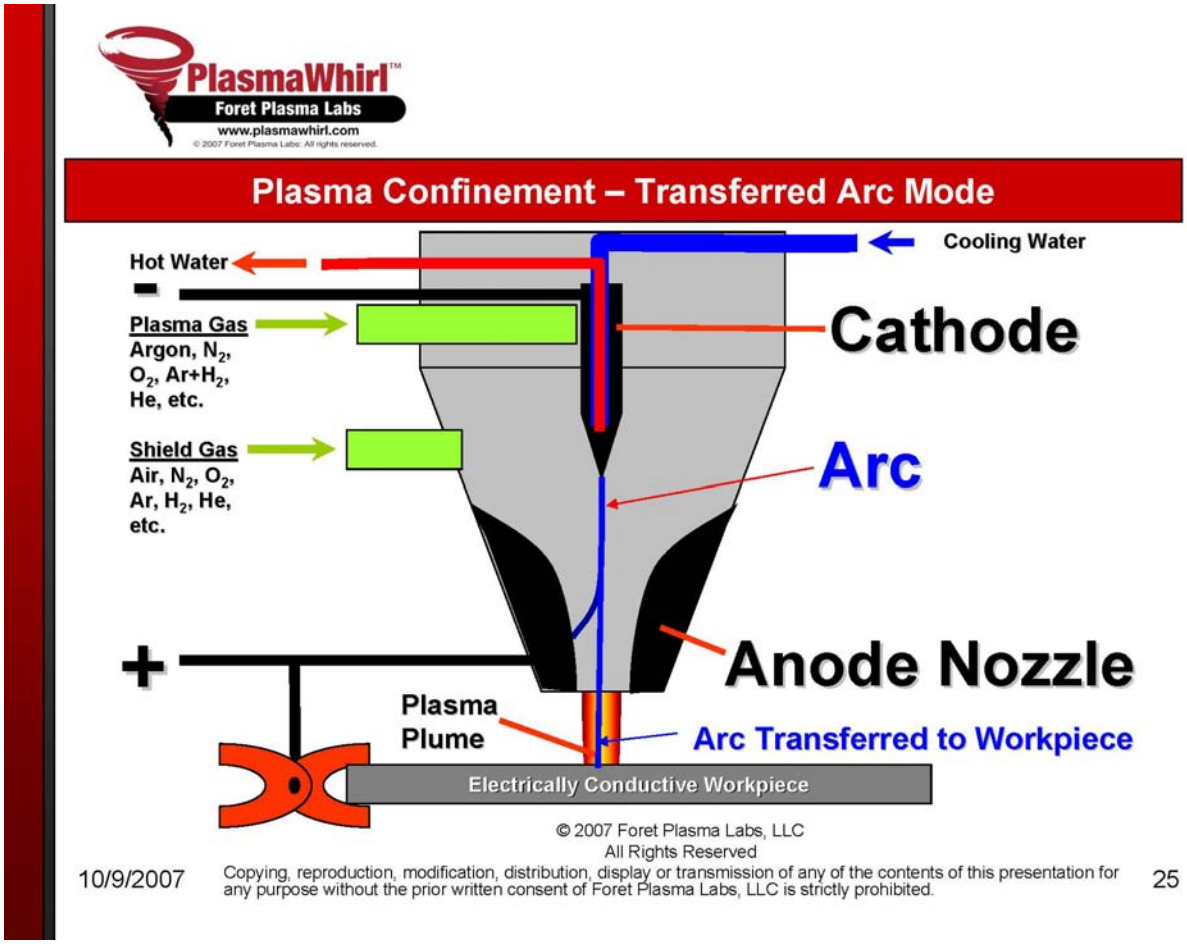
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Plasma Confinement – Transferred Arc Mode
Hot Water
Cooling Water
Plasma Gas
Argon, N2,
O2, Ar+H2,
He, etc.
Cathode
Shield Gas
Air, N2, O2,
Ar, H2, He,
etc.
Arc
Anode Nozzle
Plasma
Plume
Arc Transferred to Workpiece
Electrically Conductive Workpiece
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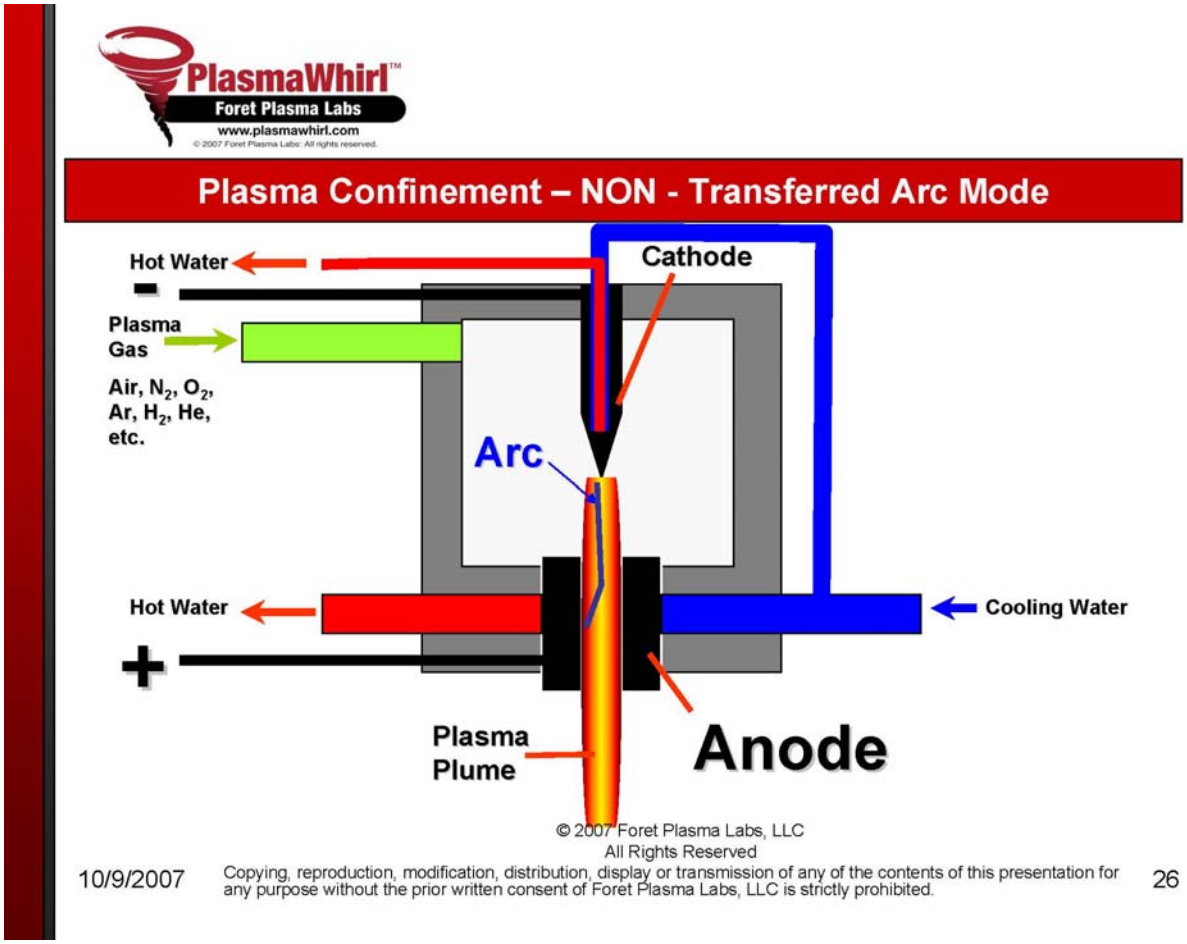
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Plasma Confinement – NON - Transferred Arc Mode
Hot Water
Cathode
Plasma Gas
Air, N2, O2, Ar, H2, He, etc.
Arc
Hot Water
Cooling Water
Plasma Plume
Anode
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Plasma Confinement – NON - Transferred Arc Mode

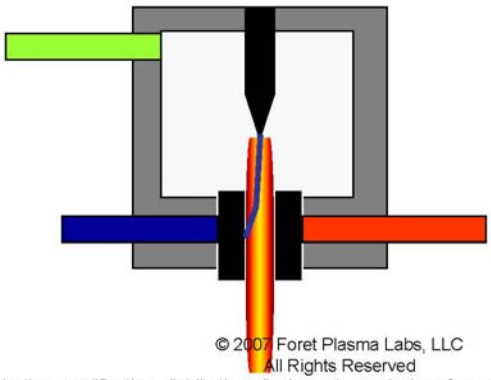
Water Cooled Electrodes: Heat loss to water = Equivalent of 30% of Torch Power

NOTE: "The system is a closed-loop configuration with a pump and heat exchanger. The heat exchanger should have a maximum capability to dissipate the equivalent of 30% of the torch power with heat removed by the plant recirculating water system."

See: http://www.westinghouse-plasma.com/westinghouse/ie/plasmatechnology/pt_main_is.htm

The core of the arc is found to be close to LTE, with a central plasma temperature of 6,200 deg K in the non-transferred mode, and approx. 15,000 deg K in the transferred mode.

See: http://stinet.dtic.mil/oai/oai?&verb=getRecord&metadataPrefix=html&identifier=ADA360841



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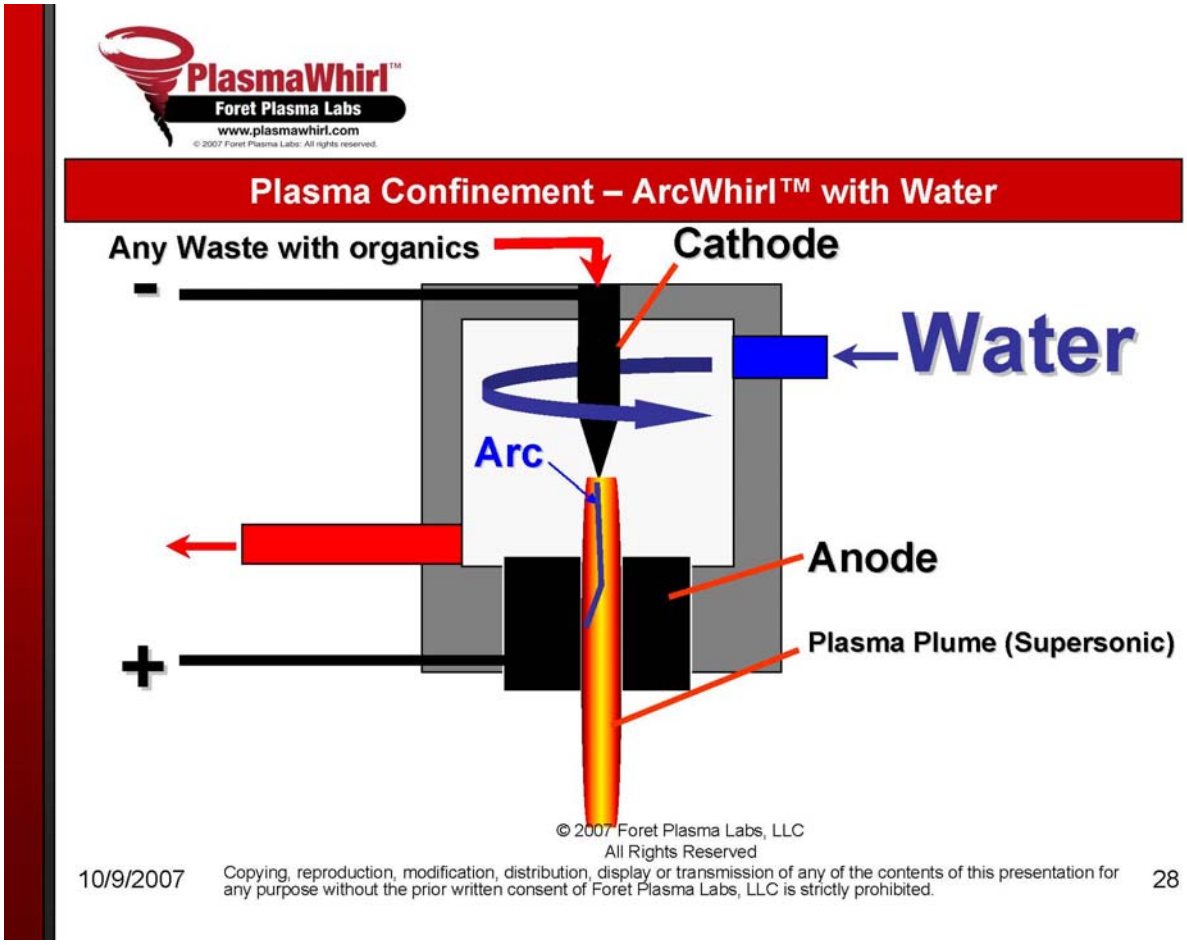
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Plasma Confinement – ArcWhirl™ with Water
Any Waste with organics
Cathode
Water
Arc
Anode
Plasma Plume (Supersonic)
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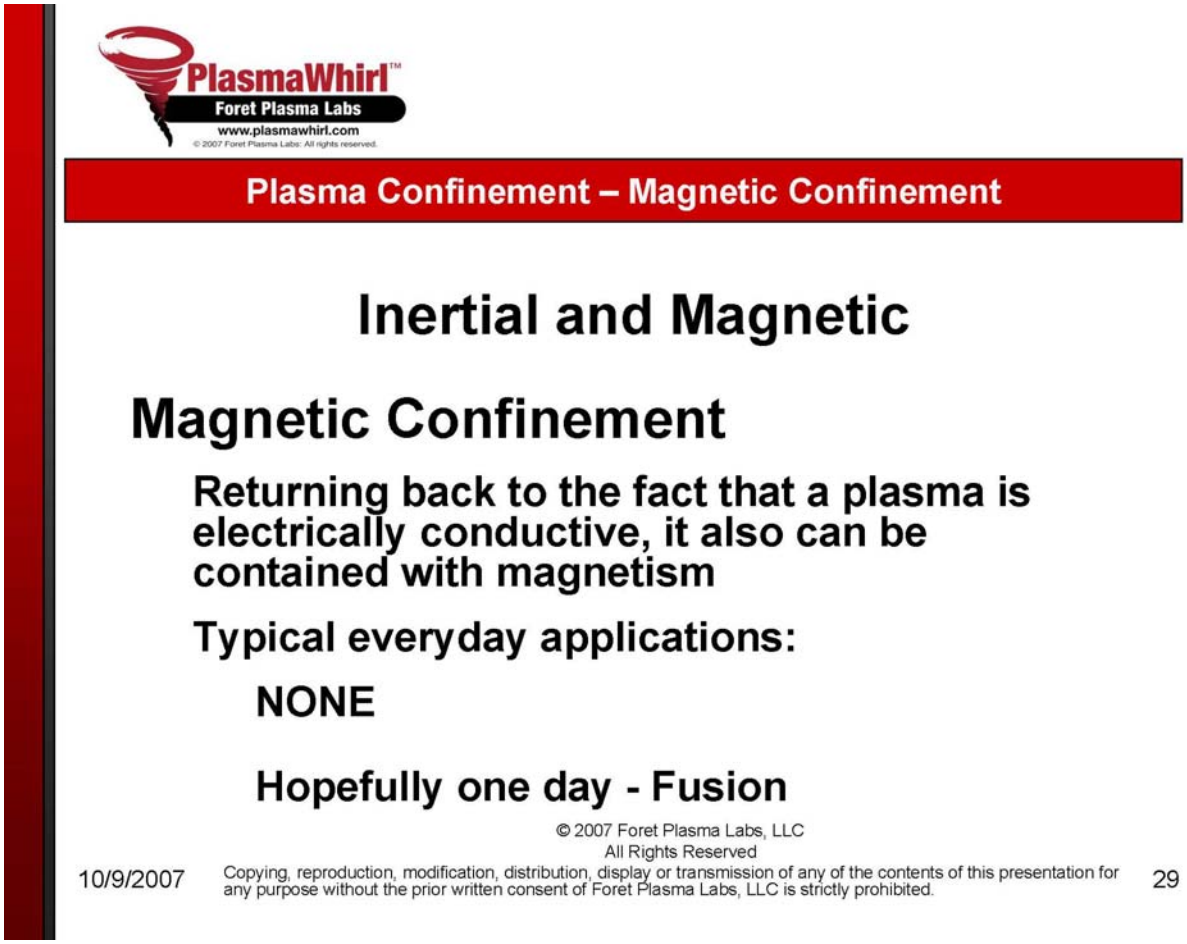
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Plasma Confinement – Magnetic Confinement
Inertial and Magnetic
Magnetic Confinement
Returning back to the fact that a plasma is electrically conductive, it also can be contained with magnetism
Typical everyday applications:
NONE
Hopefully one day - Fusion
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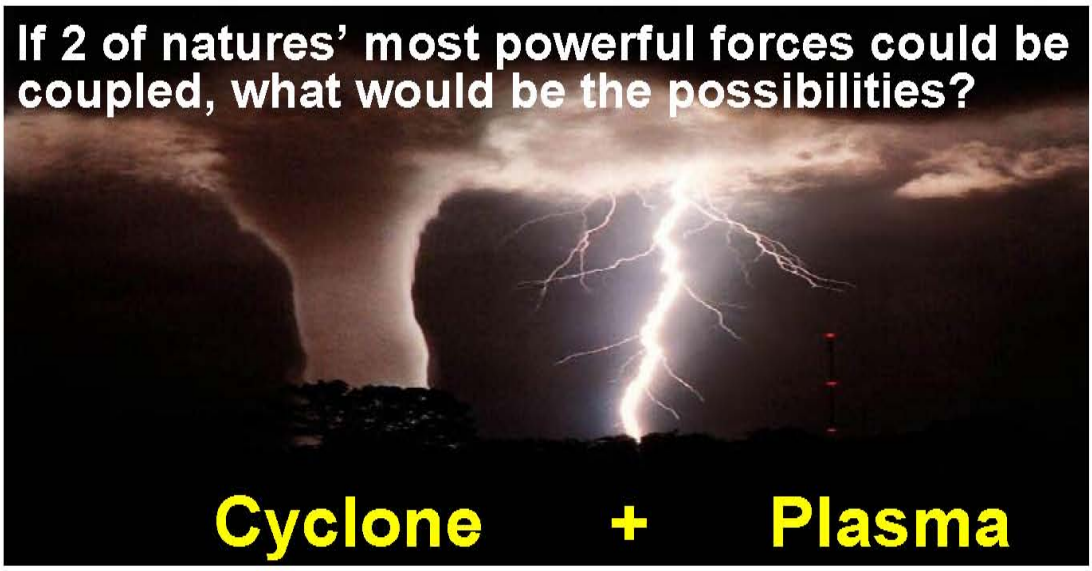
Plasma Cyclone Mass Transfer



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Plasma Cyclone – Mine's Closed-Top Cyclone Reactor

U.S. Patent No. 5,228,901

http://www.mines.edu/academic/met/plasma/facilities.htm

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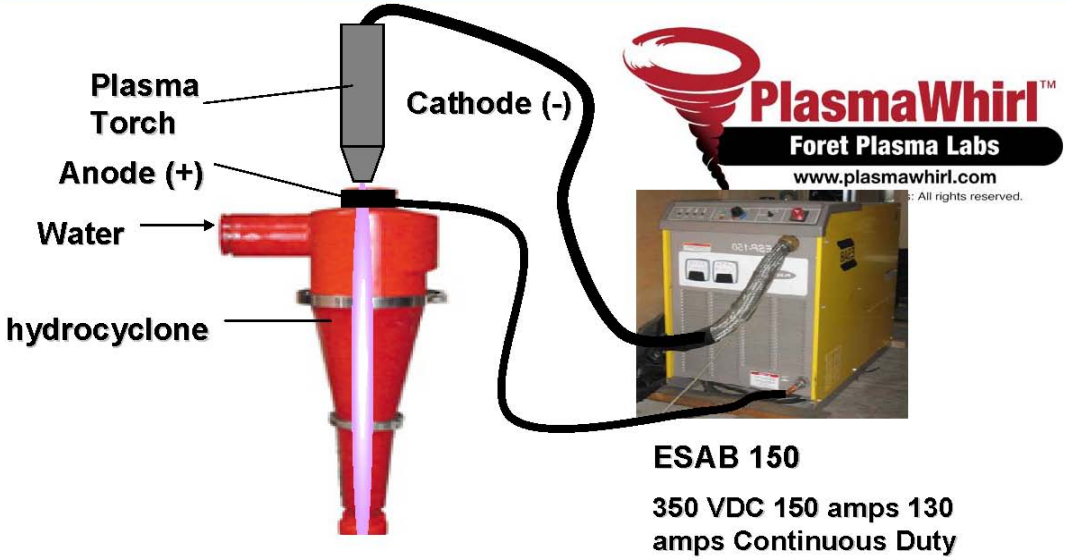
Plasma Cyclone – FPL PlasmaWhirl™ for Liquids



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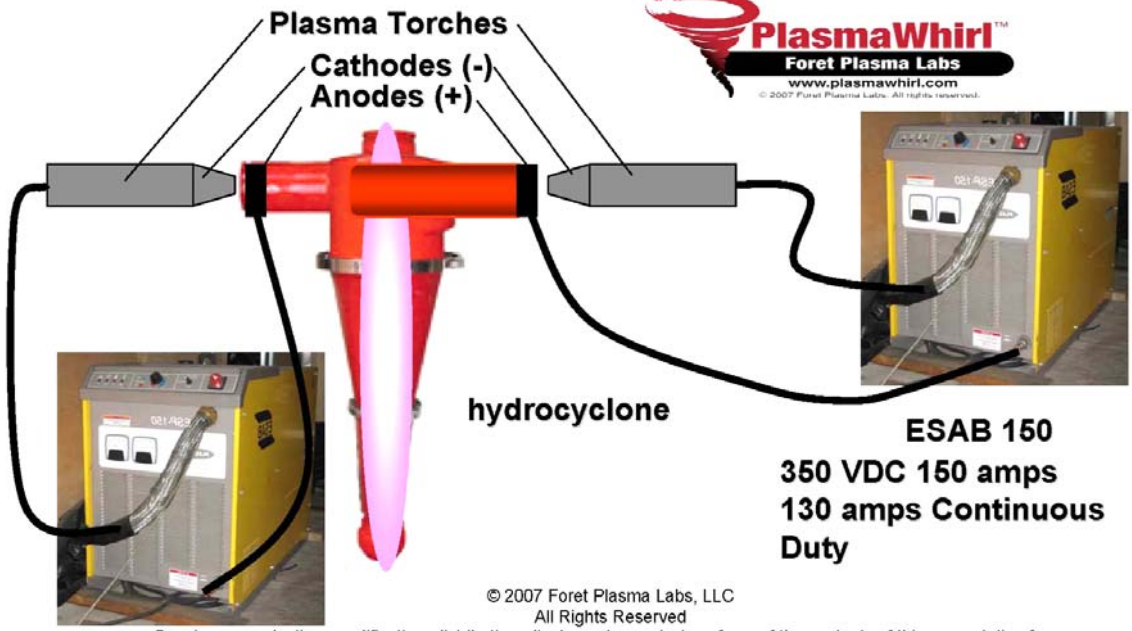
Plasma Cyclone – FPL PlasmaWhirl™ for Solids



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ESAB 150
350 VDC 150 amps
130 amps Continuous Duty

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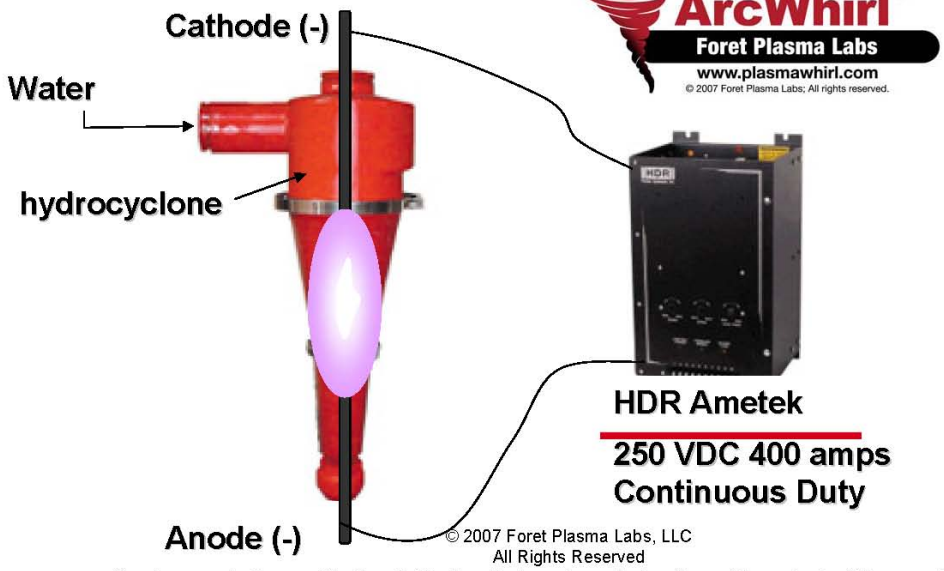
Plasma Cyclone – FPL ArcWhirl™ for Solids or Liquids



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Plasma Cyclone – FPL ArcWhirl™ Original Concept

Replacing the air/gas core in a hydrocyclone with a plasma core.

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Plasma Mass Transfer

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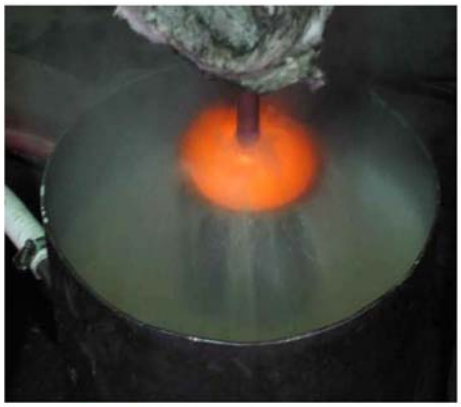
Plasma Mass Transfer



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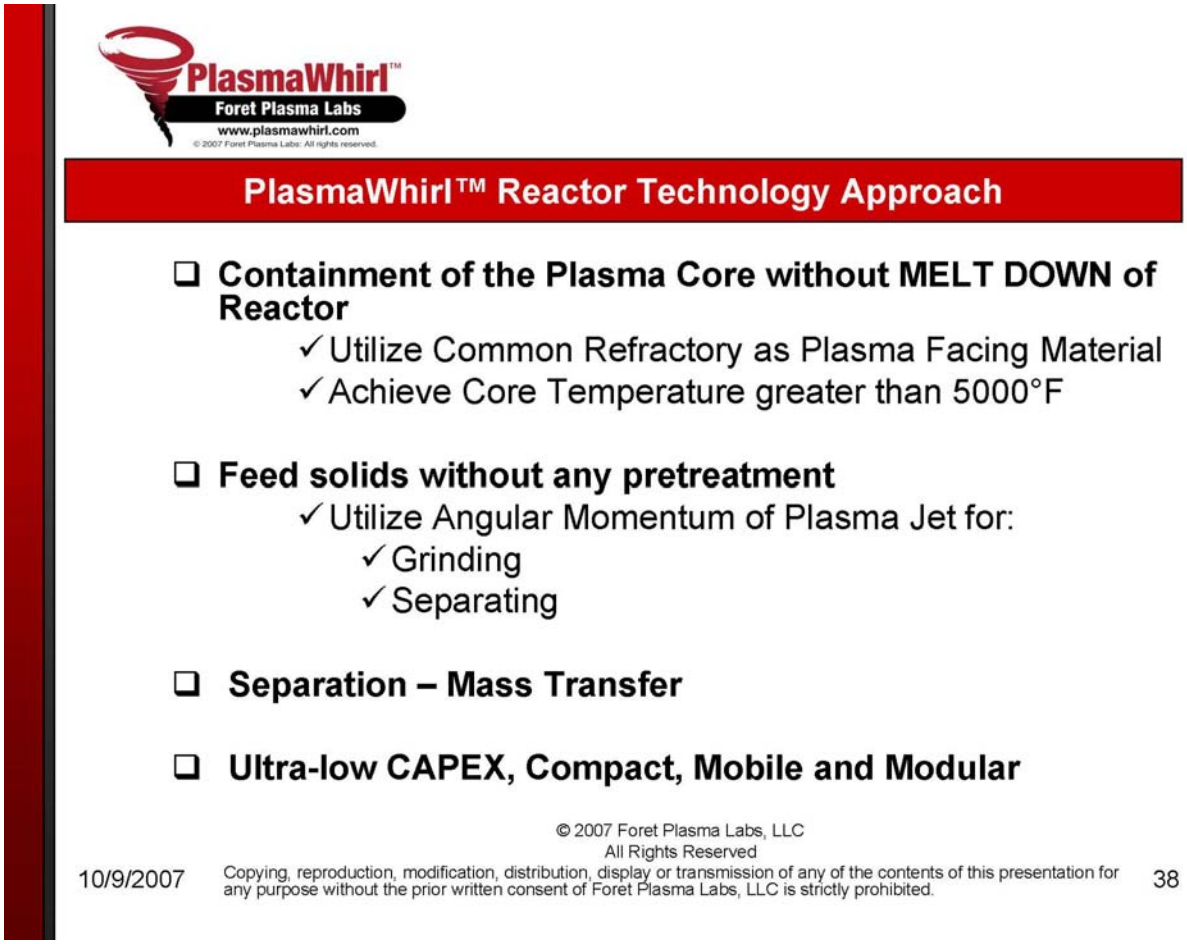
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PlasmaWhirl™ Reactor Technology Approach
Containment of the Plasma Core without MELT DOWN of Reactor
✓Utilize Common Refractory as Plasma Facing Material
✓Achieve Core Temperature greater than 5000°F
Feed solids without any pretreatment
✓Utilize Angular Momentum of Plasma Jet for:
✓Grinding
✓Separating
Separation – Mass Transfer
Ultra-low CAPEX, Compact, Mobile and Modular
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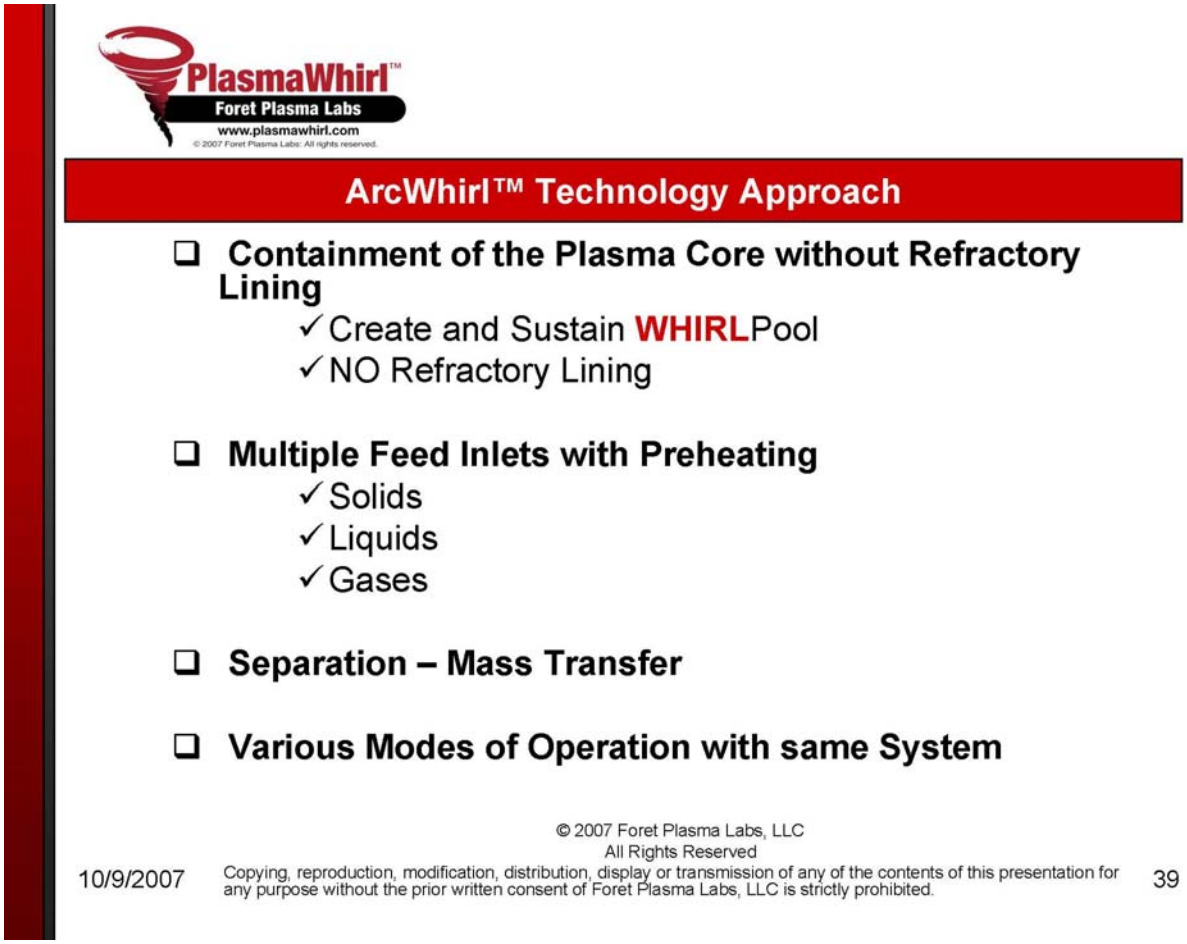
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ArcWhirl™ Technology Approach
Containment of the Plasma Core without Refractory Lining
✓Create and Sustain WHIRLPool
✓NO Refractory Lining
Multiple Feed Inlets with Preheating
✓Solids
✓Liquids
✓Gases
Separation – Mass Transfer
Various Modes of Operation with same System
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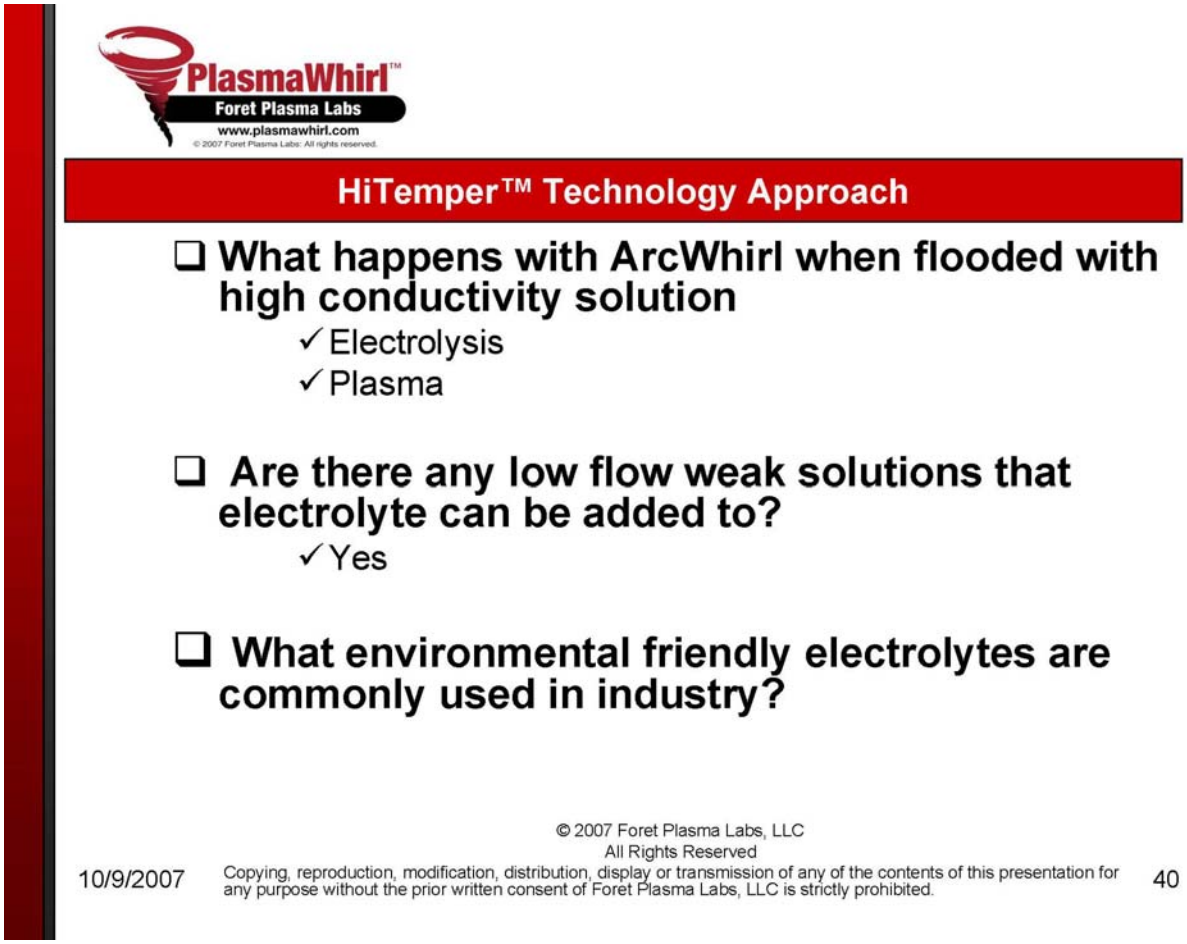
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HiTemper™ Technology Approach
What happens with ArcWhirl when flooded with high conductivity solution
✓Electrolysis
✓Plasma
Are there any low flow weak solutions that electrolyte can be added to?
✓Yes
What environmental friendly electrolytes are commonly used in industry?
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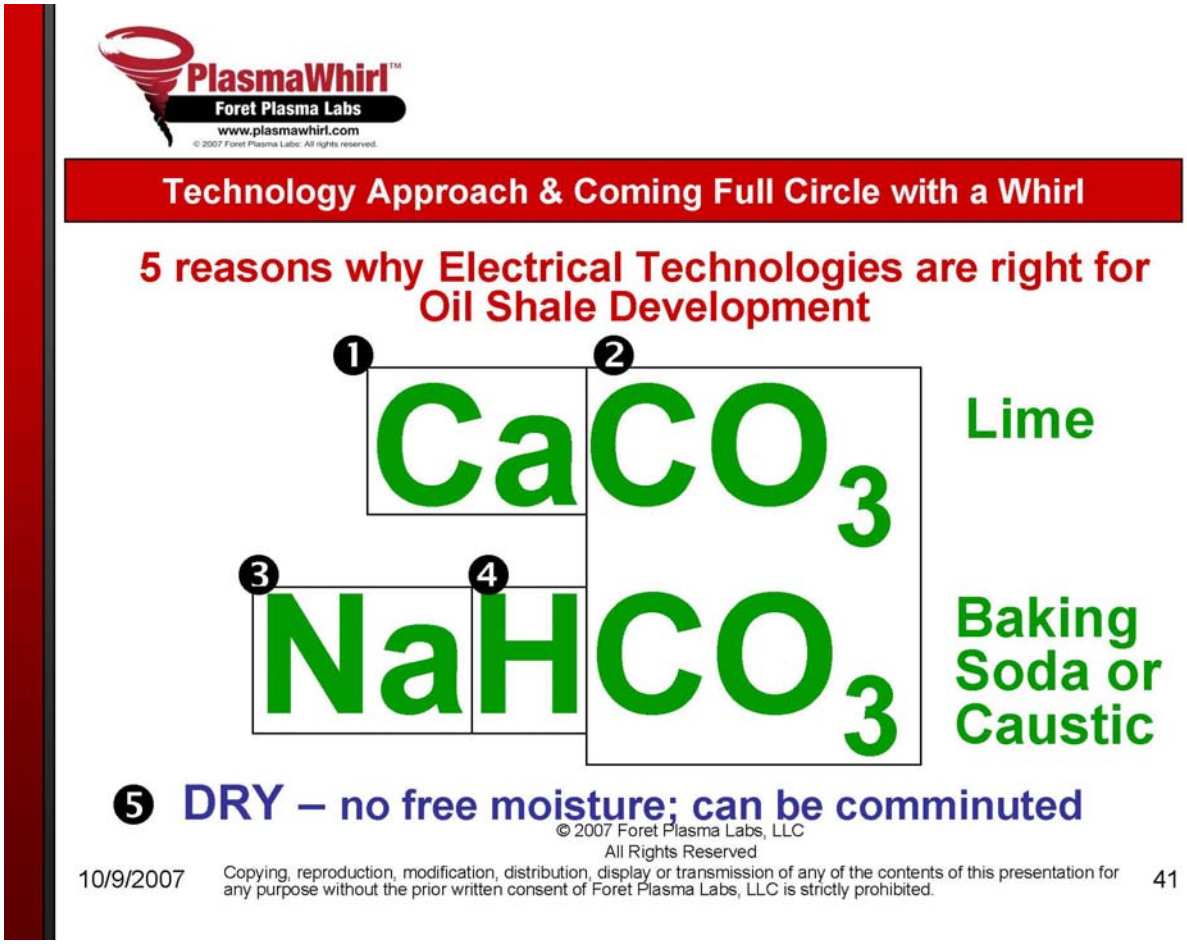
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Technology Approach & Coming Full Circle with a Whirl
5 reasons why Electrical Technologies are right for Oil Shale Development
1
2
CaCO3
Lime
3
4
NaHCO3
Baking Soda or Caustic
5 DRY – no free moisture; can be comminuted
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ArcWhirl Produced Water Treatment System

16" ArcWhirl™ - 30,000 BBL/day

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PlasmaWhirl™ Dual Torches with Power Supplies

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120 KW ArcWhirl™ Melter

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4" Casting - CF8M (316-L) Hydrocyclone Volute

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PlasmaWhirl™ Reactor Drawings

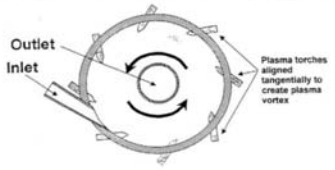

Fig. 1

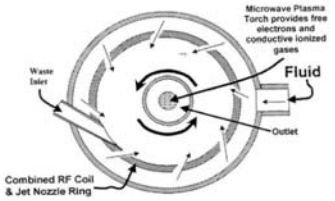

Fig. 2

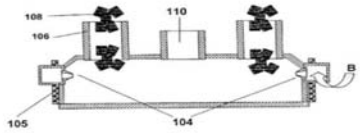

Fig. 4

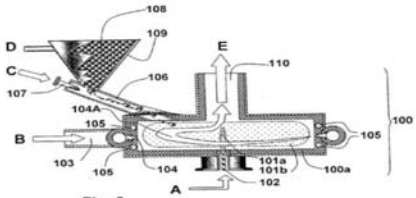

Fig. 5

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PlasmaWhirl™ Reactor CAPEX

Patent Application Publication Feb. 6, 2003 Sheet 1 of 15 US 2003/0024806 A1

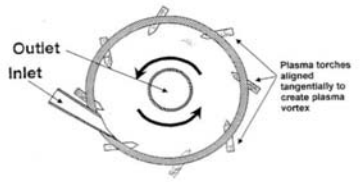

Fig. 1

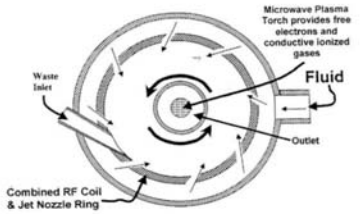

Fig. 2

Multiple Torch PlasmaWhirl™ Modules

70 KW 2 torch PlasmaWhirl™ Research Trailer/Skid
1 Ton/hour Oil Shale

720 KW 6 torch PlasmaWhirl™ Trial Unit
10 tons/hour Oil Shale

7.2 MW 6 torch PlasmaWhirl™ Module
100 tons/hour

90 MW 6 torch PlasmaWhirl™ Module
30,000 tons/day

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PlasmaWhirl™ Reactor Original Prototype

Dual Torches

Rating: 70 KW

Feedrate: ½ lb/second

Residence Time: 1 sec.

Temperature: + 3,500°F

Temp Rise for Foundry Sand + Drill Cuttings:

75°F → 1,500°F in 1 second

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PlasmaWhirl™ Reactor processing Foundry Sand

Energy for treating Drill Cuttings[1] or Foundry Sand[2]

68 KW/ton

232,084 BTUs/ton

[1]Removal of Oil based drilling fluids for ROC (retention on cuttings) below detectable limits.

[2]Burn-off of carbon residue (polyurethane)

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PlasmaWhirl™ Reactor Bottom Feed Inlet

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ArcWhirl™ Melter vitrified Shale Drill Cuttings

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ArcWhirl™ Melter vitrified Lava Filter Media from Mine Water

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ArcWhirl™ Melter – 1 oz platinum recovered from lava filter

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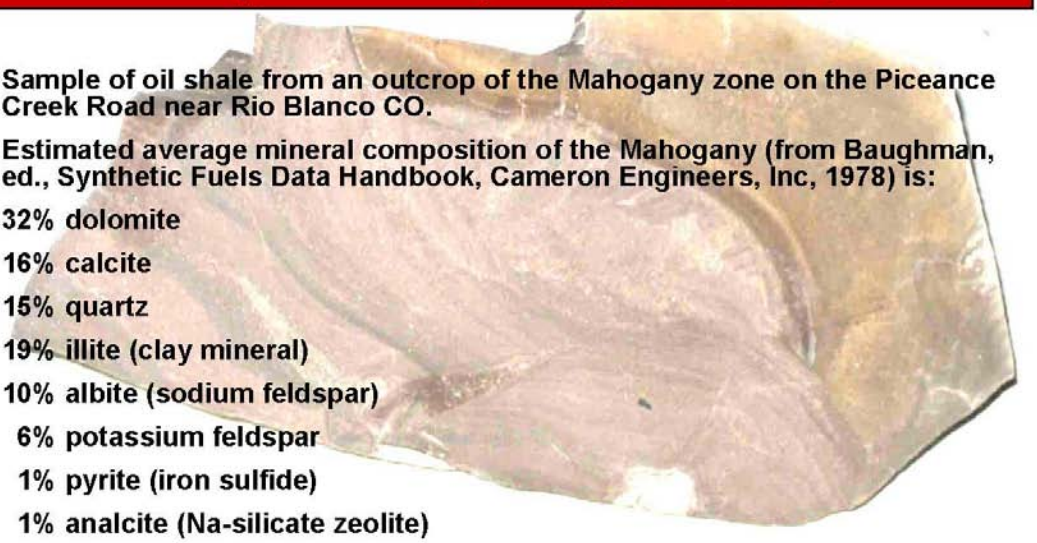
Oil Shale Sample Provided by Jeremy Boak, CERI, Mines



Sample of oil shale from an outcrop of the Mahogany zone on the Piceance Creek Road near Rio Blanco CO.

Estimated average mineral composition of the Mahogany (from Baughman, ed., Synthetic Fuels Data Handbook, Cameron Engineers, Inc, 1978) is:

- **32% dolomite**
- **16% calcite**
- **15% quartz**
- **19% illite (clay mineral)**
- **10% albite (sodium feldspar)**
- **6% potassium feldspar**
- **1% pyrite (iron sulfide)**
- **1% analcite (Na-silicate zeolite)**

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Oil Shale Sample Melt Test performed on October 3, 2007

Weight = 640 grams **Crushed then Weighed 1 lb**

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Oil Shale Sample Melt Test performed on October 3, 2007

Vitrified weight = 11 ounzes (wt reduction = 32%)

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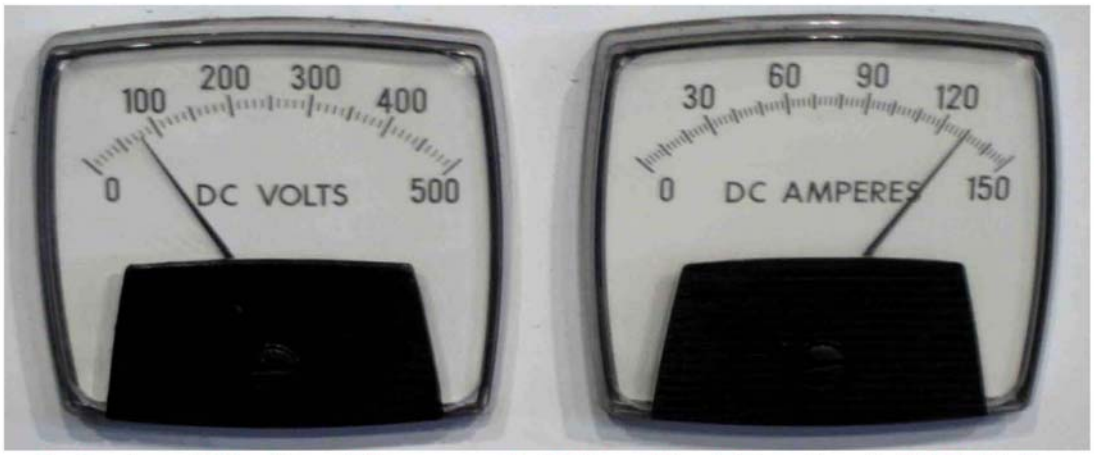
Oil Shale Sample Melt Test Energy Input



2 minutes at 80 volts x 130 amps = 10,400 kva/30 = 347 watts = 1,185 BTUs/lb

Arc Heat Input = 1,185 BTUs/lb with ZERO heat recovery
power factor = .85, then out of wall power = 409 watts/lb

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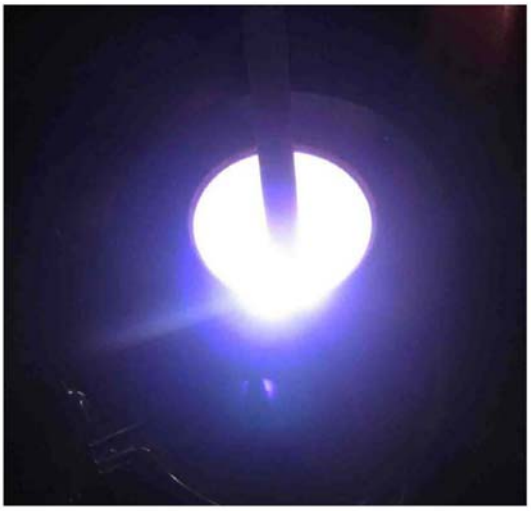
ArcWhirl™ Melter with Oil Shale Sample Melt October 3, 2007



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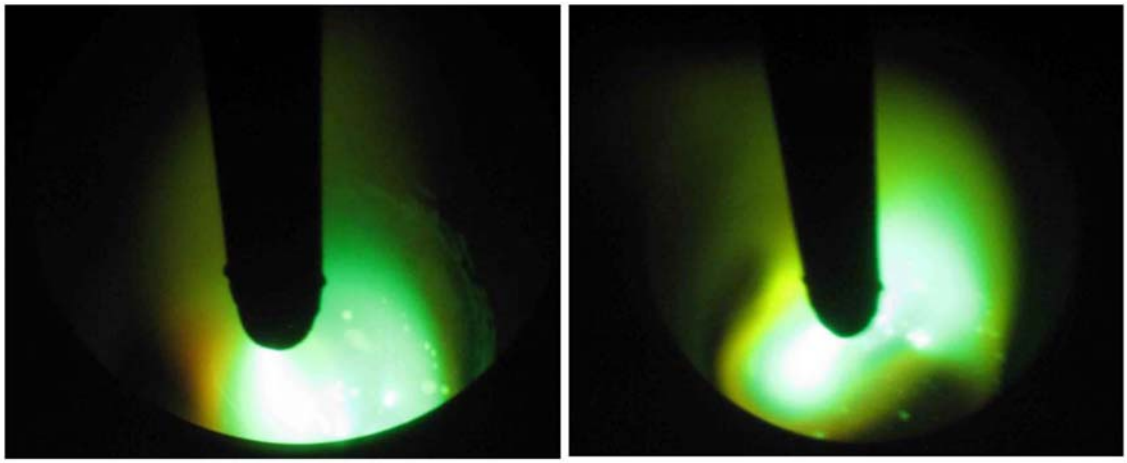
ArcWhirl™ Melter with Oil Shale Sample Melt October 3, 2007



Arc Rotates or Whirls around carbon crucible

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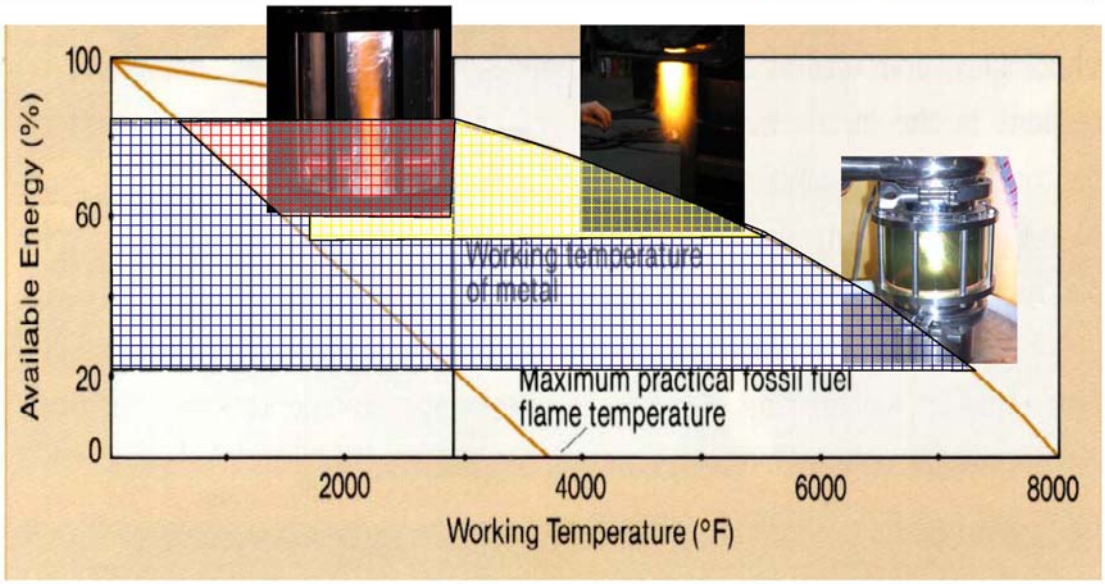
FPL Plasma Systems and Temperature Operating Curve



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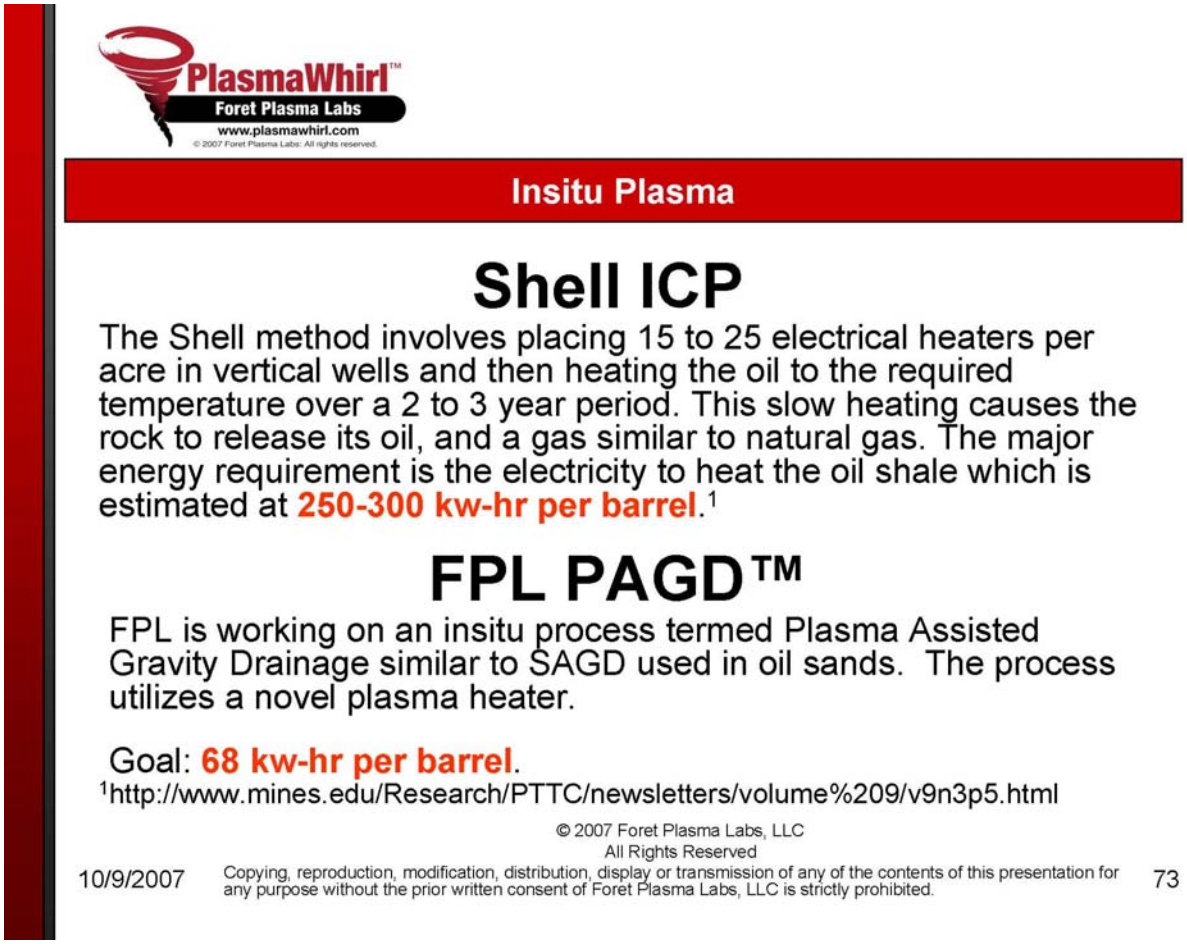
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Insitu Plasma
Shell ICP
The Shell method involves placing 15 to 25 electrical heaters per acre in vertical wells and then heating the oil to the required temperature over a 2 to 3 year period. This slow heating causes the rock to release its oil, and a gas similar to natural gas. The major energy requirement is the electricity to heat the oil shale which is estimated at 250-300 kw-hr per barrel.[1]
FPL PAGD™
FPL is working on an insitu process termed Plasma Assisted Gravity Drainage similar to SAGD used in oil sands. The process utilizes a novel plasma heater.
Goal: 68 kw-hr per barrel.
[1]http://www.mines.edu/Research/PTTC/newsletters/volume%209/v9n3p5.html
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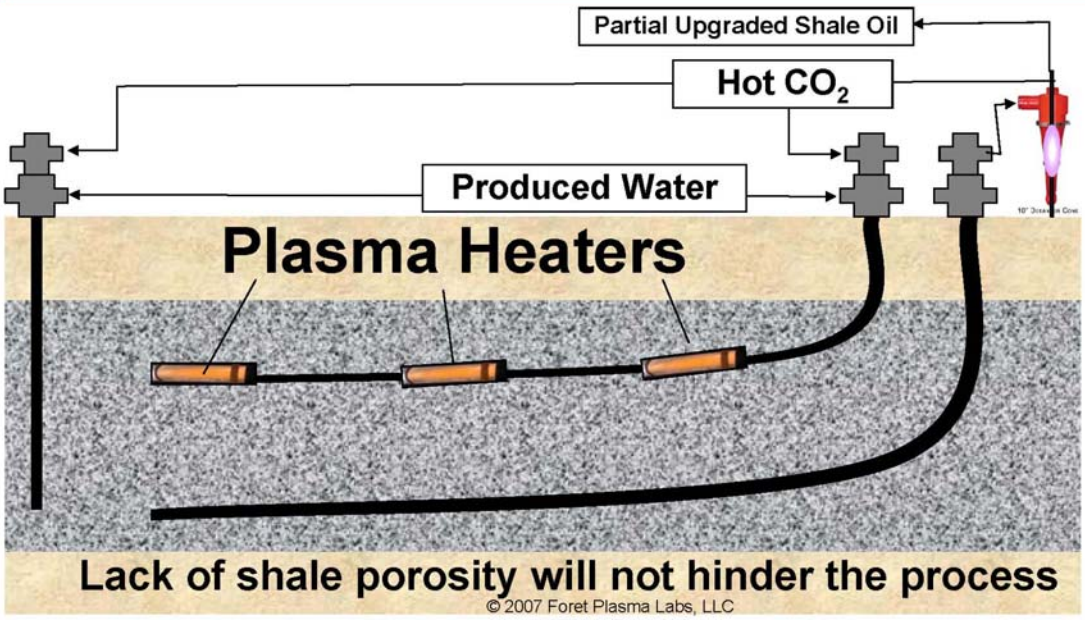
Insitu PAGD™ with ArcWhirl™



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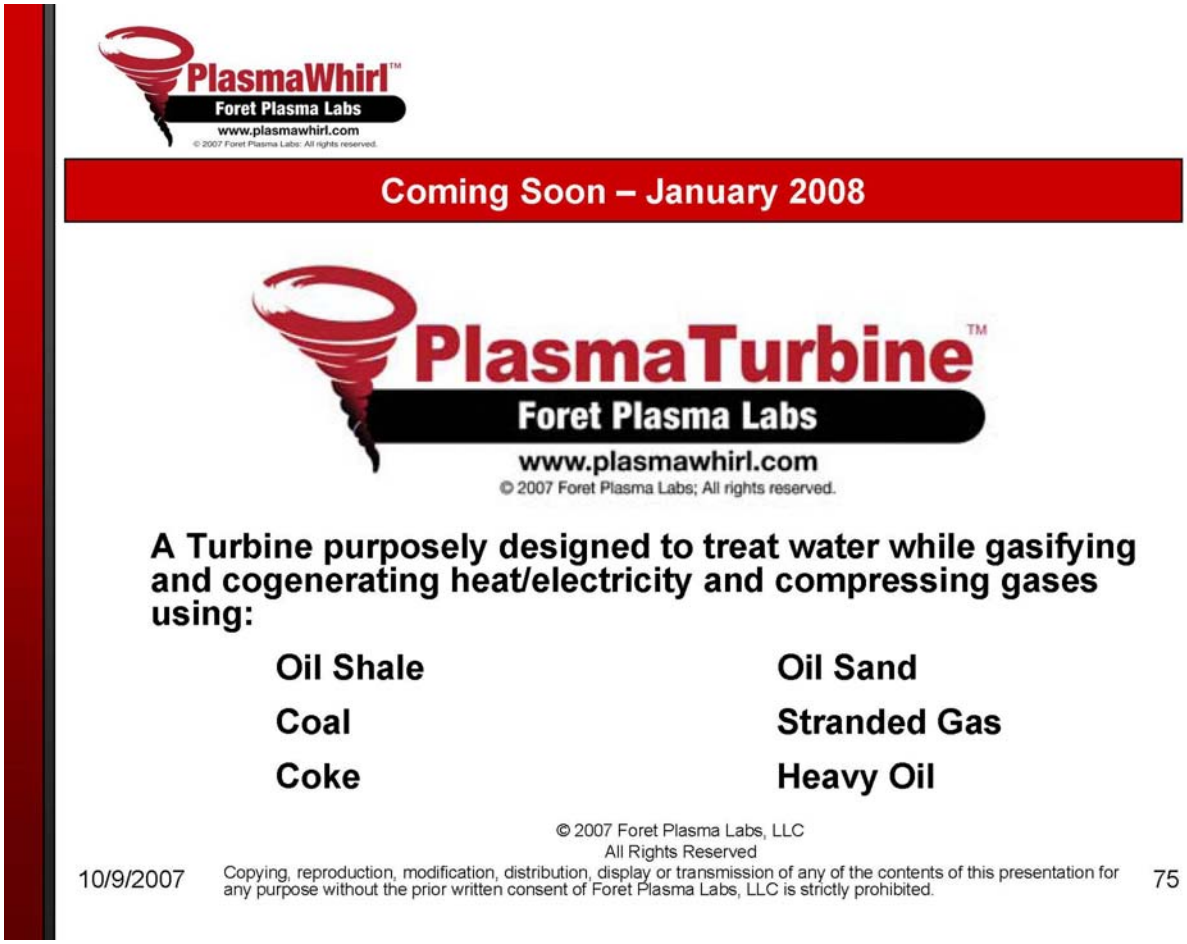
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Coming Soon – January 2008
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A Turbine purposely designed to treat water while gasifying and cogenerating heat/electricity and compressing gases using:
Oil Shale
Coal
Coke
Oil Sand
Stranded Gas
Heavy Oil
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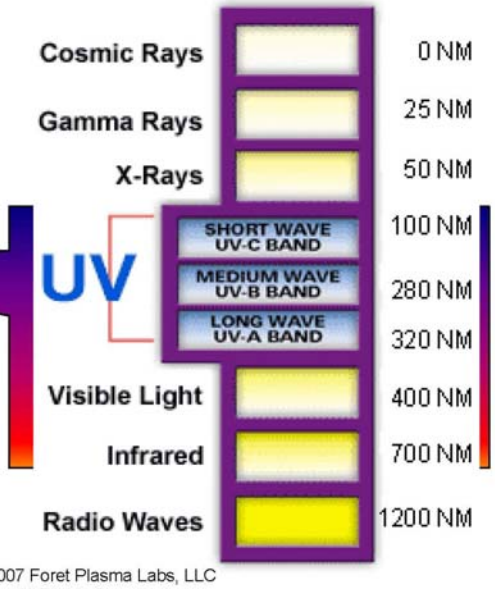
ArcWhirl™ Disinfection and Sand Filter System



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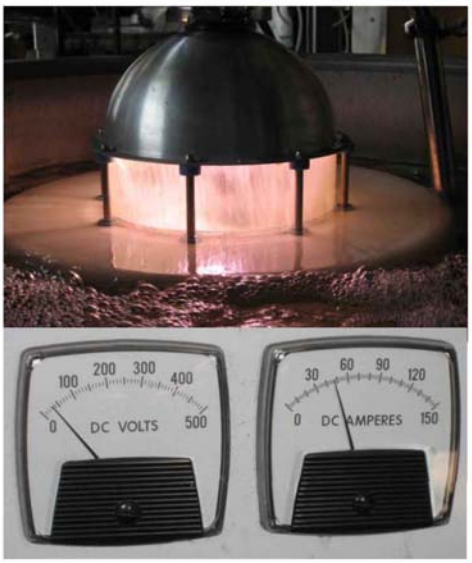
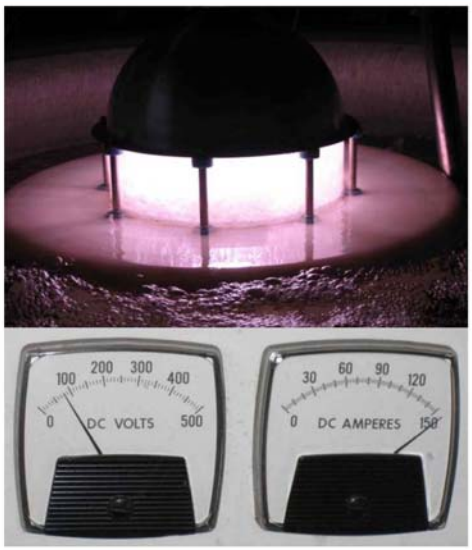
ArcWhirl™ Power





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PlasmaWhirl™ Heater Treater + Upgrader

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ArcWhirl™ Melter with Tank

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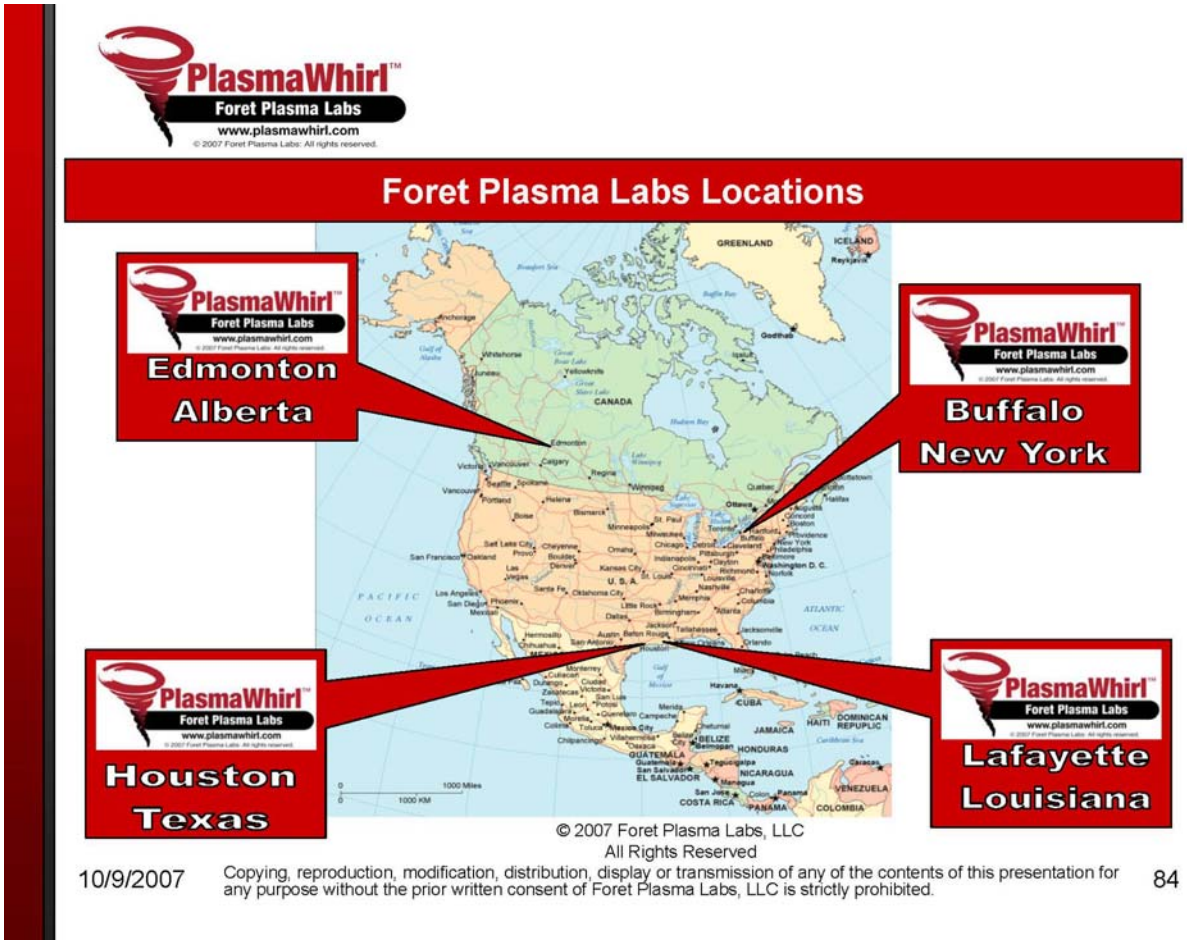
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Houston Demonstration Foundry Partner - QESC

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Response for Document 52936

52936-001: Thank you for the information.

Thank you for your comment, Royal Laybourn.

The comment tracking number that has been assigned to your comment is OSTSD52937.

Comment Date: April 15, 2008 19:02:56PM
Oil Shale and Tar Sands
Comment ID: OSTSD52937

First Name: Royal
Middle Initial:
Last Name: Laybourn
Organization:
Address: 40 Sunset Drive
Address 2: Suite 2
Address 3:
City: Basalt
State: CO
Zip: 81621
Country: USA
Email: royal@roaringforkbuilding.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am a wyoming native and lifelong westerner, The three state area of Utah, Colorado and Wyo.all have BLM lands that are potential candidates for "Oil Shale Development" This is a proven ecological disaster. It is a bonified Government boondoggle of the worst kind. It is primarily a method to for private industry to aqquire substantial govenrment benifits in the form of tax credits, water rights, and land aqusitions. Stop this madness. Super heating concepts are a huge waste of energy that wont work. Creating Shale slurries to transport and process are a huge waste of prescious water resources, the amount of over-burden and tailing will simply be horrible for people and wildlife. What part of this make any sense? except to an "Energy" group that can scam the taxpayers. Do the right thing and pull the plug once and for all on Oil Shale!!! Sincerely, Royal

52937-001

Response for Document 52937

52937-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, John Trammell.

The comment tracking number that has been assigned to your comment is OSTSD52938.

Comment Date: April 15, 2008 19:45:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD52938

First Name: John
Middle Initial: W
Last Name: Trammell
Organization:
Address: 2040 Barberry Avenue
Address 2:
Address 3:
City: Grand Junction
State: CO
Zip: 815064178
Country: USA
Email: jtgeologist@bresnan.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Don't lease until a proven technology for extraction is available.

I realize that the last time oil from shale seemed imminent, it caused OPEC to lower prices. Seeing that happen again would be good, but temporary. Although we are importers of crude oil at exorbitant prices, we can still wait for the technology.

In the mid-1070's when west Texas sweet crude was at $3.00/barrel, conventional wisdom held that when crude reached $10.00, oil from shale would be commercially feasible. I predict that the economic break-even point will continue to be a moving target - mainly because of the energy input needed to extract oil from shale. 52938-001

No matter what technology is used, the adverse effects on western Colorado's environment will be profound. This will be especially true about water supplies. 52938-002

We need to concentrate more on renewable energy resources instead of fossil fuels. However, in the long run I believe that "clean coal" technologies offer more potential for solving our energy problems than oil shale. 52938-003

In general, I oppose government subsidies for energy development, other than to encourage research on alternative sources - not including oil shale. The O&G companies have adequate research funds of their own.

Bottom line: Leasing now is premature. 52938-001 (cont.)

Thanks for the opportunity to comment.

Responses for Document 52938

52938-001: Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

The BLM believes that the RD&D program will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. The scope of the PEIS, in consultation with cooperating agencies, was changed from a leasing decision to an allocation decision. Consequently, new NEPA analysis will be required prior to offering parcels of land for lease for commercial oil shale exploration and development. This NEPA analysis will evaluate environmental impacts of the operation(s) and develop specific measures to mitigate or eliminate those impacts. This analysis will also contain any new information or circumstances relevant to the RD&D technology, which may be a consequence of research or lessons learned on the RD&D leases or as a result of studies on nonfederal lands.

52938-002: Thank you for your comment.

52938-003: The BLM acknowledges the commentor's preference for alternate energy sources, including renewable energy and clean coal technologies.

Thank you for your comment, HARLOW CHURCH.

The comment tracking number that has been assigned to your comment is OSTSD52939.

Comment Date: April 15, 2008 20:57:50PM
Oil Shale and Tar Sands
Comment ID: OSTSD52939

First Name: HARLOW
Middle Initial: M
Last Name: CHURCH
Organization:
Address: 140 N. Cheyenne St
Address 2: apt 325
Address 3:
City: Powell
State: WY
Zip: 82435
Country: USA
Email: kirche40@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Since huge deposits of oil shale are in WY, CO, & UT, and imported oil is costing around $110 per barrel in increasingly worthless dollars, is oil extraction from shale cheap enough in comparison to make exploitation almost a necessity to help the fiscal situation of the US? In other words, have foreign buyers buy oil from the US rather than US consumers and companies pay hundreds of billions to foreign exporters.. What can BLM tell us about this situation?	52939-001

Response for Document 52939

52939-001: Thank you for your comment; however, the fiscal situation described in the comment is outside the scope of this PEIS.

Thank you for your comment, Peter Rutledge.

The comment tracking number that has been assigned to your comment is OSTSD52940.

Comment Date: April 15, 2008 21:37:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD52940

First Name: Peter
Middle Initial: A
Last Name: Rutledge
Organization:
Address: 2075 Urban Drive
Address 2:
Address 3:
City: Lakewood
State: CO
Zip: 80215
Country: USA
Email: prut2075@aol.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

As was the case in 1974 through 1984 there is no currently acceptable techonology to recover kerogen or oil fron shale. Continue with the demonstration leases until a technology surfaces that is acceptable. I will await Shell's combination of a freeze wall with electrical heating. Let me know if any of the experience with the 1974 program would be of any value.	52940-001

Response for Document 52940

52940-001: Thank you for your comment. The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. The scope of the PEIS, in consultation with the cooperating agencies, was changed from a leasing decision to an allocation decision. Consequently, new NEPA analysis will be required prior to offering for lease parcels of land for commercial oil shale exploration and development. This NEPA analysis will evaluate environmental impacts of the operation(s) and develop specific mitigation measures to mitigate or eliminate those impacts. This analysis will also contain any new information or circumstances relevant to the RD&D technology, which may be a consequence of research or lessons learned on the RD&D leases or as a result of studies on nonfederal lands.

Thank you for your comment, Michael Herron.

The comment tracking number that has been assigned to your comment is OSTSD52941.

Comment Date: April 15, 2008 22:39:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52941

First Name: Michael
Middle Initial: M
Last Name: Herron
Organization:
Address: 1 Hampshire St
Address 2:
Address 3:
City: Cambridge
State: MA
Zip: 02139
Country: USA
Email: mherron@boston.oilfield.slb.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I think that C is most appropriate of the three plans submitted. However, I think a national oil shale company should be constituted to develop this resourse to overcome the vagaries of commercial developers. | 52941-001 | 52941-002

Responses for Document 52941

52941-001: The BLM acknowledges the commentor's preference for Alternative C.

52941-002: Thank you for your comment. Establishment of a national oil company is not within the scope of the land allocation decisions analyzed in this PEIS.

Thank you for your comment, Karl Hanzel.

The comment tracking number that has been assigned to your comment is OSTSD52942.

Comment Date: April 15, 2008 23:07:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD52942

First Name: Karl
Middle Initial:
Last Name: Hanzel
Organization:
Address: 736 Wagonwheel Gap
Address 2: No Mailing Lists Please
Address 3:
City: Boulder
State: CO
Zip: 80302
Country: USA
Email: karlpt@khaos.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Please let oil shale and tar sands stay in the ground. The high energy involved with extracting them, and then in turn combusting them will cinch our collective doom. 52942-001

Response for Document 52942

52942-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, John Steward.

The comment tracking number that has been assigned to your comment is OSTSD52943.

Comment Date: April 16, 2008 00:03:07AM
Oil Shale and Tar Sands
Comment ID: OSTSD52943

First Name: John
Middle Initial: R
Last Name: Steward
Organization:
Address: 915 Dameron Dr.
Address 2:
Address 3:
City: Prescott
State: AZ
Zip: 86301
Country: USA
Email: jsrascal@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I feel so strongly that we need other sources of energy other than just oil out of oil wells. Oil sands is an opportunity to accomplish having more oil and at the same time helping our environment. I know companies are working on ways of extracting oil that will do less damage to the environment which is also very important. I hope that these companies that will be extracting can help us on both sides of the environment issue. | 52943-001

Response for Document 52943

52943-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Irving Backman.

The comment tracking number that has been assigned to your comment is OSTSD52944.

Comment Date: April 16, 2008 09:09:25AM
Oil Shale and Tar Sands
Comment ID: OSTSD52944

First Name: Irving
Middle Initial: A
Last Name: Backman
Organization: Irving A. Backman & Associates
Address:
Address 2:
Address 3:
City:
State: MA
Zip:
Country: USA
Email: iabackman@rcn.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Our organization has been funding and developing new technology for over 35 years and are familiar with the many attemots of recovery of oil shale and tar sands during this period as well as the many environmental problems related to recovery. We believe we have available a new technology which is environmentally friendly, uses no water or heat and can release the gas and oil effectively and efficiently. We can do tests in our lab with as little two pounds of shsale or sands and can evaluate extent of recovery. A portable System will be available by May 1 to process one tone per hour and in 6 months 5, 10 or 15 tons per hour which can be transported and operated on from one or two large trailers. We are therefore interested in getting to or three 2 pound samples of shale or sands, or both, for our own analysis. If we are satisfied these will be recoverable by our System, we would would offer a demonstration in our labs with similar or other samples, oevn in the field with our one ton per hour unit.If all of these trests are successful, which we are quite certain will be based on our repeated testing ovewr the past 6 months, how do we arrange to put this technology and system to use? What land areas can you make available to us to start producing oil and gas without any environmental problems whatsoever? VCan we look for any funding assistance? Ten million dollars would allow us to build a unit that will process 15 tons per hour, 24 hours per day, 7 days per week, with perhaps 3 hours of downtime for cleaning or maintenance. A 6 month lead time will be required to build one or more such units. These are bold representations, but a demonstration in our labs can be arranged within ten days in a lab one half hour from the Philadelphia airport and we can process as many samples as desired. A half pound sample can be processed in 20 minutes and gas and oil will be collected in seperate vessels. Even a one ton per hour unit will be available for demonstration as well at the production factory outside of Chicago. Please advise who can discuss this dvanced technology with us and put it to use. Yes, thgis could solve our energy problems for at least the next century or two with all the oil shale and tar sands available in the U S, or elsewhere.

52944-001

Can we hear from you and help verify this technology and put it to use as fast as possible to solve

our energy, environmental, and economic crisis that we all face. You can also verify with my banks, references or others that I am not a kook, have been a respected member of the business community in the Boston area for over 35 years, have completed many successful technology advances or products during this period,nationally and internationally, and am eager to solve our energy problems with your assistance. May I hear from you promptly, regardless of your deadlines or other delaying obstacles. Internet information on technology is also available... Irving Backman ; Irving Backman & Associates; Newton MA; Tel: 617 969 2044

52944-001 (cont.)

Response for Document 52944

52944-001: Thank you for sending information on your technology.

Thank you for your comment, Hugh Henry.

The comment tracking number that has been assigned to your comment is OSTSD52946.

Comment Date: April 16, 2008 09:40:13AM
Oil Shale and Tar Sands
Comment ID: OSTSD52946

First Name: Hugh
Middle Initial: D
Last Name: Henry
Organization:
Address: 44 Mill Creek Drive
Address 2:
Address 3:
City: Boardman
State: OH
Zip: 44512
Country: USA
Email: hhenry@wesco.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The issue is environmental versus economics. This type of mining has been conducted for years, and the land restored. Not to its original splendor, but to a different splendor. The economics issue is huge. Not only does this country need to petroleum resources, oil prices are currently high enough to make the mining economical and profitable. If we delay for ten years talking about what to do, this may no longer be the case. Our economy needs the boost now; not ten years from now.	52946-001

Response for Document 52946

52946-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Carolyn Clark.

The comment tracking number that has been assigned to your comment is OSTSD52947.

Comment Date: April 16, 2008 11:35:13AM
Oil Shale and Tar Sands
Comment ID: OSTSD52947

First Name: Carolyn
Middle Initial:
Last Name: Clark
Organization:
Address: 573 12th Ave
Address 2:
Address 3:
City: Salt Lake City
State: UT
Zip: 84103
Country: USA
Email: carolyn.clark@slcc.edu
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Re: Oil Shale & Tar Sands:

Please protect our BLM lands from oil & tar development. These do have significant negative environmental impact. Let's put our energies instead into developing cleaner alternatives (wind, solar, tidal).

Save our precious BLM lands for future generations who will want and need places to escape for peace, quiet, and getting in touch with our inner selves. There is something awesome and holy about undisturbed lands. 52947-001

We have already encroached too much on lands that wildlife and watershed need to maintain the Earth's delicate ecosystem balance. Please stop messing with Mother Nature. Some day soon we will wear her out. Enough is enough.

Response for Document 52947

52947-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, David Carpenter.

The comment tracking number that has been assigned to your comment is OSTSD52948.

Comment Date: April 16, 2008 11:38:41AM
Oil Shale and Tar Sands
Comment ID: OSTSD52948

First Name: David
Middle Initial:
Last Name: Carpenter
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email:
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

BLM- I am writing to express my concern that the Oil Shale PEIS has not adequately addressed the connected actions and connected environmental impacts of granting the preferred option. Until the comprehensive impacts of large scale oil shale develpoment are better sutdied and understood, I ask that OPTION A, "No Action" be adopted as the outcome of this PEIS. 52948-001

Response for Document 52948

52948-001: A cumulative effects analysis for amending the RMPs has been presented to the extent possible. However, because of the limited character of the decision to be made on the basis of this PEIS (allocation of lands where applications for leasing can be considered), and because there will be additional environmental analysis prior to leasing, it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. It would also take into consideration any connected actions related to the development of the oil shale or tar sands resources, as appropriate.

Thank you for your comment, JO FRAPPIER.

The comment tracking number that has been assigned to your comment is OSTSD52949.

Comment Date: April 16, 2008 12:48:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD52949

First Name: JO
Middle Initial: H
Last Name: FRAPPIER
Organization:
Address: 2845 VALLEY VIEW TERRACE
Address 2:
Address 3:
City: JEFFERSON CITY
State: MO
Zip: 65109
Country: USA
Email: jobyfrap@embarqmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

If there ever was a time to begin developing this resource it is now. For the sake of our nation, please move forward. | 52949-001

Response for Document 52949

52949-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Richard Plummer.

The comment tracking number that has been assigned to your comment is OSTSD52950.

Comment Date: April 16, 2008 12:53:39PM
Oil Shale and Tar Sands
Comment ID: OSTSD52950

First Name: Richard
Middle Initial: G
Last Name: Plummer
Organization:
Address: 12 Endicott Rd
Address 2:
Address 3:
City: Arlington
State: MA
Zip: 02476
Country: USA
Email: gerry@acm.org
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

While I believe Alternative C would better provide for resource protection while still reserving the future rights to revisit the issue of leasing (when petroleum reserves may indeed be more precious), I must insist that both Alternatives B and C are flawed in one critical aspect. Neither recognizes the importance of the intrinsic wild, scenic and archeological resource values along the Green River.

Most critically, the areas on both sides of the Green River, from where Pete's Wash flows into the River, including Nutters Hole and surrounding country, and downstream into Desolation Canyon should not be included in Proposed Area Available for Application for Commercial Oil Shale Development, as they currently are in both Alternatives B and C.

52950-001

Committing these areas to the likely egregious environmental abuses inherent in Oil Shale processing, for the pittance of petroleum yielded, is a huge mistake. This should be corrected.

52950-002

Responses for Document 52950

52950-001: Thank you for your comment. The analysis in the PEIS takes into consideration the general geologic, cultural, and scenic values of areas such as the Green River. Since the BLM is analyzing an allocation decision, additional NEPA analysis will be required prior to any leasing or development of oil shale or tar sands resources. This new analysis will take into consideration the various resource values of the area prior to making a decision.

52950-002: Thank you for your comment.

Thank you for your comment, John Austin.

The comment tracking number that has been assigned to your comment is OSTSD52951.

Comment Date: April 16, 2008 13:57:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD52951

First Name: John
Middle Initial: F
Last Name: Austin
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Please do everything you can to get shale oil production up and running, 10,000,000 bbl./day in 10 years is not out of the question. | 52951-001

Yours truly, J.f. Austin

Response for Document 52951

52951-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Erica Hennig.

The comment tracking number that has been assigned to your comment is OSTSD52952.

Comment Date: April 16, 2008 14:20:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52952

First Name: Erica
Middle Initial: L
Last Name: Hennig
Organization:
Address: 119 Bear Run
Address 2:
Address 3:
City: Durango
State: CO
Zip: 81301
Country: USA
Email: ericainthesky@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

BLM- I am writing to express my concern that the Oil Shale PEIS has not adequatly addressed the connected actions and connected environmental impacts of granting the preferred option. Until the comprehensive impacts of large scale oil shale develpoment are better sutdied and understood, I ask that OPTION A, "No Action" be adopted as the outcome of this PEIS

52952-001

Response for Document 52952

52952-001: A cumulative effects analysis for amending the RMPs has been presented to the extent possible. However, because of the limited character of the decision to be made on the basis of this PEIS (allocation of lands where applications for leasing can be considered), and because there will be additional environmental analysis prior to leasing, it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. It would also take into consideration any connected actions related to the development of the oil shale or tar sands resources, as appropriate.

Thank you for your comment, Robert Seymour.

The comment tracking number that has been assigned to your comment is OSTSD52953.

Comment Date: April 16, 2008 14:33:59PM
Oil Shale and Tar Sands
Comment ID: OSTSD52953

First Name: Robert
Middle Initial:
Last Name: Seymour
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

BLM- I am writing to express my concern that the Oil Shale PEIS has not adequitey addressed the connected actions and connected environmental impacts of granting the preferred option. Until the comprehensive impacts of large scale oil shale development are better studied and understood, I ask that OPTION A, "No Action" be adopted as the outcome of this PEIS. Thanks-

52953-001

Response for Document 52953

52953-001: A cumulative effects analysis for amending the RMPs has been presented to the extent possible. However, because of the limited character of the decision to be made on the basis of this PEIS (allocation of lands where applications for leasing can be considered), and because there will be additional environmental analysis prior to leasing, it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. It would also take into consideration any connected actions related to the development of the oil shale or tar sands resources, as appropriate.

Thank you for your comment, Matthew Karl.

The comment tracking number that has been assigned to your comment is OSTSD52954.

Comment Date: April 16, 2008 15:24:17PM
Oil Shale and Tar Sands
Comment ID: OSTSD52954

First Name: Matthew
Middle Initial:
Last Name: Karl
Organization:
Address: 449 Herschel St
Address 2:
Address 3:
City: Saint Paul
State: MN
Zip: 55104
Country: USA
Email: mjkarl2@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

BLM- I am writing to express my concern that the Oil Shale PEIS has not adequatly addressed the connected actions and connected environmental impacts of granting the preferred option. Until the comprehensive impacts of large scale oil shale develpoment are better sutdied and understood, I ask that OPTION A, "No Action" be adopted as the outcome of this PEIS.

52954-001

Response for Document 52954

52954-001: A cumulative effects analysis for amending the RMPs has been presented to the extent possible. However, because of the limited character of the decision to be made on the basis of this PEIS (allocation of lands where applications for leasing can be considered), and because there will be additional environmental analysis prior to leasing, it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. It would also take into consideration any connected actions related to the development of the oil shale or tar sands resources, as appropriate.

Thank you for your comment, Jason Wilson.

The comment tracking number that has been assigned to your comment is OSTSD52955.

Comment Date: April 16, 2008 19:57:59PM
Oil Shale and Tar Sands
Comment ID: OSTSD52955

First Name: Jason
Middle Initial:
Last Name: Wilson
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am writing to express my concern that the Oil Shale PEIS has not adequatly addressed the connected actions and connected environmental impacts of granting the preferred option. Until the comprehensive impacts of large scale oil shale develpoment are better sutdied and understood, I ask that OPTION A, "No Action" be adopted as the outcome of this PEIS.	52955-001

Response for Document 52955

52955-001: A cumulative effects analysis for amending the RMPs has been presented to the extent possible. However, because of the limited character of the decision to be made on the basis of this PEIS (allocation of lands where applications for leasing can be considered), and because there will be additional environmental analysis prior to leasing, it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. It would also take into consideration any connected actions related to the development of the oil shale or tar sands resources, as appropriate.

Thank you for your comment, David Waddington.

The comment tracking number that has been assigned to your comment is OSTSD52956.

Comment Date: April 16, 2008 23:19:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD52956

First Name: David
Middle Initial:
Last Name: Waddington
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I feel that there should be no leasing of land for the development of oil shale or tar sands until the technology is developed to obtain usable hydrocarbon materials with energy efficiency and without using the large quantities of water presently required. Water use consists of both evaporation and also of pollution which makes it unusable for either potability or irrigation. Respectfully, David Waddington

52956-001

Response for Document 52956

52956-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

Thank you for your comment, Andy Hennig.

The comment tracking number that has been assigned to your comment is OSTSD52957.

Comment Date: April 16, 2008 23:32:04PM
Oil Shale and Tar Sands
Comment ID: OSTSD52957

First Name: Andy
Middle Initial:
Last Name: Hennig
Organization:
Address:
Address 2:
Address 3:
City:
State:
Zip:
Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

BLM- I am writing to express my concern that the Oil Shale PEIS has not adequatly addressed the connected actions and connected environmental impacts of granting the preferred option. Until the comprehensive impacts of large scale oil shale develpoment are better sutdied and understood, I ask that OPTION A, "No Action" be adopted as the outcome of this PEIS.

52957-001

Response for Document 52957

52957-001: A cumulative effects analysis for amending the RMPs has been presented to the extent possible. However, because of the limited character of the decision to be made on the basis of this PEIS (allocation of lands where applications for leasing can be considered), and because there will be additional environmental analysis prior to leasing, it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. It would also take into consideration any connected actions related to the development of the oil shale or tar sands resources, as appropriate.

Thank you for your comment, paul rowe.

The comment tracking number that has been assigned to your comment is OSTSD52958.

Comment Date: April 17, 2008 00:27:58AM
Oil Shale and Tar Sands
Comment ID: OSTSD52958

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Country: USA
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Attachment:

Comment Submitted:

I am writing to express my concern that the Oil Shale PEIS has not adequatly addressed the connected actions and connected environmental impacts of granting the preferred option. Until the comprehensive impacts of large scale oil shale develpoment are better sutdied and understood, I ask that OPTION A, 'No Action' be adopted as the outcome of this PEIS. | 52958-001

Response for Document 52958

52958-001: A cumulative effects analysis for amending the RMPs has been presented to the extent possible. However, because of the limited character of the decision to be made on the basis of this PEIS (allocation of lands where applications for leasing can be considered), and because there will be additional environmental analysis prior to leasing, it is neither required nor possible to present a cumulative effects analysis showing the impacts of leasing and development. Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. It would also take into consideration any connected actions related to the development of the oil shale or tar sands resources, as appropriate.

Thank you for your comment, Leslie Glustrom.

The comment tracking number that has been assigned to your comment is OSTSD52963.

Comment Date: April 17, 2008 14:57:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD52963

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Comment Submitted:

The oil shale and tar sands will wreak havoc on our environment and their production will be very energetically demanding which means that they will always be marginal from an economic point of view as well as devastatingly destructive from an environmental point of view. These should not be leased.	52963-001

Response for Document 52963

52963-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

Thank you for your comment, Larry Svoboda.

The comment tracking number that has been assigned to your comment is OSTSD52964.

Comment Date: April 17, 2008 15:57:27PM
Oil Shale and Tar Sands
Comment ID: OSTSD52964

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Attachment: Final BLM OilShale DPEIS comment ltr.doc

Comment Submitted:

See our attached comment letter. See Attachment.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Ref: EPR-N

Sherri Thompson
Project Manager
Bureau of Land Management
Colorado State Office
2850 Youngfield Street
Lakewood, CO 80215

Subject: Draft Oil Shale and Tar Sands Resource Management Plan (RMP) Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming:
Draft Programmatic Environmental Impact Statement (draft PEIS) [CEQ# 20070524]

Dear Ms. Thompson:

The U.S. Environmental Protection Agency (EPA) has reviewed the Bureau of Land Management's (BLM) Draft Programmatic Environmental Impact Statement (draft PEIS) for Oil Shale and Tar Sands Resource Management Plan (RMP) Amendments to address the land use allocations for a commercial leasing program. Our review and comments are provided pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(c) and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

The draft PEIS considers alternatives for making BLM-administered lands available for application for future commercial leasing of both oil shale and tar sands resources. The study area for the oil shale resources includes portions of the Green River Formation located in the Piceance, Uinta, Green River, and Washakie Basins. The draft PEIS would amend twelve Resource Management Plans to describe those mineral resource areas where oil shale and tar sands deposits are present, and to designate which portions of those areas are appropriate for application for commercial leasing, exploration, and development. The Preferred Alternative would make approximately 2 million acres of lands containing oil shale resources available for application for commercial leasing and approximately 430,000 acres available for tar sands.

The draft PEIS states that BLM will conduct additional NEPA analyses prior to any leasing of these lands for oil shale or tar sand development. The NEPA analyses conducted prior to leasing will enable BLM to evaluate the potential environmental impacts of a project-specific extraction technology. In addition to the direct project impacts, the subsequent NEPA analyses will also consider cumulative impacts and the indirect environmental impacts from the proposed project, including impacts from new coal-fired or nuclear power plants that may be built to support the additional energy demands of oil shale

52964-001

and tar sands extraction. Given the sensitive resources and the potential for impacts to air quality and water quality, EPA believes that it may be difficult to support a FONSI in the subsequent NEPA analyses.

EPA recognizes the complexity of the proposed land use allocation to support a commercial leasing program for the development of oil shale and tar sand resources. We support an energy policy that assures a long-term, sustainable balance between available energy supplies, energy demand, and protection of ecosystems and human health. 52964-001 (cont.)

EPA has several primary concerns which are summarized in our cover letter: (1) impacts to surface water and groundwater; (2) air quality; (3) depth of the alternatives analysis; and (4) the adequacy of the cumulative impacts analysis. The enclosed "Detailed Comments" provide more discussion of our concerns regarding these and other issues in the draft PEIS.

Surface Water and Groundwater Resources

EPA believes that the Final Programmatic Environmental Impact Statement (final PEIS) should fully consider whether there is sufficient surface water to support industrial development and other reasonably foreseeable projects in the region of influence. We believe the final PEIS should address measures that can prevent the surface water resources in the Upper Colorado River Basin from becoming overextended. Factors that could influence this outcome include additional growth, continued drought, the utilization of existing or pending water rights in the Basin, as well as climate change. 52964-002

EPA also is concerned about the fate and transport of salts, selenium, arsenic, and polynuclear aromatic hydrocarbons in groundwater. There are cases where these contaminants may be converted to more mobile chemical species in the formation when oil shale is recovered. The final PEIS should review and analyze the potential impacts of the various oil shale recovery methods. 52964-003

Air Quality

EPA believes that the oil shale and tar sands development processes may have significant, adverse impacts to air quality, in particular by increasing levels of ozone and nitrogen deposition and by impairing visibility on a regional level. We believe detailed air quality analyses have a place in subsequent NEPA analyses for all national ambient air quality standards (NAAQS), visibility, and air quality-related values (AQRV) in the region. EPA recommends a more thorough analysis of cumulative impacts on air resources in subsequent NEPA documents. This will be critical to protect public health and the large number of Class I areas in proximity to these lands. 52964-004

The Clean Air Act (CAA) requires special protection of air-quality related values in Class I areas, several of which are situated near the proposed oil shale and tar sand resource areas. There are also sensitive Class II areas nearby. Given the need for protecting these ambient air quality areas from deterioration, EPA recommends that these Class I and II areas receive additional consideration in the final PEIS analysis and subsequent NEPA analyses. 52964-005

Alternatives Analysis

The alternatives analysis in the draft PEIS does not include a thorough discussion of why several alternatives were not carried through full analysis. In addition, the draft PEIS does not analyze the no action alternative to the same extent as the action alternatives. To address these issues, EPA recommends that the final PEIS analyze a broader range of alternatives, provide additional justification for the alternatives that were eliminated from detailed analysis, and provide further analysis of the no action alternative. 52964-006

Cumulative Impacts

EPA believes that the final PEIS, and subsequent NEPA analyses for the leasing decisions, should address with greater specificity the cumulative effects on the environment. It is important to examine carefully cumulative impacts before leasing decisions are made, as it may be difficult to determine the cumulative impacts of the individual leases when they are reviewed separately. 52964-007

The draft PEIS should address the cumulative impacts with a greater degree of specificity including an analysis of reasonably foreseeable development scenarios. EPA acknowledges that the ability of BLM to assess the reasonably foreseeable development scenarios is somewhat limited without having specific plans for commercial scale development. However, given that Congressional intent was to establish a commercial leasing program that would result in an oil shale industry capable of significantly reducing dependence on foreign oil imports, a substantial amount of development seems likely and should be discussed in the final PEIS. We suggest the cumulative impact analysis assess a range of reasonably foreseeable development scenarios (e.g., 200,000 barrels produced per day (bpd), 1 million bpd, and 3 million bpd). 52964-008

EPA recommends that the interagency council of cooperating and participating agencies continue to meet to discuss the impacts to surface water resources, and the appropriate depth of EIS analysis and mitigation measures for the subsequent leasing decisions. We believe that the final PEIS can state more clearly that subsequent levels of NEPA analysis are needed to implement the leasing decisions. EPA recommends that the final PEIS specify that this analysis will examine the environmental impacts that have been indicated in the draft PEIS. 52964-009

Consistent with section 309 of the Clean Air Act, it is EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. In accordance with our policies and procedures for reviews under NEPA and Section 309 of the Clean Air Act, EPA is rating this draft PEIS as "Environmental Concerns – Insufficient Information" (EC-2), for reasons given in this letter and the enclosed detailed comments. The "EC" rating is given because our review has identified environmental impacts that should be avoided in order to fully protect the environment. The "2" rating represents that the draft PEIS does not contain sufficient information to fully assess environmental impacts that may be avoided in order to fully protect the environment. This is in accordance with EPA's national rating system, a description of which is enclosed. 52964-010

We appreciate the opportunity to review this draft PEIS and are available to discuss our comments. Please send one hard copy of the final PEIS and one CD ROM copy to this office at the same time it is officially filed with our Washington, D.C. Office. If you have any questions, please contact me at (303) 312-6004 or James Hanley, the lead reviewer for this project, at (303) 312-6725 or at hanley.james@epa.gov.

Sincerely,

Larry Svoboda
Director, NEPA Program

Enclosures: Summary of EPA Rating Definitions
Detailed Comments

cc: Heads of Cooperating Agencies:
Mary Bomar, National Park Service
Robert W. Johnson, U.S. Bureau of Reclamation
H. Dale Hall, U.S. Fish and Wildlife Service
Abigail R. Kimbell, U.S. Forest Service
Harris D. Sherman, Colorado Department of Natural Resources
Garfield County (Colorado)
Mesa County (Colorado)
Rio Blanco County (Colorado)
City of Rifle (Colorado)
Town of Rangeley (Colorado)
Governor Huntsman, State of Utah
Duchesne County (Utah)
Uintah County (Utah)
Governor Freudenthal, State of Wyoming

US EPA DETAILED COMMENTS
OIL SHALE AND TAR SANDS RESOURCE MANAGEMENT PLAN (RMP) AMENDMENTS TO ADDRESS LAND USE ALLOCATIONS IN COLORADO, UTAH, AND WYOMING: DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT (DRAFT PEIS)

Surface and Groundwater Resources

EPA is concerned about the potential adverse impacts to water resources that would result from commercial-scale leasing. The draft PEIS describes uncertainty regarding whether sufficient amounts of surface and groundwater will be available for projects within the region of influence. We believe the final PEIS can clearly address what measures can be taken, and by whom, should the surface water resources in the Upper Colorado River Basin become overextended due to additional growth, continued drought, and the utilization of existing or pending water rights in the Basin. 52964-011

The potential for future climate change to impact the availability of surface water and groundwater is not discussed in the document. EPA recommends that the cumulative impact analysis for surface water and groundwater be amended to include a discussion of the potential effects of future climate change on the proposed commercial leasing and projected subsequent development, including the connected action of water infrastructure development. We recommend this discussion provide a short summary of the climate change studies specific to the project area and the Upper Colorado River Basin[1], including their findings on potential environmental and water supply effects and their recommendations for managing these effects. 52964-012

We recommend that the final PEIS clarify the regulatory structure for protecting groundwater, by describing the role of the Colorado, Utah, and Wyoming State Engineers in protecting beneficial uses, human health, and the environment. This would include, for example, describing the water right permits and whether they include special conditions, discussing measures to mitigate direct, indirect, and cumulative impacts, and establishing provisions for monitoring and adaptive management. 52964-013

EPA also is concerned about the fate and transport in groundwater of salts, selenium, arsenic and polynuclear aromatic hydrocarbons that may be converted to more mobile chemical species in the formation when oil shale is recovered. We believe BLM can address this risk to groundwater quality from any of the potential oil shale recovery methods in the final PEIS and subsequent NEPA analyses. 52964-014

Section 5.5 of the draft PEIS states that no mitigation would be required for groundwater resources, in spite of the draft PEIS' conclusion that groundwater withdrawals could lead to significant cumulative decline in groundwater levels and flows (Section 5.5.1.2; pg. 5-27). EPA recommends that BLM revisit groundwater mitigation in the final PEIS in light of the potentially significant direct and cumulative impacts to groundwater resources. 52964-015

EPA also recommends that BLM clearly describe the groundwater monitoring program in the final PEIS, and define the responsibility for monitoring in the commercial leasing program for oil shale and tar sand leasing. 52964-016

[1] A number of studies specific to the Colorado River Basin indicate the potential for significant environmental impacts as a result of changing temperatures and precipitation (Colorado River Basin Water Management: Evaluating and Adjusting to Hydroclimatic Variability, National Research Council, 2007).

Given the potential for adverse impacts from pumping groundwater, EPA believes it is important that detailed monitoring and mitigation information from the proposed project be provided to the public and decision-makers.

Recommendations:

EPA recommends that:

- the final PEIS address measures to be taken if groundwater resources become overextended; 52964-011 (cont.)
- the cumulative impact analysis for surface water and groundwater evaluate the potential effects of future climate change on the proposed project and water infrastructure development; 52964-012 (cont.)
- the climate change discussion summarize and incorporate findings from the above-mentioned studies;
- the final PEIS describe the role of the Colorado, Utah, and Wyoming State Engineers in protecting groundwater beneficial uses, human health, and the environment; 52964-013 (cont.)
- the final PEIS clarify that subsequent NEPA analyses will address the risks to groundwater quality from any of the potential oil shale recovery methods; 52964-014 (cont.)
- BLM revisit groundwater mitigation; and
- the final PEIS clearly describe a groundwater monitoring program and responsibility for implementing the program. 52964-015 (cont.)

52964-016 (cont.)

Air Quality Impacts

Chapter 6 provides well-written but only cursory information regarding the qualitative magnitude of air quality impacts from site-specific projects during implementation of a commercial leasing program. BLM did not conduct any air dispersion modeling nor was any air impact analysis conducted. The draft PEIS states "It is not possible to predict site-specific air quality impacts until actual oil shale projects are proposed and designed. Once such a proposal is presented, impacts on these resources would be further considered in project-specific NEPA evaluations and through consultations with the BLM prior to actual development." (draft PEIS page 4-46) EPA is concerned that a project-specific analysis approach on actual oil shale projects may not capture the true regional scale cumulative effects. EPA believes that the oil shale and tar sands development resulting from the proposed commercial leasing may have significant air emissions that may negatively impact air quality, especially by increasing levels of ozone and nitrogen deposition and impairing visibility on a regional level. Ozone may be of particular concern because of the potential emissions of volatile organic compounds and nitrogen oxides from these and other sources in the resource area. 52964-017

The CAA requires special protection of air-quality related values in Class I areas, several of which are situated near the proposed oil shale and tar sand resource areas. These areas include Arches National Park, Canyonlands National Park, Black Canyon of the Gunnison National Monument, Flat Tops Wilderness Area, and Mount Zirkel Wilderness Area. There are also sensitive Class II areas nearby, including Colorado National Monument and Dinosaur National Monument. EPA recommends that these Class I and II areas receive additional consideration in the final PEIS analysis and subsequent NEPA analyses. 52964-018

BLM has initiated an oil shale research, development, and demonstration (RD&D) program on six small tracts to demonstrate the technical and economic feasibility of oil shale extractive technologies. Air pollution emission estimates were not provided for some of these pilot sites. EPA recommends that the final PEIS include a comparative table of air monitoring data from the existing six RD&D leases including emissions values for lead, mercury, and carbon dioxide, as the information becomes available. For subsequent NEPA analyses, EPA recommends that BLM complete a cumulative impact analysis with an emphasis on ozone, visibility, and nitrogen deposition. 52964-019 52964-020

EPA recommends that the final PEIS address the range of emission control technologies for use at oil shale production and upgrading facilities to obtain a level of pollutant emission control sufficient to protect air quality standards and levels of concerns, and discuss the factors and processes that were used to select the appropriate technology. 52964-021

Table 3.5.3-2, Background Concentration Levels Representative of the Study Area, presents ambient monitoring data for the region surrounding the proposed project. Much of the data presented was measured prior to 2005. We suggest that you update Table 3.5.3-2 to include data measured during 2006-2007. Data from Canyonlands National Park Ozone monitoring station and the Garfield, Colorado PM10 monitoring study should also be included. We believe BLM could summarize Visibility data measured at the Arches and Storm Peak IMPROVE sites in the final PEIS. 52964-022

The draft PEIS does not contain an existing source emission inventory for the planning areas. EPA suggests that each Resource Management Plan (RMP) amendment include an estimate of these air emission sources in relation to the proposed commercial leasing and projected subsequent development. The pollutant estimate should include criteria pollutants, VOC and aldehyde emissions. 52964-023

Recommendations:

EPA recommends that:

- the final PEIS clarify that subsequent NEPA analyses give additional consideration to Class I areas when proposed project specific evaluations are conducted; 52964-018 (cont.)
- the final PEIS include a comparative table of emissions values for the existing six RD&D leases, as the information becomes available; 52964-019 (cont.)
- the final PEIS clarify that for subsequent NEPA analyses, a cumulative analysis for the leasing area be completed with an emphasis on ozone, visibility and nitrogen deposition; 52964-020 (cont.)
- the final PEIS address the range of emission control technologies that would be evaluated to obtain a level of pollutant emission control sufficient to protect air quality standards and levels of concerns; 52964-021 (cont.)
- Table 3.5.3-2 be updated to include additional information outlined above; and 52964-022 (cont.)
- each RMP amendment includes an estimate of these air emission sources in relation to the proposed commercial leasing and projected subsequent development. The pollutant estimate should include criteria pollutants, VOC and aldehyde emissions. 52964-023 (cont.)

Alternatives Analysis

The draft PEIS examines in detail only a limited range of alternatives. The draft PEIS does not include a thorough discussion as to why alternatives were eliminated from detailed consideration. Based on our review of the draft PEIS, we believe that there are other alternatives, including alternatives not within the jurisdiction of the lead agency, that may indeed be reasonable and practicable alternatives and that merit a full exploration and evaluation in the final PEIS. Such alternatives include some of those that BLM initially considered after scoping but eliminated from serious analysis. EPA recommends that BLM explore oil shale and tar sands extraction and upgrading technology that incorporates carbon capture and sequestration, as well as impact assessment methodologies that establish carrying-capacity thresholds for the resource management plans affected by this draft PEIS . 52964-024

Although the Alternatives Analysis includes a No Action Alternative, the draft PEIS did not evaluate the No Action Alternative to the same degree and depth of analysis as the other alternatives. EPA believes that this alternative serves as a benchmark that enables decision makers to compare the magnitude of environmental effects of the action alternatives. We believe the No Action Alternative can also be analyzed in depth as it is possible that BLM could select it as the preferred alterative in some situations. 52964-025

EPA also recommends that for subsequent NEPA analyses, the screening process for determining which alternatives merit detailed consideration should include something similar to the approach used in Canada to report on the current environmental impacts from the oil sands industry there. We suggest that BLM establish technology-screening criteria that utilize an environmental value-weighted evaluation of technologies that demonstrate achievement of environmental protection objectives or mitigation of unavoidable impacts. These criteria would include: 1) demonstration of an independently-accredited environmental management system such as ISO 14001; (2) setting of voluntary targets to limit absolute greenhouse gas emissions; (3) support for water intensity reduction targets; and (4) the ability to meet minimum land reclamation thresholds before additional disturbance occurs. 52964-026

Recommendations:

- EPA recommends that the Alternatives Analysis be broadened in the final PEIS; 52964-024 (cont.)
- EPA recommends strengthening the analysis of the No Action Alternative in the final PEIS; and 52964-025 (cont.)
- the final PEIS clarify that subsequent NEPA analyses consider screening criteria similar to those cited above from the oil sands industry in Canada. 52964-026 (cont.)

Cumulative Impacts

EPA believes that the final PEIS, and subsequent NEPA analyses for the leasing decisions, should address with greater specificity the cumulative effects on the environment. It is important to examine carefully cumulative impacts before leasing decisions are made as it is difficult to determine the cumulative impacts of the individual leases when reviewed separately. 52964-027

The draft PEIS should address the cumulative impacts with a greater degree of specificity 52964-028

including an analysis of reasonably foreseeable development scenarios. EPA acknowledges that the ability of BLM to assess the reasonably foreseeable development scenarios is somewhat limited without having specific plans for commercial scale development. However, given that Congressional intent was to establish a commercial leasing program that would result in an oil shale industry capable of significantly reducing dependence on foreign oil imports, a substantial amount of development seems likely and should be discussed in the PEIS. We suggest that BLM prepare a few reasonably foreseeable development scenarios to take into account a potentially significant industry that within the next two decades could produce substantial amounts of oil. Specifically, we suggest that the cumulative impact analysis in the final PEIS assess a range of reasonably foreseeable development scenarios (e.g., 200,000 barrels production per day (bpd), 1 million bpd, and 3 million bpd). 52964-028 (cont.)

Recommendations:

- EPA recommends that the final PEIS, and subsequent NEPA analyses for the leasing decisions, address with greater specificity the cumulative effects on the environment; and 52964-027 (cont.)
- EPA recommends that the final PEIS assess a range of reasonably foreseeable development scenarios for production. 52964-028 (cont.)

Waters of the U.S./Wetlands

The draft PEIS does not address important statutory requirements and executive orders that relate to water resources.

Clean Water Act Section 404

The draft PEIS does not provide sufficient information on the possible discharge of dredged or fill materials into waters of the United States because of this development and the resulting permitting requirements. The Clean Water Act (CWA) prohibits discharges of dredged or fill material into waters of the United States except when authorized by a CWA Section 404 permit. 33 U.S.C. § 1311, 1344. The United States Army Corps of Engineers (Corps) is generally responsible for implementing the CWA Section 404 permitting program. In implementing CWA Section 404, the Corps issues a determination of whether waters in the project area are waters of the United States and thereby subject to the CWA. Specific oil shale projects may be subject to CWA Section 404 and may be required to obtain a CWA Section 404 permit. 52964-029

Recommendation:

- EPA recommends that the final PEIS explicitly state that any discharges of dredged or fill materials associated with individual leases may require a CWA 404 permit, which would include an additional full alternatives and impacts analysis; and
- EPA also recommends that the final PEIS contain information identifying the types of dredge and fill activities that will be associated with commercial-scale leasing, e.g., road crossings, transmission lines, pipelines and their potential impacts to waters of the U.S. 52964-030

Executive Order 11990 – Protection of Wetlands

EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. The Wetlands Protection Executive Order 11990 (EO 11990) directs federal agencies in certain circumstances to provide leadership and take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands. Executive Order 11990 is not limited to wetlands regulated under the Clean Water Act. EPA believes the final PEIS could discuss how EO 11990 applies to the proposed commercial-scale leasing and how BLM will address this EO. 52964-031

Energy Generation Requirements

The draft PEIS estimates that 2400 MW of additional energy capacity would be required for oil shale development in the region. This large increase in power demand may require significant new electrical generation and transmission facilities to be constructed. Coal-fired power plants may supply a large portion of this electrical energy. The draft PEIS contains a summary analysis of some of the potential impacts from that development, but missing from that analysis are the impacts of mercury emissions from coal-fired electric generation. EPA recommends that the final PEIS include a more in-depth discussion of the oil shale industry's reliance on new fossil-fuel electricity generation and potential impacts from the new energy requirements, particularly mercury emissions and impacts. In addition, we recommend the final PEIS describe more fully how additional emission controls could reduce the various phases of mercury emissions. 52964-032

Greenhouse Gas Emissions

EPA believes that BLM should expand the discussion of greenhouse gases and climate change sections in the final PEIS. Although there are currently no EPA regulatory standards directly limiting greenhouse gas emissions, there is enough information developed by the IPCC to inform a more detailed quantitative estimate of the GHG generated by known oil shale and tar sands extraction technologies .[2]

Section 3.5.1.2, *Global Climate Change,* presents a brief discussion on the potential climate change impacts associated with the potential future commercial development of the oil shale and tar sand resources. This section, however, only includes limited information on the potential impact on greenhouse gas emissions and does not address the carbon dioxide emissions associated with each alternative. EPA recommends that BLM expand its discussion of potential impacts on greenhouse gas emissions and include an assessment of the greenhouse gas emissions associated with each alternative. 52964-033

[2] Since the issuance of the April 2, 2007 Supreme Court opinion in Massachusetts, et al. v. EPA, 127 S.Ct. 1438 (2007), EPA has been developing a response to the remand as well as evaluating the broader ramifications of the decision throughout the Clean Air Act (CAA). On March 27, 2008, the Administrator announced that he has directed his staff to draft an Advanced Notice of Proposed Rulemaking (ANPR) to discuss and solicit public input on the specific effects of climate change and the interrelated issues raised by the possible regulation of greenhouse gas emissions under the CAA. Thus, this comment letter does not reflect, and should not be construed as reflecting, the type of judgment that might form the basis for a positive or negative finding under any provision of the CAA.

Although the draft PEIS includes a brief discussion on *Air Quality Cumulative Impacts* in Section 6.1.5.3.5, the cumulative impacts analysis does not evaluate greenhouse gas emissions, nor does the cumulative impact analysis address the impact that greenhouse gas emissions may have on climate change[3]. EPA recommends that the cumulative impacts analysis include discussion of potential oil shale tar sands development's level of contribution to greenhouse gases on a regional, national, and global scale. 52964-034

Comparing the magnitude of annual emissions from projected oil shale development to annual emissions from other sources in the area will enable the decision-makers to better understand the extent to which their decisions on the proposed resource allocation may affect regional greenhouse gas emissions. In February 2007, New Mexico and Arizona joined with California, Oregon, and Washington to create the Western Regional Climate Action Initiative, a joint strategy to fight global warming. This initiative includes development of a design for a regional market-based multi-sector mechanism, such as a load-based cap and trade program, to achieve regional greenhouse gas reduction goals. Colorado, Utah, and Wyoming are official observers to this Western Regional Climate Action Initiative. Therefore, EPA believes that it would be useful for decision-makers in Colorado, Utah, and Wyoming if the final PEIS addresses the greenhouse gas contribution of the proposed commercial leasing and projected subsequent development within the context of other contributors at the state and regional level. 52964-035

In addition to providing regional context, we recommend that the final PEIS compare the annual greenhouse gas emissions from the proposed oil shale industry to estimated annual greenhouse gas emissions from all sources combined at a national and global scale. The U.S. Department of Energy has quantified emissions of greenhouse gases in the United States[4] and EPA[5] has released similar data in a 2007 report. The Carbon Dioxide Information Analysis Center (CDIAC) has assimilated additional information on carbon emissions from the burning of fossil fuel and other sources at a regional, national, and global scale[6].

The draft PEIS also does not fully address opportunities to mitigate or reduce greenhouse gas emissions. There are a number of voluntary measures available to reduce and offset greenhouse gas emissions and EPA recommends that the final PEIS address them. These include improving plant efficiency, carbon capture and sequestration, and the purchase of offsets. 52964-036

Recommendations:

EPA recommends that:

- the final PEIS quantify and disclose the amount of carbon dioxide emissions associated with all 52964-037

[3] We note here the recent decision of the United States Court of Appeals for the Ninth Circuit, *Center for Biological Diversity v. National Highway Traffic Safety Administration*, No. 06-71891 (9th Cir. November 15, 2007).

[4] For example, see the *Emissions of Greenhouse Gases in the United States 2006*, DOE/EIA-0573(2006), November 2007, available at: ftp://ftp.eia.doe.gov/pub/oiaf/1605/cdrom/pdf/ggrpt/057306.pdf.

[5] For example, see the *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990 – 2005*, April 17, 2007, available at: http://www.epa.gov/climatechange/emissions/downloads06/07CR.pdf.

[6] The CDIAC is the primary climate change data and information analysis center of the U.S. Department of Energy. Information can be found at http://cdiac.ornl.gov/ndps/ndp030.html.

alternatives to the extent possible. 52964-037 (cont.)

- the final PEIS evaluate the emissions performance level for all alternatives, in terms of pounds of carbon dioxide per barrel of shale oil-equivalent. 52964-038
- the final PEIS consider utilizing a greenhouse gas equivalencies calculator[7] to translate greenhouse gas emissions into terms that are easier to contemplate (For example, EPA estimates annual emissions from the required coal-fired generation capacity would be 7.08 million tons of carbon dioxide, which is equivalent to 1,390,000 passenger cars driven for one year.); 52964-039
- the final PEIS discuss: 1) carbon capture and sequestration and other voluntary means of capture and storage of carbon dioxide; 2) the costs associated with implementing these measures; 3) design modifications necessary to allow physical space for future carbon dioxide capture; and 4) the feasibility of implementing these measures; and shale oil upgrading efficiency to reduce carbon dioxide emissions, as well as what opportunities may exist to purchase carbon dioxide offsets 52964-036 (cont.)
- the final PEIS present a general, qualitative discussion of the anticipated effects of climate change, including potential effects at a regional scale;
- the final PEIS compare anticipated annual greenhouse gas emissions from the proposed commercial leasing and projected subsequent development to annual emissions from other existing and reasonably foreseeable future projects, including the other greenhouse gas emitting projects in the States of Colorado, Utah, and Wyoming; 52964-035 (cont.)
- the final PEIS compare anticipated annual greenhouse gas emissions from the proposed commercial leasing and projected subsequent development to annual emissions from all sources combined at a national and global scale using data collected by the U.S. Department of Energy and EPA; and 52964-034 (cont.)
- the final PEIS identify the EPA voluntary greenhouse gas reduction programs that would apply (e.g., a shale oil upgrade facility might consider EPA's Gas STAR program, http://www.epa.gov/gasstar/index.htm). 52964-040

Construction Emissions Mitigation

The draft PEIS does not contain information regarding opportunities to reduce air emissions associated with construction. EPA recommends an evaluation of the following measures to reduce construction emissions of criteria air pollutants and hazardous air pollutants (air toxics). EPA recommends that the final PEIS include a *Construction Emissions Mitigation Plan* to reduce construction emissions and commit to the use of these measures during construction, as appropriate.

Recommendations: 52964-041

EPA recommends that the Construction Emissions Mitigation Plan:

- reduce emissions of diesel particulate matter (DPM) and other air pollutants by using particle traps and other technological or operational methods. (Control technologies such as traps control approximately 80 percent of DPM. Specialized catalytic converters (oxidation catalysts) control

[7] For example, see the U.S. Climate Technology Corporation Gateway website, which is sponsored by the EPA and the U.S. Agency for International Development. See http://www.usctcgateway.gov/tool/.

approximately 20 percent of DPM, 40 percent of carbon monoxide emissions, and 50 percent of hydrocarbon emissions.);
- ensure that diesel-powered construction equipment is properly tuned and maintained, and shut off when not in direct use;
- prohibit engine tampering to increase horsepower;
- locate diesel engines, motors, and equipment as far as possible from residential areas and sensitive receptors (schools, daycare centers, and hospitals);
- require low sulfur diesel fuel (<15 parts per million), if available;
- reduce construction-related trips of workers and equipment, including trucks;
- lease or buy newer, cleaner equipment (1996 or newer model), using a minimum of 75 percent of the equipment's total horsepower;
- use engine types such as electric, liquefied gas, hydrogen fuel cells, and/or alternative diesel formulations; and
- ensure that BLM works with the local air pollution control district(s) to implement the strongest mitigation for reducing construction emissions.

52964-041 (cont.)

Hazardous Materials Impacts

Coal Combustion Products (CCPs)

As oil shale development will likely require additional electricity generation from coal-fired plants, EPA recommends that the final PEIS address coal combustion products (CCPs), the byproducts generated from burning coal in coal-fired power plants. These byproducts include fly ash, bottom ash, boiler slag, and flue gas desulfurization (FGD) gypsum. EPA promotes the beneficial reuse of CCPs through its Coal Combustion Products Partnership (C2P2), a voluntary program to reuse CCPs in commercial applications to divert waste and save natural resources. Additional information about C2P2 can be found at http://www.epa.gov/epaoswer/osw/conserve/c2p2/index.htm. CCP reuse can mitigate potential negative effects of placing CCPs in landfills and/or mines, while simultaneously resulting in economic benefits. EPA encourages participation in C2P2 program. For more information on CCP reuse and partnership opportunities, please contact Kendra Morrison (303-312-6145) in the EPA Region 8 Solid and Hazardous Waste Program.

52964-042

Subsequent NEPA Analyses Recommendations

As BLM may be unable to address all the potential impacts at this stage before more specific information about leasing decisions is known, EPA recommends that the final PEIS establish a framework to analyze these impacts in subsequent NEPA analyses. To recap, we have made several recommendations above that are specifically related to subsequent NEPA analyses, including that:

- groundwater quality impacts from any of the potential oil shale recovery methods should be presented in subsequent EIS analyses;
- BLM should adopt technology-screening criteria for the screening process for determining which alternatives merit additional consideration in subsequent NEPA analyses;
- BLM should address cumulative impacts on air, groundwater, surface water and other media with

greater specificity. The cumulative analysis for air quality should emphasize ozone, visibility and nitrogen deposition, and Class I areas should be given additional consideration when proposed project specific evaluations are conducted;

- the subsequent NEPA analyses should carefully evaluate the indirect environmental impacts from the proposed project, including impacts from the development of coal-fired or nuclear power plants that may be built to support the additional energy demands of oil shale and tar sands extraction; 52964-043
- detailed air quality analyses should be presented in subsequent NEPA analyses for all national ambient air quality standards (NAAQS), visibility, and air quality-related values (AQRV) in the region;
- subsequent NEPA analyses for the individual leases should address plans to reduce construction emissions.

Responses for Document 52964

52964-001: It is unclear how EPA has come to the conclusion that a FONSI would be the outcome of any future NEPA analysis. The BLM is committed to preparing the appropriate level of analysis prior to the issuance of any lease or approval of any plan of development. Any agency considering a major federal action must determine the significance of the environmental effects and look at alternative means to achieve the purpose and need of that action. It is premature, at this time, to determine the type of documentation required and the outcome of such analysis without the benefit of the scope and nature of the proposed action. It is foreseeable that NEPA analyses for permit issuance or approval of plans of development would find significant environmental impacts notwithstanding mitigation measures.

Note also that it is premature to assume that the only possible alternatives for electrical energy supply would be coal-fired or nuclear power plants.

52964-002: Thank you for your comment. The specific amount of water needed for oil shale development depends on many factors, including scale of development, technologies used in the development, and the locations and hydrologic conditions of project sites. That is the reason the PEIS describes a range of estimates of water needs for oil shale and/or tar sands development.

Long-term hydrologic data, state water plans, and historical water consumption data are used in the PEIS to evaluate regional water availability in the oil shale basins. Therefore, the water availability results represent long-term average conditions. For projected water uses, results from state water plans were used. The state plans have taken regional population growth into consideration. As stated in the PEIS (Section 4.3.1), whether enough water is available for development depends on the results of intensive negotiations between various parties, including water right owners, state and federal agencies, and municipal water providers as well as the developers. The source of water needed for any oil shale and/or tar sands development projects would be specified in the project-specific NEPA documents and not in this PEIS.

The BLM recognizes that regional population growth, prolonged drought, climate change, and pending water rights issues are uncertainties. These are issues that would be revisited in subsequent project-specific NEPA documents with updated information.

52964-003: The potential impacts from the leaching of chemicals from various oil shale technologies are discussed in Section 4.5, specifically in Section 4.5.1.3. The degree of impact to water resources would be a technology-specific and site-specific issue. Findings gleaned from the RD&D sites or other research will provide valuable current information on expected contaminants and their

concentrations, and these data would aid in decision making for any future leases, which would require their own individual NEPA analyses.

52964-004: The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. In addition, potential cumulative impacts were addressed in Sections 6.1.5 and 6.2.5 of the Draft PEIS. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1). If a decision is ultimately made to make oil shale and/or tar sands available for future leasing, additional, site-specific NEPA analyses will include detailed potential air quality and climate impact analyses (including the direct, indirect, and cumulative effects of the proposed action) before issuing leases and approving plans of development. The EPA will have an opportunity to participate in such analyses.

52964-005: NEPA analysis at the leasing and plan of development stages will consider impacts to Class I and Class II areas as required by the applicable regulations. The BLM looks forward to the EPA's participation as a cooperating agency.

52964-006: The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, on the basis of the nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b). While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies and as mandated by Congress in the Energy Policy Act of 2005, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was an essential part of the process.

The No Action Alternative, in this case, is "no change" from the current management direction or level of management intensity. A complete analysis of "no action" is contained in the 12 land use plans.

A discussion of the alternatives, including those considered but not analyzed in detail, is presented in Chapter 2 of the PEIS. The BLM believes the discussion of the alternatives considered but dismissed adequately conveys the rationale why the alternatives not considered would neither meet the requirements of the Energy Policy Act of 2005 nor address the purpose and need identified in Section 1.1 of the PEIS.

The alternatives focus on amending land use plans to identify public lands that would or would not be available for application for the potential leasing of oil shale or tar sands in the future. The PEIS does not include a particular level of development or production.

To facilitate the comparison of the alternatives, the BLM consolidated information regarding the No Action Alternative and provided additional analysis comparable to that presented for Alternatives B and C. The analysis of the impacts of the No Action Alternative and the comparison of the alternatives in Section 6.1 also has been revised.

52964-007: A cumulative analysis for the PEIS is presented to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Wyoming, Utah, or Colorado. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on all resources, including air, water, wildlife, electrical generation capacity, and the local communities, when considered with other reasonably foreseeable actions.

The scope and the nature of the proposed action will drive the type of analysis the BLM will perform. In general, the scope would be dependent upon the number of applications received and the type and size of operations proposed by the applicants. This could result in a statewide, regional, basinwide, or site-specific impact analysis. Again, the appropriate level of cumulative analysis, as required by NEPA, will be performed.

52964-008: Because there is presently no technology proven to be commercially viable, and thus we do not know which geographic areas or what economic conditions would be required, our cooperating agencies convinced us that there are no supportable assumptions on which to base any reasonably foreseeable development scenario. The range of production scenarios suggested in the comment would be appropriate for a mature industry such as oil and gas, but cannot lead to any useful analysis in the present experimental state of the oil shale and tar sands industries.

52964-009: The introductory paragraphs of Sections 2.3.3 and 2.4.3, which contain the descriptions of the action alternatives for both oil shale and tar sands development, state in part "…under both alternatives, additional NEPA analyses would be conducted prior to the issuance of commercial leases. In addition, site-specific NEPA analyses would be conducted during evaluation and approval of plans of development during the project development phase."

Pursuant to NEPA and to its own planning regulations, the BLM will initiate scoping and offer cooperating agency opportunities when any future commercial

leasing or development proposal is being considered. The BLM would participate in the interagency council that EPA proposes to convene.

52964-010: EPA's rating of the PEIS is noted.

52964-011: It would be more appropriate to address potential overextended uses of water resources if oil shale and/or tar sands are proposed to be developed. Measures such as surface water and groundwater monitoring near project sites are likely to be implemented. These measures would be considered during future project-specific NEPA analyses.

Please see also response to Comment 52964-002.

52964-012: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Regarding climate change, different models use different assumptions and algorithms, and it is difficult to justify that one model result is better than another. Because of that, we choose to use long-term hydrologic data (from 1906 to 1986) of the Colorado River to evaluate long term average water supply of the River (see Section 3.4.1) that may fit the landscape of potential long-term development of oil shale and/or tar sands in the region. Meanwhile, we recognize prolonged drought in the region could reduce water supply (see Section 3.4.1).

Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

Potential cumulative impacts are addressed in Sections 6.1.5 and 6.2.5 of the PEIS.

52964-013: Because the regulatory agencies of the various states differ in terms of structure and responsibilities, and because these factors may change over time, the PEIS does not detail the specific roles of the agencies. This PEIS has clearly informed the reader that state agencies applying state law, not the BLM, govern private groundwater uses and protection. Site-specific NEPA analysis of any proposed projects would include descriptions of the state-specific agencies involved in decisions regarding water or other resources.

52964-014: Text has been added to the end of the mitigation discussion in Sections 4.5.3 and 5.5.3 in response to the comment.

52964-015: Section 5.5 of the Draft PEIS does list potential groundwater mitigation measures that would be expected to reduce impacts.

52964-016: A groundwater monitoring program for a development would be a site-specific issue based on project-specific NEPA analysis. As discussed on pages 4-1 and 5-1 of the Draft PEIS, the PEIS provides examples of mitigation measures that the BLM may consider adopting, if site-specific analysis warrants. The measures are not proposed as a final or a comprehensive list of required stipulations or management prescriptions.

52964-017: See response to Comment 52964-012 regarding the proposal and scope of the PEIS.

Section 6.1.1.5 of the Draft PEIS described the potential air quality impacts under Alternative A (No Action) as it pertains to the existing RD&D oil shale projects (as reviewed by EPA Region 8). In addition, potential cumulative impacts were addressed in Sections 6.1.5 and 6.2.5 of the Draft PEIS. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1). If a

decision is ultimately made to make oil shale and/or tar sands available for future leasing, additional, site-specific NEPA analyses will include detailed potential air quality and climate impact analyses (including the direct, indirect, and cumulative effects of the proposed action) before issuing leases and approving plans of development. EPA will have an opportunity to participate in such analyses.

52964-018: See responses to Comments 52964-005 and 52964-017.

Table 3.5.3-3 in Section 3.5.3 of the Draft PEIS lists the Prevention of Significant Deterioration (PSD) Class I areas, describes the significance for their designation, and identifies the four Class I areas closest to the oil shale and tar sands resources. The Draft PEIS also indicates that most of the study area is designated PSD Class II, which would allow for moderate emission growth. A map of all mandatory federal PSD Class I areas is available online at: http://www.nature.nps.gov/air/Maps/images/ClassIAreas.jpg

52964-019: See response to Comment 52964-017.

Potential air quality impacts were adequately analyzed under NEPA documents previously prepared for the oil shale RD&D projects. The BLM will not conduct or authorize activities that would not comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, or implementation plans. However, speculation regarding where and how potential development might occur is beyond the scope of this programmatic analysis.

No monitoring data from the existing RD&D leases is available; at this writing there are no operations occurring at any of the RD&D lease sites. If a decision is ultimately made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts would be appropriately evaluated in site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development. EPA will have an opportunity to participate in such analyses.

52964-020: See responses to Comments 52964-017, 52964-018, and 52964-019.

52964-021: See response to Comment 52964-017.

52964-022: Table 3.5.3-2 in Section 3.5.3 provides a detailed list of representative criteria air pollutant concentrations. See also response to Comment 52964-017.

52964-023: Table 3.5.2-1 in Section 3.5.3 provides a detailed list of several air pollutant emission levels by county. See also response to Comment 52964-017.

52964-024: While there are many possible alternatives or actions, the BLM, in consultation with 14 cooperating agencies, used the scoping process to determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives

identified by the public. It was determined that the three alternatives provided a reasonable range because the allocation decisions, as being proposed in the PEIS, had a very narrow and limited scope to allow certain lands to be considered for future leasing. This approach is in full compliance with NEPA since the purpose and need of the PEIS serves as the basis to determine the reasonable range of alternatives in a NEPA document. A broad statement of need may necessitate a wider range of alternatives, while a more limited and narrow scope would have a limited number of alternatives. The consideration of an alternative that includes extraction and upgrading technology that incorporates carbon capture and sequestration as well as impact assessment methodologies that establish carrying-capacity thresholds for the resource management plans requires a level of specificity on the nature of the technologies to be used. Consideration of this type of alternative would be more appropriate when specific technologies are identified by companies to produce the shale oil and the consequences of that technology are known.

52964-025: The No Action Alternative, in this case, is the "no change" from the current management direction or level of management intensity. The No Action Alternative does not amend any of the 12 land use plans and consequently does not alter any management decision contained in the Record of Decision of those plans. The management prescriptions and associated impacts with maintaining the current management direction are discussed in detail in each Field Office's land use plan.

52964-026: The BLM appreciates the suggestion regarding utilizing screening criteria and will consider utilizing that approach should commercial lease applications be accepted.

52964-027: The PEIS cumulative impacts analysis was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). A more specific cumulative analysis would be more appropriate prior to a leasing or development decision if and when specific technical and environmental information becomes available.

52964-028: See response to Comment 52964-008.

52964-029: The PEIS is a programmatic-level document that analyzes land use allocation decisions. No dredging or filling operations would be decided based on the analyses conducted for the PEIS. The BLM is not currently committing to development in this PEIS. If dredging or filling operations in streams are proposed for future projects, the operations would be evaluated in separate site-specific NEPA documents. All lessees will be responsible for obtaining and operating in compliance with all applicable permits, including any permits required under Section 404 of the Clean Water Act.

52964-030: The PEIS is a programmatic-level document, analyzing allocation decisions. Information identifying the types of dredge and fill activities that will be associated with commercial-scale leasing is outside the scope of this document. This type of information may be more appropriate at a subsequent, more specific level of NEPA analysis.

52964-031: Text has been added to Sections 4.8.1.2 and 5.8.1.2 to indicate that E.O. 11990 requires all federal agencies to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands. It is expected that the BLM will address the requirements of this E.O. during the review and NEPA evaluation of oil shale and tar sands development projects prior to leasing, to ensure the adequate protection of all wetlands, including those not under Clean Water Act jurisdiction.

52964-032: Data on electrical generation requirements are given for informational purposes. They are necessarily crude estimates based on technologies that have not yet been proven to be commercially viable. Coal is one possible fuel for new electrical generation; others include natural gas, nuclear, and renewable sources of energy. Mercury emissions depend upon the impurities within the coal, which are variable depending on the source of the coal. Furthermore, new electrical generating facilities, including coal-fired power plants, would need to operate in compliance with Clear Air Act permits, which should be adequate to minimize emissions of mercury.

Furthermore, new electrical generating facilities, including coal-fired power plants, would need to operate in compliance with Clean Air Act permits, which minimize emissions of mercury. Speculation about the mercury emission control technologies that would be available for any new coal-fired power plant (which would be subject to individual state regulatory authority, with EPA oversight) would not be useful, particularly at this land-use planning stage.

The potential emissions of any air pollutant (including mercury) would not result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

See also responses to Comments 52964-012 and 52964-017.

52964-033: See responses to Comments 52964-004, 52964-017, and 52964-032.

Also, we agree that the NEPA analysis for leasing should include within its scope a discussion and/or analysis of the impacts from foreseeable transportation requirements, as well as any energy infrastructure or refining projects that might be associated with commercial development of these resources. Transportation issues are discussed within the Socioeconomic sections throughout the PEIS. The PEIS also includes a discussion of the possibility of land disturbance and other impacts from planned power lines, both those required for oil shale/tar sands

facilities and those planned for other purposes, in the cumulative impacts analysis. (For example, the transmission and pipeline rights-of-way are included in the total acreage estimate of 14,000 acres for an oil shale facility [Table 6.1.5-9 of the PEIS], and the potential impacts from other energy corridors are also acknowledged in Section 6.1.5.3.1.) At this time, however, it would be an inappropriate exercise in speculation to attempt to present an analysis of impacts from power generation for oil shale/tar sands development, because the amount of power required would vary with the technology to be implemented, and also because the source of the power and therefore the impacts are unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. Refinery requirements are also highly speculative at this time; however, the PEIS does include a preliminary assessment of these requirements, concluding that, even if significant oil shale/tar sands development occurs over the next 20 years, new national refining facilities are unlikely to be needed, although expansion of existing refineries would likely occur (see Sections 4.1.7 and 5.1.6).

For similar reasons, it is neither required nor possible in this PEIS to present an analysis of cumulative effects showing the impacts of leasing and development of these resources across the entire landscape of Colorado, Utah, and Wyoming. First, the decisions to be made on the basis of this PEIS are limited in character, consisting only of allocation of lands where applications to lease can be considered. Second, the locations, scope, and scale of future oil shale and tar sands development are highly speculative, and, third, there will be additional NEPA analyses prior to leasing. These points have been clarified in the introduction to the cumulative impacts sections (Sections 6.1.5 and 6.2.5). The BLM is committed to implementing its multiple use mandate in FLPMA, in accordance with its planning and other regulations, and notes that authorized uses include commercial development of oil shale and tar sands resources.

The NEPA analyses at the leasing and development stages will consider effects from Reasonably Foreseeable Future Actions (RFFAs) (40 CFR 1508.7). If the proposed action would impact a particular resource that one or more RFFAs would also impact, the impacts of those RFFAs would be included in the cumulative effects analysis for the proposed action. At the leasing or development stage, the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects. For example, the geographic extent of a cumulative effects analysis for leasing or for a proposed development project will reflect not only the geographical limits of the proposed lease/projects but also the geographical limits of the resource being affected (e.g., elk winter range).

52964-034: See response to Comment 52964-012.

52964-035: See responses to Comments 52964-012, 52964-017, and 52964-033.

52964-036: The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. In addition, potential cumulative impacts were addressed in Sections 6.1.5 and 6.2.5 of the Draft PEIS. An additional discussion of the cumulative effects analysis has been added to Chapter 1 (Section 1.2.1). If a decision is ultimately made to make oil shale and/or tar sands available for future leasing, additional, site-specific NEPA analyses will include detailed potential air quality and climate impact analyses (including the direct, indirect, and cumulative effects of the proposed action) before issuing leases and approving plans of development. Where appropriate, this may include a discussion of potential climate change-related pollutant emissions (including carbon dioxide) and control technologies. The EPA will have an opportunity to participate in such analyses.

See also response to Comment 52964-017.

52964-037: See response to Comment 52964-036.

52964-038: The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants.

Environmental and economic climate change impacts from commodity consumption are not effects of the planning decisions and thus are not required to be analyzed under NEPA. They are not direct effects, as defined by the Council on Environmental Quality, because they do not occur at the same time and place as the action. Nor are they indirect effects, because the plan actions and the resulting production would not be a proximate cause of the emissions or other factors resulting from consumption. And, because the impacts of consumption are not direct or indirect effects of the proposed action, a cumulative impact analysis would not reveal an incremental effect attributable to the proposed plan decisions.

There is no reliable methodology to assess the relationship between the plan decisions and the ultimate consumption of the resources produced as a result of the plan decisions. An attempt to analyze the impacts of climate change-related air pollutant emissions and other climate change factors from the ultimate consumption of the resources produced from the planning area would be a highly speculative exercise unnecessary for the land management decisions for which the BLM is responsible. The BLM does not dictate the destination of the resource produced from federal lands. The effects from consumption are not only speculative, but beyond the scope of agency authority or control. Therefore, the PEIS does not analyze or address the consumption of resources produced as a result of planning decisions.

See also the response to Comment 52964-017.

52964-039: The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. If a decision is ultimately made to make oil shale and/or tar sands available for future leasing, additional, site-specific NEPA analyses will include detailed potential air quality and climate impact analyses (including the direct, indirect, and cumulative effects of the proposed action) before issuing leases and approving plans of development (subject to individual state regulatory authority, with EPA oversight). Where appropriate, this may include a discussion of potential climate change-related pollutant emissions (including carbon dioxide) and control technologies. At that time, the BLM will evaluate and utilize the appropriate scientific and technical information available, and the EPA will have an opportunity to participate in such analyses, including providing expertise in communicating effectively with the public.

See also the response to Comment 52964-017.

52964-040: See response to Comment 52964-039. The EPA will also have an opportunity to participate in the Gas STAR program.

52964-041: The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. If a decision is ultimately made to make oil shale and/or tar sands available for future leasing, additional, site-specific NEPA analyses will include detailed potential air quality and climate impact analyses (including the direct, indirect, and cumulative effects of the proposed action) before issuing leases and approving plans of development (subject to individual state regulatory authority, with EPA oversight). Where appropriate, this may include a discussion of potential mitigation measures. The EPA will have an opportunity to participate in such analyses.

Speculation regarding potential air quality impacts due to construction activities is premature at this stage of the process.

52964-042: The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. If a decision is ultimately made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts would be appropriately evaluated in site-specific NEPA analyses (including potential coal combustion product (CCP) emissions) before issuing leases and approving plans of development. The EPA will have an opportunity to participate in such analyses.

The additional power needs for oil shale and tar sands facilities would vary depending on the type of facility (see Sections 4.1.7 and 5.1.7). Data on electrical requirements are given for informational purposes. They are necessarily crude estimates based on technologies that have not yet been proven to be commercially viable. Coal is one possible fuel for new electrical generation, others include natural gas, nuclear, and renewable sources of energy. Furthermore, new electrical generating facilities, including coal-fired power plants, would need to operate in compliance with Clean Air Act permits.

Impacts from potential coal-burning power plants in the study area, whether the power is used for general regional power needs or for future oil shale/tar sands facilities, are discussed under Cumulative Impacts, Section 6.1.5.1.4 for oil shale and Section 6.2.5.1.4 for tar sands. The text in the summary tables in these sections has been revised to acknowledge the potential to mitigate the impacts from CCPs through beneficial reuse.

52964-043: Subsequent project- or site-specific NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. They would also take into consideration any connected actions related to the development of the oil shale or tar sands resources.

Thank you for your comment, Daniel Weber.

The comment tracking number that has been assigned to your comment is OSTSD52965.

Comment Date: April 17, 2008 16:23:22PM
Oil Shale and Tar Sands
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Attachment:

Comment Submitted:

I am totally amazed to find out that we have so much available oil reserve in this one area alone and no one is commercially producing it. If it is because of the enviromentalists please feel free to have them share my fuel and heating bills. If not, please have them shut up and set down while we get this product on to the world market. I feel we should be ashamed for allowing the Saudi's to control America. 52965-001

Response for Document 52965

52965-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Lance Oswald.

The comment tracking number that has been assigned to your comment is OSTSD52966.

Comment Date: April 17, 2008 17:52:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52966

First Name: Lance
Middle Initial: M
Last Name: Oswald
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Dear BLM: Please read my comments on Oil Shale Plan. Thank You. 4/16/08 I believe that before the BLM takes steps towards holding a commercial lease sale it should encourage private companies to conduct research and development toward perfecting a proven process and demonstrate that the process is efficient and environmentally sound. The public must know that the technology actually works and that it will not result in unacceptable impacts on the environment or Western Slope and its communities. . We know that oil shale extraction and processing will require very large amounts of water and huge amounts of electrical generation plants to supply the power needed. Because the commercial development of the West's oil shale is more than a decade away, a measured approach right now is critical to future success. To rush the process now without a clear and practical plan will lead to bigger Black Sunday busts than the past ones. We are not willing to gamble our beautiful Colorado landscape, heritage, air water and wildlife quality and general environment to unnecessarily rush recklessly into development of oil shale. Please think and plan carefully first by proceeding slowly with much.caution. To auction off oilshale land now before the technology is completely developed is premature and foolhardy and encourages the passions of greed boom and bust. We must preserve the superb qualities of Colorado for our children to enjoy. 52966-001

Thank You Very Much, Lance & Margaret Oswald CO.

Response for Document 52966

52966-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Thank you for your comment, James Boone.

The comment tracking number that has been assigned to your comment is OSTSD52967.

Comment Date: April 17, 2008 20:17:30PM
Oil Shale and Tar Sands
Comment ID: OSTSD52967

First Name: James
Middle Initial: L
Last Name: Boone
Organization:
Address: 8535 Bedington Dr. SE
Address 2:
Address 3:
City: Olympia
State: WA
Zip: 985133406
Country: USA
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am strongly opposed to oil shale and tar sands developmint in the United States. It is very dirty, and it pollutes the land, rivers and waters, the air, and just about anything it has the ability to touch near or far. Even worse, it provides little or no net gain in energy since the very extraction takes huge amounts of energy just to produce a barrel of oil. Furthermore, it appears to me that these vast land areas that are ripped open will never be recovered, and those costs are not included even if recovery were possible. One only has to look to Canada to see what a disaster similar development has caused there. Thank you for considering my comments.

52967-001

52967-002

Response for Document 52967

52967-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52967-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

Thank you for your comment, Larry Clynch.

The comment tracking number that has been assigned to your comment is OSTSD52968.

Comment Date: April 18, 2008 11:07:09AM
Oil Shale and Tar Sands
Comment ID: OSTSD52968

First Name: Larry
Middle Initial: F
Last Name: Clynch
Organization: Temple Mountain Energy Inc
Address: 8220 south Highway 45
Address 2:
Address 3:
City: Vernal
State: UT
Zip: 84078
Country: USA
Email: clynch@templemountainenergy.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

We support Program B. Opening the largest area for oil sand development will allow producers to develope deposits that are economic at the present time. Restricting large areas will result in them never being developed because once the deposits in Utah are worked out or bypassed capital requirments will not allow backtracking.	52968-001

Response for Document 52968

52968-001: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Pamela Hunt.

The comment tracking number that has been assigned to your comment is OSTSD52969.

Comment Date: April 18, 2008 12:11:34PM
Oil Shale and Tar Sands
Comment ID: OSTSD52969

First Name: Pamela
Middle Initial: K
Last Name: Hunt
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

I am in favor of utilizing this resource. The need to develop new sources of oil and lessen our dependence on foreign sources is vital. The continuing strength of the US, our economy and our position as a democratic world power depend on this untapped reserve.	52969-001

Response for Document 52969

52969-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52970.

Comment Date: April 18, 2008 12:16:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD52970

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

RE: Oil shale has tremendous potential

April 18, 2008

The Bureau of Land Management BLM Oil Shale and Tar Sands Draft Programmatic EIS Argonne National Laboratory 9700 S. Cass Ave. Argonne, IL 60439

Dear The Bureau of Land Management:

While in an ideal world America could satisfy its energy demands by neither importing foreign energy nor developing its own energy resources, the fact remains that American energy must be developed in order to stem American dependence on foreign energy sources and satisfy its energy demands. BLM has taken a major step towards that end in the draft PEIS for oil shale and tar sands.

Perhaps the most overlooked energy resource America has to offer is its rich abundance of oil shale. The quantities of oil shale in the Green River formation in Utah, Colorado, and Wyoming are particularly overwhelming in their potential to provide America with its own energy. In fact, the total oil shale in Colorado alone approaches almost a trillion barrels of oil - completely dwarfing even the most plentiful oil reserves of every other country. 52970-001

The time is now for American energy to be utilized and for oil shale to be developed. Our dependence upon foreign energy sources threatens our livelihood and security.

Sincerely,

Response for Document 52970

52970-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Keith Montag.

The comment tracking number that has been assigned to your comment is OSTSD52971.

Comment Date: April 18, 2008 12:16:49PM
Oil Shale and Tar Sands
Comment ID: OSTSD52971

First Name: Keith
Middle Initial: P
Last Name: Montag
Organization: Eagle County, Colorado
Address: 500 Broadway
Address 2: P.O. Box 179
Address 3:
City: Eagle
State: CO
Zip: 81631
Country: USA
Email: keith.montag@eaglecounty.us
Privacy Preference: Don't withhold name or address from public record
Attachment: DOC018.PDF

Comment Submitted:

Please see attached comments from Eagle County, Colorado. Hard copy to follow. Thanks. See Attachment.

COMMUNITY DEVELOPMENT
DEPARTMENT
(970) 328-8730
FAX: (970) 328-7185
Email: keith.montag@eaglecounty.us
www.eaglecounty.us

EAGLE COUNTY

KEITH P. MONTAG
Director

April 15, 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

RE: Programmatic Environmental Impact Statement (PEIS) for the
Draft Oil Shale and Tar Sands Resource Management Plan Amendments

To Whom It May Concern:

Thank you for granting a 30 day extension for review of the aforementioned PEIS and allowing Eagle County, Colorado an opportunity to provide comments for consideration as part of the decision-making process.

Eagle County is located in the west central portion of Colorado immediately east of Garfield County. With a current population of approximately 50,000 residents, Eagle County is comprised of 80% public lands (USFS, BLM, State Lands) with a strong year-round tourism and recreation economy and home to world class resorts (Vail and Beaver Creek). We are home to three designated wilderness areas (Flat Tops, Eagles Nest, and Holy Cross). Because of our geographic location and proximity to the areas identified in the PEIS, we are extremely concerned about potential impacts from oil shale and tar sands land designation that would be open for commercial leasing.

It is our understanding that the Bureau of Land Management (BLM) has identified Alternative B as the preferred alternative for both oil shale and tar sands because it would make the largest amount of potential oil resources available for lease application. The scope and magnitude of this proposal (Alternative B) is enormous – almost 2 million acres in three states (360,000 acres in Colorado) would be made available for oil shale commercial lease and 431,000 acres of tar sands would be available. Nine different BLM land use plans would need amendment. Even by the document's admission (page 7, Executive Summary), "the magnitude of impacts and the applicability and effectiveness of mitigation measures cannot be assessed at the programmatic level and will need to be evaluated on a project-by-project basis". It is our position that prior to designating lands for commercial lease, more detailed evaluation should occur to fully investigate and determine all impacts associated with oil shale and tar sands development.

52971-001

Eagle County Building, 500 Broadway, P.O. Box 179, Eagle, Colorado 81631-0179

Staff has reviewed the PEIS relative to potential impacts to Eagle County and has identified the following concerns:

1. Air Quality
2. Water Consumption
3. Employment Leakage from Eagle County
4. Transportation
5. Affordable Housing

Air Quality:

Air quality is of major concern to Eagle County given our geographic location immediately east of the study areas. The predominant prevailing wind direction in the region is from west to east which places our county in the direct path of the various emissions associated with oil shale and tar sands development. Given our topography (mountains and valleys), we experience numerous temperature inversions which cause poor air dispersion and stagnation thereby trapping air pollutants in the valleys. Per your data, the existing air quality of the study area (and in Eagle County) is currently in attainment with all ambient air quality standards. How will we be assured that attainment will be maintained in Eagle County if Alternative B is implemented considering both the direct and indirect impacts? What are the potential fugitive dust and air quality impacts on Eagle County associated with the "tracking" of mud and debris onto Interstate 70? How will monitoring occur in Eagle County given there is no routine air quality monitoring currently in place in the study area? What will the impacts be in Eagle County regarding regional haze, visibility and acid deposition? How will ozone emissions impact Eagle County? As previously mentioned, we are a "Premier Recreation County" located downwind of the study area, offering world class year-round recreational opportunities that would be greatly affected if ambient air quality is not maintained. Staff sees no analysis in the PEIS regarding potential air quality impacts for geographic locations downwind (Eagle County) of the study areas. 52971-002

On a more global scale, another concern related to air quality is the potential effects of "greenhouse gas" (GHG) emissions on the regional and global climate. Again, by the documents own admission (page 3-97), "the assessment of GHG emissions and climate change is in its formative phase, and it is not yet possible to know with confidence the net impact on climate". How can we be assured that GHG will not impact and affect Eagle County relative to oil shale and tar sands development? 52971-003

Water Consumption:

Oil shale development and production is a large user of water in an arid climate. The PEIS data indicates that consumption of water for a 200,000 bbl/day project would be about 20,000 – 41,000 ac-ft water/yr. In addition, water consumption for a 50,000 bbl/day underground mine with surface retort would be about 6,400 to 9,700 ac-ft water/yr. The PEIS contains an assumption that, "available water is stored and/or transported to the oil shale areas from various other water basins". Eagle County is 52971-004

concerned about the abundance of water needed to support oil shale development and the impacts it may have on the Colorado River drainage system. If additional storage of Colorado River water is necessary as the PEIS indicates, where will such storage be located? Eagle County has a history of being concerned about the impacts of water storage reservoirs and associated infrastructure in our mountainous environment. We will scrutinize any water storage facilities in Eagle County that could potentially affect our pristine mountain ecosystems. Staff sees no analysis in the PEIS regarding potential water impacts within the Colorado River basin upstream (Eagle County) of the study areas.

52971-004 (cont.)

Our concerns are magnified when the PEIS states (page 6-43), ". . . the lack of information regarding the type of technology that might be employed make it impossible to predict the specific impacts on water resources that could occur . . ."

Given the legal ramifications of Colorado River water, we recommend specific discussions with the Colorado River Compact, the Colorado Water Conservation Board, the Denver Water Board, as well as other Front Range water users to identify potential impacts to water sources and outline mitigation measures.

52971-005

Employment Leakage from Eagle County:

The PEIS describes a socioeconomic situation in Alternative B whereby it is assumed that the entire construction and operations labor force for oil shale facilities and associated power plants and coal mines would come from outside the Region of Influence (ROI). Fifty percent (50%) of the labor force would move and reside into the area and the remainder would commute on a daily basis. Eagle County already has an extremely tight labor force that results in more jobs in the employment sector than workers available to fill the positions – especially in the service industry. With the potential development of oil shale in our neighboring counties to the west, we are concerned with the loss (leakage) of employees currently working in Eagle County who would commute out of the county to fill oil shale related jobs, leaving many positions unfilled and significantly impacting our resort based economy. Staff sees no analysis in the PEIS regarding the potential impacts on areas adjacent (Eagle County) to the study areas regarding employment leakage and/or economic impacts.

52971-006

Affordable/Employee Housing:

Related to the employment issue identified above, Eagle County has established a priority to create 3500 affordable housing units within the county over the next 5 to 10 years, based on a 2006 study and recommendation from the Urban Land Institute. We are working diligently with the incorporated towns to meet our affordable housing goal by implementing very strict housing criteria on all new development in the county. In addition, Eagle County is investing taxpayer dollars to create affordable housing opportunities through public/private partnerships. If these local Eagle County workers,

52971-007

whom we are striving to create affordable housing, commute to the study area for employment, we will have lost any gains made. Staff sees no analysis in the PEIS regarding the potential impacts on areas adjacent (Eagle County) to the study areas regarding affordable housing

52971-007 (cont.)

Transportation:

Interstate 70 bisects much of the study area within Colorado. Transportation and traffic issues are the greatest concern to citizens of Eagle County based on a quality of life survey conducted in 2007. With the potential of a workforce commuting to the study areas, more traffic could be added to an already burdened infrastructure in Eagle County which will degrade the quality of life even more.

Additionally, the PEIS states (page 4-134), "many of the industries that would likely provide the appropriate materials, equipment, and other supplies in sufficient quantity for construction and operation of oil shale facilities and the associated power plants and coal mines are presently located outside the ROI in each state; thus, it was assumed the majority of these resources would be purchased outside each ROI and shipped to the relevant oil shale, power plant, and coal mine facility locations". What impacts will this have on the I-70 corridor through Eagle County?

52971-008

Finally, we are concerned with potential energy transmission lines being located in Eagle County. Impacts could certainly occur along transmission ROWs such as visual concerns, wildlife, weeds and vegetation, maintenance roads, erosion, and loss of recreational lands.

52971-009

Staff sees no analysis in the PEIS regarding the potential traffic and transportation impacts on Eagle County.

52971-010

Again, thank you for allowing Eagle County to comment on the PEIS. We ask that your agency please consider our concerns and adequately address them as the process moves forward. Please don't hesitate to contact me if further clarification is necessary.

Sincerely,

Keith P. Montag, Director
Community Development

Cc: Board of County Commissioners
Bruce Baumgartner, County Manager
Ray Merry, Environmental Health Director

Responses for Document 52971

52971-001: The BLM is conducting a phased decision-making process—proceeding from land use planning to leasing to operational permitting. The land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases. When applications to lease are received and additional information becomes available, the BLM will conduct further site-specific NEPA analysis, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures, as well as what level of development may be anticipated. The BLM has also initiated the research, development, and demonstration leasing process to provide important information that can be used as the BLM works with communities, states, and other federal agencies to develop strategies for managing any environmental effects, including those of water requirements and the technical aspects of the technologies.

52971-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA

analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

52971-003: See response to Comment 52971-002.

Section 3.5.1.2 of the PEIS describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

52971-004: The assumption is for the calculated projection (Section 4.5.2.1) and not for the PEIS. The projection provides an upper bound of water available.

This PEIS is a programmatic-level document, analyzing allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. The PEIS provides an effective analytical foundation for subsequent project-specific NEPA documents. The amount of water to be needed would be better understood at the future project-specific level when the scale of development, the technologies to be used in the development, and the locations and hydrologic conditions of project sites are known. Whether new water storage facilities or delivery systems are needed is uncertain and cannot be addressed in this PEIS as it depends on the locations of project sites. It is more appropriate to address these issues in subsequent NEPA documents.

52971-005: Thank you for your comments. Copies of the PEIS are sent to state and federal agencies for inputs and comments regarding many environmental issues, including potential impacts on water resources and mitigation measures.

52971-006: When commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken to analyze in detail the extent of regional economic impacts. If it is determined that additional impacts may occur in other counties outside each ROI, particularly with regard to workforce commuting and migration patterns and the impact on local labor and housing markets, these counties would be included in any future site-specific assessment.

52971-007: See response to Comment 52971-006.

52971-008: Additional heavy truck use as well as worker-generated “commuter” traffic would accompany commercial oil shale development. The level of increase on any particular road that would be associated with oil shale development is highly

location dependent as well as dependent upon the size of projects that would be developed. Timing of any oil shale development will also affect traffic loads—as the commentor points out, ongoing oil and gas activity may be peaking in the next 20 years in the areas that have oil shale potential in both Colorado and Utah. While it is not possible to predict with certainty where and when development will occur, it is likely that because of the high quality of the resource, the Piceance Basin in Western Colorado may be developed before other areas. Traffic loads on I-70 would be affected by this development, but it is not possible at this time to estimate the magnitude of the effect.

52971-009: The PEIS analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts of given projects. As a result, additional site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

52971-010: Additional information regarding general transportation impacts has been included in the Final PEIS. Because of the lack of specific location data for development of oil shale projects, the additional information deals largely with generic impacts.

Thank you for your comment, Robert San Socie.

The comment tracking number that has been assigned to your comment is OSTSD52972.

Comment Date: April 18, 2008 14:04:43PM
Oil Shale and Tar Sands
Comment ID: OSTSD52972

First Name: Robert
Middle Initial: G
Last Name: San Socie
Organization:
Address: 4450 Timber Hollow Way
Address 2:
Address 3:
City: Jacksonville
State: FL
Zip: 32224
Country: USA
Email: sanscare@bellsouth.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Oil Shale and Tar Sands for energy??? Have we gone nuts? This will only keep us on the same path to a dirty end to the human race. Stop this madness. | 52972-001

Response for Document 52972

52972-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, John Keyser.

The comment tracking number that has been assigned to your comment is OSTSD52973.

Comment Date: April 18, 2008 15:13:22PM
Oil Shale and Tar Sands
Comment ID: OSTSD52973

First Name: John
Middle Initial: M
Last Name: Keyser
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Thank you for being able to comment on the oil shale Draft PEIS. I have lived in the Rocky Mountain Region twice in my life and anticipate living there again. I share the concerns of many who have submitted comments, that the anticipated demands on already oversubscribed river and stream segments in the Green River formation area will present tremendous challenges. Should major development efforts proceed it seems to me essential that the numerous Federal agencies involved in the effort submit all plans to more than a "hard look" at their specific and cumulative impacts on riparian habitat and wildlife communities. I hope that at every significant stage of plan submission and review, the Fish and Wildlife Service's advice will be sought and heeded. Further, I hope that the best possible data on reasonably anticipated regional climate changes and their impacts on water supplies will be carefully considered. Only if such things are done can the cost and benefits of oil shale extraction be truly calculated. Thank you for the opportunity to make this comment. Sincerely, J. Keyser

52973-001

Response for Document 52973

52973-001: Since the alternatives in the PEIS do not authorize the immediate leasing of the lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The PEIS's analysis provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing.

Subsequent NEPA analysis will be required prior to any leasing or plan of development decision and will consider the direct, indirect, and cumulative effects of that action. That analysis will also help to form the basis for the development of mitigation measures, such as best management practices to avoid or mitigate short-term and long-term adverse impacts.

Thank you for your comment, Cheri Robinson.

The comment tracking number that has been assigned to your comment is OSTSD52974.

Comment Date: April 18, 2008 16:28:32PM
Oil Shale and Tar Sands
Comment ID: OSTSD52974

First Name: Cheri
Middle Initial:
Last Name: Robinson
Organization:
Address: [Withheld by requestor]
Address 2: [Withheld by requestor]
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

Public Comment for Oil Shale and Tar Sands EIS- The regions which will experience impact from energy development must first be examined, remediated, and supported prior to any permits being issued and work being started. A prime example of the need for this process is Rio Blanco County road #5, Piceance Creek road. Historically,c the primary use for that road was agricultural. Witness the damage done by massive heavy traffic in a twenty-four hour period in March of 2006: Multiple areas on the upper portion of the Piceance Creek road sustained massive damage, resulting in loss of use for ranchers in the area. I needed $800.00 dollars in front end work as a result of one of March 6th 2006 potholes. We also had ten broken windshields in 18 months. The money for those repairs came out of my pocket, but the damage was caused by companies using Rio Blanco County infrastructure which was not appropriate for industrial purposes. Industry should also create a fund to compensate and repair loss of historic road users, caused by industry operations. I took photos which paint the grim picture of the road damage. They are available on request. The 52974-001

needs of schools should also be addressed prior to granting permits for any industry which will cause large sudden increases in populations. Schools have a count day in October of each year. The state funds the school district based on that count. Students who arrive and are not funded, dramatically dilute the resources available to students who were already here, and place massive strain on the schools as they scramble to provide materials and services without the funds to do so properly. Sincerely, Cheri Robinson 52974-002

Responses for Document 52974

52974-001: Thank you for your comments. The issue you raise regarding industry creating a fund to compensate local users and repair road damage is beyond the scope of this document.

52974-002: Given the programmatic nature of the PEIS, the purpose of the analysis of socioeconomic impacts is to provide an overview of the type and magnitude of impacts that would likely occur with the construction and operation of representative oil shale and tar sands and ancillary facilities. If commercial-scale oil shale and tar sands resource development occurs, additional NEPA analyses would be undertaken, where project locations, employment levels, and the number of in-migrating workers in each phase of development would be known, enabling a detailed analysis of oil shale and tar sands development and ancillary facility impacts on local tax revenues, educational facility capacity and expansion costs, and on the scale and timing of local government expenditures required to maintain different levels of service in local schools.

Thank you for your comment, Rick Hammel.

The comment tracking number that has been assigned to your comment is OSTSD52976.

Comment Date: April 18, 2008 17:22:36PM
Oil Shale and Tar Sands
Comment ID: OSTSD52976

First Name: Rick
Middle Initial:
Last Name: Hammel
Organization: Friends of Northwest Colorado
Address: 355 County Road 201
Address 2:
Address 3:
City: Craig
State: CO
Zip: 81625
Country: USA
Email: rhammel@cmn.net
Privacy Preference: Don't withhold name or address from public record
Attachment: FoNWCoCommentLetter3_08Word03.doc

Comment Submitted:

Please see the attached letter. See Attachment.

April 18, 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory
EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Re: Oil Shale and Tar Sands Resources Programmatic EIS

Dear Reviewers:

We represent the Friends of Northwest Colorado a community group representing citizens concerned about the long term economic and environmental sustainability of the communities of Northwest Colorado. The mission of the members of the Friends of Northwest Colorado (hereafter known as the "organization" or the "membership") is to protect, preserve and conserve our unique local natural resources so that all generations, present and future can experience, enjoy, and be nurtured by them. Additionally, our mission is to educate and to be a voice for people who believe in the inherent value of wildlife, water, air, wilderness, and the natural landscape. We appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement for Oil Shale and Tar Sands (DPEIS or the plan).

It is our collective view that this draft environmental impact statement is woefully inadequate. It does not let the reader fully understand what the impacts of oil shale development will actually be. As written, we say to the BLM, "go back and do a complete environmental assessment of the impacts. Where you don't have data, tell the reader you do not have data." 52976-001

In light of the lack of detail in the DPEIS, we would like to see the BLM add and then adopt a NO ACTION Alternative to the Final PEIS. In the following pages we will argue that a NO ACTION Alternative best supports

- the BLM's multi-use mission,
- provides the necessary time for industry to prove technologies that would make extraction of the resource commercially viable,
- allows communities to adjust to growth already being experienced from oil and natural gas development, 52976-002
- allows time for mitigation of socio-economic hardships likely to results from combined natural gas and oil shale/tar sands development,
- allows reflection of where development fits within the public lands framework
- provides the public a better chance of receiving fair compensation for the use of its land and purchase of the resource and
- provides protections to our biological and cultural resources.

DPEIS does NOT support the BLM Multi-Use Mission

The DPEIS on Oil Shale and Tar Sands does not support BLM's multi-use mission. To quote from the plan:

- *Shale development would likely preclude other mineral development activities on leased lands. DPEIS 4.17*
- *Temporary or long-term reductions in authorized grazing use may be necessary because of loss of a portion of the forage base. DPEIS 4.18*
- *Commercial activities are largely incompatible with recreational land use.... Including hiking, biking, fishing, bird watching, OHV use, and camping. DPEIS 4.19*
- *Direct & Indirect impacts would include: Industrialization of the landscape; declines in the value of private ranches/residences adjacent to oil shale developments or rights of way because of perceived noise, human health, and aesthetic concerns; noise and visual impacts; increased traffic; increased access to previously remote zones; conversion of land in and around local communities from existing agricultural, open space, or other uses to provide services and housing for employees and families that move to the region in support of shale development; loss of available lands to new industrial structures. DPEIS 4.16/17*

52976-003

Agency regulations and federal law require that the BLM manage its lands for multiple uses, yet the agency admits that oil shale development will displace every other public use of public land to benefit private companies. A No Action Alternative would is more in keeping with the federally mandated mission of the BLM.

Commercial Viability is NOT Feasible

The DPEIS had been developed before viable technology for the commercial development of this resource. To quote from industry sources,

> *"For decades, energy companies have attempted to unlock the large, domestic oil shale resources of northwestern Colorado's Piceance (pronounced "Pee-ance") Basin. For more than a quarter of a century, Shell has conducted laboratory and field research on its promising, In situ (in-ground) Conversion Process to recover oil and gas. Shell's research, thus far, has shown great promise. We are committed to doing oil shale the right way through a responsible and thorough research program. This research program will answer some of the few remaining questions to determine if oil shale can responsibly increase domestic energy supplies. We hope to make a decision on a commercial project early in the next decade"*
> *(http://www.shell.com/home/Framework?siteId=us-en&FC2=&FC3=/us-en/html/iwgen/shell_for_businesses/exploration_production_shared/mahogany_shared/dir_mahogany.html, visited March 17, 2008).*

52976-004

Cheveron's RD&D will not be completed until 2016, according to the Oil Shale Research, Development & Demonstration Project Plan of Operations submitted to the BLM in 2/15/2006. EGL is between 3-10 years out from production depending upon RD&D (http://www.egloilshale.com/). It will be years before companies developing oil shale technology will know if it is technologically or economically feasible.

Since oil shale/tar sands development appears to be many years down the road, and the requirements for water and energy appear to make cost-effective development most unfeasible, we fail to see why there is such a rush to lease this land. It raises strong suspicions of ulterior motives

We must know more about the technologies that would be used in extracting energy from our particular types of Tar Sands. We must ensure that the Oil Shale RD&D process has allowed us to assess the impacts of experimental extraction technologies on energy consumption and water use before proceeding with a plan for wide-scale commercialization. A NO ACTION alternative would provide the necessary time for industry to prove technologies that would make extraction of the resource commercially viable.

52976-004 (cont.)

Human Impacts of Proposed Development

The development envisioned by the study would come at a time when our land is already experiencing severe pressure from the current energy boom and significant population growth across the West. Oil Shale/Tar Sands development will create additional strain. To quote from the plan:

- *"The number of new residents lured by commercial development of oil shale will substantially change demographics and social fabric of rural communities. Quality of life will be changed. Transition will occur away from traditional agricultural way of life. Small isolated, close-knit, homogeneous communities with a strong orientation toward personal and family relationships will become more urban, with increasing cultural and ethnic diversity and increasing dependence on formal social relationships within the community". DPEIS.144*
- *Because of the relative economic importance of oil shale developments in small rural economies and the lack of available local labor and economic infrastructure, large-scale oil shale developments are likely to cause a large influx of temporary population. DPEIS 4.134*
- *Oil Shale development will likely steal jobs from the service industry. DPEIS 3.217*
- *Local communities may be unable to absorb new residents. DPEIS 4.134*
- *Colorado impacts will include the loss of recreation, hunting, fishing and tourism income- for example: 10% reduction in recreation employment there would be a loss of 1,415 jobs and $18.3 million lost in income, w/ 20% reduction 2,830 jobs would be lost and $36.5 million lost in income. DPEIS 4.145*
- *Property value impacts could be substantial as a result of deterioration in aesthetic quality, increases in noise, real or perceived health effects, congestion, or social disruption. DPEIS 4.146*

52976-005

The *DPEIS* States also states an additional 2,400 megawatts of electrical energy will be needed when commercial levels of development are reached. It states that new, coal fired generation plants will be built. While no specifics are given on siting, There are some generalities can be stated: Any new coal-fired plant must utilize the very latest low impact, low carbon footprint, technology. Where will the coal come from? A new local mine? New rail line to transport it in? Who will build and operate these new facilities?

52976-006

The DPEIS has the BLM finding itself again in favor of development of the public lands, adding to its history of financing development, making development compliant with this country's environmental protection laws. The BLM will never find a new energy development plan in non-compliance. Never. And we the public ask why? We the public have known why for some time. Six long standing reasons

52976-007

follow, and all must be investigated and brought into the most basic public democratic reasoning of lawfulness and accountability in the revised PEIS.

1. A review, has been over looked, of the Congressional debate and law which established the federal public lands system, and so has research been over looked into whether such lands have ever yet been truly public and whether the Congress has ever yet investigated the mandate that such land be preserved in a condition fit for the time when the public will finally access them for sustenance of healthy economic and cultural survival.
2. The ability of the Federal Government and its land agency the BLM to thus far avoid public knowledge and understanding of the full factual picture of how energy development of the public lands subsurface fuels and minerals fragments the land's habitat – from its near paper-thin soil crust to its largest ungulates, carnivores, birds of prey – until its natural systems of balance and rebalance are instead now excessive, and relenting adaptations and lost ability of adaptations resulting in closer and closer conditions of ecosystem collapse.
3. The ability of the Federal Government, its land management agency the BLM and its corporate users of our public lands nearly free resources to bury from public sight or weaken with false science or fears of American economic regression the economic facts in an as-yet unchallenged history of accessing the public's resources for private wealth and power. This burying from public knowledge of the stages of accessing eventually all known public lands profitable resources for private gain includes the following: persistent de-regulation of corporate behavior – both physical on-ground and market behavior; subsidies from the public's taxes to underwrite R&D of resource extraction; and an assumption that the public will never grasp the economics of the corporate free market system that either doubts itself or privately manipulates its own system to guarantee itself greater and greater profits – profits not from its system's adequate rational and success, but from the public's collective resources.
4. The ability of the Federal Government and its BLM agency to cover the fact and knowledge that the public's land is being privatized, so that they will less and less have to be made accountable for their health and sustainability until the eventual time in our public history when they – the public's land – are handed back over to the public in near useless condition.
5. The ability of the Federal Government and its land management agency the BLM to inhibit thus far the actualization, in dollar figures, for the public of the loss in market value of the public land's sustainable, renewable resources.
6. The ability now, in the 2008 systemic financial uncertainty, of the Federal Government to confer the exploiting and marketing of the public lands remaining resources as collateral to the very capitalizing and marketing banking industries that have so thoroughly amassed the public's welfare, labor, taxes, and resources for private gain.

52976-007 (cont.)

It is difficult to understand why the BLM is rushing toward a commercial leasing program without even knowing if oil shale development is feasible economically. In light of that, it's even more difficult to understand why the BLM seems so anxious to give oil shale development priority over other uses on our public lands as shale development would likely preclude all other activity, including natural gas development in priority areas. A No Action Alternative allows communities to adjust to growth

52976-002 (cont.)

already being experienced from oil and natural gas development. A No Action Alternative would allow communities to mitigate socio-economic hardships likely to results from combined natural gas and oil shale/tar sands development. And a No Action Alternative would allow full review and community discussion of the place of development on public lands.

52976-002 (cont.)

Environmental Impacts of Development

This plan proposes development in some of the best hunting, fishing, and recreation areas in Colorado, Wyoming, and Utah. We can and should protect these areas from adjacent impacts such as diminished air quality and habitat fragmentation. The cumulative impact of this massive development will negatively affect our air, water, wildlife and communities in Colorado, Wyoming, and Utah. To quote from the plan:

- *In Colorado, 10,789.7 acres of Areas of Critical Environmental Concern (ACEC's) are included in areas designated for commercial oil shale leasing. DPEIS 2.8.*
- *Direct and indirect impacts of commercial oil shale development will include: wildlife displacement and mortality (including threatened and endangered species), industrial noise across the landscape, visual transformation of the landscape, increased traffic, new roads, increased access to currently remote areas, industrialization of agricultural and undeveloped landscapes, sprawl, as agricultural and open lands near existing communities are converted to new housing and new development necessary to support increasing populations, loss of available land for other new (clean?) industries, loss of threatened/endangered plant species, new rights of way stripped of and maintained w/out major vegetation, decreased property values for adjacent landowners due to noise human health, and aesthetic concerns, degradation or loss of cultural sites. DPEIS 4.16/17*
- *"There is a potential for commercial oil shale development projects to adversely affect most of the threatened, endangered, and sensitive species that occur in the counties where development could occur." 4.85*
- *Additional likely impacts include:*
    - *Habitat loss, alteration, fragmentation, and resulting changes in habitat use*
    - *Disbursement and displacement – habitat modification, noise (4.75), fire (4.81), lights, etc.*
    - *Mortality – collisions with structures and vehicles, changes in predator populations, and chronic or acute toxicity from herbicides, hydrocarbons, or other contaminants*
    - *Increased accessibility – humans infiltration of previously remote habitat DPEIS 4.66*

52976-008

<u>Water</u>

Water is finite. Almost all of the water in the Colorado River Upper Basin is appropriated by the 1922 Interstate Colorado River Compact. In addition, the Navajo Nation is asserting a claim for up to 800,000 acre feet. It is our view that they will prevail. In the State of Colorado, where will the oil shale developers obtain enough senior water rights to develop oil shale under present technology? Ranchers and municipalities own most of the senior rights. The municipalities are not going to sell their water rights. If ranchers sell their rights, they are out of business. How will the oil shale developers reclaim the water they have used? This must be a high priority to render the used, polluted, water potable so that this water can be returned to the river from where it came.

52976-009

Fish and Wildlife

Our first concern is five species of fish that are already listed on the Endangered Species list and the one species awaiting listing. The species listed as Endangered are the pike minnow, razorback sucker, boney tail sucker and the humpback chub. The Colorado River Cutthroat Trout (CRCT) has been petitioned for listing. The Endangered Species Act of 1973 states that it is unlawful to modify or remove habitat of listed species. Water from warm water streams, such as the White River, are within the range of the 4 species listed as Endangered. Streams, such as Trapper's Creek, contain viable populations of CRCT. 52976-010 (cont.)

Our second concern is disruption, or loss, of sagebrush, *Artimisia tridentata,* subsp. This loss will have adverse effects on greater sage grouse, *Centrocercus urophasianus*, which is under a federal court order for the Fish and Wildlife Service to reevaluate for listing on the ESL. If there is substantial removal of sage grouse habitat as would be the case in the current plan then, listing of this species would probably be one end result. 52976-011

Another concern is the impact to our big game populations. Deer and elk were pretty prevalent in the Rifle, CO, area prior to oil and gas development. Hunting is now a sport of the past in that area, due to, in part, the development. Should development occur, big game loss could occur simply by drinking unprotected, polluted water. These impacts upon the land are just unacceptable. We urge the BLM to consider these and the likely cumulative effects of this industry on wildlife habitat and protected areas across the West. 52976-012

Conclusion

After more than $23 billion spent on research, oil shale technology is still experimental. Yet the Bush administration is rushing to create a massive federally driven oil shale development program before anyone knows if the technology will work, let alone what cost it will exact on our air, water, wildlife and communities. The government should force industry to prove they can develop oil shale without wrecking the environment through research-scale projects before anyone talks about commercial leasing or production. There are just too many unknowns in the DPEIS. It is ill-prepared and inconclusive. As presented, we must conclude that the ***No Action*** alternative be the only alternative that is reasonable and prudent. Western Colorado has already suffered through decade-long economic calamity prompted by the collapse of the last oil shale scheme on Black Sunday. The administration's unseemly haste to lock in a massive oil shale program before anyone knows if it works shows a negligent disregard for western Coloradans and the state's future. 52976-002 (cont.)

Sincerely On behalf of Friends of Northwest Colorado and Citizens of the West,

Rick & Laurie Hammel
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rhammel@cmn.net

Allan Reishus
601 Sandwash Dr
Craig, CO 81625

Jane Yazzie
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David Morris
1083 Colorado St
Craig Co 81625

Leona Hemmerich
11018 Hwy 40
Dinosaur, CO 81610

Responses for Document 52976

52976-001: Congress declared its intent in the Energy Policy Act of 2005 for the Nation to pursue the development of oil shale and tar sands resources among other unconventional fuels, if it can be done in an environmentally sound manner. Currently, there is sufficient information on a programmatic level to make a reasoned choice among the alternatives when considering whether lands should be opened or closed for application for commercial oil shale or tar sands leasing. The PEIS analyzes the environmental consequences of this allocation decision. The PEIS also describes the requirement for additional site-specific NEPA analysis prior to both issuance of commercial leases and approval of proposed exploration or development projects.

52976-002: The BLM acknowledges the commentor's preference for Alternative A.

52976-003: The BLM is managing the public lands in compliance with the FLPMA principles of sustained yield and multiple use, to preserve and protect the public lands, and to provide for domestic sources of minerals. These principles guide the BLM to cooperatively manage the public lands through its land use planning process to achieve a balance among a variety of uses and resource protection. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

52976-004: Thank you for your comments. The BLM shares your concerns about the great amount of uncertainty attached to oil shale technologies. Consequently, this PEIS supports only land allocation, not leasing for oil shale development. Comprehensive project-specific NEPA analyses will be required before any lease is issued.

52976-005: A cumulative analysis of socioeconomic impacts is presented in the PEIS to the extent possible based on the nature and scope of the proposed action (i.e., an allocation decision) (see Sections 6.1.5.3.10 and 6.2.5.3.10). Under this allocation decision, there is no irreversible or irretrievable commitment of resources. The decisions analyzed in the PEIS make no commitment on the part of the BLM to offer for lease public lands within Wyoming, Utah, or Colorado. Therefore, it will be necessary to conduct further site-specific NEPA analysis prior to a leasing decision. As a consequence, the level of cumulative analysis in the PEIS need not be as extensive as when the decision is to offer specific parcels for lease. (Text has been added to Section 1.2.1 of the PEIS to clarify the extent of cumulative impact analysis at the programmatic level and at leasing.) When the additional NEPA analysis is performed, it will analyze the impacts of the proposed action on

all resources, including the local communities, when considered with other reasonably foreseeable actions.

52976-006: The PEIS states that this additional energy may be required for oil shale development using in situ methods. However, it would be an inappropriate exercise in speculation to attempt to present an analysis of impacts from power generation for oil shale/tar sands development, because the amount of power required would vary with the technology to be implemented, and also because the source of the power and therefore the impacts are unknown. Required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources.

The connected impacts from required power production would be assessed in future project-specific analyses when information on the source and amount of required energy, along with other factors mentioned in the comment, is available.

52976-007: Congress mandated in the Energy Policy Act of 2005 that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable environmentally sound manner. This PEIS addresses that mandate. The issues raised in the comment are outside the scope of this PEIS.

52976-008: Since the alternatives in the PEIS do not authorize the immediate leasing of the lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing.

Subsequent NEPA analysis will be required prior to any leasing or plan of development decision and the direct, indirect, and cumulative effects of that action. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to avoid or mitigate short-term and long- term adverse impacts.

52976-009: Agricultural water and probably water from ranchers are good candidates to be diverted for oil shale development through water rights trading, but this is speculative.

Based on the experience in the tar sand development in Calgary, Canada, the water is likely to be treated, recycled, and reused. These activities would be specified in an oil shale development plan for a project. The impacts on the water resources would then be evaluated in subsequent project-specific NEPA documents.

52976-010: The proposed action does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on endangered Colorado River fishes or the Colorado River cutthroat trout (a BLM

sensitive species). However, potential future direct and indirect impacts on these species are discussed in Sections 4.8.1.4, 5.8.1.4, 6.1.1.7.4, 6.1.2.7.4, 6.1.3.7.4, 6.2.1.7.4, 6.2.2.7.4, and 6.2.3.7.4 of the PEIS. As stated in the PEIS, each alternative would require adherence to BLM policy on the protection of sensitive species and project-specific ESA Section 7 consultation with the USFWS.

52976-011: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Thus, land use allocations would not result in impacts to greater sage-grouse habitat. Policies and BMPs that would be implemented at the project-specific level are expected to avoid impacts to crucial sage grouse habitat and, where not possible, minimize and mitigate impacts to the extent practicable. Sage grouse mitigation would be incorporated as part of project stipulations, as needed. The need for mitigation would be determined on a project-by-project basis in conjunction with input from federal, state, and local agencies and interested stakeholders. Mitigation of impacts to sage grouse habitats would include recommendations included in the BLM's national sage grouse habitat conservation strategy, as well as those contained in statewide and regional sage grouse conservation strategies prepared by state agencies.

52976-012: The BLM is fully committed to minimizing potential impacts to ecological resources to the greatest extent possible. Additional mitigation measures would be incorporated as project stipulations, as needed, to address site- and species-specific issues. The need for these mitigation measures would be determined on a project-by-project basis in conjunction with input from federal, state, and local agencies and interested stakeholders. Fencing and/or covering contaminated waters would be among the mitigation measures considered to prevent big game from drinking from these water bodies. Sections 6.1.5 (oil shale) and 6.2.5 (tar sands) provide an overview of impact-producing factors and potential cumulative impacts, including cumulative impacts to ecological resources (see Sections 6.1.5.3.7 and 6.2.5.3.7). Project-specific NEPA analyses would identify and assess any cumulative impacts that are beyond the scope of the cumulative impacts addressed in the PEIS.

Thank you for your comment, Tony Marra.

The comment tracking number that has been assigned to your comment is OSTSD52977.

Comment Date: April 18, 2008 18:24:10PM
Oil Shale and Tar Sands
Comment ID: OSTSD52977

First Name: Tony
Middle Initial:
Last Name: Marra
Organization:
Address:
Address 2:
Address 3:
City:
State: FL
Zip: 32327
Country: USA
Email: tonytke@yaho.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

No Tar Shale!! 52977-001

Response for Document 52977

52977-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Gopa Ross.

The comment tracking number that has been assigned to your comment is OSTSD52978.

Comment Date: April 19, 2008 00:41:04AM
Oil Shale and Tar Sands
Comment ID: OSTSD52978

First Name: Gopa
Middle Initial: K
Last Name: Ross
Organization:
Address: 11111 Box Canyon Rd.
Address 2:
Address 3:
City: Weston
State: CO
Zip: 81091
Country: USA
Email: rossgopa@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

You must stop allowing the destruction of our beautiful state of Colorado and our public and private lands for the greed of corporations taking oil shale. As residents of Colorado we need to use sun and wind resource development. WE CAN NOT DRINK OIL OR GAS NOR CAN WE BREATH OIL AND GAS. We must protect our water resourses from this RUSH mentality. STOP IT NOW before it is too late, and protect wildlife Gopa' Ross, chairwomen Sierra Club of Southern Colorado oil gas water issues

52978-001

Response for Document 52978

52978-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, David Hoffman.

The comment tracking number that has been assigned to your comment is OSTSD52979.

Comment Date: April 19, 2008 07:11:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD52979

First Name: David
Middle Initial: K
Last Name: Hoffman
Organization:
Address: 3755 Horizon Glen Court
Address 2:
Address 3:
City: Grand Junction
State: CO
Zip: 81506
Country: USA
Email: dkhoffman1@bresnan.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

It is my sincere belief that oil shale leasing is premature at best. Technologies are showing the tremendous need for the one resource we find scarce in the Western US: Water!. Having lived in Western Colorado for thirty one years, I have directly experienced the downside of poorly planned oil shale development. It is a fuel that currently will require nearly as much energy input as is yielded. I say no oil shale leasing until development can prove itself. | 52979-001

Response for Document 52979

52979-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Thank you for your comment, christopher Buckley.

The comment tracking number that has been assigned to your comment is OSTSD52980.

Comment Date: April 19, 2008 17:53:23PM
Oil Shale and Tar Sands
Comment ID: OSTSD52980

First Name: christopher
Middle Initial: P
Last Name: Buckley
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold address from public record
Attachment:

Comment Submitted:

To Whom It May Concern:

I would like the oil share and tar sands in the U.S. to be exploited as soon as possible. All applicable environmental precautions should be taken but we need to do all we can to release ourselves from foreign control of our energy supply. 52980-001

Chris Buckley S. , MA

Response for Document 52980

52980-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Richard Coen.

The comment tracking number that has been assigned to your comment is OSTSD52981.

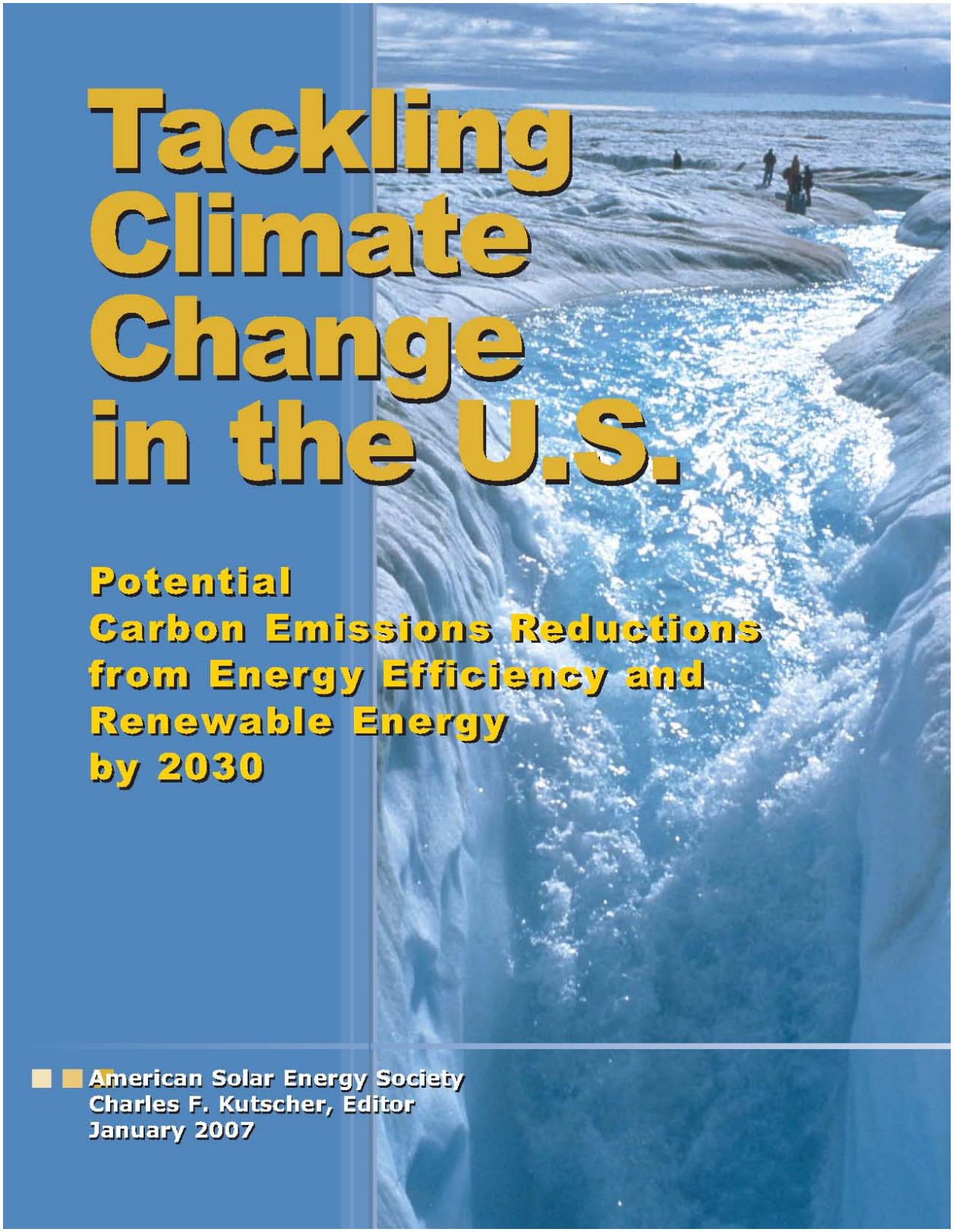
Comment Date: April 20, 2008 09:26:42AM
Oil Shale and Tar Sands
Comment ID: OSTSD52981

First Name: Richard
Middle Initial:
Last Name: Coen
Organization: Northern Colorado Renewable Energy Society
Address: 412 Garfield Street
Address 2:
Address 3:
City: Fort Collins
State: CO
Zip: 80524
Country: USA
Email: coenrw@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment: Report on Climate Change.pdf

Comment Submitted:

Speaking for NCRES, we are against oil shale. Oil Shale is a dirty, expensive and unproven source of fossil fuel. Spending money on developing this "resource" is a tragedy when considering the other clean, long-term, proven technologies available and ready for prime-time. Ours is a great nation founded by innovative pioneers. Let's not let them down by desperately clinging to broken dreams of the past. Let's develop the our clean energy expertise and embrace the future as laid out in the attached report. See Attachment.

52981-001


Tackling Climate Change in the U.S.
Potential Carbon Emissions Reductions from Energy Efficiency and Renewable Energy by 2030
American Solar Energy Society
Charles F. Kutscher, Editor
January 2007

Response for Document 52981

52981-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Dan Lincoln.

The comment tracking number that has been assigned to your comment is OSTSD52982.

Comment Date: April 20, 2008 20:30:03PM
Oil Shale and Tar Sands
Comment ID: OSTSD52982

First Name: Dan
Middle Initial:
Last Name: Lincoln
Organization:
Address: 32854 UPPER BEAR CREEK RD
Address 2:
Address 3:
City: evergreen
State: CO
Zip: 80439
Country: USA
Email: dan@sinbadtravel.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

The proposed lease is simply a case of too much, too soon. It is clear that under any circumstances, the industry will be unable to develop anything like 2.3 million acres of area for many years. Given that oil shale extraction technology is still in its infancy, it is rediculous to jeapardize so large a piece of public land before the ability to assess the environmental dangers of this kind of development. Furthermore the lack of technology to properly quantify the impact of development is not a valid justification to continue with development that will obviously have a highly detrimental effect on air and water resource, including very high CO2 emissions. The inability of an observer to accurately measure the speed of an approaching truck is not a good reason to step into its path. 52982-001

Response for Document 52982

52982-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

Thank you for your comment, William Bird Mounsey.

The comment tracking number that has been assigned to your comment is OSTSD52983.

Comment Date: April 20, 2008 21:13:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52983

First Name: William Bird
Middle Initial:
Last Name: Mounsey
Organization:
Address:
Address 2:
Address 3:
City: Evergreen
State: CO
Zip: 804397224
Country: USA
Email: uofthewild@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Shell technology: Oil shale (OS) How does BLM reconcile land use for single energy development w/multiple use? Prioritize for most productive use; min-
imize development acres & impact. Shell:
wont know process viable until 2010: why rush now? Where is consideration of 60 MTons of CO2 from a 1200MV coal plant? | 52983-001

Responses for Document 52983

52983-001: The BLM is taking a measured approach to oil shale development where each step builds upon a prior step. This staged approach ensures that the commercial oil shale program meets the intent of Congress while taking advantage of the best available information and practices to minimize impacts and offers opportunities for states, local communities, and the public to participate in the process.

The decisions analyzed in the PEIS include no commitment by the BLM to offer for lease public lands without additional site-specific NEPA analysis. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. New information on technologies may be a consequence of research on the RD&D leases or result from research or studies from other sources. Specific mitigation measures, management prescriptions, and the best available practices to minimize impacts will be applied as a result of site-specific NEPA evaluations. The BLM will involve the state, local communities, and the public throughout the subsequent NEPA processes.

52983-002: It is correct that the FLPMA directs the BLM to manage its public lands for multiple use (Section 102(a)(7)). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans.

The FLPMA also makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 USC §1702(c))). Like hunting, fishing, and recreation, commercial oil shale and tar sands operations are statutorily authorized uses of BLM lands. The BLM is aware that not all authorized uses can occur on the same lands at the same time; conflicts among resource uses are not new, and this PEIS is not intended to solve all potential conflicts involving oil shale or tar sands leasing. The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including energy and mineral development, as well as conserving and protecting other resource values for current and future generations. Future decisions regarding oil shale or tar sands leasing and approval of operating permits will be informed by NEPA analysis of the conflicting or alternative land uses of the particular tracts.

52983-003: This PEIS focuses on land allocation decisions—to open or close lands to application for consideration of commercial leasing of oil shale and tar sands resources. NEPA analyses of cumulative impacts at the leasing and plan of

development stages will consider effects from Reasonably Foreseeable Future Actions (RFFAs); the scope of a cumulative effects analysis will be determined by the location and number of potential leases/projects and the specific resources that may be affected by those leases/projects. Currently, it is premature to assume that the only possible alternatives for electrical energy supply would be coal-fired or nuclear power plants.

Thank you for your comment, Laura Nelson.

The comment tracking number that has been assigned to your comment is OSTSD52984.

Comment Date: April 20, 2008 22:00:09PM
Oil Shale and Tar Sands
Comment ID: OSTSD52984

First Name: Laura
Middle Initial:
Last Name: Nelson
Organization: Red Leaf Resources
Address: 6985 Union Park Center
Address 2: Suite 375
Address 3:
City: Cottonwood Heights
State: UT
Zip: 84047
Country: USA
Email: lnelson@ecoshale.com
Privacy Preference: Don't withhold name or address from public record
Attachment: BLM Oil shale and tarsands draft PEIS.pdf

Comment Submitted:

See Attachment.

April 18, 2008

Via Overnight Delivery and Electronic Mail
(http://ostseis.anl.gov/involve/comments/index.cfm)

Bureau of Land Management
Oil Shale and Tar Sands Resources Draft
Programmatic EIS Comments, 9700 South Cass
Avenue, Argonne IL 60439

Re: *Re: BLM Oil Shale and Tar Sands Draft PEIS (72 Federal Register 245)*

Dear Sir or Madam:

Red Leaf Resources ("RLR") provided initial comment on the Bureau of Land Management's ("BLM") "Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement" ("Draft PEIS") on March 19, 2008 in advance of the notice for a 30-day extension. In the initial comment letter, RLR advocates BLM's preferred option, Alternative B, for oil shale development as contained in the draft PEIS. In addition, RLR supports adoption of a commercial leasing program that allows access to locations conducive to oil shale development. RLR continues to support Alternative B and a commercial leasing program.

RLR provides these additional comments as supplemental to those contained in our prior filing. Our focus here is to further encourage that maintenance of a viable Research

6985 Union Park Center, Suite 375 / Cottonwood Heights, UT 84047 / Office 801 878 8100 Fax 801 878 8101 / www.ecoshale.com

Development and Demonstration (RD&D) program is critical to technologically positioning the United States to meet growing domestic and global energy demand.[1]

Significant technological advancements have occurred in the last 25 years resulting in opportunities to sustainably deliver fuel feedstocks from oil shale, but access to public lands will be required to further commercial delivery of these technologies. This will allow for full demonstration of the economic and environmental sustainability of technological options for oil shale development and support the continued delivery of innovations in production. As discussed below, there are technologies available today that do not use water, result in lower emissions, permit rapid site reclamation, and can result in positive net impacts for both energy and the environment. It is in the interest of the American people that such advances not be thwarted. BLM is in a key position to support the joint goals of enhanced energy supplies and environmental management and can do so by providing an avenue to resource access and commercial leasing.

Need for RD&D

There are at least 1.2 trillion barrels of petroleum products derived from oil shale available in Utah, Colorado and Wyoming. These vast energy resources must be available to the country if it is going to continue its world leadership. Nationally and globally, immense funding is currently being deployed for research and subsidization on new technologies and energy approaches. However, expenditures are generally directed at a sub-set of energy options generally classified as "renewable." While these resources are needed to meet growing demand, they only represent a component of the overall portfolio of options that will be required. Reliance on any single option can have both adverse economic and environmental impacts. Thus, innovations in these areas must be coupled with development of more traditional resources in order to maintain the strength of our nation and deliver a secure and sustainable energy portfolio for decades to come. 52984-001

We strongly recommend that BLM support a viable RD&D program by continuing current RD&D leasing programs and allowing the options under these leases to come to full fruition. In addition, all demonstrations resulting in sustainable deployment of technologies should be provided a secure avenue for acquiring additional leasing options for commercial development through retention and adherence to the preferential right to convert the RD&D acreage plus adjacent acreage up to 4,960 acres to a 20-year commercial lease. **It is further recommended that BLM initiate further RD&D programs beyond the five oil shale projects on public lands in Colorado's Piceance Basin and the single Utah project at the White River Mine site. Enhanced RD&D should be considered as a fundamental aspect of BLM's land management options for oil shale and tar sands deposits on the federal lands of Colorado, Utah, and Wyoming.**

Benefits of New Technologies

In the absence of access to oil shale resources located on public lands, it can be expected that attraction of capital the industry will be modest. Nonetheless, industry has continued to

[1] Such a RD&D program is specifically authorized by section 369(c) of the Energy Policy Act of 2005 ("EP Act").

provide funding for its own R&D efforts and technologies have been designed to significantly minimize environmental impacts and with considerably improved economics.

With rising energy demand and increased uncertainty about economic conditions, markets for conventional oil products are likely to remain tight resulting in the continuation of higher prices for these resources. This coupled with technological advances contributes favorably to the economics of oil shale production. Moreover, it demonstrates the sheer necessity to develop these resources.

Environmental.

The U.S. DOE Office of Petroleum Reserves prepared a report, "Secure Fuels from Domestic Resources," (June 2007) that reviewed the spectrum of technologies available today for the development of oil shale and tar sands. Many of the technology options and those likely to be commercially viable exhibit the following characteristics:

- No process water is used
- Low emissions heating options are utilized with potential for recycling and other heating efficiencies
- Processes can allow for rapid reclamation and reduced surface disturbance
- Depleted shale, although not exhibiting hazardous characteristics, can be environmentally managed or impounded
- CO_2 output can be significantly reduced with low temperature processes, utilization of low CO_2 emitting heating fuels (such as natural gas)
- Opportunities exist for carbon capture and sequestration and technologies develop and become economic
- Sound methods exist to protect surface water and aquifers[2]

52984-002

Economics.

In the report "America's Strategic Unconventional Fuels," (September 2007) developed by the Federal Strategic Unconventional Fuels Task Force[3] it was estimated that traditional retort technologies could be sustained at oil prices above $54/bbl and in situ projects at prices above $35/bbl. The current trend in technologies is driving down both capital and operating costs and it is highly probable that oil shale projects could reach an equal economic footing with more traditional oil extraction options. However, as we have asserted above, RD&D efforts demonstrating the viability of oil shale developments will provide an important element for understanding costs, potential efficiencies, design enhancements that would be applied to

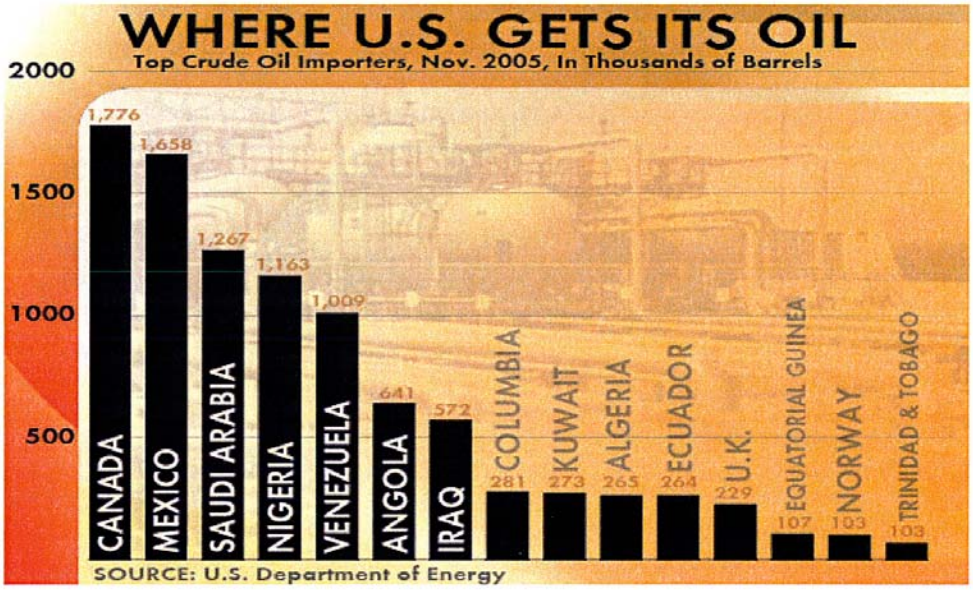
52984-003

[2] RLR is aware of comments being made by certain parties to the effect that oil shale development will necessarily result in dire environmental impacts and over-taxing of critical natural resources (e.g., water) in and around the public lands containing these reserves. Such comments appear out of touch with current technologies and methodologies offering sustainable development of these resources.

[3] Two reports were developed and are available at http://www.unconventionalfuels.org/publications.html. The first report is titled "Development of America's Strategic Unconventional Fuels Resources," September 2006. The second report is entitled "America's Strategic Unconventional Fuels," September 2007.

commercial scale projects. Such a process is analogous to the experience in Alberta, Canada with its oil sands development. With a strong commitment to publicly supported programs,[4] Alberta has become a major developer and exporter of synthetic crudes, contributing both to its own energy and economic vitality as well as that of much of North America. In fact, Canada is now a major supplier of US oil imports as indicated in the graph below:

52984-003 (cont.)



The U.S. is similarly positioned to capitalize on its vast unconventional resources. For example, the sustained operations of 2.5 million barrels of oil shale production a day for 25 years would generate in excess of $500 billion in local, state and federal revenues.[5] In order to achieve these results, there will have to be a sustained commitment to R&D and allowance for access to public lands.

52984-003 (cont.)

Concluding Comments

52984-004

The United States needs to develop its unconventional resources, including oil shale and tar sands. We understand the BLM's responsibility to manage our public lands and the resources

[4] As in Alberta where Canadian "oil sands" are being rapidly developed with public support, section 369(e) of the EP Act specifically authorizes BLM to gauge "the level of support and interest in [particular] States in the development of tar sands and oil shale resources" and conduct lease sales in those states with the highest interest. RLR encourages the BLM to carefully explore the use of this approach in the states of concern.

[5] Ibid, September 2007.

contained within those properties. However, we assert that environmental protection and energy development are not mutually exclusive. Rather, it is possible and imperative that we pursue these objectives in concert. In managing our resources, BLM should consider that it is equally important to protect our access to resources as priority resource development zones (RDZs) do exist within the public domain and these areas are matters of national energy and security concern. Arbitrary limits to development potential will stifle our energy future, limit technological advance, and eliminate opportunities for positive net sum outcomes for energy and the environment. We believe that BLM understands this as exemplified in the PEIS and noted on its web site in the following text:

52984-004 (cont.)

> *The United States holds the world's largest known concentration of oil shale. Nearly five times the proven oil reserves of Saudi Arabia underlies a surface area of 16,000 square miles. The enormous potential of this domestic resource is a key to the Nation's energy security and economic strength, and to the quality of life Americans enjoy today and hope to ensure for future generations.*[6]

Sincerely,

Laura Nelson, PhD
VP, Energy and Environmental Development

[6] www.blm.gov/wo/st/en/prog/energy/oilshale_2.html

Responses for Document 52984

52984-001: The BLM recognizes the merits of the oil shale RD&D program to provide information, not only on technologies, but also on other resources, to ensure that oil shale technologies operate at economically and environmentally acceptable levels. The BLM believes this effort will significantly enhance the collective knowledge regarding the viability of innovative technologies for oil shale development on a commercial scale and provide additional information on environmental consequences and potential mitigation measures. Data will be collected, as appropriate, to ensure that operations are in compliance with state and federal statutes and regulations. Although future rounds of RD&D leasing are possible, no decision has been made whether there will be additional opportunities to compete for RD&D leases on federal lands.

52984-002: Thank you for your comment.

52984-003: Thank you for your comments. Although expanding the RD&D program to support additional leasing is possible, no decision has been made whether there will be additional opportunities to compete for RD&D leases on federal lands.

52984-004: The BLM acknowledges the commentor’s general support of access to oil shale and tar sands.

Thank you for your comment, bruce glenn .

The comment tracking number that has been assigned to your comment is OSTSD52985.

Comment Date: April 20, 2008 22:09:12PM
Oil Shale and Tar Sands
Comment ID: OSTSD52985

First Name: bruce
Middle Initial: p
Last Name: glenn
Organization:
Address: 24396 Currant Drive
Address 2:
Address 3:
City: Golden
State: CO
Zip: 80401
Country: USA
Email: bpglenn@comcast.net
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Developing Oil Shale will only delay the day we must convert the world's economy from a petroleum base. It has never quite been economic. That is because it takes so much energy to get the energy out of the rock. And that will always be the case. When the huge environmental impacts are figured in, it seems a poor decision to continue to develop oil shale	52985-001

Response for Document 52985

52985-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Reed Morris.

The comment tracking number that has been assigned to your comment is OSTSD52986.

Comment Date: April 20, 2008 22:14:45PM
Oil Shale and Tar Sands
Comment ID: OSTSD52986

First Name: Reed
Middle Initial: F
Last Name: Morris
Organization:
Address: 571 Mountain Vista Cir.
Address 2:
Address 3:
City: Steamboat Springs
State: CO
Zip: 80487
Country: USA
Email: reed.morris@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment: Oil_Shale_Draft_PEIS_Comments_030208.pdf

Comment Submitted:

Reed F. Morris 571 Mountain Vista Cir. Steamboat Springs, CO 80487

April 20, 2008

Dear Reviews:

The undersigned herby submits his comments on the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PDEIS).

I am an individual who resides in Northwest Colorado, and I take this proposal seriously. I am an avid hiker, fisherman, and wilderness enthusiast. I value our clean air, clean water, free-flowing rivers, wildlife habitat, cultural resources, rare and endangered species, and wilderness. I also value environmentally responsible development of our domestic fossil fuels.

I am deeply concerned and troubled by the BLM's proposals and the dearth of environmental analysis presented in the PDEIS. The ongoing Resource Management Plan (RMP) amendments/revisions for the Little Snake Resource Area and the White River Resource Area in Colorado make BLM's consideration of wholesale oil shale leasing in the Piceance Basin premature and the environmental analysis of these proposals necessarily incomplete. 52986-001

I incorporate, as if entirely authored by the undersigned and as though fully set forth herein, the comments submitted by Western Resource Advocates, et. al on March 20, 2008 (Re: Oil Shale and Tar Sands Resources Programmatic EIS) including the Detailed Comments on Oil Shale and Tar Sands DPEIS on pages 6-47 of that document, which is attached in its entirety.

Sincerely,

s/

Reed F. Morris See Attachment.

See Document 00079 for entire document and responses.

March 20, 2008

BLM Oil Shale and Tar Sands PEIS
Argonne National Laboratory
EVS/900
9700 S. Cass Avenue
Argonne, IL 60439

Re: Oil Shale and Tar Sands Resources Programmatic EIS

Dear Reviewers:

On behalf of the undersigned organizations and business, we are submitting the following comments on the Bureau of Land Management's (BLM) *Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (DPEIS).* We represent individuals who live in close proximity to the areas identified for oil shale and tar sands leasing, and many others who are concerned about the fate of their public lands. Based on the BLM's analysis, commercial development of oil shale or tar sands would irreparably harm local lives and livelihoods. Development would also compromise a wide range of environmental values, including clean air, clean water, climate, recreation, water supply, and wildlife habitat.

Despite beliefs in some quarters that oil shale might finally be ready for large scale commercial development, industry's research and development are moving at a snail's pace. At the current pace of research, design and demonstration (RD&D) programs, we are years away from being informed of the social, economic and environmental impacts of commercial development. Prematurely amending Resource Management Plans (RMPs) is certain to lead to considerable unknown consequences at the expense of the affected region and its citizens.

Congress' directive that the BLM develop an oil shale and tar sands leasing program with arbitrary deadlines, while simultaneously working with industry on a RD&D leasing program, raises serious concerns. As Colorado Governor Bill Ritter stated in 2007, "the movement towards commercial leasing regulations and ultimately commercial leasing prior to the evaluation of the RD&D projects will not be in the best interest of our state and ultimately our nation."[1] Other western governors are raising similar concerns.

In June 2007, the Western Governors Association, led by South Dakota Governor Michael Rounds and Wyoming Governor Dave Freudenthal, argued the potential development of a large scale program "demands a thoughtful discussion."[2] According to the governors, the schedule for developing a commercial oil shale program set forth in Section 369 of the Energy Policy Act of 2005 "hampers the ability of the states to constructively participate." These "concerns are heightened by the lack of detailed information about the technologies that would be involved; the potential effects on our lands, water, air

[1] Appendix 1.
[2] Appendix 2.

Response for Document 52986

52986-001: Thank you for your comments. The comments you attached from Western Resource Advocates have been addressed separately. Please see responses to Document 00079. Please note that the Little Snake FO is outside of the PEIS study area.

Thank you for your comment, Edward Pucciarelli.

The comment tracking number that has been assigned to your comment is OSTSD52987.

Comment Date: April 21, 2008 04:06:54AM
Oil Shale and Tar Sands
Comment ID: OSTSD52987

First Name: Edward
Middle Initial: F
Last Name: Pucciarelli
Organization: Black Sands Energy
Address: 3360 East Russell Rd. Suite A
Address 2:
Address 3:
City: Las Vegas
State: NV
Zip: 89120
Country: USA
Email: epucciarelli@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment: To Whom It May Concern.txt

Comment Submitted:

See Attachment.

To Whom It May Concern;
My major problem with the management plan is that it does not have a way for new developers (oil shale or oil sands to enter the industry to try new technology on other than existing oil shale RD&D leases (5 in Colorado and 1 in Utah) and essentially none for oil sands in Utah. There are no second or future rounds of RD&D leasing. It seems that BLM (and the State of Colorado-Governor and Senators) do not want any new players and want current players to go away, and lock up the Resource for ever.
We at Black Sands Energy are a new company using new technology. We are the only environmentally friendly oil extraction company around. We use a closed loop, solvent based oil extraction process that uses no water and spews no contaminants into the atmosphere. Imagine; no water usage and clean air! This alone should be able to give us an opportunity to participate, but with the way things are set up we won't be able to. Please allow for new players, with the vision to develop new ways for America to become less dependent on foreign oil and at the same time not causing further damage to our environment.

52987-001

Thank you for the opportunity to state our case and voice our opinions.
Sincerely;

Edward Pucciarelli

Black Sands Energy, Inc
3360 East Russell Rd. Suite A
Las Vegas NV. 89120
Office (702) 855-3444
Cell (720) 233-3333

Response for Document 52987

52987-001: Thank you for information on your technology. Although expanding the RD&D program to support additional leasing is possible, no decision has been made whether there will be additional opportunities to compete for RD&D leases on federal lands.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52988.

Comment Date: April 21, 2008 07:30:11AM
Oil Shale and Tar Sands
Comment ID: OSTSD52988

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am opposed to leasing huge tracts of Western Colorado to energy companies for commercial operations. New power plants will significantly impact air quality in all of the downwind communities in Eagle, Garfield, Routt counties and beyond. Damages to the Class 1 airshed and waters of the White River and Zirkel Wilderness areas are risked. | 52988-001 | 52988-002 | 52988-003

I too believe there is no commercially viable process in existence today, and the proposals that are out there would have devastating effects to historic western land uses such as agriculture, wildlife and recreation. Our most valuable resource, WATER, would also be at risk with this extraaction porcess, benefits do not outweigh risks. DO NOT DO IT, too SHORT SIGHTED! | 52988-004 | 52988-005 | 52988-001 (cont.)

Responses for Document 52988

52988-001: The BLM acknowledges the commentor's preference to not support leasing of oil shale and tar sands on public lands.

52988-002: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

Speculation regarding the quantity and source of electrical power that might be needed for potential development is premature at this stage in the process.

52988-003: Thank you for your comment.

52988-004: Thank you for your comment.

52988-005: Thank you for your comment. The BLM recognizes that water is treasured in the region. An objective evaluation of potential impacts on water resources, within the scope of the PEIS as a programmatic document, is provided in Sections 4.5 5.5 and various sections of Chapter 6.

Thank you for your comment, Jon Hill.

The comment tracking number that has been assigned to your comment is OSTSD52989.

Comment Date: April 21, 2008 08:04:25AM
Oil Shale and Tar Sands
Comment ID: OSTSD52989

First Name: Jon
Middle Initial: D
Last Name: Hill
Organization:
Address: P. O. Box 40
Address 2:
Address 3:
City: Rangely
State: CO
Zip: 81648
Country: USA
Email: cripple-cowboy@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

You are not doing good enough on the electric requirements. You need to look at first dams, burning trash, burning beetle-killed trees, natural gas, nuclear, and not just coal-fired generation. I believe that we should build dams at least on the White River to make this work. Don't forget that there is already one with an EIS in place at Bonanza from the last oil shale dream. Thank you for your time, Jon D. Hill.

52989-001

Response for Document 52989

52989-001: An analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

Thank you for your comment

The comment tracking number that has been assigned to your comment is OSTSD52990.

Comment Date: April 21, 2008 08:57:12AM
Oil Shale and Tar Sands
Comment ID: OSTSD52990

First Name: [Withheld by requestor]
Middle Initial:
Last Name: [Withheld by requestor]
Organization:
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment:

Comment Submitted:

I am wholly opposed to oil shale and tar sands development on public lands. Such extractive operations severely and adversely impact all other resources on the land, such as archaeological, botanical, wildlife, and recreational values, because of the extensive surface alterations required to obtain the one mineral resource. These surface alterations include road building, noise pollution from industrial activity such as vehicle traffic, earth moving and stationery equipment, massive surface disturbance from hauling sand and shale to processing facilities, enormous consumption of fresh water, with useless, toxic, produced water being left behind, construction and use of addidional energy supply and transmission corridors such as electricity, to perform in-situ processing of keragen, and resultant contamination of ground water, lowering of water tables, eradication of archaeological sites which may be in the vicinity of mining operations, scaring off wildlife such as mule deer due to the above activity, etc. 52990-001 52990-002

It is clear that alternatives to fossil fuel development are urgently needed to deal with the nations's energy demand without the attendant environmental damage which is inevitable from the mining, and consumption of fossil fuel. Leave it in the ground and move ahead to wind and solar developments. 52990-003

Responses for Document 52990

52990-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

52990-002: In the PEIS, the BLM analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

In addition, an analysis of the impacts associated with power requirements for oil shale/tar sands development is considered to be too speculative. For example, required power could come from coal-fired plants, nuclear plants, natural gas, or renewable energy sources. As the proposed action and alternatives for subsequent NEPA analysis for leasing and plans of development decisions are formulated, aspects such as power requirements and generating capacity will be delineated and analyzed. Therefore, a more focused evaluation of the impacts of power requirements for oil shale/tar sands development will be available during the leasing and plan of development decision-making process.

52990-003: The BLM acknowledges the commentor's preference for reducing use of fossil fuels.

Thank you for your comment, sven upsons.

The comment tracking number that has been assigned to your comment is OSTSD52991.

Comment Date: April 21, 2008 12:07:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD52991

First Name: sven
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Last Name: upsons
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Address 3:
City: evergreen
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Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Hello. I strongly disagree with the BLM's plan to make available 2.3 million acres of public land for oil shale and tar sands development by private companies.

An accelerated review process of the EIS means a less thorough job is done of considering all aspects of opening up public lands for private gain. 52991-001

I want to see the Bureau finish its job of serving the public interest, and not the interests of selective, private corporations.

Thank you for your time.

Sven Upsons Evergreen, CO

Response for Document 52991

52991-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Mary McCutchan.

The comment tracking number that has been assigned to your comment is OSTSD52992.

Comment Date: April 21, 2008 12:31:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD52992

First Name: Mary
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Attachment:

Comment Submitted:

After speaking with oil company representatives at the public meeting, I found the Shell rep to be most forthright about the ratio of energy used in the process versus energy recovered. This technology (so far) ruins more than it benefits. I think we would be better served by waiting for it to advance. Secondly, STOP PANDERING TO THE MERCHANTS OF DEATH!!!!!!!!!!!!!!1

52992-001

Response for Document 52992

52992-001: Thank you for your comment.

Thank you for your comment, Dean Moffatt.

The comment tracking number that has been assigned to your comment is OSTSD52993.

Comment Date: April 21, 2008 12:50:11PM
Oil Shale and Tar Sands
Comment ID: OSTSD52993

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Attachment:

Comment Submitted:

I am against development of oil shale altogether. If it can't be stopped, then it should go slow. I wrote my college thesis on oil shale in 1966. It was a bad idea then. I worked for Battlement Mesa up to May 2, 1982. It was a bad idea then. Until someone can come up with a retort method that doesn't use massive amounts of water and coal, oil shale development will continue to be a bad idea. | 52993-001

Response for Document 52993

52993-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, Joyce Olson.

The comment tracking number that has been assigned to your comment is OSTSD52994.

Comment Date: April 21, 2008 13:09:58PM
Oil Shale and Tar Sands
Comment ID: OSTSD52994

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Attachment:

Comment Submitted:

Please take it easy with the oil shale development. There is not a good and proven method, as yet, for its economical or safe extraction. We live in a desert where water is in limited supply so it is imperative we not use water irresponsibly. At some time in research and development, shale will become extractable. Has't happed yet so we neeed to wait until the system works to benefit all.

52994-001
52994-002
52994-001 (cont.)

Responses for Document 52994

52994-001: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

52994-002: Thank you for your comment. The use of water for oil shale and/or tar sands development would be a critical concern of many stakeholders and would be addressed in NEPA documents at the lease and development stages.

Thank you for your comment, Mark Schofield.

The comment tracking number that has been assigned to your comment is OSTSD52995.

Comment Date: April 21, 2008 13:11:47PM
Oil Shale and Tar Sands
Comment ID: OSTSD52995

First Name: Mark
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Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Thank you for the opportunity to comment on the Oil Shale-Tar Sands draft PEIS. I am deeply concerned about the ecological and social impacts associated with full-scale oil shale development in western Colorado. Many of these impacts were disclosed in the PEIS. Cumulatively, these impacts would result in negative ramifacations for local communities, air, water and wildlife that would persist for generations. These impacts, as currently understood, are unacceptable and fly in the face of local desires for a healthy landscape and sustainable economic activity. 52995-001 52995-002

It is particularly troubling that the BLM is proceeding with this PEIS and potential commercial leasing even though (as the agency acknowledges) it is not clear what technologies will be used to exploit this resource - and therefore it is not clear what the precise impacts will be.

Given the vast impacts disclosed in the PEIS and the lingering unknowns about what technologies will be used in commercial oil shale development, the BLM must put the brakes on commercial oil shale leasing/development and allow current Research, Demonstration & Development projects to play themselves out. That way our communities will be able to understand which technologies are economically viable and decide whether or not the impacts associated with these technologies are socially and ecologically acceptable. 52995-003

Responses for Document 52995

52995-001: Thank you for your comment.

52995-002: The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified.

The cumulative impacts analysis in the PEIS was conducted to the extent appropriate, as dictated by the limited scope and narrow allocation decisions being proposed in the PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing). At this preliminary stage, when the specifics of the extent of future oil shale and tar sands development are unknown, it is neither required nor possible for this PEIS to present a cumulative effects analysis showing the impacts of leasing and development of these resources across the entire landscape of these three states. At the leasing or plan of development stage (when site-specific information is available) and when the scope of the proposed action is determined, the appropriate level of additional analysis will be performed, including a cumulative analysis. The analysis will enable state and local governments to have a complete understanding of the long-term impacts associated with past, present, and reasonably foreseeable actions.

52995-003: The alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development; any future leasing will require subsequent NEPA analysis as is described in the PEIS. When applications to lease are received and additional information on the technologies and potential impacts becomes available, the BLM will conduct further NEPA analysis. The additional information may be a consequence of research on the RD&D leases or a result of industry research or studies on nonfederal lands. Further NEPA analysis will include consideration of direct, indirect, and cumulative effects, reasonable alternatives, and mitigation measures, as well as what level of development may be anticipated.

Oil shale has tremendous potential to help provide the Nation with a secure and reliable energy source. With the passage of the Energy Policy Act of 2005, Congress recognized the importance of encouraging research and development, as well as of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. Therefore, Congress mandated, in the Energy Policy Act of 2005, that the Secretary of the Interior pursue the development of oil shale and tar sands, if it can be done in an acceptable, environmentally sound manner.

Thank you for your comment, Daniel Luecke.

The comment tracking number that has been assigned to your comment is OSTSD52996.

Comment Date: April 21, 2008 14:26:53PM
Oil Shale and Tar Sands
Comment ID: OSTSD52996

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Attachment: Oil Shale PEIS Luecke Commentwith Attach.doc

Comment Submitted:

See Attachment.

Daniel F. Luecke
3870 Norwood Court
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(303) 443-5815

April 21, 2008

BLM Oil Shale and Tar Sands Programmatic EIS
Argonne National Laboratory
EVS / 900
9700 South Cass Avenue
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Re: Oil Shale/Tar Sands draft PEIS, Colorado River Endangered Fish, and Water Availability

To whom it may concern:

If the Colorado River's endangered fish are ever to be restored it will be in the upper basin. Oil shale and tar sands development, were it to occur on even a modest scale, would seriously undermine the past successes and future potential of recovery efforts. The most important basins for the native fish are the very ones on which BLM leasing alternatives have painted bulls-eyes. For all practical purposes, the oil shale/tar sands Draft PEIS fails to address this issue in any serious way. 52996-001

Perhaps there is no one place where the Endangered Species Act (ESA) is so directly related to water development as it is in the Upper Colorado River Basin. Here the history of conflict between water interests and those concerned with the protection of the river's endangered fish (Colorado River pikeminnow, humpback chub, bonytail, and razorback sucker) is long and acrimonious.

But by the mid-1980s, all parties to the conflict -- the responsible federal and state agencies, water developers, and the environmental community – settled on a more cooperative approach that resulted in the formalization of an inter-agency agreement for the recovery of the endangered fish. The agreement, the Upper Colorado River Endangered Fish Recovery Implementation Program (RIP), established as its central feature the working assumption that the native fish could be recovered while, at the same time the states of Colorado, Utah, and Wyoming developed water to which they were entitled under the Colorado River Compact and the Upper Colorado River Compact. The parties to the agreement structured it in such a way as to accommodate both environmental and water development concerns. This accommodation provides ESA coverage for water depletions in exchange for support of water and habitat related improvement activities designed to restore the native fish populations to self-sustaining levels.

The program, now in its 21st year, contains five major elements:

1. Habitat management: identify instream flows, the change in operation of federal reservoirs in the basin, and where necessary, obtain water rights.
2. Habitat development: research methods for creating, protecting, and improving habitat.
3. Stocking native fish: identify and maintain specific genetic stock of native fish.
4. Non-native species and sport-fishing: monitor sizes of non-native fish populations and manage and reduce them where necessary.
5. Research, monitoring, and data management: study various means of recovering fish (including protection of flows) and monitor long-term population trends.

The program participants incorporated these elements into a detailed set of actions (called the RIP Recovery Action Plan or RIPRAP) for each of the important drainages in the upper basin – the Colorado mainstem, the Green, the Yampa/Little Snake, the Gunnison, the White, the Duchesne, and the Dolores. Their intention was to create an action plan that would make it possible to respect the working assumption on recovery and entitlements described above.

The oil shale/tar sands basins (Green, Yampa/Little Snake, White, Colorado, and Duchesne) are at the very center of the RIPRAP[1] and their development would seriously threaten the working assumption as it relates to flow needs for the native fish found in these drainages. The RIP is designed to make compact entitlement development possible, but not necessarily at any level and at all places in the basin.

To explain the threat posed by oil shale and tar sands development, this letter describes the importance of these basins to native fish, the water elements of the action plan, and it highlights, as well, all depletion restrictions to which the states and their water users have agreed. The intricacies of the recovery plan and the ways in which it will affect development in specific places are illustrated by describing depletion limits and flow requirements for one stretch of the Colorado, the 15-Mile Reach near Grand Junction. The letter also comments on the related water matter of Colorado River compact entitlements.

Green River

The Green River system supports populations of humpback chub and Colorado pikeminnow, and it historically supported populations of bonytail and razorback sucker. The importance of the Green River to the endangered fishes has been established by the RIP and is the highest priority area for recovery of the species. Habitat in Desolation and Gray canyons supports a self-sustaining humpback chub population, and the last known riverine concentration of wild bonytail was found in the Green River

[1] In the draft PEIS the oil shale leasing maps (Figures 2.3.3-1 to 2.3.3-6) and the tar sands maps (Figures 2.4.3-1 and 2.4.3-2) for Alternatives B and C make this abundantly clear.

within Dinosaur National Monument. Recovery plans for humpback chub and bonytail identified the Green River in Desolation and Gray canyons and in Dinosaur National Monument as important to recovery. Until recently, the Green River supported the last known riverine concentration of wild razorback sucker.

The flow recovery actions in the Green River have focused on refining the operation of Flaming Gorge dam to enhance habitat conditions for the endangered fishes. A biological opinion was issued on the operation of Flaming Gorge Dam in 1992. This opinion contained seasonal flow recommendations for the Green River at Jensen, Utah, and called for additional research to refine the flow recommendations (particularly flow recommendations for spring and winter) and to develop flow recommendations for other areas of the Green River. A report including revised flow recommendations was issued in 2000, a new biological opinion was finalized in 2005, and NEPA compliance on reoperation of Flaming Gorge Dam was completed in 2006.

An element of the 1992 Flaming Gorge Dam biological opinion identified the need to protect releases from possible diversion in the occupied habitat of the endangered fishes. The initial focus of this effort was to legally protect Flaming Gorge releases in the Green River down to the confluence of the Duchesne River for the months of July through October. Flow protection for the remainder of the year (November–June) and downstream to Canyonlands National Park will be addressed by Utah now that the final Environmental Impact Statement and biological opinion on reoperation of Flaming Gorge Dam have been issued. This flow protection will, for all practical purposes, eliminate any future depletions in the Green from Flaming Gorge to Lake Powell. The State of Utah agrees, the strongest evidence being that Utah's State Engineer has stopped approving any large water development proposals.

Yampa River and Little Snake River

The Yampa River is the largest remaining essentially unregulated river in the Upper Colorado River Basin, and its inflow into the Green River, 65 miles downstream of Flaming Gorge Dam, ameliorates some effects of dam operation on river flow. Yampa flows (augmented by flows from the Little Snake), especially spring peak flows, are crucial to the maintenance of the Green River's "large-river" characteristics. The Yampa River supports resident subadult and adult Colorado pikeminnow, contains one of the primary Colorado pikeminnow spawning areas in the Upper Basin and is a major producer of fish for the entire Green River subbasin. A small population of humpback chub exists in the Yampa River in Dinosaur National Monument. Spawning aggregations of adult razorback sucker have been observed near the mouth of the Yampa River, and adult razorback sucker captured upstream to the mouth of the Little Snake River. The lower portion of the Yampa River is part of the historic range of bonytail and is associated with some of the most recent captures of this very rare fish.

The Yampa River Management Plan, a plan that has important implications for its major tributary, the Little Snake, identifies management actions necessary to provide and protect the needs of the endangered fishes, proposes base flows in accordance with the Yampa River flow recommendations, and limits future depletions to 50,000 acre-feet. A cooperative agreement implementing the Yampa River Management Plan and a PBO were completed for the Yampa River in 2005. In 2009, the RIP and the Colorado Water Conservation Board (CWCB) will review flow recommendation under the Yampa PBO and, prior to that, they will develop a process for assessing the need for further instream-flow protection for the endangered fishes. On completion of this review, a determination will be made regarding the need for additional instream-flow protection for the endangered fishes.

Duchesne River

Colorado pikeminnow and razorback sucker regularly utilize the mouth of the Duchesne River especially during spring runoff. Fishery surveys conducted in 1993 documented the use of the lower 15 miles of the Duchesne River by Colorado pikeminnow and razorback sucker. More recently, fish surveys have been conducted in the lower 33 miles of the Duchesne River and have documented seasonal use by Colorado pikeminnow and razorback sucker.

Initial flow recommendations were developed for the Duchesne in 1995, refined in 1997, and finalized in 2003. During that interval, a water availability study that identified sources of water to meet the flow recommendations was also concluded, as was a coordinated reservoir operations study. The Duchesne Biological Opinion issued in 1998 was updated in 2005. Agreements are now being developed to provide flows and flow protection in the basin. With this agreement in place, there will be no room for new depletions in the Duchesne.

White River

Adult Colorado pikeminnow occupy the White River downstream of Taylor Draw Dam near Rangely, Colorado, in relatively high numbers. Adult Colorado pikeminnow in the White River spawn in the Green and Yampa rivers. Juvenile and subadult Colorado pikeminnow also utilize the White River on a year-round basis. Incidental captures of razorback sucker have been recorded in the lower White River.

Interim flow recommendations for the White River were completed in 2004 and are now under review for possible refinement. This review involves the addition of peak flows to the base flow targets in the 2004 recommendations. Instream-flow filings are on hold pending reevaluation of how flows will be legally protected in Colorado, but with their protection, whatever form it may take, future depletions will be constrained. When the flow recommendations are available and their review complete, the U.S. Fish and

Wildlife Service RIP office plans to initiate a PBO process that will, among other things, establish depletion limits on the White River in both Colorado and Utah.

Colorado River (an important example of depletion limits)

The mainstem Colorado River from Rifle, Colorado, to Lake Powell, Utah, supports populations of humpback chub and Colorado pikeminnow, and is recognized as important to the recovery of all four endangered fishes. Relatively large and healthy humpback chub populations occur at Black Rocks and Westwater Canyon near the Utah-Colorado state line. A smaller humpback chub population occurs in Cataract Canyon, and some of the last wild bonytail were collected in this river reach. All life stages of Colorado pikeminnow occur in the section of river from Palisade, Colorado, downstream to Lake Powell. However, razorback sucker populations, while present in the mainstem, have declined precipitously in the past 20 years.

In 1992, Colorado filed an application in state water court for a 581 cubic feet per second (cfs) instream-flow right in the 15-Mile Reach (Colorado River upstream of the Gunnison River confluence) for the months of July, August, and September. A final decree was issued in 1997. A PBO for this reach was completed in December 1999 and put in place additional deliveries of water and restricted future depletions. The future depletions restriction limits are up to two 60,000 acre-foot increments, the second of which depends on the status of the native fish (i.e., the adult pikeminnow population estimated to be about 870 must reach 1,100).[2] Even the first depletion increment of 60,000 acre-feet depends on the condition of the native fish. If the population estimate of pikeminnow declines no additional depletions against this increment are allowed.[3] Two projects now under EIS review, the Windy Gap Firming Project of the Northern Colorado Water Conservancy District and the Moffat System expansion of Denver Water, would take 50,000 acre-feet of the first increment, leaving at most only 10,000 acre-feet in the first increment.

The instream flow requirements of the 15-Mile Reach PBO illustrate the complexities of the recovery program and the way in which depletion limits are intertwined with the water needs of the endangered fish. Regarding new water for the 15-Mile Reach under the PBO, the Bureau of Reclamation has made available 5,000 acre-feet of water annually plus an additional 5,000 acre-feet in four of every five years from Ruedi Reservoir to augment flows during July, August, and September. In addition, water is available from the lease of 10,825 acre-feet/year of water from Ruedi Reservoir and permanent commitment of 10,825 acre-feet/year from East and West slope water users. By 2009, Colorado River Water Conservation District (CRWCD) and Denver

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[2] Final Programmatic Biological Opinion for Bureau of Reclamation's Operations and Depletions, Other Depletions, and Funding and Implementation of Recovery Program Actions In the Upper Colorado River Above the Gunnison River, U.S. Fish and Wildlife Service, Denver Colorado, December 1999.

[3] A significant population decline could even prompt reinitiation of the PBO. Specifically, "a negative population response would trigger reinitiation if the population declined to 350 adults." Final PBO, page 71.

Water will have a plan in place to permanently provide the 10,825 acre-feet that is now delivered from existing reservoirs. Additional water is being provided through an MOA with CRWCD for delivery of up to 6,000 acre-feet of water from Wolford Mountain Reservoir.

Other sources of water for the 15-Mile Reach include construction of the Grand Valley Water Management Project and operation of federal and private projects. Water users are also exploring ways to increase participation in the expanded coordinated reservoir operations (CROS) as recommended in the PBO. Superimposing oil shale development at almost any scale on top of this complex agreement is a challenge that the BLM's Draft PEIS has completely ignored.

Another feature of ESA compliance that the BLM PEIS has ignored is the need to consult with FWS on the the recovery program and the the impact that its leasing alternatives would have. This omission compounds the PEIS inadequate assessment of the links between leasing and the RIPRAP. 52996-002

Colorado River Compact, Water Availability, and Energy Development

The Draft PEIS misstates the nature and substance of the agreement of the 1922 Colorado River Compact and, as a result, overestimates upper basin compact entitlements. To understand this misreading involves an explanation of certain provisions of the compact and also the way in which BLM misuses a study of the State of Colorado.

While it is true that the compact signatories apportioned, under Article III(a) of the compact, a "consumptive use of 7.5 million ac-ft of water annually" to the upper and lower basins (PEIS, page 3-60), they did not establish this apportionment "based on an assumption of 15 million ac-ft of totally available water for the Colorado River." (PEIS, page 3-60) They actually believed there was more water – closer to an annual average of 17.5 million acre-feet -- and that they were being conservative with the 7.5 million acre-feet divisions in Article III(a). But the belief of the signers and the 7.5 million acre-foot apportionments are, for all practical purposes, made irrelevant by two other compact provisions, Article III(c), which establishes an obligation to Mexico, and Article III(d), which places all of the risks of being wrong about the annual average on the upper basin. 52996-003

Under Article III(c) and the US/Mexico treaty (negotiated subsequent to the compact), the upper basin states have an annual obligation to deliver 750,000 acre-feet to Mexico (an obligation with which the states do not agree) and under Article III(d) the states must not prevent the delivery of less than "*75,000,0000 acrefeet for any period of ten consecutive years*" immediately below Lake Powell. Many experts now believe that the

long-term average is less than 14 million acre-feet.[4] But even assuming it were 14 million acre-feet, accounting for the upper basin obligations under III(c) and III(d) and making a simple calculation would leave the states with an annual entitlement of in the neighborhood of 5.75 million acre-feet.

The PEIS takes a different approach based on the misreading of the CWCB's *Statewide Water Supply Initiative* (Colorado Department of Natural Resources, Denver, November 2004) by citing it as the basis for its (PEIS) "conservative" estimate of 12 million acre-feet of water available to the upper and lower basin states and then dividing this equally, i.e., 6 million acre-feet to each (see footnote f to Table 3.4.1-2).[5]

The CWCB did not, however, intend to have its report interpreted as the PEIS has, but rather to assume that after meeting the 75 million acre-foot delivery requirement and also the treaty obligation to Mexico (not mentioned in this section of the PEIS), the upper basin states would have 6 million acre-feet to share. But this would not be the kind of "conservative assumption" that the PEIS seems to believe it to be. Reclamation, for example, estimates that the upper basin share is between 5.55 million acre-feet and 5.72 million acre-feet (in the range of the above estimate based on III(c) and III(d)), depending on assumption made about power pool levels behind the dams (Reclamation, Hydrologic Determination, 2007).

The most conservative interpretation of this estimate in conjunction with the "High" 2030 demand estimates in Table 3.4.1-2 of the PEIS would mean that within the next 20 years Colorado will have almost exhausted its compact entitlement – its total entitlement would be 2.872 million acre-feet (5.55 million x .5175) and the demand from the table is 2.811 million acre-feet, an estimate obtained from the *Statewide Water Supply Initiative* that does not include water for oil shale development.[6] The remaining entitlements for Utah and Wyoming are able to accommodate Table 3.4.1-2 demands, which like Colorado do not include water for oil shale or tar sands, somewhat more easily, but they still put these states in constrained positions.[7]

52996-003 (cont.)

These demand estimates, which do not include any oil shale or tar sands development, if they were to be realized over the next decades, would not necessarily lead to an actual "compact call" (i.e., a requirement that the upper basin states curtail diversions to

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[4] A great deal of uncertainty surrounds this estimate, in part due to research on historic climate trends and in part to forecasts of climate change impacts.

[5] If, in fact, there were only 12 million acre-feet available each year, Article III(d) would still require a delivery of 75 million acre-feet over any 10 year period, leaving the upper basin with, at most, 4.5 million acre-feet.

[6] *Statewide Water Supply Initiative* (Colorado Department of Natural Resources, Denver, November 2004).

[7] The Utah Department of Natural Resources and the Wyoming State Engineer's office verify that the depletions in Table 3.4.1-2 do not include oil shale or tar sands demands. In a recent communication (April 18, 2008) Wyoming has also reported that the depletions in Table 3.4.1-2 are out-of-date.

meet the delivery requirements of the compact and the treaty), but they would move the basin closer to one and would virtually eliminate the states' maneuvering room.

If almost any level of oil shale and tar sands development were then placed on top of these demands, there would have to be upper basin reductions in use or, in the alternative, the upper basin states would challenge at least a component (most likely the Mexico treaty) of the obligations to the lower basin. Either outcome would have very large-scale and lasting effects. 52996-003 (cont.)

The draft PEIS has not dealt fully or correctly with these water issues.

Sincerely,

Daniel Luecke, Ph.D.

Enclosure: Luecke resume

Responses for Document 52996

52996-001: The BLM recognizes that the four species of Colorado River endangered fishes and their critical habitat occur in the areas being considered for oil shale and tar sands leasing. Impacts of development on these species are discussed in Sections 4.8.1.4 and 5.8.1.4. In addition, conservation measures to protect these species were developed in consultation with the USFWS and are presented in Appendix F. It is important to recognize that the proposed action is a land use allocation and does not commit any mineral resources or authorize any BLM action that would have a direct, indirect, or cumulative impact on the threatened or endangered species. As stated in the PEIS, each project would require adherence to BLM policy on the protection of sensitive species and project-specific ESA Section 7 consultation with the USFWS.

52996-002: The need to consult with the USFWS at the project-specific lease and development levels is discussed in several sections of the PEIS (e.g., Sections 4.8.1.4 and 5.8.1.4). In Appendix F, conservation measures for the Colorado River endangered fishes are identified, including the possible need to complete actions related to the Recovery Implementation Program.

52996-003: Thank you for your comment. The errors have been corrected, as appropriate, in Section 3.4 of the PEIS.

There are different opinions regarding the flow of the Colorado River. Historical data were used to determine the average flow. A recent BOR "Final EIS for Colorado River Operations under Low Reservoir Conditions" study, published in 2007, confirmed that the long-term average annual natural flow at Lees Ferry is about 15 million ac-ft, by using data from 1906 to 2005. That would allow the Upper Colorado River Basin states an annual entitlement of more than 6 million ac-ft. To be reasonably conservative, we used the 6 million ac-ft in evaluating the water availability for the PEIS. Meanwhile, as stated in the PEIS, we recognize that prolonged droughts could reduce the flow of the river.

We understand that the estimates provided in CWCB's Statewide Water Supply Initiative did not include water uses for future oil shale or tar sands development. The development in Colorado, Utah, and Wyoming is restrained by water availability—the flow of the Colorado River. If the policy of the development is adopted, the source of most of the water needed is likely to be from the transfer of agricultural water through water rights acquisitions by oil shale or tar sands developers.

Thank you for your comment, eric edelstein.

The comment tracking number that has been assigned to your comment is OSTSD52997.

Comment Date: April 21, 2008 14:32:40PM
Oil Shale and Tar Sands
Comment ID: OSTSD52997

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Attachment:

Comment Submitted:

NO! tHIS WILL POISON OUR WATER AND OUR AIR AND IS COMPLETELY UNACCEPTABLE! iT'S TIME THAT THE BLM LISTENS TO ITS CONSTITUENTS AND QUITS BEING THE LAP DOG OF HEAVY INDUSTRY! | 52997-001

Response for Document 52997

52997-001: The BLM acknowledges the commentor's preference to not support access to oil shale and tar sands on public lands.

Thank you for your comment, James Bunger.

The comment tracking number that has been assigned to your comment is OSTSD52998.

Comment Date: April 21, 2008 15:15:06PM
Oil Shale and Tar Sands
Comment ID: OSTSD52998

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Attachment: PEIS JWBA comments Final.pdf

Comment Submitted:

This submittal replaces file OSTSD52792 submitted on the earlier deadline. See Attachment.

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April 21, 2008

Mr. Michael D. Nedd
Assistant Director-Minerals, Realty and Resource Protection
Bureau of Land Management
Oil Shale and Tar Sands Resources Draft Programmatic EIS Comments,
9700 South Cass Avenue,
Argonne IL 60439

Dear Mr. Nedd:

Thank you for the opportunity to comment on this critically important document. We advocate adoption of Alternative B, as may be corrected or amended based on our comments.

Section 369 EPACT 05 (PL 109-58) directed the Secretary of Interior to prepare this PEIS to support a commercial leasing program necessary for the production of energy supply from the vast US oil shale resources. We offer specific comments below, but some historical context to both the importance of the PEIS and our recommendations is in order.

Federal oil shale lands have not been generally available, with the limited exception of the prototype leasing program in the 1970s, for commercial development for more than 80 years. As a consequence, the private sector has been shut out of this resource opportunity, resulting in a lack of definitive information and the appearance of little commercial interest.

The 1930 withdrawal of oil shale leasing by President Hoover (Executive Order # 5327), effectively took federally managed oil shale out of private sector consideration, from which we have not yet recovered. Even though President Truman in 1952 issued Executive Order #10355 authorizing the Secretary of Interior to rescind the Hoover order and lift the moratorium, *to this date, the moratorium has not been lifted.*

In 1965, testifying before the Senate Committee on Interior and Insular Affairs, Undersecretary of the Interior John Carver, Jr., described the situation as follows: "The Secretary has not yet determined what recommendation should be made to Congress, if any, for the resolution of any policy questions prior to the lifting of the [oil shale] withdrawal order... No Secretary . . . can take any more than tiny and tentative steps which have the effect of relinquishing title to this resource without running great risks of misinterpretation ... This reserve is so big and so valuable that ... it tends to freeze any kind of action, either congressional or administrative..."

In 1980, the Congressional Office of Technology Assessment (OTA) stated "...private landowners (generally major energy companies) have traditionally declined to commit to large-scale development pending a clarification of the Government's position with regard to private access to public oil shale resources. If industry did invest in private tracts the Government could

subsequently permit development on adjacent Federal lands that, according to industry, had greater profit potential." (This statement relates to the fact that most private land is a result of pre-1920 mining claims based on outcrop discoveries, whereas the thickest zones are in the centers of the basins and were not 'locatable' pre-1920, and which remained federal land.)

Today, we find that only a few companies have enough privately held oil shale resources to consider commercialization, and even these holdings may not be large enough or of the necessary characteristics of depth, thickness, or richness for available technologies. Even if existing holdings were attractive for investment, the private sector requires that a regulatory framework and fiscal regime be established in order to reduce the uncertainty of current policy and legal conditions. Most observers believe that the best federal land must be made available to block up logical development units that will allow for initial production, and subsequent expansion of that production in future generation projects. Without the promise of resource availability, significant expenditures on technology R and D will continue to be impeded. 52998-001

Hence, it is imperative that these impediments be mitigated. The PEIS is one component of this mitigation process; commercial leasing regulations are another critical component. The PEIS should have the effect of optimizing responsible development for the economic and security benefits for the Nation while leading to proper regulation of the social and environmental impact.

Geologically Prospective Oil Shale Resources

In the context of oil shale development the term 'geologically prospective' is tantamount to 'economically prospective'. Indeed, in discussing or defining the term geologically prospective words such as 'commercially viable' are used, which implies an economic component.

Unfortunately, the criteria adopted for classifying 'geologically prospective' (25/25 and 15/15) are overly-simplistic, do not track very well with economics, and appear to have resulted in eliminating economically prospective resources. A better method, for which the data were readily available to calculate, would have been to use some form of pay-ratio, as is used in reserve estimates for minerals. Such evaluation methods are becoming well-established for Alberta oil sands. These methods use average grade, intercept height, overburden ratios (which are combinations of accessibility and richness), and could have readily been calculated from the geologic maps, the grade contours (isopachs) and related literature data existing for oil shale. Such an analysis of currently-available data would have contributed greatly to the increased value of the public land, and would have avoided the situation that the 1980 OTA report was concerned about, but which will persist to some extent under the currently classified area. 52998-002

The 500 ft criterion for mining access is likewise both simplistic and arbitrary. Using this criterion would have been unnecessary had a reserve estimation technique been used. Unfortunately, this criterion eliminates substantial resource amenable to viable mining, whether surface or underground. For instance, the criterion eliminates such areas as tract Ca even though, by industry estimates, the overburden to pay ratio is acceptable for surface mining, and warranted a substantial bonus bid in the 1970s. It appears to also eliminate certain exposures along drainages even though underground mining through horizontal adits is a proven and reasonable-cost method (Unocal experience) of accessing mineral ore. Conversely, the 500 ft

criterion includes some land that is clearly not commercially viable for mining because of the thinness of the rich, pay intercept at depth.

We recognize that changing the 'geologically prospective' classification criteria at this stage of the PEIS process would delay the process and for that reason we do not request a change. However, as the process moves forward, or if for other reasons the process is delayed, we urge BLM to consider an appropriate reserve estimation methodology so as to avoid elimination of commercially viable resources and to enhance the information value of the resource. 52998-002 (cont.)

Technology

The PEIS asserts that incomplete information on technology prevents the document from being used as a basis for commercial leasing rules. Instead the objective has been diminished to a resource allocation document; one which only informs modifications of Resource Management Plans (RMPs).

Failure to achieve the intended objectives of Sec 369 is significant and is, we believe, unnecessary. Most of the important environmental impacts of oil shale development are either known or readily calculable from available information. The richness and grades are known; hence, the acreage impacted can be calculated for any given production capacity.

For example, simple analyses of core-hole data (stratigraphy and assays) along with reasonable recovery approaches reveal the production potentials given in the following table. Applying reasonable production scenarios would provide an estimate on the impacted acreage from various locations. 52998-003

Colorado Piceance Creek Basin	Prospective yields 1000s bbl/acre
Mining (Southern exposures)	100-150
In-situ (Southern basin)	200-500
In-situ (North/Central basin)	500-1500
Utah Uinta Basin	
Modified In-situ (Southeastern basin)	100-150
Mining (Eastern basin)	110-140
In-situ (North/Central basin	200-400
Wyoming (not estimated)	

All oil shale production will involve some form of heating, and the energy required to heat the oil shale is well-known. Reasonable engineering estimates of heat recovery factors could place bounds on the net energy requirements.

The quantities of non-condensable gases produced are known, within reasonable limits. Best available control technologies are known for controlling emissions and cleaning discharge water. Gas cleaning technologies are known from the gas industry. Liquid upgrading technologies are known from the Unocal experience, as well as the broader petroleum industry.

Total water consumption, even if placed at some upper end of the generally accepted range (4 bbl-water/bbl-oil) is known. Transportation requirements with pipelines, rail or truck could be determined for various production scenarios. Potential production scenarios were recently outlined by the Strategic Unconventional Fuels Task Force in several reports (www.unconventionalfuels.org). It appears than none of the several years of work of this Task Force was consulted (at least none of their work is cited in the bibliographies). 52998-003 (cont.)

Based on the ease by which boundaries to the problem can be determined from readily available information, it does not appear as if the PEIS process took the obvious step of independently estimating environmental impacts of reasonable production scenarios, the very task it was charged to perform. As stated above, relying on current private sector experience would be expected to be a fruitless approach, because the lack of resource availability has impeded expenditures on research, development and commercialization. To cut through the catch-22 the PEIS must make some reasonable estimates of boundaries of impacts, which will necessarily be refined over time.

Even if the PEIS fails to estimate the impacts in support of commercial leasing regulations, the document should at least acknowledge that compliance with NEPA through current regulatory authorities is a currently-established method for assuring acceptable controls on environmental impact. Deficiencies of the PEIS process should not be used to paralyze the Government from moving forward on making these resources available for production. 52998-004

Perpetuation of myths

Certain myths have been perpetuated in the document. The 'popcorn effect' described on page A-49 and elsewhere does not, in fact, exist. Mined oil shale, like any mined soil or rock, exhibits a lower bulk density than the 'bank' density before it was mined. This lower density is entirely a function of breaking and rubblizing the ore. Contrary to statements in the PEIS, there is no expansion of the ore in the retort; in fact, as the oil is produced the particles actually contract. 52998-005

Inordinate CO_2 emissions do not occur at modest temperatures as asserted on page A-40. Even under the most severe conditions of combustion temperatures, the carbonate decomposition endotherm is only about 8% of the product values (Synthetic Fuels Data Handbook, Cameron Engineers, page 33, 1975), not the insurmountable problem and devastation to yields and product quality asserted. In fact, holding temperatures below the decomposition temperatures of the carbonate minerals during retorting is the long-accepted way to avoid CO_2 production. 52998-006

Relative to total life-cycle CO_2 emissions it is not even clear that shale oil production would be higher than for the heaviest, hardest-to-recover petroleum. In fact, we can expect efficiency improvements to lower emissions from shale oil over time, whereas we can expect emissions 52998-007

from conventional petroleum to increase with time. Thermodynamics tell us that there will come a time when there is parity between the two. 52998-007 (cont.)

Alternative C

The criteria distinguishing between Alternatives B and C are regrettably simplistic and flawed. Overlaying current oil and gas seasonal restrictions on oil shale land, and by so doing effectively eliminating large swaths of viable resource, ignores the fact that oil shale is substantially more concentrated than oil and gas. Only a small fraction of acres need be disturbed at one time to generate equivalent yields and economic benefits compared to oil and gas. Restrictions that are feasible for oil and gas result in fragmentation of contiguous acreage, completely eliminate the opportunity for oil shale development, unnecessarily so, because permitting year-round surface operations for projects of limited acreage may be acceptable under current standards. 52998-008

Additionally, there is a component of arbitrariness in this criterion in that land that has been previously restricted, through RMPs or agreements with leaseholders, is eliminated while land that has yet to encounter oil and gas development is open. Because of the excessive and unnecessarily broad restrictions imposed by Alternative C, we recommend rejecting this alternative.

Alternative A

Alternative A may not eliminate oil shale from leasing consideration as stated in Table ES-1. Under current RMPs (Book Cliffs, Utah and White River, Colorado RMPs, for example) there are large areas currently open to oil shale leasing. Should commercial leasing regulations be promulgated, it would appear that no changes in RMP would be needed to accommodate leasing in areas currently designated as "open to leasing". Any closing of these currently-open areas as a consequence of this PEIS process would not be 'No Action', and would be outside of the established regulatory procedure. 52998-009

With respect to tar sands, it would appear that all alternatives would result in closure of areas outside the STSAs, which would mean even the 'No Action' alternative results in action.

Summary of Need for PEIS

It should now be obvious to those involved with energy that the World is heading for a crisis in liquid fuels supply. Attention being paid to renewables (solar energy in its various electricity-generating forms) should not distract from the urgent need for more secure, abundant liquid fuels. Without oil shale (and coal liquids) the United States will soon rely even more heavily on imports and will find itself competing even more with other countries for limited petroleum supplies. This competition, as exhibited in the escalating price of crude oil, is already having devastating effects on undeveloped and developing economies. Any notion that oil prices will once again return to modest levels completely ignores the fact that the level of investment needed to achieve that situation is simply not being made. 52998-010

Economists speak of the unexpected ability for the United States to absorb higher energy costs, but such discourse systematically ignores the impact we are having on the rest of the world by consuming supplies we are unwilling to provide for ourselves. Unlike most nations that import oil, we are actually blessed with a choice; we have vast resources that will make a difference. Whether it is obvious now, or later, there will come a time when it is incumbent that the United States takes greater responsibility for its own energy needs. Doing so not only advances our economy and security, but by reducing demand on other's resources we directly benefit world society. The effect of promoting global social stability could be enormous, and to fail will surely exacerbate the chaos resulting from insufficient supplies.

52998-010 (cont.)

Oil shale, with its rich grade and vast accumulation is by far the most economically and thermodynamically attractive next-generation source of domestic liquid fuels. Accumulations ranging from 100,000 bbl/acre to more than 1 million barrels per acre pervade the 1.9 million acre area open under Alternative B. High oil prices drive the economics to greater intercepts (of leaner ores) increasing the recoverable barrels per acre, over historic estimates.

It is entirely conceivable, and indeed should be a long-term objective of the Nation, to open the resource to leasing and prove the technologies necessary to convert at least 400 billion barrels of 'in-place' resource to 'proven reserves'. This would make the United States the holder of the largest proven oil reserve in the World. Achieving this goal is essential to our long-term energy and economic security. Further, because it would show that America is serious about taking responsibility for her energy needs, merely adopting such a goal would add risk to speculative buying of oil futures, and present an immediate, moderating effect on world crude oil prices.

52998-011

Adopting Alternative B of this PEIS serves as an important milestone in assuring that such development occurs.

Sincerely yours,

James W. Bunger, Ph.D.
President

Responses for Document 52998

52998-001: As stated in the Energy Policy Act of 2005, the development of oil shale, tar sands, and other strategic unconventional fuels, for research and commercial development, should be conducted in an environmentally sound manner using practices that minimize impacts. The BLM believes that analyzing an allocation decision provides the opportunity to build on scientific, governmental, or industry research in order to analyze the possible impacts of commercial development of these resources. The analysis of this land use planning (allocation) decision is just one step, however.

Prior to offering for lease any parcels of land for commercial oil shale exploration and development, further analysis will be carried out and documented in accordance with NEPA, to support any decisions. That NEPA analysis will evaluate the environmental impacts of the oil shale exploration and development and develop specific mitigation measures to mitigate or eliminate the identified impacts. The BLM believes that such a phased approach will ensure that commercial oil shale development programs meet the intent of Congress and take advantage of the best available practices to minimize impacts and to offer opportunities for states, local communities, and the public to participate in the process. The BLM is committed to working closely with the states and local governments in a full and open public participation process to achieve a proper balance between land use and environmental protection in each subsequent step in the process.

52998-002: Most geologically prospective areas for oil shale were identified on the basis of the grade and thickness of the deposits in Utah, Colorado, and Wyoming; whether the oil shale is economically or technically recoverable was not a consideration.

52998-003: Thank you for your comment. Please see the response to Comment 52998-002 for an explanation of the approach used for defining geologically prospective.

Additionally, with the passage of the Energy Policy Act of 2005, Congress recognized the importance of establishing a commercial leasing program to reduce the growing dependence on foreign oil imports. After beginning the analysis of a leasing program, and in consultation with the cooperating agencies, the PEIS was modified from a leasing document to one analyzing the impacts of an allocation decision, creating a “staged” or “phased” approach to an oil shale program. This provides an opportunity to build on the scientific, governmental, or industry research, including findings from the existing RD&D leases. Any new information and/or circumstances will be taken into consideration when preparing future NEPA analysis. Future analysis will consider a full range of alternatives, as well as specific mitigation measures, such as best management practices or stipulations to avoid or mitigate short-term or long-term adverse impacts to Colorado’s environment, public safety, wildlife, and local communities.

52998-004: The BLM is conducting a phased decision-making process—proceeding from land use planning, to leasing, to operational permitting—as the BLM does for other resources such as oil and gas. This first step—RMP amendment to allow the BLM to consider applications for leasing—may be followed by the subsequent steps of leasing and plans of development. As explained in the PEIS, the proposed amendment of the land use plans is a land allocation decision—opening or closing lands to further consideration of the possibility of leasing for commercial development. Development of lease stipulations will occur in the subsequent NEPA and land use planning actions that are evaluating proposed commercial leases or plans of operations. This process is intended to allow oil shale leasing and development to proceed as long as adequate information regarding proposed technologies and their potential impact can be provided at each step.

52998-005: The BLM agrees that the bulk density of oil shale will decrease upon crushing and sizing in preparation for retorting. However, there is also conflicting data in the open literature as to whether additional volume and density changes occur during retorting. Nevertheless, the text in Section A.4 has been modified to remove the term "popcorn effect." From an environmental perspective, the volumetric increase, together with the accompanying reduction in bulk density, may increase the potential both for erosion and for leaching of hazardous constituents and thus is an important consideration in the design of disposal strategies for spent shale from technologies employing AGR.

52998-006: The text is not inconsistent with the comment. It notes that decomposition of carbonate minerals and CO_2 production occur with indiscriminate (i.e., poorly controlled) formation heating. Nevertheless, clarifying language has been added to acknowledge the point of the comment.

52998-007: Thank you for your comment.

52998-008: The alternatives in the PEIS were formulated to give the decision maker the ability to fully compare the consequences of protecting or not protecting the resources within the planning areas. Since the alternative identifies lands that could be available for application for leasing in the future (i.e., an allocation decision), subsequent NEPA analysis will be required prior to a leasing decision. When applications are received, an interdisciplinary team of resource specialists, with on-the-ground knowledge of the planning area, will analyze the current management situation, desired conditions, and existing uses, activities, and management prescriptions to create a framework to resolve the issues raised through the development of the leasing alternatives. A balanced approach consistent with the FLPMA principles of "multiple use" will be a key component of the analysis. Another factor will be existing BLM policies, such as optimizing the recovery of multiple resources in an endeavor to secure the maximum return to the public in revenue and energy production.

52998-009: The PEIS has been revised to clarify the No Action Alternative (Alternative A) to clearly identify areas of the Book Cliffs and White River RMPs that are available for application for leasing, consistent with the requirements of the existing RMPs. However, as noted in the existing RMPS, these areas would require additional NEPA analyses prior to being leased for commercial development (see Section 2.3.2).

For tar sands under Alternative A, no decisions are made. The assumption is that no development of tar sands would occur under the alternative. Decisions in Alternatives B and C apply only to the STSAs and do not directly affect areas outside of them. A land use plan amendment would be required if industry comes forward with an economically and environmentally sound proposal for a tar sands project outside the STSAs.

52998-010: The BLM acknowledges the commentor's preference for proceeding with oil shale and tar sands development in order to increase the supply of liquid fuels.

52998-011: The BLM acknowledges the commentor's preference for Alternative B.

Thank you for your comment, Michael Powelson.

The comment tracking number that has been assigned to your comment is OSTSD52999.

Comment Date: April 21, 2008 16:42:18PM
Oil Shale and Tar Sands
Comment ID: OSTSD52999

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Comment Submitted:

See Attachment.

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April 21, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 South Cass Avenue
Argonne, IL 60439

Subject: **Comments on Oil Shale and Tar Sands Resources Programmatic EIS**

Following are additional comments on the Bureau of Land Management's Oil Shale and Tar Sands Resources Programmatic EIS. The Nature Conservancy, through its Utah Chapter, previously submitted comments on March 19, 2008 (attached). These comments expand upon our previous comments to address two additional key landscape-scale issues, Water & Ecological Resources.

1. Water resources

This EIS must provide a more complete evaluation of the impacts to water resources (Section 4.5 of the Draft PEIS). The EIS should recognize that the states in the Upper Colorado River Basin (CO, UT, WY, and NM) are already pressing up against their water use allocations under the Colorado River Compact. Given other competing demands for water -- including growing municipal needs, agriculture, and key recreational and environmental attributes of the basin, coupled with the emerging understanding of actual water supply in the Colorado River from paleo-climatic records and climate change modeling projections, the DEIS likely substantially underestimates the impacts of oil shale development on water resources. This concern is heightened by the looming uncertainty of global climate change and its impact on the timing and magnitude of water supply. 52999-001

Ultimately, water resource impacts are directly connected to the health and vitality of rivers and streams in the Colorado River Basin. In particular, we are concerned about the four endangered fish species that are the focus of the collaborative, multi-partner, Upper Colorado River Endangered Fish Recovery Program. Protecting flows and floodplains are cornerstone strategies of this recovery effort, which in turn provides Endangered Species Act (ESA) coverage for all consumptive water use from the Upper Colorado River Basin. If we jeopardize this recovery effort, we jeopardize continued water use in the Upper Colorado Basin and the out-of-basin communities it supplies, e.g. Denver, Colorado's northern front range, and Salt Lake City.

2. Ecological resources

We urge BLM to, (1) identify the specific globally rare species and rare plant communities in Chapter 3 (Affected Environment); and (2) to describe impacts to globally rare species and plant communities in Chapter 4 (Effects of Oil Shale Technologies), Chapter 5 (Effects of Tar Sands Technologies) and Chapter 6 (Impact Assessment for Oil Shale and Tar Sands Alternatives). Information about the location and status of rare species and rare plant communities is readily 52999-002

available through NatureServe and individual State Natural Heritage Programs. Many globally rare species are not represented in Threatened and Endangered Species listings; Candidate species under ESA; or BLM-designated Sensitive Species and State-Listed Species. Also, the PEIS does not appear to address all rare plant communities. To paraphrase from our earlier comments, "No alternate opportunities exist to conserve or maintain these [species and rare plant communities] elsewhere. If they are not conserved in the locations they currently inhabit, they will likely go extinct or (at best) require more stringent federal listing."

52999-002 (cont.)

We would also encourage BLM to identify important large, unfragmented (or nearly so) blocks of ecological systems (i.e., large and high-quality patches) that potential leasing may impact. Such large habitat patches are increasingly rare, impacted by mineral leasing that will continue with or without leasing for oil shale and can provide, among other benefits, refuges for wildlife during sensitive portions of their lifecycles (e.g. nesting, denning, wintering). The PEIS should recognize the extent to which future leasing may impact the most important blocks across the affected region. The PEIS needs to make clearer the extent of impact to wildlife resources at a regional scale associated with the action alternatives.

52999-003

Thank you for your consideration.

Regards,

\s\ Michael Powelson

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The Nature Conservancy
Protecting nature. Preserving life.™

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March 19, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 South Cass Avenue
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Gentlemen:

The Nature Conservancy (TNC), Utah Chapter, would like to thank the Bureau of Land Management (BLM) for the opportunity to provide comments on the Draft Oil Shale and Tar Sands Leasing Programmatic Environmental Impact Statement (PEIS) for oil shale and tar sands resources on BLM-managed public land in Colorado, Utah and Wyoming.

The Nature Conservancy is dedicated to preserving the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters these species and communities need to survive. The Conservancy has nearly one million members and over 1,900 corporate sponsors. We currently have programs in all 50 states and in 27 other countries. To date our organization has protected more than 14.5 million acres in the United States and more than 101 million acres in other countries through local partner organizations. The Conservancy manages more than 1,400 private preserves in the United States – the largest private system of nature sanctuaries in the world. Our conservation work is grounded in sound science, strong partnerships with other private and public landowners, and tangible results at local places.

Working with partners to take a science-based approach to conservation planning, the Conservancy has completed assessments of the biological resources for the Wyoming Basins, Utah-Wyoming Rocky Mountains, and Utah High Plateau Ecoregions, which when combined, cover much of the proposed PEIS planning area. Our comments are based upon that assessment work and other projects completed in the planning area. We in the TNC Utah Chapter are most knowledgeable about the biological resources in our state, and thus will limit these comments to application of the PEIS in Utah.

We begin our comments by stating support for Alternative A, The No Action Alternative. We believe that Alternative A is the most prudent course, given the combination of: (1) the sensitivity of ecological resources in the Uinta Basin, and (2) the lack of knowledge about impacts to those resources that would proceed from oil shale and tar sands leasing. We understand that the BLM was obliged to evaluate establishment of commercial leasing programs for oil shale and tar sands development under the Energy Policy Act of 2005. Hopefully you have fulfilled this obligation by virtue of producing this PEIS; we also urge that you fulfill your management duty to protect sensitive resources on public lands by selecting Alternative A.

Rationale for Selecting Alternative A for both Oil Shale and Tar Sands Leasing

– Lack of Information to Evaluate Impacts Realistically

As documented in the PEIS, there is interest in oil shale development but no commercial production is currently being undertaken in the United States. Given this state of the industry, the PEIS notes that both published information and communications with companies holding the R&D leases were inadequate to describe future commercial technologies and associated needs, including processes, power, water, and employees, and the amount of land that will be disturbed. As stated in the PEIS: "without this information, it is not possible to define what related impacts will be" (PEIS, page 2-50). Nor has the industry given any firm indication when or where commercial oil shale production may begin (PEIS, page 6-40).

Similarly, as noted in the PEIS, no tar sands have been developed, no project proposals have been submitted, no commercially viable technology is available in the United States, and no foreseeable development of tar sands exists on public lands within next 20 years (PEIS, pages 2-37 and 38).

Because of this lack of information, the BLM is wise not to attempt to issue leases for commercial development of oil shale or tar sands on the basis of this PEIS. However, we question the wisdom of taking even the preliminary step of designating public lands as open for application to lease under Alternatives B and C. Implementing one of these Alternatives, especially Alternative B, may give the industry false hope that they will be able to proceed when, in reality, BLM may not be able to meet its dual mandate of protecting sensitive resources and making areas available for oil shale and tar sands development.

– The Sensitive Species Mandate

A number of sensitive species will likely be adversely affected under development that could proceed under either of the action alternatives. TNC is particularly concerned with potential impacts to the Pariette cactus, Uinta Basin hookless cactus, clay reed-mustard, and shrubby-reed mustard (all of which occur only in Utah); and to the Graham beardtongue and White River beardtongue (which occur mostly in Utah, and entirely within the PEIS planning area). No alternate opportunities exist to conserve or maintain these plants elsewhere. If they are not conserved in the locations they currently inhabit, they will likely go extinct or (at best) require more stringent federal listing.

We are also concerned about potential impacts that oil shale and tar sands leasing may have on several other species, including the black-footed ferret, white-tailed prairie dog and the four Colorado River endangered fishes. Regarding the endangered fishes, the Green River from Jensen to Sand Wash (approximately 60 river miles) is the critical river reach for razorback sucker, including the prime spawning bar and the largest and most important floodplain rearing habitat in the entire Upper Colorado basin. This reach of river is also at the core of the largest remaining Colorado pikeminnow population, and contains key backwater habitat for this species. The Endangered Fish Recovery Program has acquired and reopened several floodplain parcels in this reach of river, for rearing of young fish of these species. Further, recent sampling

has confirmed that the lower White River contains a significant number of adult Colorado pikeminnow.

The options outlined in this oil shale and tar sands PEIS are being considered prior to the adoption of a Vernal Resource Management Plan (RMP). Nevertheless, we assume (and urge) that general protection commitments for special status plants and animals contained in the Draft Vernal RMP will be carried forward into the approved Final Vernal RMP. The following management commitments for special status species are common to all alternatives listed in the Draft Vernal RMP:

- Special Status Species will be preserved and their habitat enhanced (Draft RMP, page 2-29);
- All specific goals and objectives of all recovery plans and conservation plans and strategies will be implemented (Draft RMP, page 2-30); and
- Non-listed sensitive species and the habitats upon which they depend will be managed in such a manner as to preclude the need to list them as either threatened or endangered (Draft RMP, page 2-30).

We also assume (and urge) that these same protections will be granted to all special status species under the oil shale and tar sands PEIS. However, one of the major problems with the PEIS is that it has not and cannot – given the lack of information about the industry and the species – predict if the special-status species mandates can be met. It seems imprudent and arbitrary to make major decisions in light of such uncertainty.

– Comparison With Other Alternatives

While we support Alternative A, Alternative B does offer more protections for special status species than Alternative C. However, based on the information and scale of maps available to us, Alternative B would still allow leasing in the habitat for all of the plant species of concern identified above on page 2, except the Pariette cactus.

Given the lack of information on how oil shale and tar sand development will impact special status species, and whether potential exists for mitigation or reclamation (not a certainty for the plants), we are disappointed that the neither of the Action Alternatives (B or C) takes the clear and important step to AVOID areas that have high conflict with other values.

Actions to Consider Prior to Leasing

In the sense of being better to "look before we leap," TNC recommends that two pre-conditions be addressed prior to any PEIS leasing decisions:

1. **Wait until the Vernal RMP is finalized.** Until the BLM's Vernal Resource Management Plan is approved and implemented, it is impossible to assess cumulative effects from prospective oil shale and tar sands development, because the effects even of traditional oil and gas development are unknown.

2. **Learn more about indirect effects to sensitive plants.** Not only are we concerned with the direct effects that oil shale and tar sands development could have on special status plants, we believe it is also necessary to know how these plants are affected by the indirect impacts such as road dust, habitat/pollinator fragmentation, invasive species, etc. One example of this "need to know" is affirmed in the Conservation and Research Plan for *Penstemon scariosus* var. *albifluvis*, *Penstemon goodrichii*, *Astragalus equisolensis*, and *Penstemon grahamii* developed for the BLM by Red Butte Garden. As noted in this Plan:

> "Not only does the Intermountain West have many rare plant species, but little is known about their basic biology and most plant populations are not being visited on any regular basis . . . it is not enough to hope to protect rare plant species by protecting a portion of their habitat. We must develop an understanding of the ecological requirements necessary for each species' long-term survival."

This multi-plant Conservation Plan further notes that "it is imperative that the BLM and the USFWS take actions to collect the necessary data *now* in order to be capable of making sound management decisions, and prevent the need for listing in the future."

Reactive lease stipulations and mitigation measures will not be most effective without a better understanding of rare plant biology. For example, in recent comments on the Castle Peak and Eightmile Flat Oil and Gas Expansion Project DEIS, TNC noted that the proposed mitigation measures only address direct effects to plants (e.g. controlling employees and contractors from driving OHVs off established roads and trails to avoid Uinta Basin hookless cactus). Given the lack of information about cactus viability requirements, for example, it is impossible to determine if steps such as these would be adequate. In this oil shale / tar sands PEIS, the BLM is setting in motion the possibility to develop these mineral resources before the true cost to all resources can be assessed.

As a way to mitigate the generally defined impact, the PEIS states that "adherence to BLM policy and consultation with the USFWS could reduce the incremental contribution of commercial oil shale development to cumulative impacts" (PEIS, page 5-161). Again, this seems to be putting off the difficult analysis that should be completed and resulting choices made before expectations are created. More information is needed about both industry's practices and needs, and individual species and natural communities, before an informed, tailored leasing decision can be made that truly fulfills BLM's mandate to manage and maintain species, plant and animal communities.

A More Reasonable Approach

We are all still learning about the special status plants of the PEIS planning area. We currently have a basic knowledge about their location, but know little about their long-term survival needs and much less about what they need to remain viable over the long term. Given this lack of knowledge, we offer the following recommendations as the BLM moves forward with their decision making:

1. Be conservative. Err on the side of conserving the plants, your most limited resource.

2. Begin to develop the knowledge about these sensitive biotic resources so that in the future the BLM can adequately estimate the effects of its actions and choose the proper course of action. BLM is supporting a number of plant monitoring efforts that are going in the right direction. We applaud these efforts.

3. Go slow. Allow the research effort to proceed under Alternative A, developing the needed information about the technology. With a little more time and more information about both biotic and abiotic resources, a more supportable leasing decision can be made in the future.

* * * * *

Thank you once again for the opportunity to provide these comments, and for giving them serious consideration in this oil shale / tar sands leasing process.

Sincerely yours,

Joel S. Tuhy

Joel S. Tuhy
Director of Science, Utah Field Office

cc: Dave Livermore, Utah State Director
Chris Montague, Director of Conservation Programs

Responses for Document 52999

52999-001: Long-term hydrologic data, states' water plans, and historical water consumption data were used to evaluate regional water availability in the oil shale basins. Therefore, the water availability results represent long-term average conditions. For projected water uses, results from state water plans were used. The state plans have taken regional population growth and economy into consideration.

The projection of future climate change relies on modeling, which in turn uses assumptions and mathematic algorithms. These vary among models. Different model results have been reported and sometimes are contradictory. To avoid such uncertainty, long-term hydrologic data were used in the evaluation presented in the PEIS. The data covers periods of both dry and wet years.

Endangered fish species in the Colorado River basin are protected by managing instream flows of various stream segments. Instream flow water rights are held and administered by CWCB in Colorado. The water rights are protected the same way as are other water rights. Any water rights transferred to oil shale developers in Water Court would be subject to the test of the "No Harm Rule" that provides protection to downstream water rights holders from injury. CWCB could also exercise water calls when existing instream flow water rights are threatened.

The issues of protecting endangered fish species and instream flows would be evaluated in subsequent NEPA documents.

52999-002: Text regarding oil-shale endemic species has been added to Sections 3.7.2, 4.8.1.2, 5.8.1.2, 6.1.1.7.2, 6.1.2.7.2, 6.1.3.7.2, 6.1.4.7.2, 6.2.2.7.2, 6.2.3.7.2, and 6.2.4.7.2. Candidate species, BLM sensitive species, and state-listed species are addressed in the sections that treat threatened and endangered species (each of these species is listed in Appendix E).

52999-003: The information presented in the PEIS addressing habitat fragmentation impacts to wildlife is of sufficient detail for the purposes of the PEIS. The PEIS provides an overview of habitat fragmentation impacts that could occur from commercial oil shale and tar sands development.

The PEIS is a programmatic-level document that analyzes allocation decisions. Programmatic environmental impact statements are used to evaluate broad policies, plans, and programs, and they provide an effective analytical foundation for subsequent project-specific NEPA documents. There is sufficient information pertaining to habitat fragmentation on a programmatic level to make a reasoned choice among the alternatives as to whether lands are suitable for future consideration for commercial oil shale and tar sands leasing.

Thank you for your comment, Eileen List.

The comment tracking number that has been assigned to your comment is OSTSD53000.

Comment Date: April 21, 2008 17:23:42PM
Oil Shale and Tar Sands
Comment ID: OSTSD53000

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Privacy Preference: Don't withhold name or address from public record
Attachment: GJ comments Oil Shale PEIS.doc

Comment Submitted:

March 21, 2008

BLM Oil Shale and Tar Sands Resources Leasing Draft Programmatic EIS Comments 9700 South Cass Ave Argonne, IL 60439 http://osteis.anl.gov

To whom it may concern:

The City of Grand Junction wishes to provide the following comments regarding the Draft Oil Shale and Tar Sands Resource Management Plan Amendments to Address Land Use Allocations in Colorado, Utah, and Wyoming and Programmatic Environmental Impact Statement (PEIS).

Grand Junction thanks the Bureau of Land Management for extending the public comment period on the draft plan in order to review the extensive document and to better understand its implications on Western Colorado social, economic and environmental issues.

Grand Junction is concerned about the vast water and electrical resource needs of oil shale developments. Grand Junction requests the BLM consider the Colorado River Basin Roundtable "Water and Energy Study" that is estimating water demands for all energy sectors, including oil shale, natural gas, coal and uranium, in the Colorado, Yampa and White river basins. This study will consider secondary water demands of that development, including for electrical power and a growing population. 53000-001

Grand Junction also requests the BLM consider socioeconomic impacts relating from energy development as identified in a recent study released by the Associated Governments of Northwest Colorado, "Northwest Colorado Socioeconomic Analysis and Forecast" dated April 2008. 53000-002

Grand Junction looks forward to working with BLM to develop a land use plan and providing input to revisions of the 1987 Grand Junction Resource Management Plan based on the PEIS. The City

will fully participate in future oil shale leasing initiatives and future impact analyses.

Sincerely,

/s/

Greg Trainor Director, Utility and Street Systems

c: Sherri Thompson, BLM Project Manager sherri_thompson@blm.gov See Attachment.

CITY OF Grand Junction COLORADO

March 21, 2008

BLM Oil Shale and Tar Sands Resources Leasing Draft Programmatic EIS Comments
9700 South Cass Ave
Argonne, IL 60439
http://osteis.anl.gov

To whom it may concern:

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Grand Junction looks forward to working with BLM to develop a land use plan and providing input to revisions of the 1987 Grand Junction Resource Management Plan based on the PEIS. The City will fully participate in future oil shale leasing initiatives and future impact analyses.

Sincerely,

/s/

Greg Trainor
Director, Utility and Street Systems

c: Sherri Thompson, BLM Project Manager
sherri_thompson@blm.gov

Responses for Document 53000

53000-001: This PEIS cumulative analysis is based on studies and data currently available. It is neither feasible nor required by NEPA to wait for new information. The NEPA does not require an agency to wait until studies are completed, especially if the information is not essential to a reasoned choice among alternatives. The PEIS is only analyzing an allocation decision, and, therefore, subsequent NEPA analysis will be required. The results of the Colorado River Basin Roundtable will be considered, if available, when new NEPA analysis is prepared to analyze the environmental consequences of a leasing or development decisions.

53000-002: Text has been added to the PEIS to reference forecasts of oil and gas activity, total employment and population in the four-county area of Colorado presented in the reference stated in the comment.

Thank you for your comment, John Harja.

The comment tracking number that has been assigned to your comment is OSTSD53001.

Comment Date: April 21, 2008 17:58:51PM
Oil Shale and Tar Sands
Comment ID: OSTSD53001

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Attachment: 20080421 OSTS PEIS.pdf

Comment Submitted:

See Attachment.

State of Utah

JON M. HUNTSMAN, JR.
Governor

GARY R. HERBERT
Lieutenant Governor

Office of the Governor
PUBLIC LANDS POLICY COORDINATION

JOHN HARJA
Director

April 21, 2008

BLM Oil Shale and Tar Sands Programmatic EIS
Argonne National Laboratory
9700 S. Cass Avenue
Argonne, Illinois 60439

SUBJECT: Oil Shale and Tar Sand Programmatic EIS

To Whom It May Concern:

The State of Utah appreciates the opportunity to work with the Department of Energy (DOE) and Bureau of Land Management (BLM) as a formal cooperating agency in the preparation of this Programmatic Oil Shale and Tar Sands Environmental Impact Statement (PEIS). The state also appreciates the DOE and BLM's extension of similar status to local governmental entities that have a stake in the planning area under consideration. The state firmly believes that cooperative discussions among the various landowners and regulatory agencies will lead to the best possible final product.

The state, local governments, DOE and BLM have invested considerable time and effort working together in this impact analysis. The state's expectation is that this process will continue and lead to a well-reasoned and well-formulated oil shale and tar sands leasing plan. Further, while the state considered local governments' input during preparation of its comments, the BLM should also fully consider the comments submitted directly by local governments.

The comments and concerns raised below are offered in the spirit of cooperation through disclosure, analysis and adherence to the provisions of law, regulation, good governance and common sense. The state recognizes impact analyses as a dynamic process that will continue into the future, and reserves the right to supplement these comments as necessary. The state looks forward to resolution of these issues as a cooperating agency through the preparation of the Final Programmatic EIS

53001-001

5110 State Office Building, PO Box 141107, Salt Lake City, Utah 84114-1107 • telephone 801-537-9801 • facsimile 801-537-9226 • 801-538-9727

Air Quality

The state appreciates the thorough and comprehensive evaluation of the impacts on various aspects of the environment in the Oil Shale and Tar Sands PEIS. Notably, the PEIS provides a fairly comprehensive description of some of the long term impacts on air quality that could be anticipated. (page 4-46).[1] The PEIS further provides a summary of cumulative impacts across the various effected areas of the environment including air quality. (page 6-154).[2] However, the PEIS states that prior to the development of oil shale, "additional project-specific NEPA analyses would be performed, subject to public and agency review and comment." (page 4-47). Despite this additional level of review, there is some concern that these project-specific NEPA analyses may not appropriately address the cumulative impacts that occur when regional and sub-regional transport of precursor emissions is involved.

The National Ambient Air Quality Standard (NAAQS) for $PM_{2.5}$ and Ozone are of concern for the State of Utah. The Ozone standard was lowered earlier this month and the $PM_{2.5}$ NAAQS was lowered in September of 2006. With these revisions, the potential for violating standards increases over a wider geographic area. More specifically, high elevation valleys in the Intermountain West, even those with relatively small population centers, can be susceptible to elevated $PM_{2.5}$ levels during strong, cold inversions. 53001-002

Ozone, which is usually a summer time problem, has become a puzzling winter time problem in the Pinedale area of Wyoming where large natural gas fields exist. The Wyoming Department of Environmental Quality issued an air pollution advisory during the last week of February, 2008 for the Upper Green River Basin, in Sublette County after monitoring very high 8-hour average ozone concentrations. During summer months, regional ozone levels, as measured by the CASTNET monitors show an increasing trend in what might be considered background levels of ozone throughout the Intermountain West (see Rural Ozone Monitors graph).

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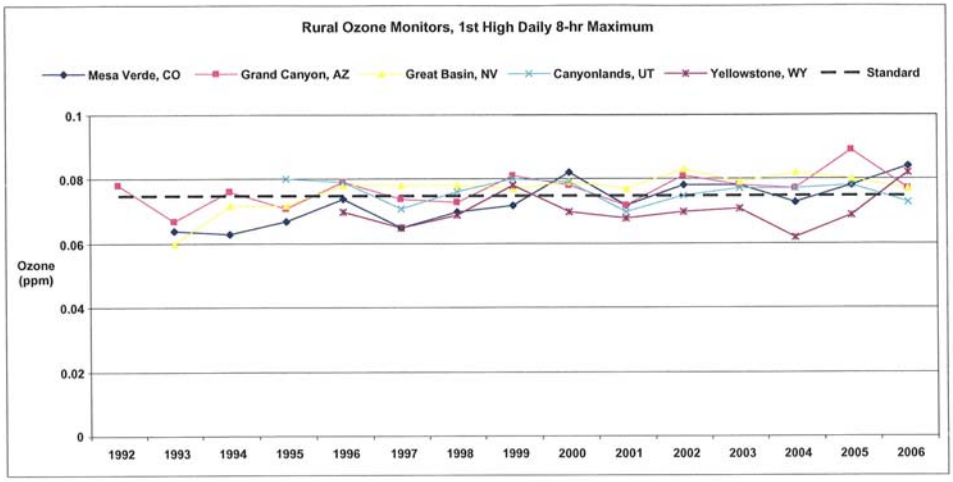
[1] Long-term, regional impacts (primarily CO and NOx, with lesser amounts of PM, SO2, and VOCs) would result from oil shale processing, upgrading, and transport (pipelines). Depending on site-specific locations, meteorology, and topography, NOx and SO_2 emissions could cause regional visibility impacts (through the formation of secondary aerosols) and contribute to regional nitrogen and sulfur deposition. In turn, atmospheric deposition could cause changes in sensitive (especially alpine) lake chemistry. In addition, depending on the amounts and locations of NOx and VOC emissions, photochemical production of O3 (a very reactive oxidant) is possible, with potential impacts on human health and vegetation. Similar impacts could also occur from the additional coal-fired power plants that would be needed to supply electricity for in situ oil shale extraction. (Section 4.6 Air Quality and Climate, page 4-46.)

[2] "Oil and gas development, other minerals development, and other activities (e.g., agricultural development and residential development) would all involve impacts on local air quality during land clearing and construction because of increased PM emissions and exhaust emission from construction equipment. There could also be regional air quality impacts if these activities involve long-term emissions of criteria pollutants or hazardous air pollutants at substantial levels. The incremental impact of oil shale development activities on total cumulative impacts would be assessed during future site-specific NEPA analyses." Section 6.1.5.3.5 Air Quality, page 6-154. 6.1.5, beginning on page 6-126.



Ultimately, a comprehensive analysis of the cumulative impacts on air quality—specifically the effects of secondary photochemistry and the ability to maintain the NAAQS for $PM_{2.5}$ and Ozone—is outside the scope of this Programmatic EIS. Moreover, the state recognizes the limitations on defining and quantitatively analyzing the scope of potential impacts when the scale, location, and method of development are uncertain. Nonetheless, in light of the foregoing issues, we request the BLM work with the state on a combined analysis of the effects of all emission sources upon completion of the pending baseline study. 53001-002 (cont.)

Relationship of PEIS to RMPs

Under the Programmatic EIS's preferred alternative "B" and alternative "C," seven land use plans in Utah would be amended. (page 1-11). Many of these land use plans are currently undergoing revision and Final RMPs are anticipated within the year. Management decisions made in each of the RMP revisions may directly affect the availability of lands within the analysis area. The State of Utah seeks clarification as to the relationship of the PEIS to the draft RMPs. Specifically, how will decisions made in each RMP amendment affect the analysis and disclosures made in the oil shale and tar sands EIS? 53001-003

Appendix C of the PEIS identifies proposed land use plan amendments associated with alternatives B and C for oil shale and tar sands. (page C-3). Appendix C indicates that under PEIS alternatives B and C, "all lands within the most geologically prospective oil shale areas that are not excluded from commercial leasing by existing law and regulation, Executive Orders, or administrative land use designation, or have not been specifically excluded by the BLM for other reasons, will be available for application for commercial leasing." (page C-11). The state appreciates this statement. However, the PEIS states lands that would be excluded from leasing under both programmatic alternatives include the following:

- Wilderness Areas
- WSAs
- Areas within the NLCS
- existing ACECs that are currently closed to mineral development
- segments of rivers determined to be eligible for WSR status by virtue of a WSR inventory. (page 2-17).

Wild and Scenic Rivers

The PEIS proposes to exclude segments of rivers administratively determined to be an eligible river segment. The state acknowledges the completion of the eligibility phase of the WSR studies as part of the RMP process. The state is also committed to exploring segments of rivers which may make a suitable inclusion in the Wild and Scenic River System. However, protections do not arise until segments are congressionally designated. The state is concerned that the proposed management of "eligible" segments is equivalent to agency designation that impermissibly shortcuts the statutory process. The state believes that exclusion of lands from leasing is not warranted by the eligibility finding, and requests a consistency review of this issue. Further, the Utah BLM is proposing to make suitability findings as part of the record of decision for the RMPs. The state requests clarification regarding treatment of segments found ineligible or unsuitable as part of the RMP revision process and their leasing availability. 53001-004

Areas of Critical Environmental Concern

The PEIS excludes ACECs that are **currently** closed to mineral development. The state requests clarification regarding treatment of potential ACECs that may be designated as part of ongoing RMP revisions. Would newly created ACEC that are closed to mineral development be available for leasing? Also, it is not clear whether "closed to mineral development" encompasses ACECs that are withdrawn for mineral development. To that end, the state requests a distinction be made between ACECs that have been withdrawn from mineral development and ACECs that are closed to mineral development , as well as clarification of how these designations may impact potential leases for oil shale and tar sands development. 53001-005

National Landscape Conservation System ("NLCS")

The PEIS excludes from leasing areas that are part of the NLCS. Please clarify BLM's authority to create a management category and subsequent basis for exclusion of lands for leasing based solely on the designation under the NLCS. 53001-006

Ongoing RMP Revisions

Appendix C designates oil shale acreage estimates for each RMP representing "those lands not excluded from commercial leasing under Alternative "B"." (page C-11). The same is done for tar sands. (pages C-20—C-22). The state requests clarification as to whether the RMPs will reflect the acreage made available for oil shale and tar sands leasing as provided for 53001-007

in the PEIS. If Final RMPs include special designations that differ from those anticipated and discussed in the PEIS, what process will be used to revise the PEIS in light of new information and changed conditions? 53001-007 (cont.)

Adaptation to Technological Innovation

Please clarify whether additional lands may be considered for leasing notwithstanding their lack of inclusion in the PEIS. The state asks the BLM to consider defining how additional lands might be made available for leasing in the event new data supports the feasibility of developing additional land not considered in the PEIS. 53001-008

Leasing

The state wishes to clarify the BLM's approach to issuing leases. Regarding oil shale leasing, the PEIS states:

> [I]f and when applications to lease are received and additional information becomes available, the BLM will conduct NEPA analyses, including consideration of direct, indirect, and cumulative effects, reasonable alternatives, and possible mitigation measures, as well as what level of development may be anticipated. On the basis of this NEPA analysis to be conducted at the lease stage, the BLM will consider further amendment of one or more plans, including, but not limited to, the establishment of general lease stipulations and BMPs. (page 2-16).

With respect to tar sands, the PEIS provides that leasing would occur on a lease-by-application process. More specifically:

> The BLM would issue a call for applications for commercial leases. In response, companies would be required to identify the specific lands that they are interested in as part of their lease application package. It is also possible that the BLM would identify specific tracts to be leased in the call for applications. This process would require that NEPA analyses be conducted prior to lease issuance. Information collected as part of the lease application process would be incorporated into the NEPA analysis. Applicants would be required to identify key information regarding aspects of the proposed development needed to support a complete NEPA review. . . During this NEPA review, the BLM would identify and establish appropriate lease stipulations to mitigate anticipated impacts. (page 2-42). 53001-009

The state requests clarification as to how the leases will be awarded to applicants. Under the current PEIS, it appears that all potential applicants would be required to submit and/or conduct NEPA analyses prior to being awarded a lease. Please clarify the timing, content, and scope of NEPA analysis associated with lease issuance. Please also clarify whether the BLM follow the coal, fluid mineral, or a hybrid leasing model?

Water Issues

The effects of water utilization for tar sands and oil shale development have been skirted in this PEIS. The state recommends an analysis of the impacts of water withdrawal for this development. The state is concerned that the degree of industrial water use may diminish flows in the Colorado River, further harming sensitive and endangered fishes inhabiting the river. We do not understand if there is sufficient physical water, let alone water rights, available to support the scale of development contemplated in the PEIS and the effects this level of water demand might have on agriculture, wildlife (especially endangered fish), or wildlife inhabiting lands and waters in the area.

The state believes it is possible to demonstrate varying scenarios of potential wildlife and environmental impacts from water utilization for tar sands and oil shale development. If, under a set of "high hydrocarbon production/high water demand" assumptions, the public might expect to encounter a 43% reduction throughout the Uinta Basin on farm irrigation, then we may expect to see a commensurate reduction in associated wildlife habitat on private lands. If, in another scenario, the forecast is for "*in situ* development only/moderate water demand" leading to a 9% reduction in lower Colorado River flows as a result of the development, then state biologists would begin to develop an understanding of the potential impacts to endangered fishes on a small reduction in river flows. There might be different ways to package the description of a quantified range of impacts, either among alternatives or within an effects matrix later in the document. This PEIS should attempt to predict precisely how much water will be needed to develop oil shale and tar sands resources under a suite of different development thresholds. An appropriate impact analysis of the loss of water on wildlife and their habitats should follow each development scenario. 53001-010

Visual Impacts

To assess the development impacts involving tar sands in Utah, the PEIS based many of its assumptions on published information for a proposed 20,000 bbl/day- capacity plant designed for recovery of oil from a diatomaceous earth tar sands deposit in California. (page 5-2). For purposes of analysis and to provide a range of impact, the PEIS scaled bitumen production in Utah to 100,000 bbl/day. (page 5-2). As part of its visual impact analysis, the PEIS shows photos of Canadian tar sands operations. (pages 5-97 – 5-99). However, the Canadian operations depicted are likely an order of magnitude larger than those operations contemplated for development in the United States. Operations in Utah are not likely to include upgraders because Utah projects will probably be too small to support an integrated upgrader. In contrast, the Canadian operations tend to have an integrated upgrader. Given the major differences between the operations likely to occur in Utah and those currently underway in Canada, the state requests additional clarification regarding the use of the large scale Canadian operations in its assessment of visual impacts in the PEIS. 53001-011

Socioeconomic Impacts

The employment data relied on in the PEIS is extrapolated from a number of NEPA documents covering impacts of large energy resource development projects. It appears the 53001-012

estimated employment numbers for a hypothetical tar sands project may be overstated by a factor of at least two. (page 6-202). Workforce estimates are also based on operations much larger than those anticipated in the project area. As such, the state requests the BLM consider this possibility in evaluating the socioeconomic impacts of hypothetical tar sands projects and to consider modifying dependent analyses to reflect the impacts of a smaller operation. 53000-012 (cont.)

The state also asks the BLM to consider the additional jobs that would be created through oil shale and tar sands development in its assessment of the impacts on recreational employment. Studies containing information on the economics of Utah's oil and gas exploration and production industry are provided for the BLM's review. 53001-013

Energy and Mineral Developments Within Utah

The state noted the following factual or typographical errors in the section of Chapter 6 discussing energy and mineral developments for Utah.

Oil and Gas Development

For the past four years (2004 through 2007), Utah's Division of Oil, Gas and Mining reported an average of 811 well spuds per year within Uintah and Duchesne counties. Projecting only 580 wells per year for the Vernal PA may be conservative for the area long term. Necessary revisions should be reflected in section 6.2.5.2.1 as well. 53001-014

Coal Mining

The largest undeveloped coal resources are in the Henry Mountain Planning Area, with smaller amounts in the San Rafael Planning Area. (see Table 6.1.5-5). Predicted production for all field offices combined is about 30 to 34 million tons/yr. About 13% of this production would be from surface mines, and 87% would be from underground mines. These changes should be reflected in section 6.2.5.2.2. 53001-015

In Table 6.1.5-5 under the section entitled Coal, in the columns for the Henry Mountain and San Rafael PAs, the description refers to coal reserves in the Wasatch Formation, but should say the Wasatch Plateau coal field. The Henry Mountains column also needs to include coal in the Sevier County portion of the Emery coal field. The section on predicted production for the Henry Mountains also needs to change from Wasatch Formation to Wasatch Plateau coal field and include the Emery coal field as well. Similar errors are repeated in Table 6.2.5-4. 53001-016

Other Minerals Development

Metals produced in Utah include copper (one mine), iron (two mines), phosphate (one mine), molybdenum (one mines), potash (three mines), silver (four mines), and uranium (one mine). (EPA 1997). In the ROI counties (Carbon, Duchesne, Emery, Garfield, Grand, San Juan, Uintah, and Wayne), only sand and gravel, gilsonite, clay, gypsum, dimension sandstone, lime, helium, and gold are produced. (USGS 2004b). Phosphate production occurs in the Diamond Mountain area, and gilsonite in the Book Cliffs area. Uranium/vanadium has a high potential for 53001-017

development in the Henry Mountain and San Juan Planning Areas; it would result in at least 30 acres/yr of surface disturbance. A limited amount of other minerals development is expected. (see Table 6.1.5-5). These changes need to be reflected in section 6.2.5.2.3. 53001-017 (cont.)

Water Quality

A significant, long-term threat for water pollution could arise from poorly managed oil shale mining. As the oil shale exists right now, it is a sedimentary layer of low permeability (aquitard) that is located either in the unsaturated (vadose) zone or within the relatively shallow saturated zone. To extract kerogen from the rock, it must either be mined using conventional techniques, or new in-situ techniques may be used. Either process will increase the permeability of the formation, and allow infiltrating precipitation to leach salts and possibly other contaminants from the rock at a much greater rate than the undisturbed materials would.

The spent shale from mining has a greater volume then the original rock and backfilling the mine workings would not dispose of all of it. Underground mine workings may change the ground water flow regime within the oil shale by causing fractures in the overlying rock. This by itself could cause increased leaching of salts from the surrounding rock. If the workings are backfilled with spent shale, the increased permeability of the surrounding rock will allow infiltrating water to create a long-term source of salts leaching into ground water that will eventually discharge to surface water. Mine pits backfilled with spent shale would also allow precipitation to react with spent shale in the subsurface, and eventually result in discharge of salts to ground water and eventually surface water. The spent shale will be very dry upon disposal and large bodies of it will require a long time to get saturated in the dry climate, but there may eventually be a breakout of ground water that has been in contact with the shale waste. 53001-018

The Ground Water Protection Regulations specifically exempt operations that have "natural ground water seeping or flowing into conventional mine workings which re-enters the ground by natural gravity flow prior to pumping or transporting out of the mine and without being used in any mining or metallurgical process" from having to apply for a ground water discharge permit. However, the regulations do allow permitting of waste piles, which could possibly apply to backfilled spent shale.

In situ extraction operations will necessarily involve fracturing the rock to extract the formerly solid hydrocarbons that have been liquefied by the process. Because the rock has a high content of hydrocarbons, removing it will also increase its permeability. After extraction, precipitation will infiltrate the mined area and cause increased leaching of salts to ground water, eventually discharging to surface water. A risk assessment should be conducted that quantifies the effects of increased salinity to the Colorado River watershed or any potentially affected surface waters of this state that may result from the proposed project.

Utah Division of Oil Gas and Mining has jurisdiction over surface effects of in situ recovery activity, requiring certain plugging techniques for drill holes. For mines over 5 acres, operators are required to show what effects the operations will have on surface and ground water systems and the actions to be taken to mitigate those effects. Therefore, the Utah Division of

Water Quality will not issue UIC permits for reinjection wells for in situ mining of shale oil or tar sands at this time.

53001-018 (cont.)

It is also important to note that Region 8 directly implements the UIC Program on tribal lands so it is critical to have an accurate map of land ownership. The land ownership data layer in the State Geographic Information Database (SGID) is the best general surface ownership layer.

UIC Oil Shale Permitting Related to Injection Wells

Well Activity	Well Class	Permitted or Rule Authorized?
Hydraulic fracturing test *(convert to injection well after test)*	Class I	P
Air injection	Class V - exp	P or RA
Aquifer Remediation	Class V	P or RA
Tracer Testing	Class V	P or RA
Storm water trenches	Class V	P or RA
Closed-loop heat (not likely injection)		
Post-retorting water disposal	Class I or Class V	P
Aquifer Recharge / Drainage	Class V	P or RA
Nahcolite mining (solution mining) (then convert to de-watering wells, then convert to oil production wells)	Class III	P
Closed-loop freeze wall (not likely injection)		
Steam Stripping Hydrocarbons	Class V	P or RA

53001-019

Type of Analysis

A mechanism should be employed to allow the public to gain a better sense of the scale and potential variability among discernible environmental impacts. Deferring meaningful, quantified analysis of environmental impacts to the leasing-by-application determination does not answer the question of possible environmental outcomes. A response to difficult quantification challenges is to make explicit assumptions and lay out a range of realistically foreseeable outcomes; the final answer may fall between projected outcomes, but the public would have the opportunity to consider the scale of environmental effects associated with the alternatives. We recommend developing such a quantified range of outcomes, with assumptions inherent, as the only viable mechanism we can envision for allowing the public to understand the scale of the potential impacts to the environment. The Draft Oil Shale and Tar Sands PEIS provides the groundwork, but in repeated instances, does not lay out realistic impact scenarios with a quantification of impacts. The quantified analysis should not be left out of the PEIS because of its programmatic orientation. The present document is the public's only opportunity to provide input to the decision, programmatically and cumulatively. Therefore, BLM should provide the public with sufficiently quantified scenarios in tar sands and oil shale production.

53001-020

Issues of water availability, water quality, air quality, climate change, loss of wildlife habitat, are all worthy of quantification. 53001-020 (cont.)

Wildlife Concerns

The open-pit mining contemplated for major portions of the Book Cliffs area within Utah, coincides with crucial winter ranges for mule deer, and is also used by elk. Open-pit mining would impact mule deer populations in a herd recognized by many entities as "world class." Given the effects of open pit mining, and given the high degree of coincidence of the Book Cliffs oil shale deposits occurring less than 500 feet below ground surface with the mapped crucial winter habitat for mule deer, and to a lesser extent elk and pronghorn, mining must be accompanied by a strong reclamation program. The state asks that the PEIS require coordination of mining plans and reclamation with Utah's Division of Wildlife Resources. 53001-021

Cumulative Impacts

Evaluating the development impacts for oil shale and tar sands resources with those of other oil and natural gas development impacts will require a future, more exhaustive cumulative impacts analysis. Oil and natural gas development in the Book Cliffs of Utah has been fairly extensive, and there are clear indications of present intentions documented in recent BLM and U.S. Forest Service NEPA documents for companies to further develop these resources. Such impacts must be considered cumulatively in association with oil shale development. 53001-022

The State of Utah appreciates the opportunity to review this proposal. Please direct any other written questions regarding this correspondence to the address listed above, or call me at (801) 537-9801. Thank you.

Sincerely,

John Harja
Director

Response for Document 53001

53001-001: Thank you for your comment. The BLM looks forward to the partnership.

53001-002: The BLM is interested in pursuing these issues with the States of Colorado, Utah, and Wyoming.

It would be useful to conduct additional background meteorology and air quality-related values monitoring throughout the study area. The BLM would like to meet with the States of Colorado, Utah, and Wyoming (along with other federal land management agencies) to pursue how such monitoring could be financed and conducted. All air quality and climate data gathered by the BLM are made available to the public upon request.

53001-003: All decisions related to land use planning for oil shale and tar sands resources in the ongoing RMPs will be made in the ROD for the PEIS. The ROD will amend the existing plans (MFP or RMP or ongoing RMP if completed first) by making land use planning decisions on whether or not lands will be available for application for future leasing and development of oil shale or tar sands on public lands for those areas where the resource is present. Additional site-specific NEPA analysis will be completed on any future lease applications before leases would be issued. If, as part of this NEPA analysis, the BLM determines that leasing and subsequent development of the oil shale or tar sands resources would cause significant impacts, the BLM can require the applicant to: 1) mitigate the impact so that it is no longer significant or 2) move the proposed lease location, or if neither of these options resolves the anticipated conflicts 3) the BLM can decide that development of the oil shale or tar sands resources outweighs protection of the on-site resources and approve the application. This NEPA analysis would include opportunities for public involvement and comment that are part of the NEPA process.

53001-004: As described in the PEIS in Section 2.2.3, a river or river section may be designated as a WSR by Congress or the Secretary of the Interior under the authority of the Wild and Scenic Rivers Act of 1968. Land management agencies conduct inventories of rivers and streams within their jurisdictions and make recommendations to Congress regarding the potential inclusion of suitable rivers into the WSR system as part of their land use planning process. These special areas are managed to protect outstanding scenic, recreational, geologic, fish and wildlife, historic, cultural, or other values, and to preserve the river or river section in its free-flowing condition. WSR boundaries are established to include a corridor of land along either side of the river as determined to be appropriate for protection of the river's values. The law recognizes three classes of rivers: wild, scenic, and recreational. It is the BLM's policy to manage potentially eligible and suitable WSRs in a manner to prevent impairment of the river's suitability for WSR designation until Congress or the Secretary makes a final determination

regarding the river's status. During this interim period, a corridor extending at least 0.25 mi from the "high water" mark on each bank of the river is established.

Segments of rivers that have been found to be unsuitable as part of the RMP process will no longer receive the interim protections afforded them during the period of their consideration for suitability. After the unsuitability decision, the lands adjoining the river segment may be managed, just as are other public lands, consistent with whatever management prescription is adopted through the land use planning process.

53001-005: Under the provisions of FLPMA, the BLM has designated ACECs where special management attention is required to protect and prevent irreparable damage to important cultural, historic, scenic values, fish and wildlife resources, or other natural systems or processes, or to protect life and safety from natural hazards. In ACECs not closed to mineral entry, the BLM has specific management prescriptions outlined in the local land-use planning document to protect the relevant and important values. However, the ACEC Manual (BLM Manual 1613) states: "Normally, the relevance and importance of resource or hazards associated with an existing ACEC are reevaluated only when new information or changed circumstances or the results of monitoring establish a need." Therefore, if there is new information or changed circumstances associated with the leasing of lands within ACECs open to mineral development (for example, if the RMP that designates an ACEC is amended by the PEIS to open the area including the ACEC to consideration for application for commercial lease), the ACEC will be reevaluated to consider whether to retain the ACEC designation or to develop additional management prescriptions in the NEPA analysis associated with the proposed leasing decision. This also applies to newly designated ACECs in the Utah RMPs.

Closed to "mineral development" and closed to "mineral entry" could mean the same thing. It depends upon the context in the document where it is found. However, unless an area has been officially designated on the public land records as "withdrawn from mineral entry," the area would fall into the category described in the first paragraph of this response.

53001-006: Congress granted the President authority to designate national monuments in the Antiquities Act of 1906, which specifies that the law's purpose is to protect "objects of historic or scientific interest." In addition to the presidentially created national monuments, Congress has established national monuments by passing laws to create individual monuments with their own purposes (generally to protect natural or historic features). For example, the Grand Staircase–Escalante National Monument was established by Presidential Proclamation on September 18, 1996, under the authority of Section 2 of the Act of June 8, 1906 (34 Stat. 225, 16 U.S.C. 431). In part, the proclamation said, "All Federal lands and interests in lands within the boundaries of this monument are hereby appropriated and

withdrawn from entry, location, selection, sale, leasing, or other disposition under the public land laws…"

53001-007: Please see response to Comment 53001-003 regarding RMP revisions.

53001-008: Should industry come forward with an economically and environmentally sound proposal for commercial oil shale or tar sands leasing, the BLM and the Secretary of the Interior have the authority to undertake another EIS that would consider additional modification of land use plans to allow leasing for such a proposal. Excluded lands under each alternative can only be made available for leasing after the appropriate RMP is amended to consider the excluded area for potential leasing.

53001-009: The excerpt from the PEIS quoted in the comment is an accurate statement of the general process that will be used to accept applications for lease. The BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedures to implement a commercial oil shale leasing program. The BLM published a proposed rule for the management of a commercial oil shale leasing program in the *Federal Register* on July 23, 2008. The regulations for tar sands resources are already promulgated at 43 CFR, Part 3140. The BLM rulemaking process is separate and apart from the drafting of the PEIS. The PEIS analyzes the environmental consequences of an allocation decision and, therefore, questions concerning the regulatory process are outside the scope of the PEIS.

53001-010: This PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of lands for commercial development. Subsequent NEPA documents will be prepared to analyze the environmental consequences of leasing and future exploration and development, including consideration of direct, indirect, and cumulative effects; reasonable alternatives; and mitigation measures to protect resources and resource values, as well as what level of development may be anticipated. The PEIS provides an effective analytical foundation for subsequent project-specific NEPA documents.

The amount of water needed would be better understood at the future project-specific level when the scale of development, the technologies used in the development, the national agricultural economy, and the locations and hydrologic conditions of project sites are known.

The source of water needed for any oil shale and/or tar sands development projects would be specified in the project-specific NEPA documents and not in this PEIS. The water is unlikely to be diverted from public use water. Agricultural water might be a candidate for sources of water rights. Impacts on water resources caused by transfers of water from agricultural uses to oil shale and tar sands development on water resources have been added to Sections 4.5 and 5.5 of the PEIS. It would be a lessee's responsibility to obtain and maintain water rights

necessary for its operations in accordance with state law. Thus, it would be conjecture to attempt an analysis of impacts from water demands for operations that might not obtain water rights.

Using different scenarios to project water utilization is a useful tool in evaluating impacts. However, there are many controlling factors in determining water uses. This approach could produce many highly speculative scenarios and unreliable results. Instead, it is more appropriate to evaluate the impacts of water resources on wildlife and their habitats at the project level. The BLM does not have a forecast "scale of development" for oil shale or tar sands. The BLM agrees with the cooperating agencies that there is not enough information at the experimental stage of the industries to support a development scenario that would be better than speculative.

53001-011: Canadian oil sands operations did not form the basis for the visual impact assessment in the Draft PEIS and were not considered in the visual impact analysis conducted for the Draft PEIS.

The photos of Canadian oil sands operations included in the Draft PEIS were intended to illustrate at a general level the types of visual impacts associated with tar sands development. They show visual impacts typical of surface mining operations and visual impacts associated with tar sands processing facilities. They illustrate the strong contrasts in form, line, color, and texture associated with mining operations and the built structures' rectilinear geometry, symmetry, and surface characteristics. The scale of tar sands facilities that might be built in the future is not known precisely at this time; the photos in the PEIS include a range of scales, including a pilot-scale facility near Vernal, Utah.

The basis of the visual impact analysis for the Draft PEIS is a determination, based solely on distance from the STSA, of sensitive visual resources that might be affected by tar sands development, if the development and/or associated project components or activities, such as lighting, dust, or smoke, were visible from the locations of the sensitive visual resources. The analysis did not account for topography, which in some cases might obscure some or all views of the tar sands development and associated activities. Because precise information about the location of the development, its size, the technologies employed, and other site-specific information is not known at this point, this level of analysis is appropriate for this PEIS. When a specific tar sands development project is proposed for a specific location, a site-specific NEPA analysis would be conducted that would incorporate information about the size and nature of the development that was proposed, the precise location of the project components, and local topography to determine the visual impacts associated with the proposed development.

53001-012: Given the programmatic nature of the PEIS, the purpose of the analysis of socioeconomic impacts is to provide an overview of the type and magnitude of

impacts that would likely occur with the construction and operation of representative oil shale and tar sands facilities. As the technologies, scale of development, and project locations associated with tar sands development are not known, the analysis described in the PEIS was based on a series of assumptions regarding project production levels and direct project employment during both construction and operations phases. These assumptions, described for both oil shale and tar sands development in Section 4.11 of the PEIS, were based on publicly available NEPA reviews of oil shale and tar sands projects. These assumptions are reasonable for a programmatic review of potential socioeconomic impacts. The BLM does, however, acknowledge the possibility that the estimate in this PEIS might be higher than actual impacts to employment or other socioeconomic values.

As the commentor suggests, the facility direct employment estimates are based on larger projects, in this case those analyzed in the Combined Hydrocarbon Leasing EIS. Direct construction and operations employment associated with two facilities, a surface mine (190,000 bbl/day, 9,600 construction employment and 6,566 operations employment) and an in situ facility (175,000 bbl/day, 12,060 construction employment, 2,235 operations), was averaged, and then scaled for the 20,000 bbl/day facility analyzed in the PEIS.

53001-013: Potential employment created by oil shale and tar sands facilities in each state ROI is presented in Sections 4.11 and 5.11 of the PEIS. The potential impacts of oil shale and tar sands developments on recreation, and the consequent loss of employment in each ROI, are presented in Section 4.11.1.5 and 5.11.1.4.

53001-014: The cumulative impacts assessment in the PEIS relied on the RFDSs for oil and gas development as presented in draft and final RMPs for each BLM Field Office. In the case of Vernal, the information was published in 2005. The total number of producing wells estimated in the Vernal RMP is still valid, although the anticipated life of the projected development scenario has been scaled back to 4 years, instead of the standard 15–20 years. The BLM does, however, acknowledge the possibility that the estimated oil and gas development presented in this PEIS might be less than the actual number of oil and gas wells developed in the future.

In general, the RFDS is an estimate based on past and present development projected into the future. The RFDS uses variables or factors to make an informed estimate of the number of oil and gas wells needed to produce the resource. These variables include the price of oil and gas, the success or failure of exploration in unproven areas, availability of exploration and development equipment, availability of infrastructure including the pipeline transportation network, technology, economics and the willingness of investors to invest in exploration for oil and gas, and the advancement of primary, secondary and tertiary recovery methods. After considering all information, the number of wells actually drilled could fluctuate, especially when determining activities over the life of an RMP.

However, variances in the number of wells, either up or down, does not alter the RFDS's usefulness as an analytical tool for NEPA analysis associated with planning-level decisions. It is the level of impacts disclosed, individually and cumulatively, that determines the validity of the NEPA analysis associated with specific planning decisions.

Given the limited scope and narrow allocation decisions being proposed in this PEIS (i.e., amending land use plans to allow certain lands to be considered for future leasing), the estimate of extensive oil and gas development given in the PEIS is considered a sufficient indicator of the magnitude of potential cumulative impacts. At the leasing or plan of development stage when the scope of the proposed action is determined, the appropriate level of additional analysis will be performed, including updated estimates of other activities occurring in the study area.

53001-015: The information presented in Sections 6.1.5.2.2 and 6.2.5.2.2 seems to agree with the information provided by the commentor. For example, in Table 6.1.5-5, the predicted coal production for all field offices given is 30 to 34 million tons/yr, as stated in the comment (most occurring in the Henry Mountain Planning Area). The information that about 13% of the production would be from surface mines and 87% from underground mining has been added to Tables 6.1.5-5 and 6.2.5-4.

53001-016: Thank you for your comment. The suggested changes have been made in the tables.

53001-017: The commentor is correct. The statements in Sections 6.1.6.2.2 and 6.2.5.2.4 have been changed to state that gilsonite is produced in the Book Cliffs area.

53001-018: The concerns above are discussed in Section 4.5 of the PEIS. Any proposed commercial development would have site-specific NEPA analyses, including determination of salinity impact, and would address state and local regulations on waste streams.

53001-019: The text in Sections 4.5.1.3 and 5.5.1.3 has been modified to account for the EPA administration of UIC on tribal land and the potential for UIC self-enforcement by Tribes.

53001-020: The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. A more specific analysis of cumulative impacts of multiple oil shale and tar sands facilities in the study area may be conducted at a future step in the assessment process, when an RFDS for oil shale and/or tar sands development would be included. An RFDS was not developed for this PEIS because most of the information necessary for producing an RFDS is unknown and not reasonably available at the present experimental stage of the oil shale and tar sands industries. Assumptions based on the limited available

information would be too speculative to support a meaningful scenario. An RFDS at a future step in the assessment process would be based on a clear set of supportable assumptions associated with a leasing or development proposed action, and would address the issues of water availability and quality, air quality, climate change, and loss of wildlife habitat.

53001-021: The BLM has a long history of cooperation with the Division of Wildlife Resources and it is our intent that this will continue when considering any future applications to lease or plans of development in the Book Cliffs area.

53001-022: See response to Comment 53001-014.

Thank you for your comment, Kirby Hughes.

The comment tracking number that has been assigned to your comment is OSTSD53002.

Comment Date: April 21, 2008 17:59:52PM
Oil Shale and Tar Sands
Comment ID: OSTSD53002

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Attachment:

Comment Submitted:

Dear Sir or Ma'am,

It is our opinion the Programmatic EIS needs to better evaluate the effectiveness of the proposed surface and groundwater protection, as well as protection for air quality, for all of the options studied. 53002-001

We further feel the quality and fragmentation of wildlife habitat has not been adequately reviewed and will leave Colorado with a much degraded environment for wildlife habitation. 53002-002

Finally, we recognize the large-scale impact of the proposed development. Accordingly, we feel the economic feasibility of tar sands and/or oil shale extraction are so marginal that they've been evaluated in a manner that's unfair to the true higher value of the land, without a proper weight to the significantly negative impacts of the proposed development. Further, we believe the 53002-003

feasibilities of the various "green" energy-generating solutions should be evaluated against the overall feasibility of tar sands and/or oil shale extraction and energy generation so as to provide for a better assessment of the overall strategy for extraction. 53002-004

Yours,

Kirby Hughes Mining, Oil & Gas Issues Chair Sierra Club/Rocky Mountain Chapter 2725 Black Canyon Rd., Colo Spgs, CO 80904 719-685-3019

Responses for Document 53002

53002-001: The PEIS analyzes, to the extent possible, impacts to a variety of location-specific resources (e.g., soil type, air quality, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) of an allocation decision because of the limited character of the decision to be made. The analysis is also limited by the inability to make assumptions concerning extraction and processing technologies and requirements and project size. These are important factors that will greatly determine the magnitude of the impacts from given projects. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development.

53002-002: Section 4.8.1.3.3 presents a qualitative overview of the impacts of fragmentation on wildlife habitat. The PEIS is a programmatic-level document that analyzes allocation decisions. It is important to note that these allocations do not authorize the immediate leasing of the lands for commercial development. Thus, land use allocation would not result in fragmentation of wildlife habitat. Therefore, providing more detailed discussion of habitat fragmentation is beyond the scope of the PEIS. Policies and BMPs that would be implemented at the project-specific level are expected to avoid high-quality wildlife habitat and minimize habitat fragmentation to the extent practicable.

53002-003: The socioeconomic impacts of oil shale and tar sands development are assessed from a number of perspectives, including both the benefits and costs of these developments. In addition to an assessment of the economic impacts of oil shale and tar sands development on ROI direct and indirect employment and income, the PEIS also assesses the impacts of these developments on those sectors of the economy providing goods and services to recreational visitors, also in terms of direct and indirect employment and income. The potential underestimation of impacts on recreation on public lands purely based on visitation and visitation expenditures is also assessed, with a discussion of nonmarket valuation of recreational resources. A qualitative assessment of the impacts on agriculture is also included in the event that water restrictions to agriculture occur with the commercial development of oil shale and tar sands in the three state ROIs. A qualitative assessment of the impacts on property values is also included, where it is accepted that values may decline in the vicinity of project locations but increase where employment impacts of oil shale and tar sands development and overall levels of economic development contribute to higher values. The social impacts of oil shale and tar sands development on traditional uses of public lands for hunting and angling are also considered, together with the potential impacts of environmental degradation and access restrictions on public lands to low-income and minority populations.

53002-004: Although renewable energy sources are an important part of a diverse domestic energy supply, oil shale and tar sands on the public lands are among our best

prospects to supply our country's future energy needs. With the passage of the Energy Policy Act of 2005, Congress instructed the Secretary of the Interior to prepare a PEIS to establish a commercial leasing program. The BLM is conducting a phased decision-making process—proceeding from land use planning to leasing to operational permitting. The land use planning or allocation decision does nothing more than remove an administrative barrier preventing the BLM from accepting applications. Therefore, subsequent NEPA analysis will be required prior to the leasing and development phases to assess impacts of those actions. This additional analysis will consider any new or site-specific information regarding proposed oil shale technology and any anticipated environmental consequences. Specific mitigation measures, management prescription, and the best available practices will be applied to minimize or eliminate impacts as a result of the NEPA analysis.

Thank you for your comment, Sandra Goldberg.

The comment tracking number that has been assigned to your comment is OSTSD53003.

Comment Date: April 21, 2008 19:05:00PM
Oil Shale and Tar Sands
Comment ID: OSTSD53003

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Privacy Preference: Don't withhold name or address from public record
Attachment: CA Attorney General Comment Letter.pdf

Comment Submitted:

See Attachment.

EDMUND G. BROWN JR.
Attorney General

State of California
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April 21, 2008

By Regular and Electronic Mail
(http://ostseis.ani.gov/involve/comments/index.cfm)

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

RE: **Comments on the Oil Shale and Tar Sands Leasing Draft Programmatic Environmental Impact Statement**

The California Attorney General submits these comments pursuant to the National Environmental Policy Act (NEPA) on the Oil Shale and Tar Sands Leasing Draft Programmatic Environmental Impact Statement (PEIS).[1] The Bureau of Land Management (BLM)'s failure to consider, evaluate, and discuss the impacts of the leasing program on greenhouse gas (GHG) emissions and global climate change violates NEPA and the Energy Policy Act of 2005, and is inconsistent with the goals and policies of the Energy Independence Act of 2007. Because California is particularly vulnerable to climate change impacts, this matter is of particular interest to the State.

1. Climate Change Background

Before discussing the PEIS, it is important to understand why human-caused climate change is of particular concern to California.[2]

The impacts of climate change are not limited to remote parts of the world – they are being felt in California today. In California, global warming is causing damage to agriculture, losses to the Sierra snowpack, higher risks of fire, eroding coastlines, and habitat modification and destruction. Global warming affects public health directly, through heat-related illnesses and

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[1] The Attorney General provides these comments pursuant to his independent power and duty to protect the natural resources of the State from pollution, impairment, or destruction in furtherance of the public interest. (See Cal. Const., art. V, § 13; Cal. Govt. Code, §§ 12511, 12600-12; *D'Amico v. Board of Medical Examiners* (1974) 11 Cal.3d 1, 14-15.) These comments are made on behalf of the Attorney General and not on behalf of any other California agency or office.

[2] The physics of climate change are well described in the Intergovernmental Panel on Climate Change, Fourth Assessment Report, "Frequently Asked Questions" (at http://ipcc-wg1.ucar.edu/wg1/Report/AR4WG1_Print_FAQs.pdf) and need not be repeated here.

deaths caused by an increase in the number of hot days, and longer heat waves, and indirectly as higher temperatures favor the formation of ozone and particulate matter in areas that already have severe air pollution problems.[3]

According to a whitepaper from the California Climate Action Team on the impacts of climate change on agriculture, "California's cornucopia is predicated on its current climate and its supply and distribution of irrigation water[.]"[4] Rising temperatures will cause crops growing in warmer climates to use more water and also may stimulate more weeds and insect pests. Pollination – essential to many California Central Valley crops – will be negatively affected if warming causes asynchronization between flowering and the life cycle of insect pollinators. And the occurrence of adequate winter chill, necessary for fruit trees to flower, may be lost for many fruit species.[5] Higher temperatures due to global warming also impact the dairy industry, which is a significant industry in California, by causing lower milk production and heat-related animal deaths.[6] The extended heat wave of 2006 caused the death of thousands of cows in California and created a backlog of carcasses for disposal.[7]

The health related impacts of climate change are of substantial importance to California. In recent testimony to Congress, Dr. Howard Frumkin, Director of the National Center for Environmental Health at the Centers for Disease Control and Prevention (CDC), identified the following major anticipated health impacts of climate change:

- Direct effects of heat;
- Health effects related to extreme weather events;
- Air pollution-related health effects;
- Water and food-borne infectious diseases;
- Vector-borne and zoonotic diseases; and
- Other pathogens sensitive to weather conditions.[8]

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[3]A summary of impacts to California, together with citations, is available on the Attorney Generals' website at http://ag.ca.gov/globalwarming/impact.php.

[4]California Climate Change Center, *An Assessment of the Impacts of Future CO2 and Climate on Californian Agriculture* (March 2006) at p. 1, at http://www.energy.ca.gov/2005publications/CEC-500-2005-187/CEC-500-2005-187-SF.PDF.

[5]*Id.*, Abstract.

[6] Dairy is the top agricultural commodity in California, with $4.1 billion of receipts in 1999. California Farm Bureau Federation at http://www.cfbf.com/info/moca.cfm#facts

[7]Williams, "Dairy producers regroup after cow deaths," Bakersfield Californian (Aug. 5, 2006), at http://www.bakersfield.com/102/story/66292.html.

[8] Testimony to Select Committee on Energy Independence and Global Warming, United States House of Representatives, April 9, 2008, at http://www.cdc.gov/print.do?url=http%3A//www.cdc.gov/washington/testimony/2008/t20080409.htm

The 2006 heat wave caused over human 141 deaths in California.[9] A recent Stanford study details how for each increase in temperature of 1 degree Celsius (1.8 degrees Fahrenheit) caused by climate change, the resulting air pollution would lead annually to about a thousand additional deaths and many more cases of respiratory illness and asthma.[10] The study also finds that the effects of warming are most significant where the pollution is already severe. (supra, fn. 8). Given that California is home to six of the ten U.S. cities with the worst air quality, the State will bear a disproportionate effect from carbon-dioxide induced global warming compared with the rest of the United States. Id. The analysis finds that carbon dioxide increases air pollution-related mortality and other health problems in California at a rate at least 2.5 times that of the United States as a whole. Id.

Dr. Frumkin from the CDC also recognizes that "t]he effects of climate change will likely vary by geographic area" and notes that "[t]he West coast of the United States is expected to experience significant strains on water supplies as regional precipitation declines and mountain snow packs are depleted." (supra, fn. 7). This has great significance for California, which relies heavily on snow melt from the mountains for its water supply.

The atmospheric concentration of CO_2, the leading GHG, is now 385 parts per million (ppm),[11] higher than any time in the last 650,000 years,[12] and rising at about 2 ppm per year. According to experts, an atmospheric concentration of CO_2 "exceeding 450 ppm is almost surely dangerous" to human life because of the climate changes it will cause.[13] Thus, we are fast approaching a "tipping point," where the increase in temperature will create unstoppable, large-scale, disastrous impacts for all the inhabitants of the planet.[14] We must take prompt action and control of our future. In the words of Rajendra Pachauri, Chairman of the United Nations Intergovernmental Panel on Climate Change, "If there's no action before 2012, that's too late. What we do in the next two to three years will determine our future. This is the defining

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[9] Munoz, Olivia, "141 Deaths Later, Heat Wave Appears Over" Associated Press, July 28, 2006, at: www.washingtonpost.com/wp-dyn/content/article/2006/07/28/AR2006072801304_pf.html.

[10] Jacobson, Mark Z., *On the causal link between carbon dioxide and air pollution mortality*, Geophysical Research Letters, Vol. 35 L03809 (2008), available at: www.stanford.edu/group/efmh/jacobson/Ve.html; see also, Mark Z. Jacobson, Professor of Civil & Environmental Engineering, Stanford University, April 9, 2008, Testimony to Select Committee on Energy Independence and Global Warming, United States House of Representatives at: http://globalwarming.house.gov/pubs/pubs?id=0036

[11] http://www.esrl.noaa.gov/gmd/ccgg/trends/

[12] IPCC 4th, WGI, Frequently Asked Question 7.1, *Are Increases in Atmospheric Carbon Dioxide and Other Greenhouse Gases During the Industrial Era Caused by Human Activitites?*" (at http://ipcc-wg1.ucar.edu/wg1/Report/AR4WG1_Print_FAQs.pdf)

[13] *See* http://www.nasa.gov/centers/goddard/news/topstory/2007/danger_point.html.

[14] *See ibid.*

moment."[15]

As the world's climate experts have concluded, if we do not drastically reduce our greenhouse gas emissions, the climate impacts we are observing and experiencing are going to get worse, and, at some point, we may even lose the ability to control the problem. There is the risk that temperature increases will set in motion unstoppable "feedback loops" that cause rapid, non-linear impacts on climate. For example, the disintegration of large areas of snow and ice will expose darker surfaces that absorb more sunlight, raising temperatures and speeding up the further loss of snow and ice.[16] Higher temperatures will thaw the arctic tundra, causing organic materials in the permafrost to decompose, thereby releasing large amounts of methane. Id. Since methane is a powerful greenhouse gas (21 times more potent than carbon dioxide), atmospheric temperature is likely to increase in turn. Id. And warmer oceans will be less able to absorb carbon dioxide, leaving more carbon dioxide in the atmosphere.[17] The strength of this feedback effect varies considerably among models. Id. Uncertainty about these feedback loops results in uncertainty about the extent of climate change impacts under various emission scenarios and the trajectory required to stabilize atmospheric carbon concentrations. (Id., at pp.38 and 73).[18]

2. Description of the Project

The Bureau of Land Management within the U.S. Department of Interior (DOI) (hereafter referred to jointly as "BLM"), prepared the PEIS to evaluate the environmental impacts of amending twelve Resource Management Plans (RMPs) -- adopted under the Federal Land Policy and Management Act -- to allow oil shale leasing on 1,991,222 acres of federal land (359,798 acres in Colorado, 1,000,453 acres in Wyoming and 630,971 acres in Utah), and to allow tar sands leasing on 431,224 acres in Utah. Oil extracted from these lands would be processed into transportation fuels.

Oil shale can be recovered by underground or surface mining of the rock, which is then retorted by heating to about 500 degrees Celsius. Another potential production method is in-situ retorting, which involves drilling numerous deep shafts into the rock and injecting heated water that, over time, converts the solid kerogen in the rock to liquid. The liquid is pumped out and

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[15] Rosenthal, *U.N. Chief Seeks More Leadership on Climate Change*, N.Y. Times (November 18, 2007).

[16] Historical Overview of Climatic Change Science, in Climate Change 2007: The Physical Science Basis, Contribution of Working Group1 to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change (2007), p. 110, at: http://www.ipcc.ch/pdf/assessment-report/ar4/wg1/ar4-wg1-chapter1.pdf.

[17] Climate Change 2007: Synthesis Report, an Assessment of the Intergovernmental Panel on Climate Change, concerning the Fourth Assessment Report, p. 38, at: http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr.pdf.

[18] See also, James Hansen, et al., Climate change and trace gases, *Phil. Trans. R. Soc. A* (2007) 365, 1925-1954 (doi:10:1098/rsta.2007.2052), at http://journals.royalsociety.org/content/l3h462k7p4068780/.

processed to remove impurities. Shell Oil is planning to test an in-situ retorting process that uses an ice wall, formed by injecting liquid ammonia into a system of pipes, as a barrier to keep groundwater out of the production area.

Tar sands are sandstone rocks consisting of a mixture of sand and clay, water, and heavy crude oil or bitumen. The PEIS states that U.S. tar sands are primarily found in Utah. It notes that they have different characteristics than Canadian tar sands, which makes recovery of oil more difficult and will require new technology.[19] The potential methods of tar sands development include surface mining and retorting or solvent extraction, or in-situ facilities using steam injection or combustion to liquify the oil that is extracted and processed on the surface.

The PEIS was prepared pursuant to the Energy Policy Act of 2005, which declares that oil shale and tar sands are "are strategically important domestic resources that should be developed to reduce the growing dependence of the United States on politically and economically unstable sources of foreign oil imports." The Act provides that this development *"should be conducted in an environmentally sound manner, using practices that minimize impacts" and "should occur, with an emphasis on sustainability.... ."* (emphasis added.)

The Act directs the Secretary of the Interior to prepare a programmatic environmental impact statement for a commercial oil shale/tar sands leasing program in Colorado, Utah, and Wyoming within 18 months of the date of enactment. The Act directs DOI to adopt a regulation establishing the leasing program, within 6 months of completing the PEIS. The current PEIS only evaluates amendment of twelve RMPs to allow commercial oil shale and tar sands leasing. DOI has indicated that after the RMPs are amended, it will do a separate NEPA evaluation of the proposed leasing program regulation.

The Act does not require issuance of leases, but provides that "[i]f the Secretary finds sufficient support and interest exists in a State, the Secretary may conduct a lease sale in that State under the commercial leasing program."

3. National Environmental Policy Act

NEPA requires a federal agency "to the fullest extent possible," to prepare "a detailed statement on . . . the environmental impact" of "major Federal actions significantly affecting the quality of the human environment." 42 U.S.C. § 4332(2)(C)(i).

If there is a substantial question whether an action "may have a significant effect" on the environment, then the agency must evaluate that impact in an EIS. *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1212 (9th Cir. 1998). An EIS should contain a discussion of significant environmental impacts, ways to minimize those impacts, and alternatives to the

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[19] It is widely recognized that Canadian tar sands production methods would not comply with U.S. environmental laws. Canadian tar sands are the fastest growing source of new GHG emissions in Canada -- currently estimated at 40 million tonnes per year (not including burning the oil) and predicted to almost double by 2020. *See*, Canada's Toxic Tar Sands, The Most Destructive Project on Earth (Environmental/Defence, Feb. 2008), p. 16-17 at: http://www.environmentaldefence.ca/reports/tarsands.htm

proposed action. *See* 40 C.F.R. §§ 1502.1, 1502.14. Whether an action may "have a significant effect" on the environment requires consideration of "context" and "intensity." *Id.* § 1508.27; *see also Nat'l Parks & Conservation Ass'n v. Babbitt*, 241 F.3d 722, 731 (9th Cir. 2001). This includes consideration of the "severity of impact," "[t]he degree to which the effects on the quality of the human environment are likely to be highly controversial," "[t]he degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks," and "[w]hether the action is related to other actions with individually insignificant but cumulatively significant impacts." 40 C.F.R. § 1508.27(b)(2), (4), (5), (7).

An EIS must address cumulative impacts, defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency . . . or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7.

An EIS must include a "reasonably complete discussion of possible mitigation measures", *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 351, 109 S.Ct. 1835, 1846 (1989), *citing*, 40 C.F.R. 1508.25(b), 1502.14(f), 1502.16(h) and 1505.2(c), as well as discussion of the "environmental effects that cannot be avoided." 42 U.S.C. § 4332(C)(ii)). Discussion of mitigation measures is recognized as an "important ingredient of an EIS... ." *Methow Valley Citizens Council*, 490 U.S. at 351.

4. The PEIS Does Not Adequately Analyze GHG Emissions and Climate Change Impacts Under NEPA

The PEIS improperly concludes that the GHG emissions from the oil shale and tar sands leasing program will not have a significant impact on the environment. The PEIS fails to comply with NEPA because it does not disclose, evaluate or estimate those GHG emissions or include a reasonable discussion of ways to minimize those emissions and the climate change impacts of the development. These are very serious omissions. 53003-001

a. Discussion of Climate Change in the PEIS

The PEIS provides some basic information about global climate change and an estimate of annual carbon dioxide emissions in the affected areas.[20] It acknowledges that industrialization and burning fossil fuels "have caused CO2 concentrations to increase dramatically and are likely to contribute to overall climatic changes." (page 4-48; 5-40.) It highlights some uncertainties, but also acknowledges "increasing concentrations of GHG, however, are likely to accelerate the rate of climate change." However, it concludes that "[t]he direct emissions of climate change air pollutants from oil shale development facilities are likely to be *a small fraction of global emissions*." (Page 4-48, emphasis added.) The document contains an identical conclusion regarding tar sands. (Page 5-41.) While not expressly stating it, this represents a conclusion that 53003-002

[20] This number is 20.18 million tons per year. (page 3-99 - 3-100, Table 3.5.2-1.)

GHG emissions from the leasing program do not have a potential significant impact on climate change. In reliance on this conclusion, the PEIS does not attempt to estimate GHG emissions from development of the leases or to evaluate (either qualitatively or quantitatively) the impact on climate from those emissions.

BLM also fails to discuss the known information, published by the United Nations Intergovernmental Panel on Climate Change, National Academy of Sciences and other preeminent scientific bodies, about atmospheric carbon concentrations that may not be exceeded if we hope to avoid catastrophic climate change, which is relevant to evaluating the significance of impacts of this project.

53003-002 (cont.)

b. The PEIS Does Not Adequately Disclose and Analyze All of the Potential GHG Emissions that May Result from Offering Federal Lands for Leasing

The PEIS entirely fails to quantify the GHG emissions that will result from the huge oil shale and tar sands commercial development program, and fails to evaluate the impact of those emissions on global climate change. Yet, at the same time, without quantifying or even estimating the project's GHG emissions, the PEIS concludes that the project would contribute only a small fraction of global GHG emissions, and will have an insignificant impact on climate change. BLM cannot reasonably make these conclusions without any quantification of the amount of direct and indirect GHG emissions that could result from the project. Moreover, because the PEIS refers to "direct" emissions, this finding was made without considering indirect emissions, which will be extensive.[21] For purposes of evaluating other environmental impacts of the leasing program, the PEIS assumes that the leasing program will result in construction of facilities that produce 50 bbl/day from oil shale surface mining, 200,000 bbl/day from oil shale in situ facilities, and 100,000 bbl/day of oil from tar sands facilities. (Page 4-2 and 5-2.). Yet, BLM made no attempt to evaluate the impact of GHG emissions using the same assumptions.

53003-003

Moreover, with respect to all impacts, "BLM has determined that the amendment of land use plans to designate lands as available for application for commercial leasing would have *no impact* on the environment." (Page ES-5.) (emphasis added.) BLM bases this conclusion on the fact that the RMP amendments merely allow BLM to consider granting leases in the future, but do not commit BLM to a particular course of action, and future leasing and development will require site-specific NEPA evaluations. (Id.) This is contrary to NEPA, since the amendment of the RMPs is a necessary step that is part of a related course of actions that allows oil shale and tar sands development to proceed on federal lands, and that will result in significant cumulative

53003-004

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[21] Indirect emissions would result from the large amounts of electricity needed for the production facilities and electricity needed to deliver the large amount of water the facilities would require. (PEIS, p. 4-13, 4-23, and 5-30 - 5-31.) Other indirect emissions would occur from transportation. In addition, because oil extracted from shale and tar sands may be heavier than conventional crude, refining the extracted material may require additional energy usage and GHG emissions as well.

environmental impacts.[22] This is particularly the case here, because the statute directs BLM to go forward with the leasing program by adopting regulations and then authorizes BLM to issue leases. 53003-004 (cont.)

The PEIS also states, without adequate explanation, "[t]he magnitude of impacts and the applicability and effectiveness of mitigation measures cannot be assessed at the programmatic level and will need to be evaluated on a project-by-project basis...." (Page ES-7.) This is in direct contrast to the U.S. Department of Energy's Clean Coal Technology Final Programmatic Environmental Impact Statement (DOE-EIS-0146), that estimates incremental and cumulative CO2 emissions expected from commercialization of various clean coal technologies.[23] BLM is avoiding its obligation under NEPA to evaluate the overall climate change (and other) impacts of the proposed leasing program and identify measures that could reduce or avoid environmental harm before the agency takes action to amend the RMPs. BLM has significant discretion in determining how much land should be offered for leases at this time, and what conditions must be satisfied before leasing occurs, and those decisions are directly relevant to the magnitude of the climate change impacts from the leasing program. Postponing consideration of those impacts undermines the purpose of doing a programmatic environmental review. It is also contrary to NEPA, which requires an agency to evaluate environmental impacts before it makes decisions about how to proceed.[24] 53003-005

In concluding that the project will not have a significant impact on climate change, the PEIS ignores research indicating that producing fuel from oil shale and tar sands will result in significantly greater GHG emissions than producing fuel from conventional petroleum, including information from the U.S. Department of Energy.[25] The oil shale and tar sands production 53003-006

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[22] See *Kleppe v. Sierra Club*, 96 S.Ct. 2718 at 2726, 2730, 427 U.S. 390 at 401, 410 (1976) (when actions pending before agency are integrated into a coherent plan or otherwise interrelated, their impacts must be considered together); *National Wildlife Federation v. Appalachian Regional Commission,* 677 F.2d 883, 888-889 (D.C. Cir. 1981) (environmental effects should be considered jointly where federal action consists of related enterprises associated within a single program and planned together; agency may not "segment" an overall program thereby unreasonably constricting the scope of environmental evaluation).

[23] National Environmental Policy Act, Lessons Learned, U.S. Department of Energy, Quarterly Report, December 3, 2007, Issue No. 53, p. 1 at http://www.eh.doe.gov/nepa/lessons.html.

[24] *Robertson v. Methow Valley Citizens Council*, 109 S.Ct. 1835, 1846, 490 U.S. 332, 349 (1989) (NEPA requires that an agency has available and carefully considers information about environmental impacts before making its decision).

[25] See, Oil Shale Development in the United States (2005 RAND Corporation) pp. 21 and 40, at http://rand.org/pubs/monographs/MG414; Strategic Significance of America's Oil Shale Resource, Vol. II, Oil Shale Resources Technology and Economics, U.S. Department of Energy (March 2004), p. 25 at www.fossil.energy.gov/programs/reserves/npr/publications/npr_strategic_significancev2.pdf;

processes will be extremely energy-intensive, will require new electricity generating capacity which will likely use coal, will require large amounts of water (which uses electricity to transport), and will also require large amounts of natural gas and/or diesel fuel. The U.S. Department of Energy recognizes that "[p]roduction of unconventional fuels (oil shale, coal to liquids, heavy oil) produces more CO2 than is produced when using conventional petroleum."[26] The high temperatures associated with surface retorting also release CO2 from mineral carbonates, contained in oil shale and produce methane, a GHG that is 21 times as potent as CO2.[27]

53003-006 (cont.)

The PEIS recognizes that large amounts of electricity will be needed for the production facilities, and to deliver the large amount of water the facilities would require. (PEIS, p. 4-13, 4-23, and 5-30 - 5-31.) Although climate change is not specifically mentioned, in the section

53003-007

Converting Green River oil shale to liquid fuels with ATP and ICP technologies, 27th Oil Shale Symposium, Colorado School of Mines, Adam R. Brandt, October 17, 2007 at abrandt.berkeley.edu/shale/Brandt_Converting_Green_River_oil_shale_to_liquid_fuels.pdf; A Study on the EU oil shale industry (2007 European Academies Science Advisory Council), p.28, at www.easac.org/displaypagedoc.asp?id=78; Farrell, A.E. and A.R. Brandt, Risks of the oil transition, *Environmental Research Letters*, 1 (2006) 014004, at http://www.iop.org/EJ/abstract/1748-9326/1/1/014004/; Brandt, A.R. and A.E. Farrell, Scraping the bottom of the barrel: greenhouse gas emission consequences of a transition to low-quality and synthetic petroleum resources, 84 *Climatic Change*, 241-263 (October 2007) at http://www.springerlink.com/content/v283j2220jj365g4/; Bartis, J., Unconventional Liquid Fuels Overview, 2006 Boston World Oil Conference, p.20, at www.aspo-usa.com/fall2006/presentations/pdf/Bartis_J_Boston_2006.pdf; Kolbert, *Unconventional Crude*, The New Yorker, November 12, 2007, p. 50.

[26] Fact Sheet: Carbon Management for Strategic Unconventional Resources, DOE Office of Petroleum Reserves at www.fossil.energy.gov/programs/reserves/npr/Carbon_Management_Fact.pdf; also see, Fact Sheet: Oil Shale and the Environment, DOE Office of Petroleum Reserves, stating that in oil shale development "[c]arbon dioxide (CO2) will be produced in large quantities and may need to be captured... ."and Fact Sheet: Energy Efficiency of Strategic Unconventional Resources, DOE Office of Petroleum Reserves, stating "[u]nconventional fuels require additional processing steps ... to recover and convert these resources to fuels. These steps consume energy and lower the energy efficiency relative to conventional oil." Available at www.fossil.energy.gov/programs/reserves/npr/Oil_Shale_Environmental_Fact_Sheet.pdf and www.fossil.energy.gov/programs/reserves/npr/Energy_Efficiency_Fact_Sheet.pdf

[27] Oil Shale Development in the United States (2005 RAND Corporation), p.40 at http://rand.org/pubs/monographs/MG414; A Study on the EU oil shale industry (2007 European Academies Science Advisory Council), p.27 at www.easac.org/displaypagedoc.asp?id=78; and Fact Sheet: Oil Shale and the Environment, DOE Office of Petroleum Reserves (explaining that in addition to releasing kerogen oil from oil shale, heating carbonate rock to 450 - 500 degrees centigrade also releases other gases, including carbon dioxide) at www.fossil.energy.gov/programs/reserves/npr/Oil_Shale_Environmental_Fact_Sheet.pdf.

discussing "Air Quality" impacts, the PEIS indicates that oil shale development on these lands would likely require additional electric power capacity that, in the near term, would be generated from low-sulfur Wyoming coal. (Page 6-112). The PEIS estimates that CO2 emissions from a new 360 megawatt coal power plant to serve the development would be 890 kg/GWh. (Page 6-113). It concludes that construction of new power plants for this development "would [also] have longer-term impacts on regional air quality." (Page 6-45.) However, none of this information was used to estimate or evaluate GHG emissions from the proposed leasing program.

It is also unreasonable for BLM to dismiss out-of-hand the environmental impacts (including GHG emissions) from tar sands development in Canada as not relevant to the U.S., because the resources in Utah will be more difficult to recover. If anything, this indicates that tar sands development in the U.S. will be more energy intensive, and therefore, the GHG emissions from Canadian tar sands development would appear to provide a minimum level of emissions that could be expected from tar sands development in the U.S.

Finally, the PEIS must disclose and consider *all* of the potential GHG emissions from build-out of the oil shale and tar sands development facilities allowed by the RMP amendments, and cannot "assume" that only a limited portion of the lands open to leasing will be developed. The PEIS, without adequate explanation, limits its consideration of other environmental impacts to impacts associated with oil shale and tar sands development on only a limited portion of the lands where leasing would be allowed.[28] This approach fails to disclose the true potential impacts of the proposed action. 53003-007 (cont.)

In sum, the GHG emissions from oil shale and tar sands leasing on almost 2.5 million acres of federal land constitutes a significant cumulative impact on the environment. The available data (which was ignored by BLM) does not support the agency's conclusion that the project will *not* have a significant impact on climate change. To the contrary, the information discussed above demonstrates that the leasing program will result in significant increases in emissions of GHG and significant impacts on climate. This is especially the case in light of the "intensity" factor for determining significance of impacts under NEPA (40 C.F.R. 1508.27(b)) due to the potential serious effects on public health, the high level of uncertainty regarding feedback mechanisms that could lead to rapid, non-linear climate change impacts, and the fact that the impacts of climate change are unique, involve unknown risks, and are controversial. See *Center for Biological Diversity v. NHTSA*, 508 F.3d 508, 553-556 (9th Cir. 2007).

c. The PEIS Ignores Recent Cases Addressing the Significance of GHG Emissions from Transportation Fuels

The characterization of GHG emissions from the project as only a "small fraction" of global emissions and the conclusion that the project does not have a significant impact on climate change, ignores the significance of emissions from the transportation sector. In *Massachusetts v.* 53003-008

[28] For purposes of its evaluation of environmental impacts of the project, the PEIS assumes facilities that produce: 50 bbl/day from oil shale surface mining, 200,000 bbl/day from oil shale in situ facilities, and 100,000 bbl/day of oil from tar sands facilities. (Page 4-2 and 5-2.)

EPA, the Supreme Court said: "[e]ven leaving aside the other greenhouse gases, the United States transportation sector emits an enormous quantity of carbon dioxide into the atmosphere... more than 6% of worldwide carbon dioxide emissions. . . . To put this in perspective: Considering just emissions from the transportation sector, . . . the United States would still rank as the third-largest emitter of carbon dioxide in the world . . . . Judged by any standard, U.S. motor-vehicle emissions make a meaningful contribution to greenhouse gas concentrations and hence, . . . to global warming." 127 S.Ct. 1438 at 1457-58 (2007). Given the huge extent of the proposed leasing program, an increase in lifecycle GHG emissions from fuels produced from oil shale and tar sands, when compared to conventional petroleum sources, must be considered a potential significant environmental impact.

53003-008 (cont.)

BLM's position is also contrary to the Ninth Circuit's decision in *Center for Biological Diversity v. NHTSA*, 508 F.3d 508 (9th Cir. 2007). There, the Court noted that "the fact that climate change is largely a global phenomenon that includes actions that are outside of [the agency's] control . . . does not release the agency from the duty of assessing the effects of *its* actions on global warming within the context of other actions that also affect global warming." 508 F.3d at 550. The Court further found that "[t]he impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct." 508 F.3d at 550.

d. The PEIS Does Not Adequately Discuss or Evaluate Feasible Measures to Mitigate GHG Emissions

The PEIS fails to identify and evaluate potential mitigation measures that could reduce or avoid GHG emissions from oil shale and tar sands development, such as requiring that the electricity needed is generated from new renewable energy sources; requiring offsite mitigation for the natural gas and/or diesel fuel that will be used; or specifying that no leases will be granted until techniques for sequestering carbon emitted at the facilities are perfected. Instead, BLM entirely abdicates its responsibility to discuss how to minimize climate change impacts as part of the leasing program. BLM notes that it is required by law to adopt a leasing program at this time. However, this does not eliminate its obligation under NEPA to provide full disclosure of the potential environmental impacts and ways to minimize those impacts. In addition, as noted above, BLM has discretion to determine how much land to offer for leasing, and what requirements to impose on the leases.

53003-009

Nevertheless, BLM proposes to go forward with the RMP amendments without a reasonable discussion of potential climate change impacts and mitigation measures. As noted above, the PEIS states, without adequate explanation, "[t]he magnitude of impacts and the applicability and effectiveness of mitigation measures cannot be assessed at the programmatic level and will need to be evaluated on a project-by-project basis...." (Page ES-7.) However, when evaluating the impacts of an individual oil shale or tar sands development project, the impacts may be considered insignificant and therefore not warranting mitigation. For example, with respect to air quality impacts, the PEIS is noncommital regarding future mitigation, stating "... on a case-by-case basis, future individual leases and use authorizations *could* include specific measures to minimize potential air quality impacts." (Page 4-50).

The PEIS only briefly mentions potential mitigation of climate change impacts, stating:

"[p]otential global warming impacts could be reduced if oil shale substitutes for the use of other fossil carbon-based energy sources, or if atmospheric loadings are reduced by emission controls or sequestration methods." (Id.) There is no explanation of what other carbon-based energy sources would be replaced, or a comparison of GHG emissions from those sources and oil shale or tar sands. The PEIS does not discuss what emission controls are available, or the applicability or status of various types of sequestration methods, the amount of GHG emissions that could be captured, and the amount of emissions that would remain. U.S. DOE has identified carbon sequestration as a mitigation measure that likely is necessary for development of oil shale in this country, noting "CO2 may need to be captured, used in other commercial applications ...., or otherwise sequestered." (Fact Sheet: Oil Shale and the Environment, DOE Office of Petroleum Reserves). The PEIS fails to discuss the methods, availability, cost, and/or effectiveness of any of these mitigation options.

53003-009 (cont.)

BLM also fails to discuss an approach that was suggested by the State of Wyoming during the EIS process, that would impose the following requirements: "CO2 and other greenhouse gases will be contained and may be used to enhance production in conventional nearly oil and gas fields if feasible. Where it is not feasible to use CO2 to enhance oil recovery or in other production processes it must be sequestered in some other location. A performance standard for greenhouse gases must be developed and implemented." (Wyoming Governor's Office, Oil Shale and Tar Sands PEIS Performance Standards Policy, August 2006, p.10.). Instead, the PEIS flatly rejects a suggestion to evaluate technologies that incorporate carbon sequestration, stating this "would be best examined in detail at the time of site-specific NEPA analysis of a specific plan of development." (Page 2-52.) Accordingly, BLM has improperly postponed consideration of ways to minimize or avoid climate impacts until *after* it has already made the decision regarding the extent of lands to open to leasing.

5. The PEIS Fails to Evaluate Whether the Large-Scale Commercial Oil Shale and Tar Sands Leasing Program is Consistent With the Goals and Policies of the Energy Independence Act of 2007

The Energy Independence and Security Act of 2007 seeks to reduce GHG emissions, including emissions from transportation fuels. The Act contains findings that: "accelerated development and use of renewable energy technologies provide numerous benefits to the United States, including .... improved environmental quality ..." (42 U.S.C. § 17285(a)(3); and: "the production of transportation fuels from renewable energy would help the United States meet rapidly growing domestic and global energy demands, ..." (42 U.S.C. § 17285(a)(4).) It establishes a "renewable fuel standard" requiring that transportation fuels sold in the U.S. must include at least 20% renewable fuels (i.e., fuel made from renewable biomass and used to replace fossil fuel) by 2015, increasing to 36% in 2022. (42 U.S.C. § 7545(o)(2).) New renewable fuel facilities must produce fuel with 20% lower lifecycle GHG emissions than the average emissions of transportation fuels sold in 2005. (Id.) The Act also prohibits federal agencies from purchasing any transportation fuel from nonconventional petroleum sources (which includes oil shale and tar sands), if the lifecycle GHG emissions exceed those of fuel produced from conventional petroleum sources. (42 U.S.C. § 17142.) This provision could prohibit federal agencies (including the Department of Defense, the nation's largest consumer of gasoline) from

53003-010

purchasing transportation fuel produced from oil shale and tar sands.[29] California has an Executive Order that also establishes a low carbon fuel standard for the state and likely would result in similar restrictions .[30]

The PEIS should discuss the significance of opening vast areas to oil shale and tar sands development on Congress' recent effort in the Energy Independence and Security Act to limit climate change impacts by reducing GHG emissions from transportation fuels. Production of transportation fuels from the nonconventional petroleum sources on these federal lands could negate all the reductions in GHG emissions achieved through the measures in the Energy Independence and Security Act that require greater use of low-carbon biofuels. 53003-010 (cont.)

6. BLM Has Failed to Comply With the Energy Policy Act of 2005

BLM has failed to comply with the requirements of the Energy Policy Act of 2005 in two ways. First, BLM has limited the scope of the PEIS to amendments to the RMPs, and failed to include impacts from the regulation that will govern issuance of oil shale and tar sands leases. This is contrary to the Act, which directs the Secretary to prepare a programmatic EIS on the entire commercial leasing program. (42 U.S.C. § 15927.) This is also contrary to NEPA, which requires evaluation of the impacts of a project as a whole, and does not permit segmentation of a project which results in piecemeal evaluation of impacts.[31] 53003-011

Second, as explained above, the PEIS does not set forth adequate information to support the determinations required by the Energy Policy Act that the proposed leasing of almost 2 million acres for oil shale development and over 430,000 acres for tar sands development will be "conducted in an environmentally sound manner, using practices that minimize impacts" or that the development will occur "with an emphasis on sustainability . . . ." As explained above, in fact, the opening these lands to oil shale and tar sands leasing will result in significant emissions of GHG and have significant impacts on climate change that have not been minimized. 53003-012

Conclusion

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[29] See Letter from Henry A. Waxman, Chairman, Committee on Oversight and Government Reform, U.S. House of Representatives, to Honorable Jeff Bingaman, Chairman, Senate Committee on Energy and Natural Resources, dated March 17, 2008, stating that Section 526 of the Energy Independence and Security Act "ensures that federal agencies are not spending taxpayer dollars on new fuel sources that will exacerbate global warming."

[30] It is unlikely that fuel produced from oil shale and tar sands will comply with California's Low Carbon Fuel Standard, established by the Governor in Executive Order S-01-07 (unless, perhaps, carbon sequestration can be used successfully *and* new renewable energy sources are constructed to provide power for the production process). See http://gov.ca.gov//executive-order/5172/

[31] See *Save Barton Creek Ass'n v. Fed. Highway Admin.*, 950 F.2d 1129, 1139) (5th Cir. 1992) (agency acted improperly when segmented project has no life of its own, or is illogical when viewed in isolation).

Scientists acknowledge that global warming is real. Unless we depart from the "business as usual" paradigm and embrace the need to limit GHG emissions, we risk pushing the environment past the "tipping point" into cataclysmic climate change. The stakes are too high for BLM to abdicate its responsibility to fully disclose and evaluate the GHG emissions associated with its decision to lease almost 2.5 million acres of federal land for oil shale and tar sands development. The GHG emissions from the proposed leasing program could be very substantial and should be fully disclosed and evaluated in the PEIS. Moreover, the Energy Act of 2005 requires that commercial oil shale and tar sands development shall occur in an environmentally sound and sustainable manner, using practices that minimize impacts. The PEIS should fully discuss the actions that BLM will take to comply with these requirements.

53003-001 (cont.)

Thank you for your consideration of these comments.

Sincerely,

/Sandra Goldberg/

SANDRA GOLDBERG
Deputy Attorney General

For EDMUND G. BROWN JR.
Attorney General

Responses for Document 53003

53003-001: Section 3.5.1.2 of the Draft PEIS describes the existing state of knowledge regarding climate change. For example, current U.S. Geological Survey information indicates a cause-effect connection cannot yet be made, scientifically, on a localized basis. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or and tar sands resources.

As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

53003-002: See response to Comment 53003-001.

53003-003: See response to Comment 53003-001.

Section 3.5.1.2 of the Draft PEIS describes the existing state of knowledge regarding climate change. However, no conclusions regarding the potential significance of climate change air pollutants as compared to local or regional emissions were made.

Speculation regarding the quantity and source of electrical power that might be needed for potential development is premature at this stage in the process.

53003-004: The scope of the PEIS was modified from a leasing decision to an allocation decision. This new allocation decision does nothing more than to remove an administrative barrier preventing the BLM from accepting applications. The amendment of the land use plans does not authorize any ground-disturbing activities and is not an irreversible or irretrievable commitment of resources under NEPA. Moreover, the amendment does not constitute the granting of any property right. In this respect, the allocation decision merely permits the administrative action of accepting applications and therefore does not trigger an action that will result in significant cumulative environmental impacts. Once applications are received, subsequent NEPA analysis will be performed in full compliance with the requirements of NEPA.

53003-005: See responses to Comments 53003-001 and 53003-004.

53003-006: See response to Comment 53003-001.

Speculation regarding the quantity and source of electrical power which might be needed for potential development is premature at this stage in the process.

53003-007: See response to Comment 53003-001.

As stated in the draft PEIS, direct emissions of climate change air pollutants are likely to be a small fraction of global emissions. Speculation regarding potential air pollutant emissions associated with burning of developed petroleum products is beyond the scope of this programmatic analysis.

Section 3.5.1.2 of the Draft PEIS describes the existing state of knowledge regarding climate change. However, no conclusions regarding the potential significance of climate change air pollutants as compared to local or regional emissions were made.

53003-008: Currently, the experimental state of oil shale and tar sands industries does not allow the PEIS to include sufficient site-specific information or make assumptions to support actual oil shale leasing. The PEIS does not propose a leasing program; at this time the BLM has no information as to the scope of leasing that may eventually occur on BLM-administered public lands.

The BLM believes that the RD&D program will be a source of additional useful information regarding commercially viable oil shale technologies and their impacts. In the Energy Policy Act of 2005, however, Congress did not authorize the BLM to wait for additional information from the RD&D program before completing this PEIS. The BLM will analyze all available, relevant information in an appropriate NEPA document before issuing leases for oil shale or tar sands. That analysis will include any new information from research or lessons learned on the RD&D leases or from studies or operations on nonfederal lands.

As explained in the document itself, this PEIS analyzes the environmental consequences of allocating certain lands for the possible commercial exploration and development of these resources. The allocation decisions to be made do not commit any resources or grant any lease rights. Therefore, in addition to the analysis of direct and indirect effects of these land allocation decisions, including consideration of alternative ways of making these decisions, the PEIS presents a cumulative impact assessment based on the nature and scope of this proposed action and on available nonspeculative information. Programmatic EISs such as this one are considered adequate without site-specific analysis when the federal action proposed, as here, does not involve a site-specific or critical decision. Prior to any commercial leasing, additional NEPA analysis will take place. Because it is still a matter of speculation as to whether leasing and development will ever take place, and because there will be additional environmental analysis prior to leasing, a cumulative analysis associated with the effects of the land use allocation decision contemplated here need not analyze the impacts of leasing and development.

Since the alternatives in the PEIS do not authorize the immediate leasing of lands for commercial development, any future leasing will require subsequent NEPA analysis, as described in Section 1.1.1. The BLM's analysis in the PEIS provides the decision maker with information to make an informed decision on which lands are suitable for future consideration for commercial oil shale leasing. Currently, there is sufficient information on a programmatic level to rigorously explore and objectively evaluate all reasonable alternatives associated with an allocation decision. As required by CEQ regulations (40 CFR 1508.7 and 1508.8), this document, and all subsequent NEPA documents, will analyze the direct, indirect, and cumulative effects of the proposed action. That analysis will also help to form the basis for the development of mitigation measures, such as BMPs to avoid or mitigate short-term and long-term adverse impacts.

53003-009: For the BLM to undertake a more detailed analysis, as suggested, too many unsupportable and highly speculative assumptions would need to be made, which would call into question the ablity to make an informed decision. It would also call into question the applicability of mitigation measures developed as a result of unknown technologies or speculative assumptions. However, the BLM, using comparable information based on BLM's experience with surface-disturbing activities from other types of mineral development, and the best available information, such as that contained in Appendix A, discloses potential impacts

(direct, indirect and cumulative)and provides the decision maker with available, essential information for making the allocation decision. At the leasing decision stage, a more specific analysis would be able to be completed based on more specific technical and environmental information, enabling the development of more applicable mitigation measures.

53003-010: It is important to recognize that the decision being considered in this PEIS is the identification of lands as open or closed to future consideration of leasing for the commercial development of these resources. At this point, BLM has no information regarding the scope and scale of any leasing that might eventually occur, and has only very limited information as to the technologies that might be used to develop these resources, and the possible impacts of those technologies on public lands and resources managed by the BLM.

The PEIS is not announcing or analyzing a large-scale commercial oil shale and tar sands leasing program. Therefore, it is not possible to discern to what extent such a program would be inconsistent with the legislation referenced by the commentor.

Please see also the response to Comment 53003-008.

53003-011: The BLM, through its rulemaking process, is drafting a proposed set of regulations to outline the policies and procedure to implement a commercial leasing program. A separate NEPA analysis is being prepared associated with the proposed set of regulations. The BLM rulemaking process is separate and apart from the drafting of the PEIS. The PEIS is analyzing the environmental consequences of an allocation decision, and therefore comments concerning the regulatory process are outside the scope of the PEIS.

The BLM disagrees with the commentor's assertion that the BLM has failed to comply with the requirements of the Energy Policy Act of 2005 because it has limited the scope of the PEIS to amendments to the RMP. The BLM manages public lands pursuant to the requirements of FLPMA, which requires the development of land use plans governing uses of the public lands. In order for any commercial leasing program to begin, the applicable land use plans must allocate areas in which such commercial leasing can be considered. The BLM's completion of this PEIS will allow it to allocate such areas, in order that the BLM can consider applications to lease. This is not a segmented approach to commercial development of these resources; rather, it is a phased approach that respects both the requirements of the BLM's existing authorities, as well as taking a measured approach appropriate to the currently limited character of the information available regarding the technology that may be used to develop these resources.

53003-012: See response to Comment 53003-001.

As stated in the Draft PEIS, direct emissions of climate change air pollutants “are likely to be a small fraction of global emissions.” Speculation regarding potential air pollutant emissions associated with burning of developed petroleum products is beyond the scope of this programmatic analysis.

Section 3.5.1.2 of the Draft PEIS describes the existing state of knowledge regarding climate change. However, no conclusions regarding the potential significance of climate change air pollutants as compared to local or regional emissions were made.

Thank you for your comment, Greg Scott.

The comment tracking number that has been assigned to your comment is OSTSD53004.

Comment Date: April 21, 2008 23:57:21PM
Oil Shale and Tar Sands
Comment ID: OSTSD53004

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Privacy Preference: Don't withhold name or address from public record
Attachment: Oil Shale PEIS Supplemental Comments.doc

Comment Submitted:

See Attachment.

Gregory L. Scott
29904 Lee Rd. Evergreen, CO 80439
(303) 674-7236 (voice) **E-mail:** ***gr8scott@ix.netcom.com*** ***(303) 670-5010 (fax)***
"Come to the Mountains and receive their Good Tidings!" - John Muir

April 21, 2008

BLM Oil Shale and Tar Sands Draft Programmatic EIS
Argonne National Laboratory
9700 S. Cass Ave.
Argonne IL 60439

VIA WEBSITE FORM ATTACHMENT

RE: Supplemental Comments on PEIS

To Whom It May Concern:

Please accept my additional comments, below, on the draft PEIS. As an environmental consultant for 28 years and having contributed to numerous NEPA documents over that timeframe, my further analysis continues to support the view that this document represents a feeble attempt to circumvent the basic tenets of NEPA. Please read on.

Yours Truly,

Greg Scott

Supplemental Comments

Comment A:

The underlying legislation for this action, Section 369 of the Energy Policy Act of 2005 (EPAct 2005) states: "Congress declares that it is the policy of the United States that-- ... (2) the development of oil shale, tar sands, and other strategic unconventional fuels, for research and commercial development, should be conducted in an environmentally sound manner, using practices that minimize impacts:" While the specific action resulting from the preferred action is not the end development, but a precursor thereto, this action establishes the basis for development of oil shale and tar sands. However, the PEIS is devoid of any substantive evaluation or projection of impacts on air quality for any of the development alternatives, and is therefore, in violation of the underlying legislation. 53004-001

Comment B:

A recent decision by the US Supreme Court determined that greenhouse gases (GHG), including CO2, are air pollutants and that the Environmental Protection Agency has the authority under the Clean Air Act to regulate this class of air pollutants. That EPA has yet to develop standards for this class of pollutants does not relieve the authors of this PEIS from the statutory responsibility (see Comment A) to evaluate the current status and the potential impacts on GHG emissions related to the various alternatives presented. Indeed, Section 4.1 lists several assumptions related to levels of development and technology parameters, but Section 4.6 fails completely to use these stated assumptions to quantify emissions of any pollutant under any technology or development scenario. 53004-002

Comment C:

The Colorado Climate Action Plan, dated November 2007, (http://www.colorado.gov/energy/in/uploaded_pdf/071105ColoradoClimateActionPlan.pdf) calls for 20% reduction in CO2 emissions statewide from 2005 levels by 2020 and an 80% reduction by 2050. The proposed action would significantly increase emissions of CO2 in the state, at any level of development under any of the potentially viable technologies and is inconsistent with the plan. What actions does BLM propose to offset the millions of tons of CO2 emissions annually, so as to be consistent with this new state policy? What logic, rhyme or reason justifies Alternative B under this environmentally responsible state plan? 53004-003

Comment D:

Energy return on energy investment is a general parameter related to the overall process efficiency to produce net energy. Nowhere in the PEIS have I found mention of this parameter, let alone its application to estimate the effectiveness of the development of oil shale on public land to produce net energy. Each technology is described as being extremely energy intensive. If the evaluation of the current state of the development technologies is such that no or little net energy is produced, then one might logically come to the conclusion that setting in motion a process to proceed full speed toward such development might be substantially premature, at least until the R&D is more robust and the technologies better developed. Such an evaluation would shed a broad light on the basic tenets of an energy development program, independent of economics, where subsidies can skew the results. It doesn't make any sense if it doesn't produce significant net energy or effectively wastes energy. Such programs would not be a proper use of public land. 53004-004

Comment E:

The Energy Information Administration (Annual Energy Outlook 2007) projects oil shale development will contribute some 405,000 barrels/day to domestic supplies in 2030. Further, the 2005 Rand report on oil shale technology states that to sustain 500,000 barrels/day production using the Shell in-situ process in the richer deposits in Colorado would require drilling an additional 150 acres per year, in addition to fixed infrastructure, which Section 4.1 of the EIS estimates at 200 acres. So, to meet the EIA projections for 2030, which is consistent with the 20-year projection period in the EIS, would require some 3200 acres, or one lease tract of 5760 acres, with nearly 100% expansion capacity. So, based on these parameters, what justifies the preferred alternative to prepare for leasing all 2.3 million acres of public land? 53004-005

Comment F:

The development scenario in Comment E, above, would produce CO2 emissions from the necessary dedicated coal-fired powerplants on the order of 59 million tons per year. EIS Table 3.5.2-1 estimates current CO2 emissions in western Colorado at about 10 million tons/year and in the five-county area where oil shale development might occur represents some 4.6 million tons/year. How is even such a meager oil shale development plan consistent with the widely acknowledged requirement, as well as the state Climate Action Plan, to substantially reduce CO2 and other GHG emissions within the same timeframe? 53004-006

Responses for Document 53004

53004-001: As stated in Section 1.1 of the Draft PEIS, the BLM proposes to amend 12 land use plans in Colorado, Utah, and Wyoming to describe the most geologically prospective areas administered by the BLM in these states where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development. Additionally, the analysis conducted in preparation of this PEIS was based on available and credible scientific data. As a programmatic evaluation, conducted in support of land use plan amendments, this PEIS does not address site-specific issues associated with individual oil shale or tar sands development projects. A variety of location-specific factors (e.g., soil type, watershed, habitat, vegetation, viewshed, public sentiment, the presence of threatened or endangered species, and the presence of cultural resources) will vary considerably from site to site. In addition, the variations in extraction and processing technologies and project size will greatly determine the magnitude of the impacts from given projects. The combined effects of these location-specific and project-specific factors cannot be fully anticipated or addressed in a programmatic analysis. As a result, additional, site-specific NEPA analyses will be conducted prior to the issuance of commercial leases and the approval of specific plans of development. The BLM would invite other federal, state, local, and Tribal agencies to participate as cooperating agencies on these site-specific project-level NEPA documents.

The proposal (describing where oil shale and tar sands resources are present, and to decide which of those areas will be open to application for commercial leasing, exploration, and development) would not result in the emissions of any climate change-related (or other) air pollutants. Speculation about project locations and how development might occur would require many assumptions that are premature at this stage in the process. If a decision is made to make oil shale and/or tar sands available for future leasing, detailed potential air quality and climate impacts will be appropriately evaluated in detailed, site-specific NEPA analyses (including potential direct, indirect, and cumulative impacts) before issuing leases and approving plans of development.

53004-002: See response to Comment 53004-001.

Section 3.5.1.2 describes the existing state of knowledge regarding climate change. However, no climate change-related pollutant emissions would result from the alternatives examined for making BLM-administered lands available for potential future commercial leasing of either oil shale or tar sands resources.

53004-003: All BLM actions (either direct or by use authorization) must comply with applicable local, state, Tribal, or federal air quality laws, statutes, regulations, standards, and implementation plans. If the State of Colorado incorporates the provision of its “Climate Action Plan” into applicable air quality regulations, the BLM will comply with those regulations.

53004-004: Thank you for your comment, but the calculation of the EROI for the developing technologies is beyond the scope of the PEIS.

53004-005: As mandated by Congress, the scope of the PEIS is focusing on the most geologically prospective oil shale resources on public lands in Colorado, Utah, and Wyoming. The identification of lands that would be available for application for lease does not presume that all the identified acreage actually would be leased.

53004-006: See response to Comments 53004-001 and -002.

Thank you for your comment, Christopher Ryan.

The comment tracking number that has been assigned to your comment is OSTSD53005.

Comment Date: April 22, 2008 03:17:46AM
Oil Shale and Tar Sands
Comment ID: OSTSD53005

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Privacy Preference: Don't withhold name or address from public record
Attachment: BLM PEIS submission.doc

Comment Submitted:

The Bureau should note the potential importance of the innovative Rendall Process in large-scale production of pipelineable shale oil from oil shale. Please refer to the attachment. See Attachment. | 53005-001

BLUE ENSIGN TECHNOLOGIES LIMITED

OVERVIEW OF THE BLUE ENSIGN GROUP

The Blue Ensign Group

Blue Ensign Technologies Limited is a small Australian public company, based in Sydney. It has two principal wholly-owned subsidiaries, RP International Pty Limited and Queensland Shale Oil Limited (QSO). Corporate and other information on Blue Ensign Technologies Limited and the Blue Ensign Group can be found in the company's website: www.blueensigntech.com.au.

Assets

The principal assets of the Blue Ensign Group are:

- Outright ownership of the intellectual property of the Rendall Process, a patent-protected process for production of synthetic crude oil from oil shale, vested in RP International Pty Limited.

- Mining development leases (MDL 379 and 380) of approximately 90 square kilometres held by QSO, covering the core area of the large and well-known oil shale deposit in Northwest Queensland, near Julia Creek.

The two MDLs host a JORC Code-compliant Indicated Resource of 1,930 million tonnes of oil shale and an additional Inferred Resource of 120 million tonnes, capable of yielding 895 million bbls of shale oil by retorting, based on Fischer Assays (a predictor of yield from typical retorting processes, which are quite different from the Rendall Process). Laboratory tests using a Tetralin Assay method (which indicates the yield expected to be obtained by the Rendall Process) conducted on Julia Creek core samples indicates that the Rendall Process has the potential to double the retorting oil yield from Julia Creek oil shale. (Tetralin Assays of oil shale samples from other deposits in Australia have given results between 200% and more than 350% of the respective Fisher Assays.)

Business plan

Blue Ensign's business plan involves four main steps:

- Completion of the development of the Rendall Process technology by construction and operation of a pilot plant (approximately 25 bopd) to demonstrate the Rendall Process in continuous mechanical operation. To date the chemistry of the Rendall Process has been well proven through more than 400 laboratory-scale tests of various oil shales from around the world. The pilot plant will confirm the process parameters for detailed design of the proposed first commercial scale plant.

- Development of the Julia Creek Project aimed at commercial production of synthetic crude oil from Julia Creek on a large scale. Successful operation of the pilot plant will ensure funding and construction of the first commercial scale plant and mining operation at Julia Creek (approximately 15,000 bopd), and then a full scale plant and mining operation targeting oil production of approximately 50,000 bopd.

- Acquisition and commercial development of additional oil shale resources both in Australia and overseas.

- Active promotion and marketing of licences for the Rendall Process to holders of shale oil resources around the world, which is expected to accelerate as process commercialisation advances.

Successful completion of technical development of the Rendall Process and its commercial application to the Julia Creek oil shale resource will position Blue Ensign at the forefront of development of a highly profitable and environmentally responsible industry, producing synthetic crude oil from oil shale at large scales and at many locations around the world.

BLUE ENSIGN TECHNOLOGIES LIMITED

THE RENDALL PROCESS

The process

The patented Rendall Process involves two main steps:

- Thermal conversion and hydrogenation of the organic matter in oil shale (kerogen) in an organic solvent containing tetralin (a hydrogen donor solvent) in a closed system, at elevated temperature and pressure.
- Supercritical solvent extraction using toluene to strip product oil from the spent shale residue, maximising oil recovery and ensuring that the residue is oil-free, clean and water-insoluble.

QuickTime™ and a
decompressor
are needed to see this picture.

THE RENDALL PROCESS: SIMPLIFIED BLOCK FLOW DIAGRAM

Principal benefits

The principal benefits of the Rendall Process are expected to include:

- **High yield of product oil**: It is expected that about 90% of the hydrocarbon content of the oil shale will be converted to oil. In the case of the Julia Creek tenement, the average yield from the Rendall Process will be approximately 1 barrel (159 litres) of oil per tonne of oil shale, that is, approximately 200% of the hypothetical retorting yield projected from Fischer Assays.
- **Environmental performance**: Emissions of greenhouse gases per barrel of oil will be minimised, and solid waste disposal problems will be essentially eliminated. Organic sulphur will be recovered as solid sulphur for sale as a by-product. With no air in the closed process system, there can be no significant generation of noxious and toxic vapours and fumes (including dioxins) by oxidation or combustion of the kerogen or its breakdown products. In summary, the environmental performance of a Rendall Process facility is expected to be similar to that of an oil refinery with the same oil throughput.

  Some spent oil shale residues will be well-suited to production of Portland cement. If that course of action is impractical for any reason, the clean, oil-free and water-insoluble residue can be returned to mined-out areas as a benign backfill material, where it will not generate contaminated run-off or ground waters.

- **Product**: The principal product will be high-quality, high-value, hydrogenated synthetic crude oil, low in sulphur, nitrogen and oxygen, and ready for sale to conventional oil refineries.

- **Secure scale-up**: The Rendall Process is readily capable of substantial scale-up, because of long-standing commercial operations in other industries using process equipment similar to all the equipment required for the Rendall Process, in well-proven, large-scale applications.

- **Self-sufficiency**: In normal operations, the fuel required for process heat and power generation, the hydrogen donor solvent and the supercritical extraction solvent will be derived from the process itself. The principal inputs to a commercial scale Rendall Process facility will be the oil shale ore and the operating personnel.

  Water consumption will be minimal. Unless the water content of run-of-mine oil shale ore is particularly low, there will be no requirement for external water supplies for process water; in particular, since the spent shale is neither tar and coke-laden nor hot, there is no need for water for residue quenching. If the oil shale ore has a high water content, export of clean, treated water from the plant for agricultural and community use could be practicable.

- **Mineral by-products**: Production of mineral by-products will depend on the mineralogy of the shale matrix and the economics of further processing in each case.

  By-products recoverable from the spent shale residue at Julia Creek may include vanadium and molybdenum oxides and portland cement. If the latter is produced, there would be no solid waste stream from the process plant for disposal at the mine site.

Julia Creek Project

The Julia Creek Project will be implemented in stages:

- ***Stage IA — Pilot plant:*** The first part of the program involves the construction and operation of a pilot-scale plant. The work program for these activities is expected to be complete within 18 months, at an estimated cost in the vicinity of US$30 million.

- ***Stage IB — Planning, cost estimating and funding of Stage II:*** Following successful demonstration of the Rendall Process in continuous operation in the pilot plant, the necessary preparations will be made to enable development of the Stage II commercial-scale plant and associated mining operation.

  Stage II — First commercial-scale Rendall Process plant: The first plant at Julia Creek will entail a three-year construction program for process, mining and infrastructure facilities, foreseen to be rated at 600 tonnes/hour of oil shale ore, and likely to deliver approximately 600 barrels of oil per hour, or approximately 15,000 barrels of oil per day (bopd). Early order-of-magnitude estimates indicate a capital cost for the process facilities of some US$300 million.

- ***Stage III — Full-scale commercial plant:*** The full-scale commercial plant is envisaged to have a nameplate capacity of 50,000 bopd, with a capital cost for the process facilities of the order of US$650 million. The development period is expected to be three years.

  Employment at a single stream, full-scale facility rated at 50,000 bopd would be made up approximately as follows:

  ~ Process plant: Approximately 45.

  ~ Strip mining and ore dressing: Approximately 200 - 300.

  ~ Project infrastructure (including pipeline and delivery terminal): 50 - 100

- Maintenance: It is anticipated that all major routine and breakdown maintenance would be contracted out to one or more specialised maintenance engineering firms. The number of workshop personnel engaged on maintenance contracts for the process and infrastructure facilities and the mining equipment would vary substantially. During normal operations, the number may be as low as 50, while the total could exceed 500 for short periods during annual or other major turnarounds.

- General office (including OHS&E personnel): 15 - 20.

Licensing

Blue Ensign expects that, as QSO's Julia Creek Project proceeds, progress towards commercialisation of the Rendall Process will generate considerable interest among holders of oil shale resources world-wide, and the international petroleum industry at large.

Blue Ensign will be ready to commence negotiation of licensing arrangements with project sponsors at any stage, based on evaluations of samples of their oil shale in small-scale laboratory tests, and then in larger scale tests in the pilot plant built ahead of Stage II of the Julia Creek Project.

Response for Document 53005

53005-001: Thank you for your comment. The BLM is aware that various technologies could involve solvents to extract kerogen decomposition products from oil shale formations after in situ retorting (see Section A.3.1.2) or to separate bitumen from mined tar sands (see B.4.2.2). However, the purpose of the discussions in these two sections was to provide a broad, generic overview of the technological options that may be available for oil shale and tar sands production, respectively, supporting those discussions with select examples. Nothing in this PEIS would prevent the submission of a lease application proposing the use of the particular technology you specify.

Thank you for your comment, Dave Corey.

The comment tracking number that has been assigned to your comment is OSTSD53006.

Comment Date: February 25, 2008 20:44:25PM
Oil Shale and Tar Sands
Comment ID: OSTSD53006

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Country:
Email:
Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

Lease the land, we need to decrease our dependancy for foreign oil. 53006-001

Response for Document 53006

53006-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.

Thank you for your comment, Jean Corey.

The comment tracking number that has been assigned to your comment is OSTSD53007.

Comment Date: February 25, 2008 20:49:31PM
Oil Shale and Tar Sands
Comment ID: OSTSD53007

First Name: Jean
Middle Initial:
Last Name: Corey
Organization:
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Privacy Preference: Don't withhold name or address from public record
Attachment:

Comment Submitted:

I am all in favor of allowing responsible companies to explore and exploit our mineral resources, so we do not become unnecessarily dependent on foreign nations. Technology and industry do not spoil the landscape; they add an element that we should be proud of, as long as it is done carefully. | 53007-001

Response for Document 53007

53007-001: The BLM acknowledges the commentor's general support of access to oil shale and tar sands.